

INCIDENT AND DISCLOSURE MANAGEMENT™

PROPERLY DISCLOSE NONCOMPLIANCE WITH CONFIDENCE



Incident Management

Companies in the defense industry routinely focus on being compliant with International Traffic in Arms Regulations (ITAR) and avoiding fines with the Department of State (DOS). With continuous export control reforms, companies in all industries, including those in defense, are equally concerned with products regulated by the Department of Commerce (DOC). Over a recent six year period, the DOC levied fines far greater than the DOS.

As example, violations of the Export Administration Regulations (EAR) resulted in criminal fines, product forfeitures, and administrative penalties totaling \$950 million levied by the DOC, almost four times those levied by the DOS for violations under the ITAR during the same time period. The Treasury, Customs and Border Protection, the FDA, and other U.S. government agencies, also commonly issue hefty penalties.

Despite properly obtaining export and import authorizations, errors are common in the process. The ability to self-disclose identified errors, and demonstrate corrective actions, will help substantially mitigate penalties and fines. OCR's Incident and Disclosure Management™ enables corporations to implement a uniform and consistent corporate wide policy, and internal review process, to evaluate all incident reports, audit findings, identify corrective actions, and when necessary prepare voluntary disclosures for the government.

KEY BENEFITS

- Enables any employee to confidentially report incidents or matters of concern related to import or export activities
- Provides management reporting and tracking of Matters Under Review (MUR) by Empowered Officials, compliance officers, auditors, or legal staff
- Assigns regulatory categorization of incidents
- Configures compliance workflow to address concerns identified during internal and external audits
- Prepare, file, and track voluntary disclosures to the regulatory government agency

INCIDENT & DISCLOSURE MANAGEMENT (IDM)



IDENTIFY REGULATION OR AGENCY TO INCIDENTS OR ISSUES OF CONCERN:

- Dual use control under EAR
- Military controlled goods under ITAR or EAR
- Office of Foreign Assets Control (OFAC) sanction
- Anti-boycott compliance (BIS 6051-P)
- Foreign Corrupt Practices Act (FCPA)
- Bureau of Alcohol, Tobacco, Firearms and Explosives (BATFE / ATF)

ROOT CAUSE ANALYSIS (RCA) OF COMPLIANCE INCIDENT

- Assign the investigation to the correct personnel in compliance, legal, or functional staff with relevant due dates at various levels of the incident review
- Identify possible corrective actions that address the core issues causing compliance concerns
- Disseminate the required corrective actions to relevant stakeholders
- Assign completion dates for implementation of corrective actions
- Provide auditable account of the incident investigation, track it from discovery, verify the violation, identify corrective action and issue a final report
- Additional corrective actions or further investigatory steps can be assigned and tracked to completion based upon U.S. Government response

MANAGEMENT TRACKING

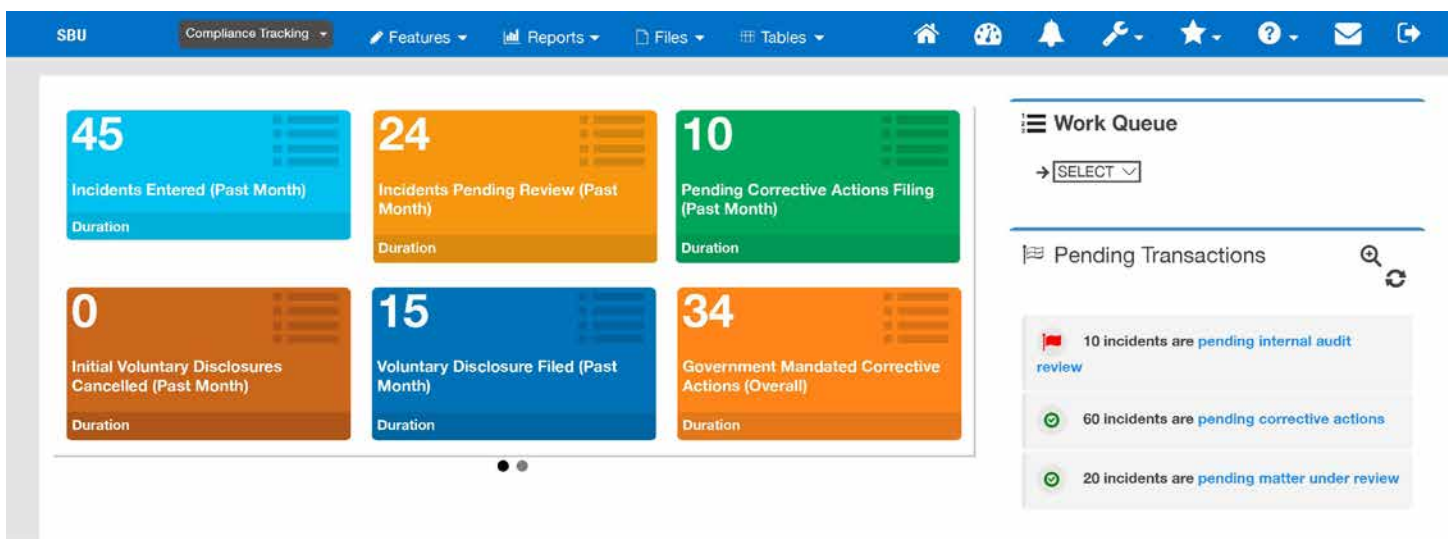
- Provide executives of compliance and legal departments with needed visibility
- Oversight of investigative activity such as weekly, monthly or quarterly summary of incident types
- Configurable dashboard with alerts and notifications provides comprehensive overview of the process
- Deep dive into additional details within Pending Transactions including incidents with status:
 - Matter Under Review
 - Voluntary Disclosure Filing
 - Internal Audit Review
 - Pending Corrective Actions

ROOT CAUSE

WHAT
WHERE
WHEN
WHO
WHY
HOW

CORRECTIVE ACTION

YES
 NO



SECURE COMMUNICATIONS

- Support secure access protocols and user authentication to Active Directory using LDAP, SAML 2.0 and Single Sign-On (SSO) tools
- Secure web forms support any secure 256 bit encrypted transmission and storage in a Relational DataBase Management System (RDBMS), such as, MS SQL or Oracle

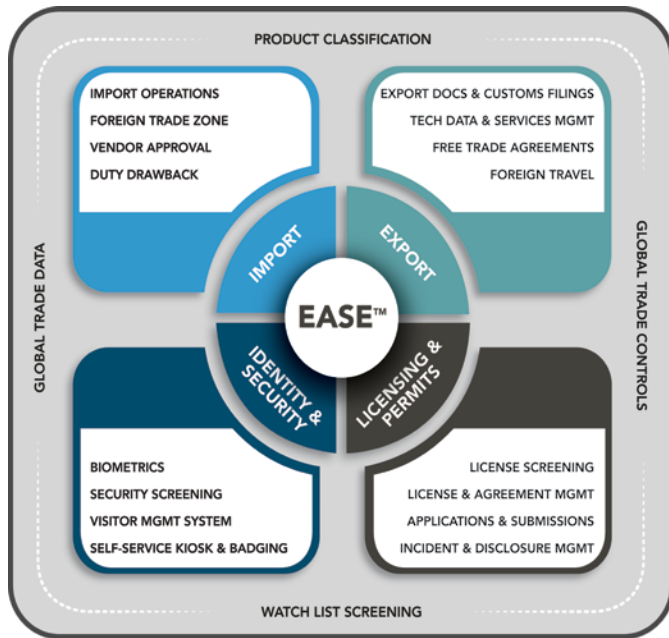
INTEGRATION WITH THIRD PARTY SYSTEMS

- Open standards, Java-based application
- Seamless real-time integration with Oracle, SAP, and other ERP, CRM, Supply Chain Management or other enterprise systems
- Integration support for any system including those client developed software



ABOUT OCR

As the foremost expert on Governance, Risk and Compliance (GRC) for international trade, OCR is trusted by Fortune 500 multi-national corporations, government agencies, and small businesses worldwide, to ensure compliance for cross-border transaction through a comprehensive solution that improves operations, complies with government regulations, saves money and provides a competitive advantage.



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EXPORT AND IMPORT WITH EASE

EASE SUITE OF SOLUTIONS

The Incident and Disclosure Management module is one of 16 modules in the OCR EASE suite of products.

Expedite Trade Flow

Avoid Regulatory Fines

Save Operating Costs

Enhance Supply Chain Security

EASE is a suite of scalable and configurable solutions designed to help clients automate and simplify their cross-border trading operations and address ever-changing international regulations.

All EASE modules are easily integrated with each other and third party solutions. They will automatically share data and documents seamlessly.

EASE software can be installed behind a firewall or implemented as a hosted service. Our Software as a Service (SaaS) platform operate in secure global data centers which are SSAE Certified with redundant failover and high availability bandwidth with full data encryption.

EASE global trade management is configurable with Global Trade Control and Data for over 180 countries.

Call Toll Free : +1-800-333-7864 (in U.S.)

For complete office locations and contact information please visit www.ocr-inc.com/contact-us/