



Export Control Compliance Statement

January 2017

K. Lacey Ltd understands the importance of Export Compliance and takes its responsibility seriously, it is essential for the running of our business that we comply with legislation. Export Control regulations are in place throughout the world principally for the control of National Security, Proliferation and Terrorism.

Non-compliance would bring serious penalties for the Company and members of staff involved. Necessary licenses and checks will be performed prior to exporting listed products or technology. It is in all of our interests to be compliant and set effective controls and processes within our organizations to help make the world a safer place.

- **Responsibility**

The Managing Director is allocated overall responsibility for export control, assisted by one staff member, the Sales Manager and Director, who was given the task of working up and implementing a viable set of procedures. The Customer Services Manager and other administrative staff are also involved in this because of the benefits in checking for creditworthiness and export control/end-use at the same time, especially with new customers.

- **Quality**

As a part of its Total Quality Management programme, the company holds regular senior management meetings at which the subject of export control is a permanent agenda item.

- **Staff awareness**

All staff concerned with the administration of export orders has access to notes via our internal computer system covering:

- Identification of licensable products;
- Types of licenses and working practices;
- Production of shipping documents;
- Quotations.

- **Identification of licensable goods**

Only a relatively small proportion of the company's stock items are controlled and introduction of a 'Positive' licensing regime within the company was considered inappropriate. The order processing system therefore incorporated a suitable flagging process.

The flags highlight the need for a license.

Visit our Website : <http://www.klaceycables.co.uk>

Tel. +44 (0) 1903 771336 Fax. +44 (0) 1903 255411 Email. sales@klaceyables.co.uk
AS9100/AS 9120 and ISO 9001:2015 APPROVED BSI. RS000146 BAE APPROVED
Registered in England No. 1031406 VAT Registration No. GB 193128460



RS00146



An acknowledgement is sent to the customer with the appropriate Undertaking Template (e.g. concerning the consignee or end use). Where it is a new consignee, staff refers the order to the Sales Manager and Director for further checks as to the bona fides of the consignee and/or end-use. In view of the sensitivity of some of the countries supplied, the company maintains regular contact with the Export Control Organization.

- [Documentation](#)

Once any part of an order is identified as requiring an export license, the completed templates are passed to the Sales Manager and Director to apply to Spire for a license. Once received the order is updated with the License reference along with the Export Log, which is available to the ECO's Compliance Inspector when he or she Audits.

- [ITAR/EAR](#)

Only very small proportions of the company's stock items are manufactured in the USA and are therefore subject to ITAR/EAR Controls. The sales processing system therefore incorporated a suitable flagging process.

The flags highlight that the item is subject to ITAR/EAR.

Where a customer requests this information either on an enquiry or order, subsequent information is requested from the appropriate supplier/manufacturer (Our form [Export control request for supplier information ISS 4](#) can be used for ease).

This information is then stored against the item in our document management system for reference and additional notes are entered against the item that will notify the customer on any paperwork provided by the system. Items are only flagged if the item is subject to the control.

Should we be notified by our suppliers that an item has been re-classified then the Sales Manager and Director will amend the system and inform all Customers who have purchased the product?

- [Shipping](#)

A close working relationship exists with the principal freight forwarders, with whom export licensing is regularly discussed. Direct routing is used wherever possible.

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