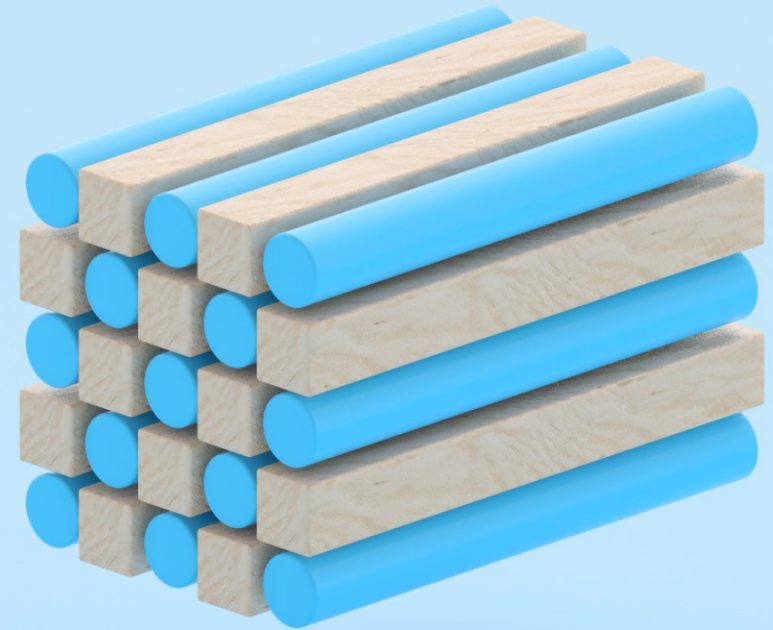# Best Practices in Export Screening

NetApp

Dharambir Bharti

Global Trade Compliance Manager, APAC

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Agenda

NetApp Introduction

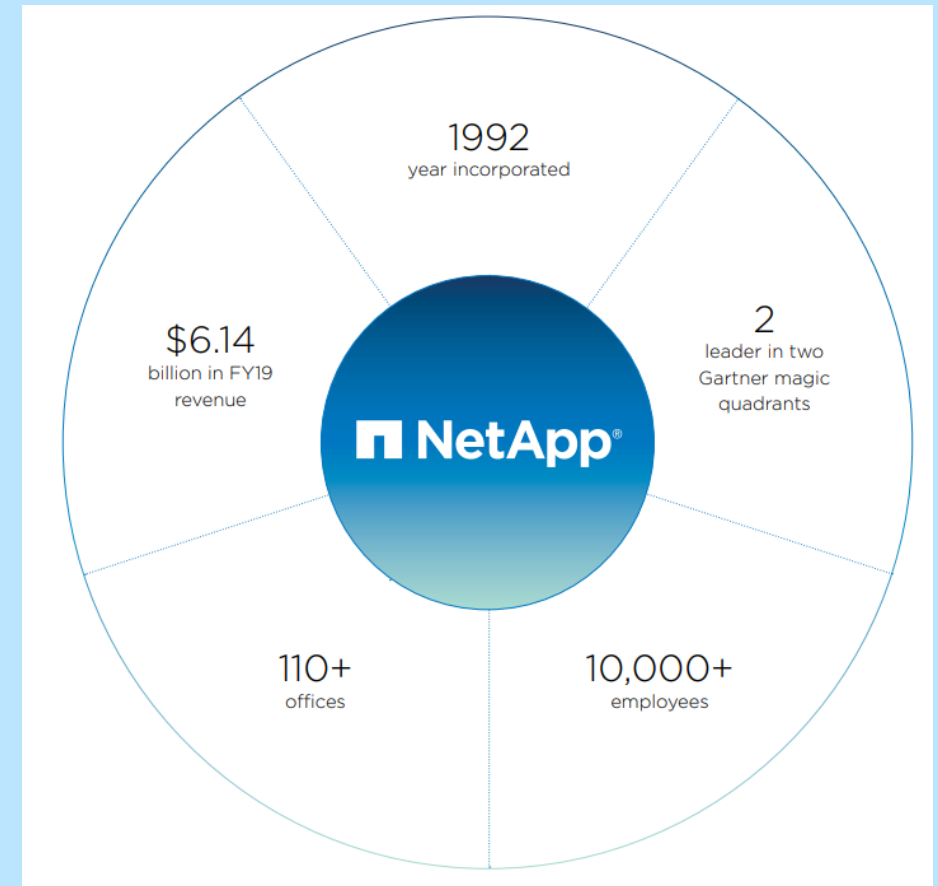Global Trade Compliance (GTC) Program - Overview

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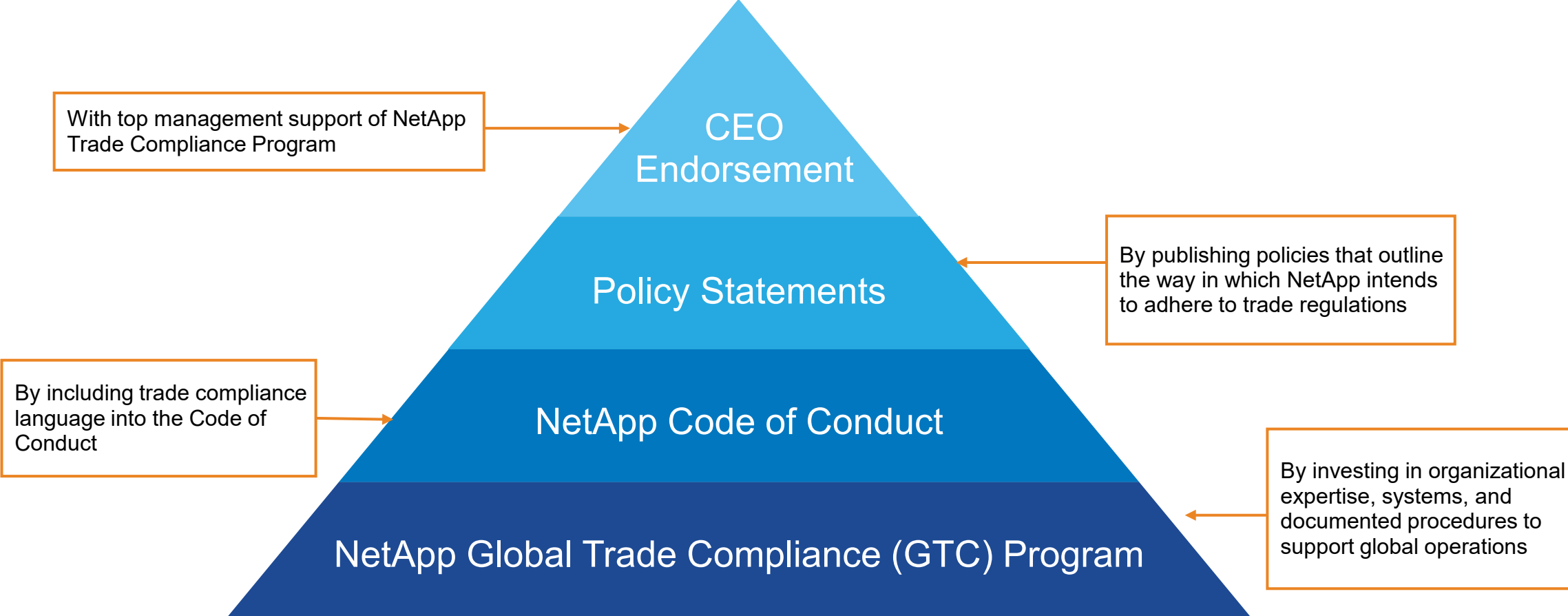
We help our customers ensure their data and applications are in the right place at the right time with the right characteristics and capabilities in order to achieve new insights and accelerate innovation.

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.

With top management support of NetApp Trade Compliance Program

CEO Endorsement

By publishing policies that outline the way in which NetApp intends to adhere to trade regulations

Policy Statements

By including trade compliance language into the Code of Conduct

NetApp Code of Conduct

By investing in organizational expertise, systems, and documented procedures to support global operations

NetApp Global Trade Compliance (GTC) Program

The Global Trade Compliance (GTC) Charter and Internal Portal

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.

Thank You

□ NetApp