Export Controls

Chinese Export Controls

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1 Quick Start

This guide offers an overview of how Export Controls and License Management can be configured to reflect the rules and regulations of Chinese law. What we'll cover:

- Information on the new Chinese export control law
- Step-by-step instructions
- Special instructions for using Export Controls with the AEB plug-in for SAP® and with Product Classification

Would you prefer for us to set this up for you in your Export Controls solution? We are happy to help. Just <u>contact AEB Services</u> to request a quote.

2 New Chinese Export Controls

- For all the latest information and a brief overview of what China has announced about its new export control regulations, please visit the special China page on the AEB website: https://www.aeb.com/intl-en/china-trade-compliance/regulation-law.php.
- The following overview of Chinese export control law is intended only as an example. At the time of writing (end of November 2020), it is not yet known which countries will be subject to embargo and what the precise export control list numbers will be.
 - Below, we describe how to reflect the provisions of the law in the software, assuming there will be a new export control list with special export control numbers similar to the dual-use numbers in the EU or US laws.

3 Step-by-Step Instructions for Export Controls

In this section, you'll learn how to define export control numbers as a goods attribute and goods list, and how to set up the licensing requirement for these goods when exported from China.

It's also possible to define embargoes or restrictions based on critical end-use.

Export Controls offers you extensible master data and a rulebase to define bans and restrictions for countries or jurisdictions for which AEB does not offer a data service.

Overview

How to define a new jurisdiction:

- First check the Requirements: see page 2
- 1. Defining new jurisdictions: see page 3
- 2. Defining new personalized goods lists: see page 4
- 3. Defining new goods attributes for export control numbers (Chinese export control number, etc.): see page 5
- 4. Defining manual restrictions for license requirements for exports from China (to define the rulebase for what is banned or subject to a license, and when): see page 5
- 5. Adding the Chinese jurisdiction to the compliance profile: see page 9
- 6. Testing the configuration in the quick check: see page 10

How-to videos

Guidance on defining new jurisdictions and manual restrictions (here for another jurisdiction, however) is also available in the following how-to videos:

- 1. How to find compliance master data: https://youtu.be/fKXxkyBLNc8
- 2. How to use master data for the quick check: https://youtu.be/CoTdw12VJv8
- 3. How to create manual restrictions: https://youtu.be/3L4mle2RHy0
- 4. How to manage licenses: https://youtu.be/DpZGkLgEpzA
- 5. How to approve transactions requiring a license: https://youtu.be/ye5nFL70qu0

3.2 Requirements

You'll need the right to edit the master data and compliance profiles in Export Controls.

This requires the roles EC master data maintenance (I_EC_DATA_ADMINISTRATION) and Compliance administrator (I_COMPLIANCEADMIN).

3.3 Defining new jurisdictions

- 1. Go to Master data Compliance Jurisdictions.
- 2. Click the New button.
- 3. On the Basic data sheet, fill in the ID and Name fields.
 - a) Click the globe icon to enter the name in both English and German.



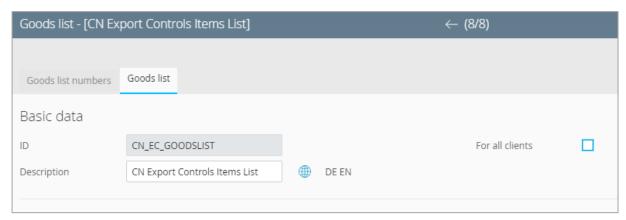
4. Click the Save and close button to save the jurisdiction. The new jurisdiction has now been defined.



You can change the name of the jurisdiction at any time, but once saved, the ID is write-protected and can no longer be changed.

3.4 Defining new personalized goods lists

- 1. Go to Master data Compliance Goods lists.
- 2. Click the New button.
- 3. On the Basic data sheet, fill in the ID and Name fields.



Click the globe icon to enter the name in both English and German.

It's helpful to define the goods list and the texts of the export control numbers from the list in both English and German, since the texts are always displayed in Export Controls in the language of the login, which is currently limited to English and German.

If you want to enter or use the goods list and export control numbers in Chinese, you'll need to define Chinese as an additional login language. This requires extended administrator rights and requires the assistance of an AEB project manager or AEB Support.

4. Now you can add the Chinese export control numbers as entries to the goods list.



- 5. The Goods list numbers menu option also lets you import the export control numbers from a CSV file.
- The format of the CSV file must have the following parameters:

 Number;Valid from;Valid to;Client-dependent;ID;Language;Description;;
 - 1A234;2020-09-01;2021-12-31;true;1A234;DE;Beschreibung von CN Exportkontroll-Gut;EN;description of CN export controls item;
- The parameters Language; Description; can be repeated for each of the languages configured in the master data (Master data For all clients Languages).

- When goods list numbers are used, as in a quick check, the description is displayed only in the current login language.
- 6. Click the Save and close button to save the goods list. The new goods list has now been defined.

3.5 Defining new goods attributes for export control numbers

- 1. Go to Master data Compliance Goods attributes.
- 2. Click the New button.
- 3. Enter the following data on the Basic data sheet:
 - a) Assign an ID (technical ID of goods attribute).
 - b) Click the globe icon to enter the Name in both English and German.
 - c) Under *Possible values*, select *Goods list*, and under *Goods list*, select the Chinese export controls goods list that you defined earlier.
- 4. Click the Save and close button to save the goods attribute. The new goods attribute has now been defined.



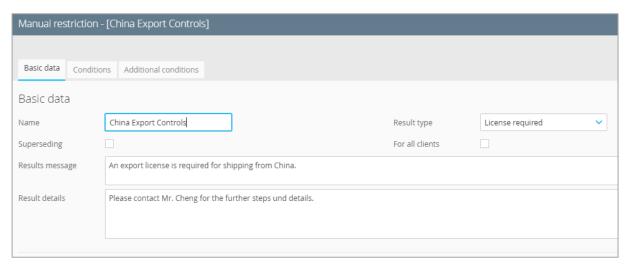
If you use the Export Controls Plug-In for SAP®, please note the additional steps in chapter 5.

3.6 Defining manual restrictions for license requirements for exports from China

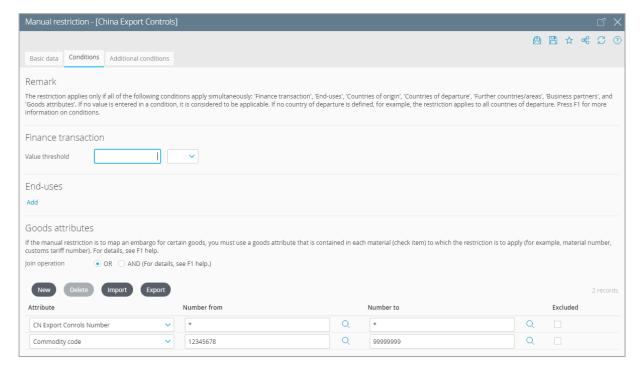
Now you can define screening rules for the new goods attribute.

- If you need to define certain export control numbers in more detail (for different results depending on the country of consignee, etc.), several manual restrictions may be required.
- 1. Select Export Controls Manual restrictions.
- 2. Click the New button.

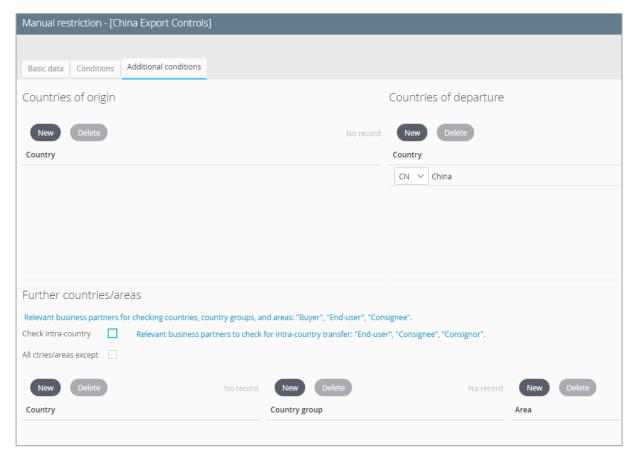
3. On the *Basic data* sheet, fill in the name, the results message, and the results details. For the result type, select *License required*.



- Please note that the Results message and Results details boxes do not support multiple languages. For this reason, use a language that will be understood by all the users who might see this text when running export control checks.
- 4. Switch to the Conditions sheet. Under Goods attributes, click New.
 - a) Select the newly defined Goods attribute.
 - b) If all goods/numbers of the Chinese goods list require a license for export from China, you can enter a wildcard (*) in the *Number from* and *Number to* fields.

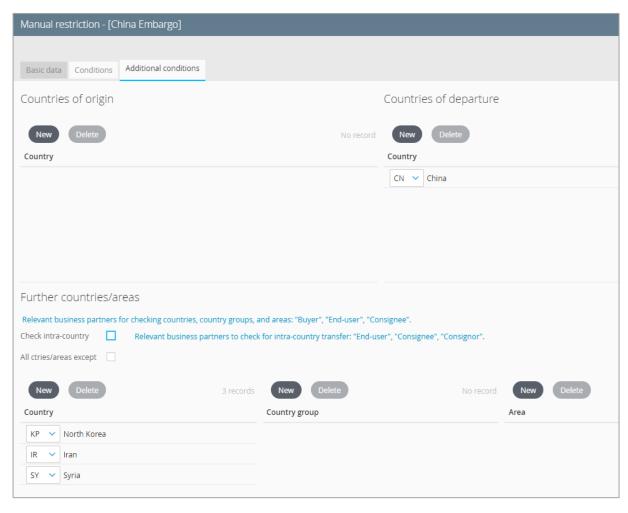


- 5. Switch to the Additional conditions sheet.
 - a) Under Countries of departure, click New and enter the ISO code CN.
 - b) Under Further countries/areas, uncheck the Check intra-country box.
 - c) Do not enter anything in the fields under Further countries/areas.



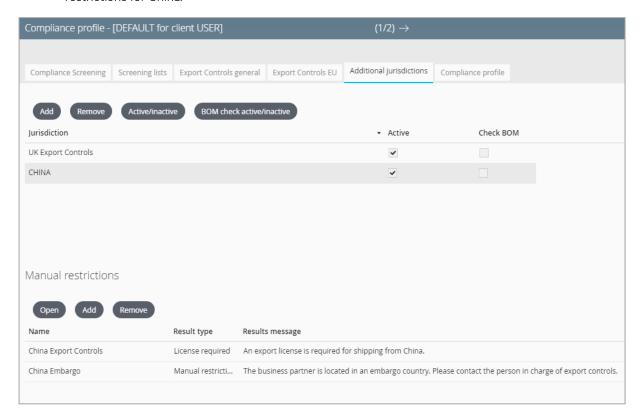
With this setting, all transactions that have a Chinese export control number and are exported from China are identified as requiring a license.

- 6. Click the Save and close button to save the manual restriction.
- To reflect embargo rules under Chinese law, we recommend defining another manual restriction. Begin by completing the *Basic data* sheet (see steps 1–3 above). For the result type, select *Manual restriction*. Next, switch to the *Additional conditions* sheet. Under *Countries of departure*, select China again, and under *Further countries/areas*, select the desired embargo countries.



3.7 Adding the Chinese jurisdiction to the compliance profile

- 1. Go to Administration Compliance Profiles, then open the relevant profile.
- 2. Switch to the Additional jurisdictions sheet.
 - a) Click the Add button, then select the newly defined China Export Controls jurisdiction.
 - b) Highlight the jurisdiction, and under *Manual restrictions* below, click *Add*. Apply the manual restrictions for China.



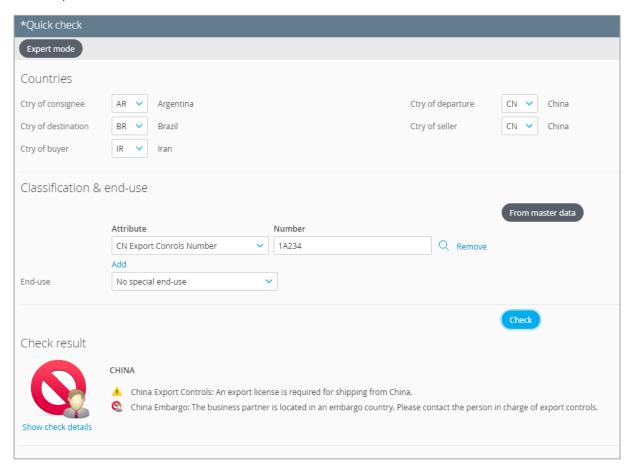
3. Click the Save and close button to save the profile. The new Chinese jurisdiction is now active.

3.8 Testing the configuration in the quick check

If you have defined the new jurisdiction step by step according to these instructions, the quick check should produce the following result.



The quick check draws on the profile marked as default. If you're not able to run this test with the profile that is set as the default, change from the *Quick check* to the *Check transaction*, where you can select the profile to be used for the check.



If you have integrated Export Controls into a host system, continue by running a function test from your host system.

4 Step-by-Step Instructions for License Management

In License Management you can set up and manage the licenses used in export control transactions. All licenses are checked for their applicability and can then, if found applicable, be used to approve critical transactions for release from export control. The approvals contain details about the license and delivery.

With the appropriate configuration, the application can generate automatic approvals based on individual licenses during export controls from a host system.

If you wish to add a license with a new license type, enter the license type first.

- Some license types are already maintained in *License Management*. The different license types make it possible to define licenses that vary by country and to control the set of all licenses of a particular type.
- The following overview of a Chinese license is only an example. At the time of writing (end of October 2020), it is not yet known what types of Chinese licenses will be issued, nor what their precise form will be.

4.1 Requirements

You'll need the right to edit the master data and compliance profiles in License Management.

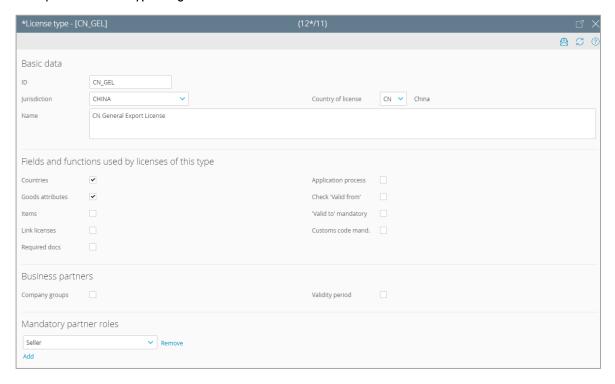
This requires the roles *LM master data maintenance* (I_LM_DATA_ADMINISTRATION) and *Compliance administrator* (I_COMPLIANCEADMIN).

4.2 Defining new license types

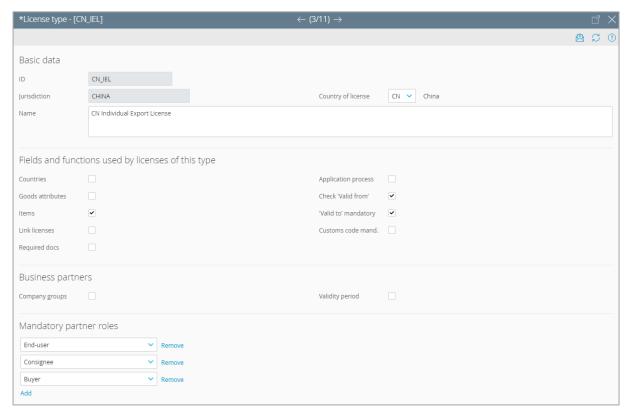
- 1. Select License Management License types.
- 2. Click the New button.
- 3. In the Basic data field group, enter the following data:
 - a) Assign an ID.
 - b) In the *Jurisdiction* field, select the jurisdiction for China that you defined earlier. Under *Country of license*, select the ISO code for China (CN).
 - c) Enter the name of the license type in the desired language.
 - Please note that the name field does not support multiple languages, so be sure to use the language most likely to be understood by all users.
- On the rest of the sheet, mark the appropriate checkboxes to define the fields and functions you wish to make available in licenses of this type.
 - Here you control how all licenses of this license type work.

- For information on the meaning and functionality of individual fields, options, and menu commands, press F1 to call up the online help.
- Examples of the field group Fields and functions used by licenses of this type:
 - a) Marking the *Items* box allows you to enter data on (license) items in the licenses. This is not a good idea for general licenses, for example.
 - b) Marking the 'Valid to' mandatory box makes the Valid to field a required field in the licenses.

Example of a license type for general licenses:



Example of a license type for individual licenses:



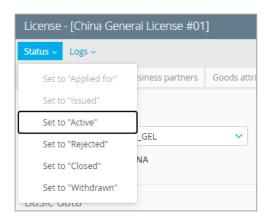
- The mandatory partner roles that you define in the license type determine which business partners you will later be required to enter in the specific license.
 - For this reason, be sure to define mandatory roles to match the partner types typically required in an order or in your individual licenses.
- 5. Click Save & close to close the window. The new license type has now been defined.
- As soon as you create one new license based on a license type, you can no longer modify or delete that license type.

4.3 Defining new licenses

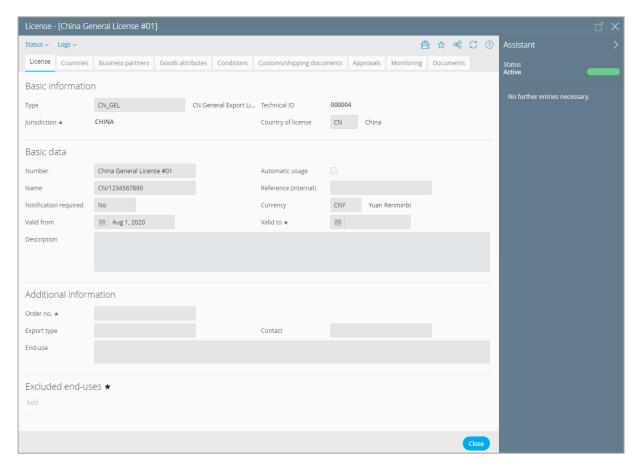
- 1. Go to License Management Licenses.
- 2. Click on the New button and select the license type that you defined earlier.
- 3. Complete the data of the various field groups and sheets. The Assistant will guide you.
- Fields that are used during the export control check to check the validity of licenses are marked with an asterisk.
- Under *Details*, please note the *Decrement type* field when entering items. It determines whether and on what basis (quantity, value, or both) the license is decremented when used.
- 4. Change the status of the entered license or activate it so that the license can be included in the applicability check in export control transactions:
 - a) To activate the license, perform the steps suggested by the Assistant.



- A license with the status of *Active* is write-protected and can only be modified if you first set the status to *Inactive*.
 - b) Changing a license to another status: Go to the Status menu and make a selection.



5. Click Save & close to save the license. The new license has now been defined.

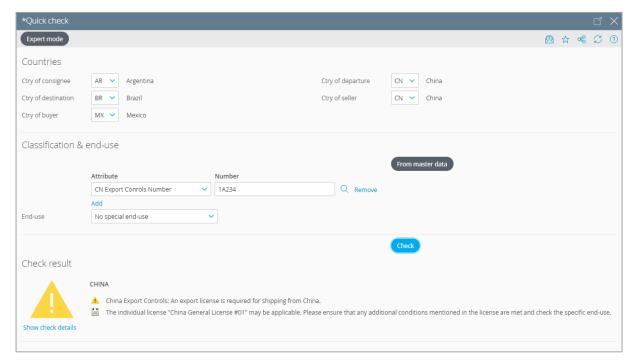


4.4 Testing the configuration in the Export Controls quick check

If you have defined the new license step by step according to these instructions, the quick check should produce the following result.

B

The quick check draws on the profile marked as default. If you're not able to run this test with the profile that is set as the default, change from the *Quick check* to the *Check transaction*, where you can select the profile to be used for the check.

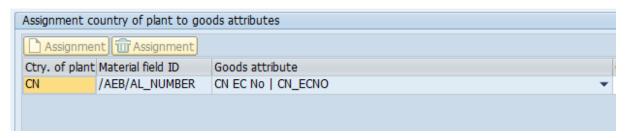


If you have integrated Export Controls into a host system, continue by running a function test from your host system.

5 Special Instructions for Export Controls Plug-In for SAP®

5.1 Defining the goods attribute for export control number in SAP ERP ECC 6.0

- 1. From the AEB Cockpit, open Customizing Export Controls check.
- 2. In the Assignment country of plant to goods attributes table, define which goods attribute in the material master is assigned to the Export control number field. The Export control number field is located on the Foreign trade export sheet under Export Controls for national jurisdiction.
- 3. Define the goods attribute you wish to assign to the export control number based on the country of plant CN and the material field ID /AEB/AL_NUMBER.



- The goods attributes available for assignment to a material field ID can be managed in Trade Compliance Management (see section 3.5 on page 5).
- Optional: In the *Goods attribute maintained* column, you can also define whether the goods attribute should have a flag available to indicate that it has been maintained. The value selected here should have been defined earlier in Trade Compliance Management as a goods attribute with the possible values of Yes or No.

5.2 Using a goods attribute from another source in export controls

As an alternative to the procedure described in section 5.1, you can also pass the Chinese export control number from another SAP field of your choice in export controls.

Click the link below for an overview of available Business Add-Ins and an example of how this is implemented:

https://sap-plugins.docs.developers.aeb.com/docs/change-data-of-export-controls-check

5.3 Maintaining goods attributes in Product Classification for use in export controls

If you are running AEB Product Classification version 4.0.1, you can maintain a classification for the Chinese export control number there. This classification is then automatically passed to the export control check by the AEB plug-in for SAP if the following values match:

- ID of the goods attribute in Trade Compliance Management
- Technical ID of classification value type in Product Classification

If the Chinese export control number in Product Classification is maintained explicitly for the country CN and not universally for all countries, the country of plant or sales organization of an SAP document must also match.

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