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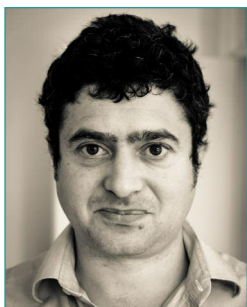
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Welcome



**Tom Blass,
Editor,
WorldECR**

As most of us continue to work from home (most of the time) and Covid continues to cast its shadow, we took the decision to continue our Forum virtually, in 2022 as we did in 2021. And we are confident, once again, that you won't be disappointed.

I'm delighted that we have 18 sessions, focusing both on new developments and changes in sanctions and export controls, and also on the practical nuts and bolts 'must-know' elements of trade compliance. We have presentations from industry leaders, visionaries, and world-renowned advisers, and we have put together a portfolio of sessions intended to ensure that you and your company are well-briefed, and well-prepared, for what 2022 might have in store (and that's no small boast!).

Amongst our presentations:

- A deep-dive into the intricacies of the increasingly critical EAR Entity List
- Enhanced Due Diligence: essentials and key elements
- Compliance challenges of home and hybrid working
- EU Regulation 821/2021 and the need to recast your ICP
- Emerging technologies – today's challenges
- Implementing end-use checks across multiple jurisdictions

and, of course, much, much more... We'll have a workshop on 'horizon scanning' (a critical component of sophisticated compliance practice), roundtable discussions on recent and anticipating trends in enforcement from the UK, EU and US, and analysis on the trade control tools that both China and the United States have taken against a backdrop of tensions.

Key dates and must-knows

The 2022 WorldECR Virtual Forum takes place between 14 and 24 February. Sessions have been scheduled so as to be accessible in real-time across multiple time zones (all sessions are recorded and available for delegates).

We are also looking forward to a Virtual Drinks Reception at the close of the Forum – and would like to see you there, if not in person, certainly 'in person'.

Tom Blass
Editor, WorldECR
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Please do not hesitate to contact us at info@worldocr.com with any questions you may have.

Speakers and their Sessions



Roundtable discussion: Enforcement trends in export controls and sanctions

The 'Covid years' of 2020-2021 have not been marked by the kind of big-ticket penalties and settlements that hitherto worried global business. But that's not to say that they haven't been busy: to date, OFAC's tally of 2021 settlements weighs in at a modest \$20m – but they've been across a slew of industries and sectors.

And observers expect new trends: A stronger role for the US DoJ? A more muscular stance taken by post-Brexit UK's OFSI? China's national security laws coming of age?

Indeed, regulators on both sides of the Atlantic warn that they remain vigilant, against a backdrop of new trade control regimes and geopolitical tensions.

In this Roundtable discussion, leading sanctions/trade controls practitioners explore the big enforcement events and their significance for industry, highlighting trends, emphases, and the regulator concerns that underpin them, promising valuable insights for organisations' compliance budgeting, planning and allocation of resources.

Moderator: Tom Blass, Editor, WorldECR

Monday 14 February, 4.15 pm GMT



Kevin Cuddy and Sanjay Notani: New directions and departures – beyond 'normal' export controls and sanctions

As the landscape of global security and foreign policy threats both broadens and becomes more intricate, regulators have employed export control and sanctions measures to address wider concerns such as human rights, environment and corruption. At the same time, lawmakers have introduced legislation that would further tighten export controls on many commodity products, increase oversight of outward investment flows, and extend the extraterritorial application of domestic laws.

But are export controls and sanctions the appropriate tools to address the geopolitical concerns?



This session, presented by IBM's Kevin Cuddy and international trade and customs lawyer Sanjay Notani of Mumbai-based Economic Laws Practice, starts by describing the more innovative uses of trade controls in recent years, and goes on to explore the other kinds of regulatory and legislative interventions governments might employ, such as: controls on cross-border data flows, new techniques for controlling and tracking the export of intangible technology, tighter investment clearance regimes, and use of artificial intelligence and blockchain technology, in their pursuit of the 'right' balance between trade and 'security'.

About Kevin: Kevin Cuddy is a Government & Regulatory Affairs Executive in the Export Regulation Office at IBM. Prior to joining IBM, he was the inaugural Trade, Technology, and Security Fellow at the Stimson Center, focusing on industry's role in technology transfers and global non-proliferation programs.

About Sanjay: Sanjay Notani is a partner at the Mumbai office of law firm Economic Laws Practice. He is regarded as being amongst India's leading lawyers for international trade, technology and related policy matters.

Tuesday 15 February, 3 pm GMT

Speakers and their Sessions



Nancy Draper Schaeffer: Addressing the compliance challenges of home and hybrid working

Since early 2020, the COVID pandemic has turned the world upside down. For many, working from home became not just the norm but a legal obligation, with ‘office life’ replaced by home working, and business travel and meetings replaced by the now ubiquitous dial-in by Zoom or other platforms.

Putting aside the obvious pros and cons of the ‘new normal’ (less commuting/ reduced interface with clients and colleagues), the compliance function has faced particular challenges in the COVID era: How to ensure that controlled data and communications are kept secure, and that the kitchen or dining room workplace isn’t the scene of unwitting trade control breaches or careless ‘shares’.

In a presentation with near-universal applicability to everyone in the world of compliance, Nancy Draper Schaeffer, a valued *WorldECR* contributor, talks through the key measures that companies need to take to ensure that the move to home and hybrid working does not result in compliance mis-steps or more egregious violations.

In addition to setting out best practice, Nancy will parse the extant guidance issued by regulators through the pandemic, including the temporary changes introduced by the Directorate of Defense Trade Controls (‘DDTC’) to facilitate easier working from home for key staff – while setting out how organisations might prepare for continued uncertainties.

About Nancy: After graduating from Harvard University with a Masters of Liberal Arts in International Relations, Nancy started her first export control position at West Virginia University. After that, she worked in BAE Systems, Inc. International Trade Compliance Office. She recently started working at Leidos, Inc. directly supporting a customer contract.

Tuesday 15 February, 4:15 pm GMT



Donald Pearce: Are you on autopilot? – Rethinking licences, exceptions, and NLR transactions

Knowing when to apply for US export control licences, and which licences to apply for, requires careful consideration of rules and circumstances and classifications that frequently change. All too often, companies work on ‘autopilot’, repeating application practices that may well be out of date, insufficient for compliance, or even unnecessary.

In this practice-focused presentation, former US BIS Special Agent, Donald Pearce, walks through the ways in which changing circumstances can affect routine transactions, exploring options and the decision-making process.

Don’s presentation will cover:

- Adventures in classification – (It’s ‘No Licence Required’, isn’t it?)
- New regs for old tech – When changing controls impact your transaction
- Can I see some identification, please? – End-use/End-user issues of concern
- Overseas but under BIS jurisdiction – Points to ponder for non-US parties

Anyone who has attended a Don Pearce training event will attest to his ability to make complex ideas in export control easily digestible and applicable to real-life situations.

About Don: Donald Pearce is a former Senior Special Agent with the US Bureau of Industry and Security. He is now Principal of consultancy Sentinel LLC and Senior Advisor in the Global Risk, Monitorship, and Investigations Practice at international business guidance firm Torres Trade Advisory. Don has been recognised for superior performance by the Secretary of Commerce and the US Attorney General for investigations into highly complex cases.

Wednesday 16 February, 3 pm GMT

Speakers and their Sessions



Meredith Rathbone and Alexandra Baj: EAR anatomy – the Entity List under the microscope

In the past decade – and even more markedly over the past three years – the US Entity List, administered under the Export Administration Regulations ('EAR'), has become a 'go-to' tool for US lawmakers, who have drastically increased the scope of the List, in terms both of criteria for inclusion and the number of parties.

The List – of certain foreign persons (including businesses, research institutions, government and private organisations, individuals, and other types of legal persons) subject to specific licence requirements for the export of goods and other transactions – is often seen as a sanctions list by another name. But understanding how the Entity List works, its categories and the requirements it imposes, is key to accurate, risk-calibrated compliance.

In this presentation, Meredith Rathbone and Alexandra Baj set out what compliance officers need to know about the composition of the Entity List, and the respective requirements its categories impose.

About Meredith: Meredith Rathbone co-chairs Steptoe's International Regulation and Compliance practice group and its Export Controls & Economic Sanctions group. She is based in the firm's London and Washington, DC offices.

About Alexandra: Alexandra Baj focuses her practice on export controls and economic sanctions laws and regulations, anti-corruption investigations and compliance, international trade, and security clearance issues.



Wednesday, 16 February, 4.15 pm GMT



Steven Brotherton and Lincoln Clark: Semiconductors in the supply chain – an export control perspective

Semiconductors – 'chips' – are critical to the global economy. At the heart of almost any industry you can name, they are deeply embedded into intricate and complex international supply chains, civilian and defence. So necessary are they that any imposition of restrictions or attempts to reshape the market – such as the imposition of export controls – is inevitably attended with consequences that are far-reaching well beyond the ITC sector. Recent regulation has led to bodies including the Semiconductor Industry Association calling for more thorough evaluation of the impact of controls on the EU and US industrial base.

In this presentation, Steven Brotherton and Lincoln Clark set out the lie of the land of the semiconductor in global supply chains, exploring impacts and challenges for manufacturers, exporters, distributors and integrators, against the backdrop of tighter US export controls and related national security measures.

About Steve: Steven Brotherton is a Principal and leads the Global Export Controls & Sanctions service line at KPMG. Steve has served two terms on the US Department of Commerce's Regulations and Procedures Technical Advisory Committee, which advises BIS on export control regulation and policy.

About Lincoln: Based in Silicon Valley, Lincoln Clark is the Global Leader of KPMG's semiconductor practice, leading the strategy to service semiconductor companies around the world.



Wednesday, 16 February, 5.30 pm GMT

Speakers and their Sessions



Frank Pan and Kerry Contini: Tricky terrain – Navigating US and Chinese trade controls

The mutual economic dependence between China and the West means obstacles to trade between them is of profound consequence to businesses of all types. But for the past few years, such obstacles have come to be part and parcel of US-Sino business, with Washington articulating concerns around, for example, Hong Kong and Taiwan, and alleged forced labour in Xinjiang through the imposition of sanctions and export controls, and Beijing threatening to exert its own pressures through the use of reciprocal legislation. While fully-fledged ‘decoupling’ appears not to be in sight, navigating the obstacles requires a steady – but responsive – hand on the figurative tiller.

In this session, lawyers Frank Pan and Kerry Contini set out the state of play of, amongst other key challenges for business:

- US export controls affecting China
- China’s countermeasures against sanctions
- China’s ‘reactivated’ technology control regime: what it means for technology companies
- The Biden Administration’s focus on human rights and what that means for global trade compliance programmes
- US supply chain policy: what companies trading with China and the US should know

This is a must-attend session for US and Chinese organisations whose trade demands an intimate understanding of these difficult issues, and also for all non-US/Chinese companies potentially affected.

About Frank: Frank Pan is Senior Counsel at FenXun Partners in Shanghai. He has more than 15 years of experience working in a broad range of trade actions, including advising clients on trade law compliance and export controls.

About Kerry: Kerry Contini is a partner in Baker McKenzie’s international trade practice in Washington, DC, advising companies on export controls, sanctions, and supply chain compliance.

Thursday 17 February, 3 pm GMT



John Grayston: All change in the EU? Understanding the impact of Regulation 821

In September 2021, accompanied by fanfare and scrutiny, the European Union implemented the ‘recast’ dual-use regulation: 821/2021. ‘We need to better respond to emerging threats in an increasingly volatile world. That means getting a better grip on dual-use technologies, including cyber-surveillance technologies that can be misused for human rights violations,’ said Commissioner for EU Trade, Valdis Dombrovskis, when the new regime came into force.

The recast arguably doesn’t constitute the wholesale revision that some had anticipated (it does not include, for example, an additional Annex describing export-controlled items beyond those mandated by the multilateral regimes). But it still represents a departure from the regulation it supersedes, creating a new ‘human security dimension’ with heightened obligations for exporters to scrutinise end use, a new definition of ‘exporter’, and introducing the prospect of greater transparency and cooperation between EU member state competent authorities in the application and administration of export controls.

As the world takes stock of 821/2021, leading Brussels-based trade lawyer John Grayston outlines its most significant impacts for exporters/reexporters and describes some of the measures member states have taken by way of implementation.

About John: Principal of Brussels-based Grayston & Company, John Grayston has practised EU law in Brussels for more than 25 years and is a recognised expert on EU laws in particular on customs and trade, export control and sanctions.

Thursday 17 February, 5.30 pm GMT

Speakers and their Sessions



Rosa Rosanelli: Sharing and learning – the Patria/Kongsberg model of compliance

The ‘Trade Compliance Project’ is a cooperation between the Patria (Finland-based) and Kongsberg (Norway-based) company trade compliance groups and came into the world in June 2019 as the companies sought to join forces to strengthen their trade compliance programmes and achieve a new, holistic, approach to export compliance, improving competences and systems for trade compliance and sharing best practices.

The (*WorldECR* award-winning) project’s intentions, amongst others, are to:

- Raise awareness on the criticality of trade compliance
- Establish a strong company culture of export compliance by setting it as a top priority
- Make export compliance an integral and natural part of the way the companies conduct business.

We’re delighted that Rosa Rosanelli has accepted our invitation to present on the steps that the companies have taken, the reasons for doing so, and the challenges of implementation – with key take-aways that attendees can apply to their own compliance efforts and collaborations.

About Rosa: Rosa Rosanelli is Vice President, Head of Compliance at Patria and project leader.

Monday 21 February, 3 pm GMT



Nora Bartos: Implementing end-use checks – a multijurisdictional perspective

A re-calibration of export control regulations by agencies on both sides of the Atlantic has resulted in a need for companies to pay greater attention to scrutiny of end-users – especially if there is potential for goods, services or technology to reach military users.

In this presentation, Nora Bartos describes the new landscape of end-use and end-user, the more muscular attitude to catch-all by authorities, and the KYC and due diligence procedures exporters need to have in place to ensure appropriate checks.

Nora’s approach is multijurisdictional and relevant to all industry sectors, and her presentation will cover due diligence, end-user checks and statements, along with common pitfalls, bringing to bear state-of-the-art best practice on an increasingly important area of compliance.

About Nora: Nora Bartos is Chief Export Control and Sanctions Compliance Officer at Swiss multinational pharma company, Roche.

Monday 21 February, 4.15 pm GMT

Speakers and their Sessions



Lloyd Meadows: Sanctions horizon scanning – methodology and means

Interpretations of ‘horizon scanning’ in the context of sanctions compliance range from acknowledging the need to keep up with international news coverage to efforts to second-guess the future with an ambitious degree of certainty.

Arguably, a realistic understanding lies somewhere between: At its heart is a systematic examination of available information to identify potential threats, risks, emerging issues and opportunities. But how?

In this unique presentation, Lloyd Meadows sets out the horizon-scanning methodologies that FIs and large corporations can adopt to be better prepared for future sanctions developments – and will walk through real life, topical examples to demonstrate the practical application of an exercise that can bring significant bottom-line benefits.

About Lloyd: Lloyd Meadows is a Director, Sanctions Advisory at Standard Chartered, having previously served in the UK government.

Monday 21 February, 5.30 pm GMT



Giovanna Cinelli: Emerging technology debate comes of age

AI, quantum computing, brain-computer interfaces... it sounds like the stuff of a sci-fi novel. But the future is now! When FIRRMA brought the emerging technology debate into mainstream compliance thinking in 2018, many relegated the issue to the back-burner – pending further consensus and clarification from government. Some of the technologies referenced seemed far-fetched and their threat potential distant; subsequent efforts to control emerging tech have met definitional and other challenges.

But as multiple agencies beyond CFIUS and BIS (including, for example, the National Institute of Standards and Technology) seek to better understand its applications and implications, the ‘emerging tech’ thematic is poised to become central to export control and related regulated tools – all against a backdrop of accelerated national security considerations around the technological capabilities of potential adversaries.

Taking a multijurisdictional approach, Giovanna Cinelli will address the state of play of emerging technologies and compliance, including the significance of recent consultations, prospects for rule-making, and will shed light on the underlying rationale driving policy development.

About Giovanna: Giovanna Cinelli is the leader of the international trade and national security practice at the law firm Morgan Lewis. Concurrent with her private practice, Giovanna has served as a Naval Reserve intelligence officer, where she specialised in Soviet-era submarine platforms, national security, and intelligence issues.

Tuesday, 22 February, 3 pm GMT

Speakers and their Sessions



Barbara Linney: Tech in sights of regulators? The SAP Settlement and its meanings

In April 2021, Germany's SAP agreed combined penalties of \$8m with the US Department of Justice, Bureau of Industry and Security and Department of the Treasury for exports of software products and services to Iran.

The sum wasn't eye-watering, but the settlement was hugely instructive not only because it underscored regulators' increasing focus on technology companies and intangible technology, and also on account of its multi-agency nature – and the role of the Department of Justice.

In her presentation, Barbara Linney takes a close look at the SAP settlements, exploring lessons that should be learnt by the tech industry and beyond, whether US or non-US based, including companies engaged in M&A activities.

About Barbara: Barbara Linney serves as BakerHostetler's International Trade & National Security team co-leader, building on 30 years of experience advising US and foreign clients. She is also an adjunct professor of export controls and economic sanctions at Georgetown University Law Center – and winner of the WorldECR Practitioner of the Year Award, 2021.

Tuesday 22 February, 4.15 pm GMT



Dr. Scott Jones and Aaron Dunne: DHL Express and the challenge of eCommerce compliance

The dramatic growth of e-commerce, particularly in reaction to the COVID pandemic, has demonstrated the robustness and future shape of global commerce. Global logistics operations undergird this emerging commercial system, with express service providers providing the arterial means of conveyance.

However, the rapid growth in route diversity and volume has introduced corresponding compliance hurdles for the industry.

DHL Express, one of the world's leading providers of package delivery and mail services, has been at the forefront of developing compliance solutions that anticipate new challenges. In this presentation – relevant to every company looking to keep up to speed with rapidly changing supply chains, payment systems and logistics – Dr Scott Jones and Aaron Dunne will review those challenges, and the company's responses.

About Scott: Dr Scott Jones is DHL Express's Regional Export Control Officer for the Americas.

About Aaron: Aaron Dunne is Global Export Control Officer at DHL Express.

Tuesday 22 February, 5.30 pm GMT



Speakers and their Sessions



Robert Price and Andrew Galdes: Blocking regulations and sanctions – clashes between legal orders

Sanctions laws – especially US regulations – are remarkable for their potential to impact the activities of organisations domiciled abroad. For a long time, so-called ‘blocking’ regulations have been regarded as lacking teeth, but in recent years they’ve garnered greater attention and relevance to corporate transactions.

In this presentation, Rob Price and Andrew Galdes explore this new terrain and its context, focusing on:

- The extra-territorial effect of some primary sanctions
- The impact of secondary sanctions
- The EU Blocking Statute in light of the recent ECJ decision on *Bank Melli/Deutsche Telekom*
- Equivalent legislation in the UK and other jurisdictions



Rob and Andrew will also focus on the strategies and preparation necessary for companies to navigate the conflicts of laws presented by blocking regulations for compliant cross-border trade.

About Rob: Robert Price is a partner in the Litigation & Trial Department in the London office of Latham & Watkins.

About Andrew: Andrew Galdes is a counsel in the Washington, D.C. office of Latham & Watkins and is a member of the Export Controls, Economic Sanctions & Customs Practice.

Wednesday 23 February, 3 pm GMT



Jim Huish: Broadening reach and escalating concerns – understanding ‘Enhanced Due Diligence’ requirements

As business grapples with issues such as forced labour and human rights – once consigned to ‘CSR’ but now more likely to fall within the regulatory space – compliance officers are looking for guidance on managing and detecting new areas of supply chain risk. The first step is adopting a process of Enhanced Due Diligence. But for many companies, the real challenges lie in understanding how to put principles into practice.

In this presentation, tailored for the export control compliance function, Jim Huish addresses the key elements of an Enhanced Due Diligence programme, including:

- Expectations of regulators and enforcement bodies
- Main areas where attention should be focused
- Understanding who to target for scrutiny
- Working through the supply chain – how far is far enough?

Focusing on forthcoming developments in the UK, EU and Germany, Jim will look at areas of future regulation that companies need to consider and look at how to introduce compliance efficiencies into due diligence endeavours.

About Jim: Jim Huish is Managing Director, Forensic & Litigation Consulting, Export Controls, Sanctions & Trade, at FTI Consulting, specialising in international trade compliance. He is based in London.

Wednesday 23 February, 4.15 pm GMT

Speakers and their Sessions



Enrico Carisch and colleagues: Together in Adversity? UNSC review

Overshadowed by deepening rifts between China and Russia on the one hand and the United States, France and United Kingdom on the other, the Permanent Members of the United Nations Security Council are not in a collectively happy place.

Nonetheless, the broader UNSC pursues its programme of work, responding to international emergencies such as the current crises in Ethiopia, Afghanistan, Sudan and Burma/Myanmar, and the ongoing refinement of non-proliferation objectives through UNSC 1540. All these developments feed into national legislation and compliance obligations.

In this presentation, Enrico Carisch and CCSI colleagues give an overview of major developments at the Security Council in the past year, and consider key touchpoints with national sanctions and export control regimes.

About Enrico: Enrico Carisch is a founding director of Compliance and Capacity Skills International (CCSI). He previously served the United Nations Security Council as a financial and natural resources sanctions monitor. He will be joined for the presentation by WMD non-proliferation expert/Former UN 1874 Expert Panel (North Korea) member, Maiko Takeuchi; Senior Director at Counter Extremism Project, Dr Hans-Jakob Schindler; and Sanctions Monitor and Border Control Expert, Thomas Bifwoli.

Wednesday 23 February, 5.30 pm GMT



Roundtable discussion: 2022 – A critical year for sanctions and the world?

As 2021 came to a close, it did so on a note of urgency – with many of the world's tinderbox crises thrown into sharp relief by the sanctions prism: Russia, Ukraine and the West; China and Taiwan; new crisis in Sudan; Tigray's ongoing woes; Afghanistan in the Taliban grip. Many of these programmes, by dint both of their geopolitical impact and perceived consequences, have generated debate well beyond the compliance community.

The possibility of considerable shake-up in 2022 is a real one, given the state of relations between Russia and the West, and the ongoing JCPOA talks.

In this roundtable discussion, thought leaders, advisers to banks, multinational corporations and other organisations, will reflect on current sanctions programmes, their likely direction of travel, and related issues and impact for 2022.

Moderator: Tom Blass, Editor, WorldECR

Thursday, 24 February, 3.30 pm GMT



Virtual networking reception

Join sponsors and *WorldECR* team members in a virtual networking reception as we consider the presentations of the past fortnight and share experiences and insights.

Thursday, 24 February, 5 pm GMT

THE WORLDECR VIRTUAL FORUM

FEBRUARY 2022

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Change of speaker and presentation

The organisers reserve the right to change speakers and/or presentations.