



GE EXPORT COMPLIANCE

Across Multiple Jurisdictions

Focus on Asia Pacific



GE today

Who we are

GE is a digital industrial company that builds, powers, moves, cures and connects the world.

What we do

We continuously make the world work better.

Why we do it

We always strive to be simpler, faster, more adaptable and customer driven.

Who we are

+

World we live in

+

How we think & act

+

How we work

=

How we deliver

Focused digital industrial company with specialty financing

GE must grow in spite of the volatile, uncertain, complex and ambiguous world we live in

GE Beliefs:

- Customers determine our success
- Stay lean to go fast
- Learn & adapt to win
- Deliver results in an uncertain world
- Empower & inspire each other

Simple, fast, adaptable, customer & outcomes driven

- FastWorks
- Performance Development

Financial performance and customer outcomes

- Customer success
- Revenue/growth
- Margins
- Cash



Principal Figures

- 300,000 employees globally as of March 2017
- Operates in over 180 countries
- Only company in the original Dow Jones Industrial Average index
- Ranked stable (AA+) by S&P

2016 PERFORMANCE: \$123.7B in Revenue & \$1.49 in Industrial Operating + Verticals EPS



THE GE STORE

The GE Store is the global exchange of technology, talent, and expertise across GE's diverse businesses and markets. GE businesses give and take from the Store.



Staying Compliant in Multiple Jurisdictions

Some of GE's strategic items & technology in Asia Pacific

STRATEGIC ITEMS



O&G valves and wellheads

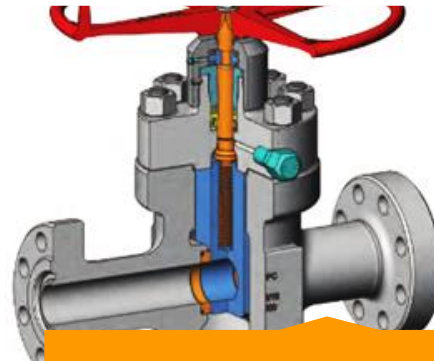


Bioreactors



Cyber security equipment

STRATEGIC TECHNOLOGY



O&G technology



Aviation technology



Export control regimes in Asia Pacific

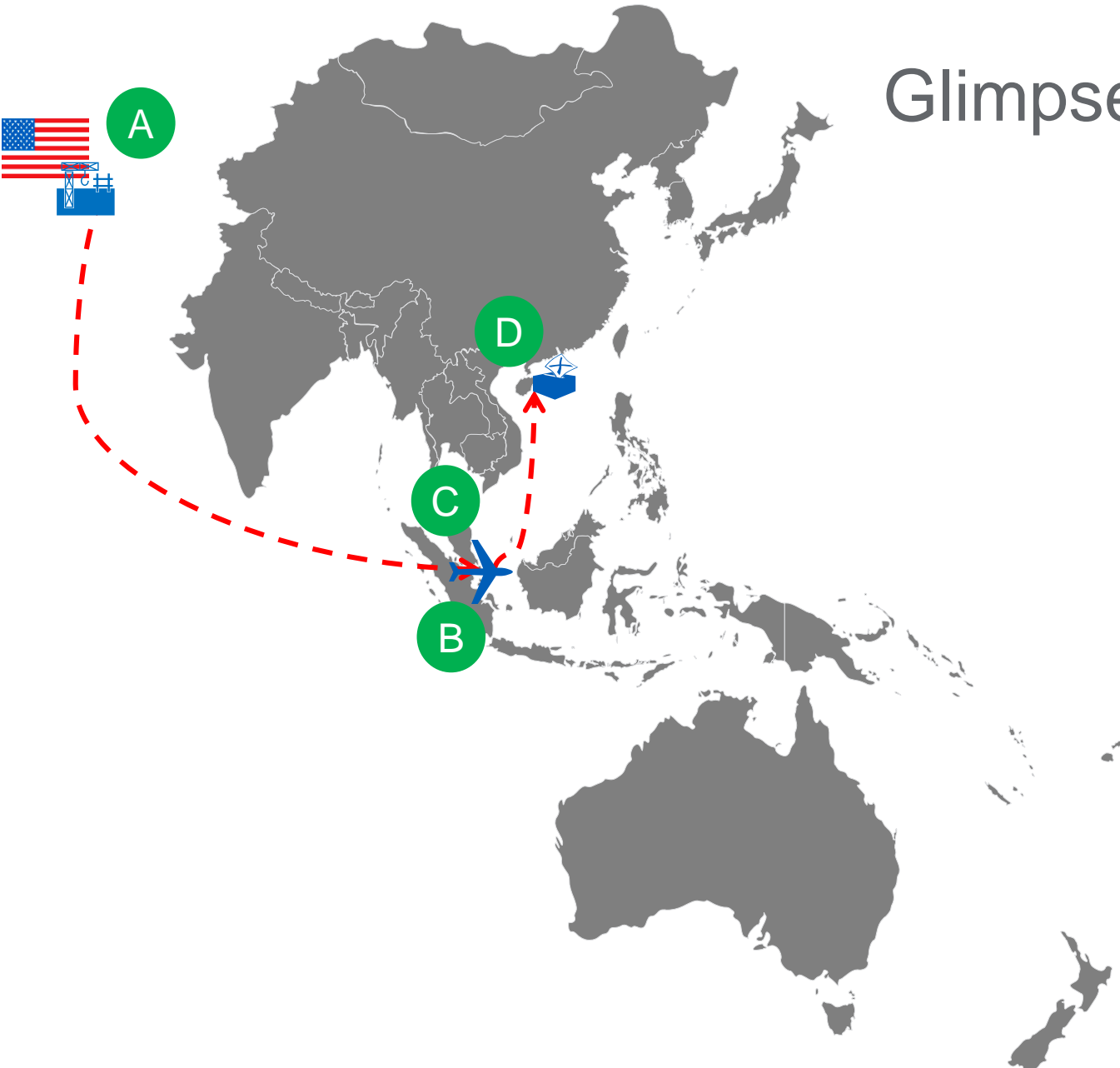
~246 GE Export Sites

- ASEAN (71)
- ANZ (23)
- Greater China (82)
- Japan (17)
- Korea (17)
- India (36)

APAC presents many Export Compliance challenges



Glimpse of export control multiple jurisdictions



- A** US export license
- B** US re-export license; Singapore export permit
- C** Malaysia brokering permit
- D** Hong Kong import license



Considerations for multi-jurisdictional export compliance



Global vs. regional export compliance structure



In-country control plans
- *Build relationships*
- *Nurture compliance champions*



Self-assessment process to identify gaps for all regulatory requirements



Customized training based on business needs and risk level



Company-wide Export Control Enterprise Standard



MINIMUM REQUIREMENTS

Export Classification

Licensing/Authorizations

Watchlist Screening

SSTs & Sanctioned Countries

Monitoring – Audit/Self-Assessment

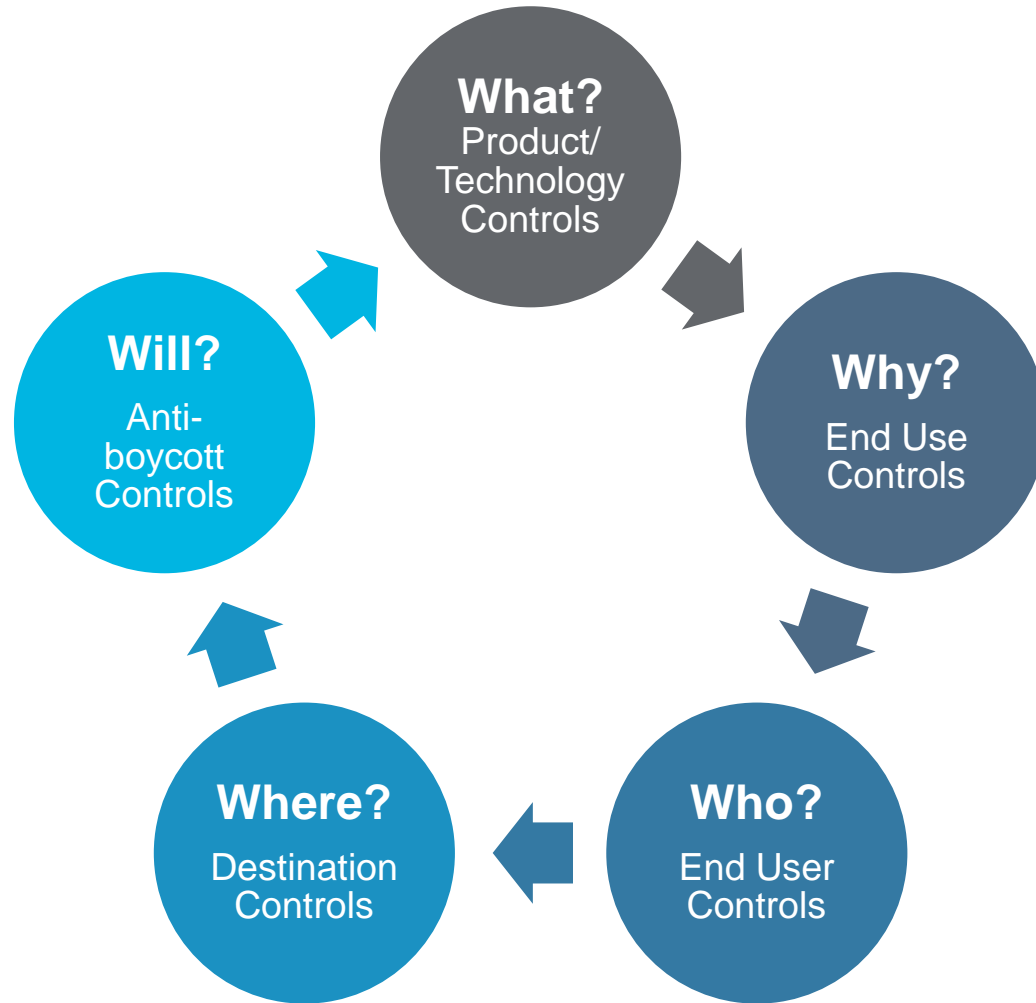
Anti-Boycott Compliance

M&A Due Diligence

General Business Program

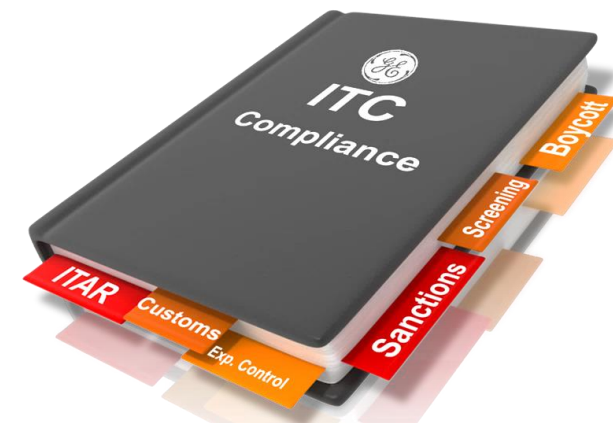


Export control program focus: **5W's**



GE's Export Profile

- High-tech products
- Distributor model
- Military items & customers
- Global sales



Previous GE International Trade Compliance Structure



The International Trade Compliance Center of Excellence (ITC COE)



In January 2015, the ITC COE was formed to consolidate the export compliance resources across the GE industrial businesses

ITC COE works for the GE businesses to make international trade compliance simpler.

Provide guidance, advice and expert solutions, and information about the governments' export control laws and regulations.



ITC Center of Excellence

Leader

Business Reps

Aviation	Power
Healthcare	Oil & Gas
Renewable Energy	Lighting & Current
Transportation	Global Research Center
Digital	

- Transaction advice
- Business rhythms, initiatives, procedures, metric
- Implementation

Core Shared Service

Compliance Sanctions Boycott Investigation / Disclosures Policies Communication Training Tools M&A Audit Screening Tagger Training US Gov't Relations	Americas License ITAR EAR OFAC DOE
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- Manage outside counsel
- On call resources
- Customs legal advice

Regional Teams

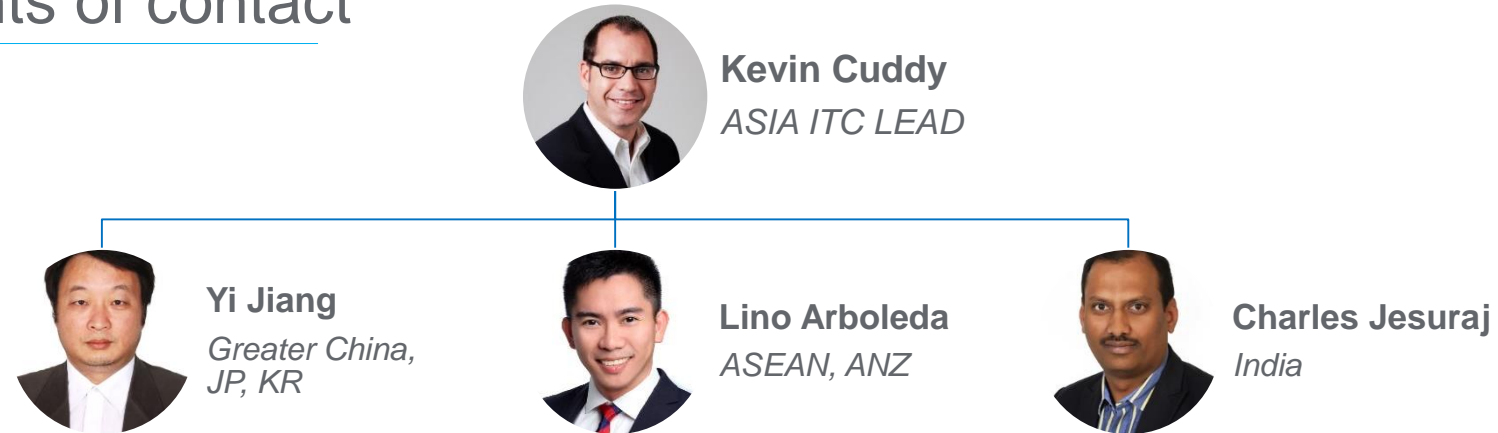
EMEA	Asia
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- Licensing
- Country requirements
- Regional training
- Gov't relations
- Regional auditing



ITC COE Asia & Menu of Services

1 Points of contact



2 Menu of services



Export control focals program

Serve as site's primary point of contact for export control matters

Disseminate Corporate ITC alerts and updates to local site employees

Resolve less complex local site's ITC matters

Participate in relevant ITC training and seminars



Export control focals program initiatives



ITC EASY BUTTONS

**INTERNATIONAL TRADE COMPLIANCE
MOMENT** | [Click here to view the June 2017 copy](#)



MONTHLY COMPLIANCE MOMENT



MONTHLY ITC NEWSLETTER



Risk Assessment

In 2016
there are about
246
export
sites
in Asia-Pacific



SCOPE & METHODOLOGY

- Sites with export activities only

Export -

- send products (“*commodities, software and/or technology*”) to other countries
- send products to other countries for repair or demo, or return repaired items to customers
- hand carry product samples or engineering documents in hard copy or saved on laptops
- send or download software and/or technology

- 10 simple questions; *GE Form*
- Training provided to export control focals

RISK LEVEL CRITERIA

HIGH

Local export license; or

Export license issued by foreign governments; or

Nuclear / military / aerospace, except Grid selling Balance of Plant for nuclear sites

MEDIUM

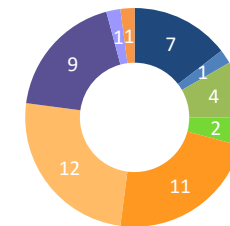
Screening issues identified; or

Located in a country with export control law, does NOT meet HIGH criteria, and exports or hand-carries commercial or repair/demo products or transmits/hand-carries technology

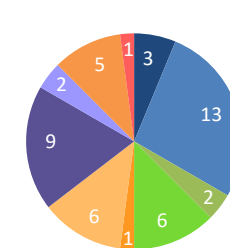
LOW

Located in a country with NO export control law

PREVIEW – HIGH RISK SITES



- Aviation
- Capital
- Energy Connections
- Global Research
- Healthcare
- Oil & Gas
- Power
- Renewable Energy
- Transportation



- Australia
- China
- Hong Kong
- India
- Indonesia
- Japan
- Singapore
- South Korea
- Taiwan
- Thailand



Export control training @ GE



Go Live!

Our message is stronger when we travel to the audience



Avoid US/EU – centric training

Translations provided when it makes sense



Go Digital!

Use on-line training to reach large populations
Make it interactive, e.g. 5min video



Questions, collaborations, benchmarking, best practices sharing?
Reach out to –



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