

## CEP Magazine – March 2021 Navigating export compliance

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So you want to be an export compliance officer? Maybe you've been asked to take on some export compliance responsibilities at your company? Regardless of whether you fell into the job or sought it out, the role of an export compliance officer is a unique compliance position. Having my fair share of experience in the field, below I list the main concepts and guidelines to keep in mind when fulfilling your export compliance responsibilities, some of which may also be applicable to other areas of compliance.

### **No one else's priority is export compliance**

Sorry export compliance officers, but it's true. Export compliance cuts across multiple disciplines within a business—logistics, sales, human resources, research and development, information technology (just to name a few)—and the people in those sectors of the business don't wake up every morning thinking to themselves, "How can I be export compliant today?" Your goal as the export compliance officer is not to make anyone an expert on export compliance; it's to bring awareness, ensure that internal policies are being followed, and provide the necessary guidance to employees when approached with questions or concerns. Your success in this role could be dependent on the professional relationships you create with employees. We'll talk later about some of the softer skills you may need (sensitivity to discrimination issues, providing context, being patient, etc.) to ensure that employees keep export compliance in mind as they go about their day, even if it's not their priority.

### **Be prepared for regulatory change**

Don't expect to write an export compliance policy, procedure, or guideline and be able to let it sit untouched for years (or even months!) at a time. While all compliance policies and procedures need refreshment every now and again, you may find that export compliance policies and procedures need updating *multiple times a year* depending on the geopolitical environment, regulatory revisions, and changing government administrations. The country, company, or person that your company can export to today may very well be restricted tomorrow.

### **Solicit help from nonexperts**

It is rare and almost impossible to run your export compliance program in a vacuum. Export compliance intersects with multiple disciplines and sectors within a business; not only will you be expected to train non-export compliance personnel on export compliance issues to increase their awareness, but you may come to *depend* on these employees for their help in implementing initiatives and ensuring compliance. This may be formalized assistance (such as an export champions network) or a more informal contact list of those employees within different sites, sectors, and expertise who can serve as your eyes and ears in spotting, reporting, and directly addressing export compliance concerns or potential violations. Again, it's the professional relationships you build and cultivate with these employees that will influence your ability to rely on their assistance.

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