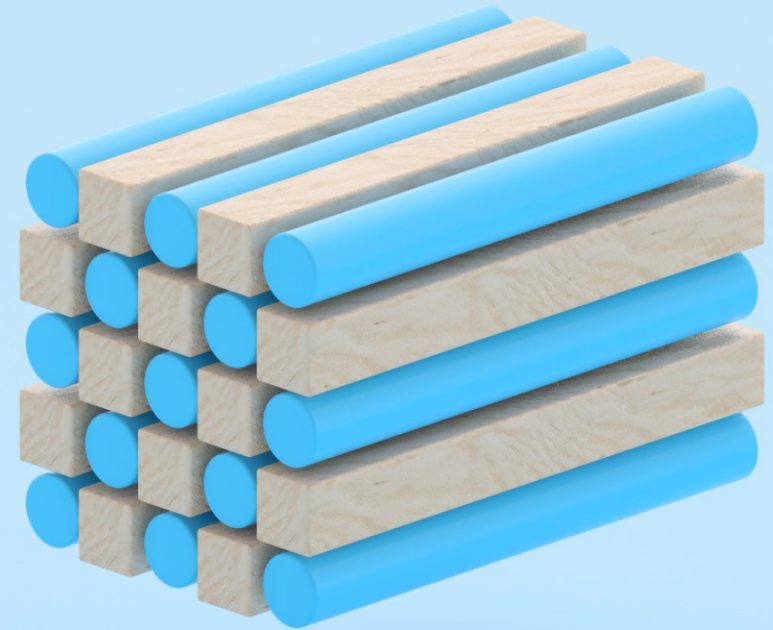


Best Practices in Export Screening

Dharambir Bharti

Global Trade Compliance Manager, APAC

1st of Oct 2020



Agenda



NetApp Introduction



Global Trade Compliance (GTC) Program - Overview



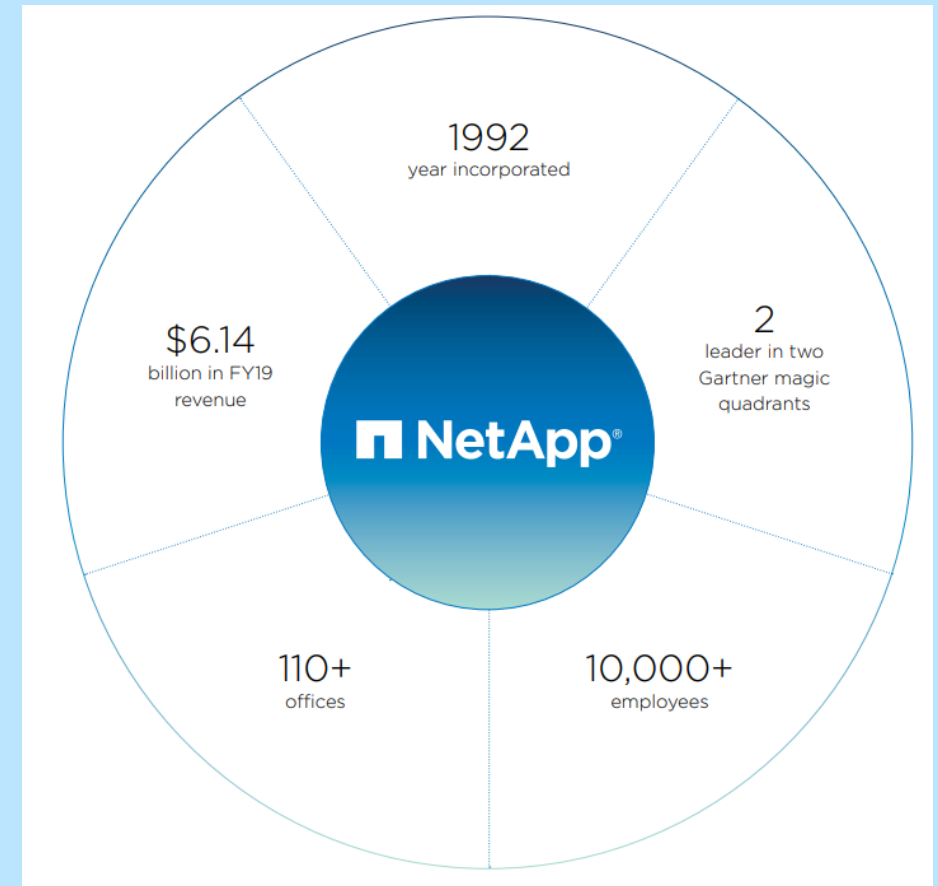
Global Trade Compliance (GTC) Program – Export Control Screening

NetApp Introduction

NetApp is the leader in hybrid cloud data services, empowering global organizations to change their world with data. In a world of increasing complexity, we simplify.

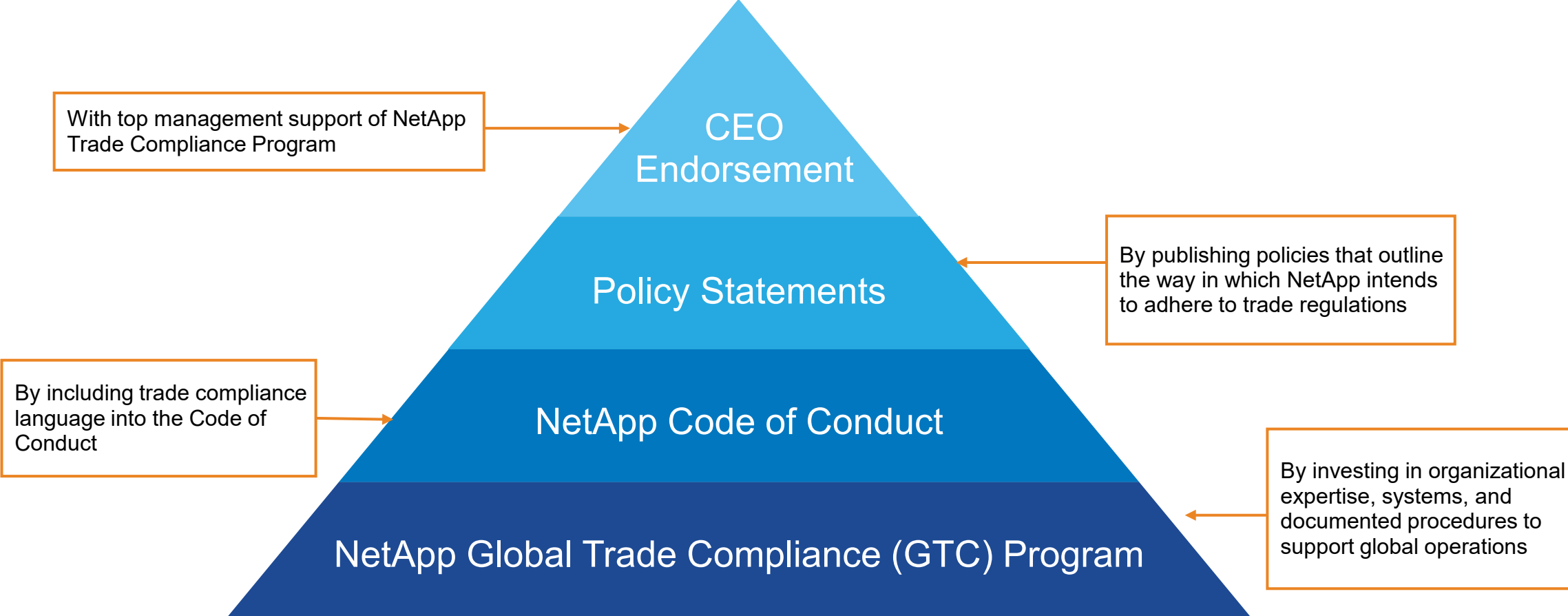
We help our customers ensure their data and applications are in the right place at the right time with the right characteristics and capabilities in order to achieve new insights and accelerate innovation.

Together with our partners, we are the only ones who can help you build your unique data fabric, simplify hybrid multi cloud, and securely deliver the right data, services, and applications to the right people at the right time.



NetApp Internal Controls Program

NetApp is committed to building an infrastructure to meet the global trade requirements of all countries in which it transacts business.



The Global Trade Compliance (GTC) Charter and Internal Portal

Global Trade Compliance

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Global Trade Compliance

Welcome to Global Trade Compliance (GTC)

About Us

The Global Trade Compliance (GTC) group is responsible for Trade Policy and Trade Operations at NetApp. We support and provide guidance to all NetApp organizations involved in international trade related activities.

GTC Vision

To be a key partner in positioning NetApp to win in the marketplace by leveraging global trade compliance as a strategy and a competitive advantage.


GTC Mission

Enable, grow, and support NetApp's global business by ensuring compliance with trade-related procedures and operations, and via collaboration with customs and export authorities in trade policy regulations and standards.


Responsibilities

- Deliver GTC training to employees
- Document GTC Policies and Procedures
- Develop and adhere to global customs and export regulations and standards
- Conduct Trade Compliance Assessments
- Actively participate with high tech peers in shaping trade policy worldwide
- Fulfill tactical responsibilities such as classification, country of origin determination, licensing and screening

- [GTC Home](#)
- [Export Controls](#)
- [GTC E-Newsletters](#)
- [FAQ](#)
- [Policies and Procedures](#)
- [Self-Help Tools](#)
- [Training Materials](#)



[Annual Trade Compliance Statement](#)



[Global Trade Compliance Policy](#)

GTC Policy Statement

NetApp expects its employees and contractors worldwide to comply with applicable U.S. and international trade laws and regulations as well as NetApp's trade policies and procedures. This includes compliance with applicable U.S. trade laws that generally apply globally, as well as applicable international trade laws and regulations. A trade compliance policy has been endorsed and enacted by NetApp's Executives.

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GTC Policies and Procedures

Global Trade Compliance Overarching Documents:

- [NetApp Internal Controls Manual](#)
- [NetApp Global Trade Compliance Policy](#)

Global Trade Compliance Policies and Procedures:

GTC Scope Documents	GTC Related Procedures
GTC-SCOPE-002 Country of Origin Marking	
GTC-SCOPE-003 Country of Origin Determination	GTC-PROC-003 A Country of Origin Determinations
GTC-SCOPE-004 Deemed Exports	GTC-PROC-004 A Technology Transfers GTC-PROC-004 B Deemed Exports
GTC-SCOPE-005 Technology Review and Classification	GTC-PROC-005 A Product Classification GTC-PROC-005 B How to use the Product Classification Tool
GTC-SCOPE-006 Non-Commercial Shipments	GTC-PROC-006 A Non-Commercial Shipments GTC-PROC-006 B EU Trade Requirements for Swing Gear & Demo/Eval
GTC-SCOPE-007 Non-Routine Communications with Government Officials	GTC-PROC-007 A Non-Routine Communications with Government Officials
GTC-SCOPE-008 Valuation of Commodities	GTC-PROC-008 A Valuation of Commodities
GTC-SCOPE-009 Global Trade Assessment	GTC-PROC-009 A Global Trade Compliance Assessment GTC-PROC-009 B Singapore Import Export Assessments GTC-PROC-009 C EMEA Import Export Assessments GTC-PROC-009 D Export Compliance Review Audit Framework for Singapore GTC-PROC-009 E Electronic Export Information (EEI) Filing GTC-PROC-009 F Electronic Export Information (EEI) Audit Checklist
GTC-SCOPE-010	GTC-PROC-010 A Antiboycott

Restricted Party List (RPL) Screening

NetApp transactions are screened proactively against various government lists that designate companies, individuals, and/ or entities as prohibited or subject to specific authorization prior to export.

The parties screened in a transaction include:

- Bill-To party
- Sold-To party
- Ship-To party
- End-User

RPL screening occurs at different stages, including:

- After New Customer is created
- When there are changes to the RPL or customer information
- When an order is booked in Oracle
- One day before to the Scheduled Ship Date (SSD) in Oracle

End-use is also reviewed. If risk is identified in a transaction, the transaction is put on hold and NetApp's Global Trade Compliance team will either alleviate that risk prior to shipment via written certifications from the impacted entity and/or through relevant government licenses / authorizations. If risk cannot be mitigated, then the transaction will be terminated.

Automation

Trade Automation

NetApp utilizes a 3rd Party software tool called Trade Automation (TA) owned by E2open.

NetApp leverages Trade Automation for all types of export screening, including classification and licensing controls.

Trade Automation eliminates manual processes that could be prone to error as well as houses important trade-related records.



Trade Automation

Thank You

