



Ceterus Consultants Ltd

www.ceterusltd.com / +(44) 7824772566 / jeffgunn@ceterusltd.com

UK Export Control Compliance Checklist

◆ 1. Item Determination

- ☐ Identify if your goods, software, or technology are listed on the **UK Strategic Export Control Lists** (Military, Dual-Use, WMD, Human Rights).
- ☐ Use the **Goods Checker Tool** or consult the **UK Control List** to determine classification.
- ☐ Confirm whether the item is subject to control based on its technical specifications and intended use.
- ☐ Document your determination process for audit and licensing purposes.

◆ 2. Destination Controls

- ☐ Check if the destination country is subject to **UK arms embargoes or trade sanctions**.
- ☐ Review additional restrictions under **UK autonomous sanctions regimes** (e.g. Russia, Belarus, Iran).
- ☐ Confirm if OGELs are valid for the intended destination.

◆ 3. End-Use & End-User Screening

- ☐ Screen all parties against the **UK Sanctions List** and **Consolidated List of Financial Sanctions Targets**.
 - ☐ Assess risk of diversion to prohibited end-uses (e.g. military, nuclear, surveillance).
 - ☐ Obtain and retain **End-User Undertakings (EUUs)** where required.
 - ☐ Flag red flags: vague end-use descriptions, unusual routing, or high-risk destinations.
-

◆ 4. Licensing

- ☐ Select the appropriate license type:
 - **Standard Individual Export Licence (SIEL)**
 - **Open General Export Licence (OGEL)**
 - **Open Individual Export Licence (OIEL)**
 - ☐ Apply via the **LITE system** and track application status.
 - ☐ Review license conditions, validity period, and usage limits.
 - ☐ Ensure license coverage matches destination, end-user, and item classification.
-

◆ 5. Internal Compliance Programme (ICP)

- ☐ Develop written procedures for classification, licensing, and recordkeeping.
 - ☐ Train staff on UK export control obligations and red flag awareness.
 - ☐ Maintain records of exports, licenses, and communications for **at least 4 years**.
 - ☐ Conduct regular internal audits and risk reviews.
-

◆ 6. Technology & Data Transfers

- ☐ Identify if software, encryption, or technical data is controlled under UK regulations.
 - ☐ Apply for licenses for **intangible transfers** (email, cloud, remote access).
 - ☐ Implement access controls for sensitive data shared cross-border.
-

◆ 7. Post-Export Monitoring

- ☐ Track shipments and confirm delivery to approved end-users.
- ☐ Monitor license usage and report any breaches to the ECJU.
- ☐ Update compliance documentation and review license renewals.