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FSI WEBINAR OM EKSPORTKONTROLL

# Due Diligence av partnere

20/04/2022

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Vice President Corporate Compliance  
Kongsberg Gruppen ASA



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## Fun fact



**The airplane is 92% titanium inside and out**



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# Unngå silo tilnærming



Sales



Project



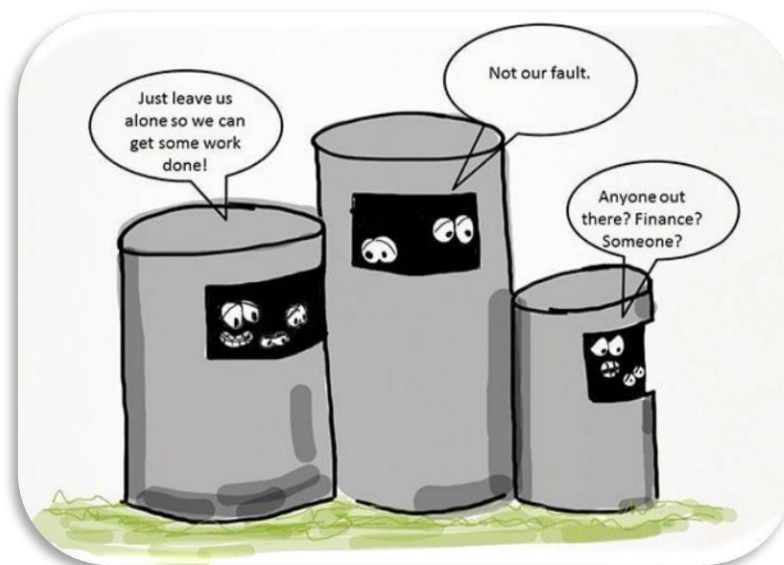
Finance



Compliance



Export Control





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# Sørg for at de viktige avklaringen blir gjort





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# Hvem?

Business Partner is a third party with whom you engages in a transactional business relationship. This may include, without limitation:

- Custom Agents
- Customers
- Distributors/Dealers
- Integrator
- Joint venture partners or other cooperation partners compare
- Market Representatives/Sales Representative/Agent
- Offset partners, Consultants
- Receivers of sponsorships and charitable contributions.
- Resellers
- Sales Representative
- Suppliers

Rev.	Date	Reason for issue	Author, dept and name	Authorising dept, name, sign	Security level/IPR
-	21NOV2011	First issue	Compliance/LS	CEO/ W.Qvam	
A	19MAY2014	Revision	Compliance/LS	CEO/ W.Qvam	
B	01MAR2017	Revision	Compliance/L. Sverre	CEO/ G. Høy	
C	29APR2019	Revision	Compliance/L. Sverre	CEO/ G. Høy	
D	12JUN2020	Revision	Compliance YR Larsen	CEO/ G. Høy	Company limited

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# Nivå?

Business Partner	Minimum Examination Level
Customers* Integrators*, Resellers	Level 1
Receivers of sponsorships, Receivers of charitable contributions	Level 2
Suppliers**	Level 2
Custom Agents	Level 2
Joint Venture or Teaming Partners or other similar partnerships, Distributors, Dealers, Offset partner	Level 3
Market Representatives/Sales Representative/Agent	Level 4

\* Unless otherwise described in KOG-DIR-x

\*\* Unless otherwise described in KOG-DIR-x



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# Hvordan

	Description	Responsible	Level 1	Level 2	Level 3	Level 4
<b>Step 1</b>	Verify the identity of the BP - obtain company legal name, registration number, address, website and contact person	Proposer	Yes	Yes	Yes	Yes
<b>Step 2</b>	Develop a business justification	Proposer	No	Yes	Yes	Yes
<b>Step 3</b>	<b>Screen for Sanction / Enforcement risks.</b>	<b>Export Control</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>
<b>Step 4</b>	Adverse media screening	Compliance	Yes	Yes	yes	yes
<b>Step 5</b>	Verify bank details	Finance	Yes	Yes	Yes	Yes
<b>Step 6</b>	Collect a credit report	Finance	Yes	Yes	Yes	No
<b>Step 7</b>	Collect a Self-Assessment Form	Compliance	No*	Yes**	Yes	Yes
<b>Step 8</b>	Screening of Board members, shareholders, beneficial owners	Compliance	No*	Yes	Yes	Yes
<b>Step 9</b>	Ensure the BP has an adequate compliance system	Compliance	No*	Yes***	Yes	Yes
<b>Step 10</b>	External Due Diligence	Compliance	No*	No*	Yes	Yes
<b>Step 11</b>	Compliance Interview	Compliance	No*	No**	No*	Yes
<b>Step 12</b>	<b>Risk Assessment</b>	<b>All functions</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>
<b>Step 13</b>	<b>Ensure ABC and export control/sanction clauses in contract</b>	<b>Proposer</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>
<b>Step 14</b>	Ensure Audit rights in resultant contract	Commercial	No	No	Yes	Yes
<b>Step 15</b>	Perform BP ABC training	Compliance	No	No	Yes	Yes

\* Unless satisfactory information cannot be obtained from previous steps or Red Flags have been identified. Requirement to be assessed by Compliance on a case by case basis

\*\* Unless otherwise described in KOG-DIR-x

\*\*\* Requirement to be assessed by Compliance on a case by case basis



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# Hva må jeg undersøke?







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# I forhold til hva?



## Sanksjoner og tiltak

Les mer om sanksjoner og tiltak, og om eksport til Russland og Iran.



## EU Sanctions Map



## OFAC Sanctions Lists



OFAC publishes lists of individuals and companies owned or controlled by, or acting for or on behalf of, targeted countries. It also lists individuals, groups, and entities, such as terrorists and narcotics traffickers designated under programs that are not country-specific.

- Specially Designated Nationals List
- Consolidated Sanctions List
- Additional OFAC Sanctions Lists





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# Verktøy?



403. That's an error.

We're sorry, but you do not have access to this page. That's all we know.



## Sanctions List Search

Sanctions List Search: Rules for use

Download the SDN List, Sanctions List Search, Rules for use, Visit The OFAC Website, Download the Consolidated Non-SDN List, Program Code Key

Lookup																
Type:	All	Address:														
Name:		City:														
ID #:		State/Province:														
Program:	All	Country:	All													
	561 - Related	List:	All													
	BALKANS															
	BELARUS															
Minimum Name Score:	100	<input type="button" value="Search"/> <input type="button" value="Reset"/>														
Lookup Results:																
<table border="1"> <thead> <tr> <th>Name</th> <th>Address</th> <th>Type</th> <th>Program(s)</th> <th>List</th> <th>Score</th> </tr> </thead> <tbody> <tr> <td colspan="6"> </td> </tr> </tbody> </table>					Name	Address	Type	Program(s)	List	Score						
Name	Address	Type	Program(s)	List	Score											

\* U.S. states are abbreviated on the SDN and Non-SDN lists. To search for a specific U.S. state, please use the two letter U.S. Postal Service abbreviation.

SDN List last updated on: 11/19/2020 10:32:14 AM  
Non-SDN List last updated on: 3/17/2020 10:55:27 AM



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Takk