

Criteria		Relevant Evidence for Compliance Program Mitigation
1. Whether the Company Has Performed a Meaningful Risk Analysis	Design	
	Implementation	
2. The Existence of a Formal Written Compliance Program	Design	
	Implementation	
3. Whether Appropriate Senior Organizational Officials Are Responsible for Overseeing the Export Compliance Program	Design	
	Implementation	
4. Whether Adequate Training is Provided to Employees	Design	
	Implementation	
5. Whether the Company Adequately Screens its Customers and Transactions	Design	
	Implementation	

6. Whether the Company Meets Record keeping Requirements	Design	
	Implementation	
7. The Existence and Operation of an Internal System for Reporting Export Violations	Design	
	Implementation	
8. The Existence and Results of Internal/External Review or Audits	Design	
	Implementation	
9. Whether Remedial Activity Has Been Taken in Response to Export Violations	Design	
	Implementation	