



FICCI

Export Control Compliance Manual 2018





FICCI
**Export Control Compliance Manual
2018**



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Foreword



Shortly after conducting its first nuclear test in 1972, India found itself bound by a range of multilateral sanctions and technology denials by the developed world. While these sanctions have since progressively been removed, some restrictions continue to impede India's access to licensed, dual-use products, technologies, and services.

It is, therefore, a matter of immense pride that the world has acknowledged India's discipline and commitment towards peaceful use of dual use technologies by bestowing membership to three of the four major Multilateral Export Control Regimes, i.e. Wassenaar Arrangement, Missile Technology Control Regime and the Australia Group. These developments have opened new opportunities for "*Made in India*" high technology items to be transferred across the world.

Today, countries world over are keen to engage in the licensed trade of high technology dual-use items, whether it is in Defence, Nuclear Energy, Software, Pharmaceuticals, or Bio-Chemical sector. It is now more important than ever for companies operating within India to be cognizant of responsibilities and obligations, create robust internal systems to play their part in stemming the illegal proliferation of technology into the hands of non-state actors.

The FICCI ***Export Control Compliance Manual 2018*** is an attempt to combine best practices in internal compliance policies and procedures to safeguard organisations from exporting unauthorized items and consequently damaging the reputation of their firms and of the country, in addition to facing export penalties. Efforts have been made to make this Export Compliance Manual accessible to all industry players, regardless of their size or sector.

Any company looking to enter these strategic sectors can benefit from the growing goodwill accrued to India must align themselves to the rules laid down by the Government of India under the guidelines for SCOMET items, for the export of dual-use commodities, software, and technology. Hence, Export Compliance is both a necessary and an enabling condition for the growth of Indian industries.



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Secretary General
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Introduction to Internal Compliance Program

The Indian Industry is looking towards the advent of new business opportunities heralded by the Sovereign's entry into new Global Multilateral Export Control Regimes.

Therefore, it is essential that the industry support, and also grow the needed industries for the activities required as industry participation is vital to international efforts that underline these regimes.

To such an end, implementation of an Internal Compliance Program (ICP) is the first step that needs to be undertaken. ICPs refer to the policies and procedures that an organisation undertakes to adopt, at all levels of an organisation, to adhere and comply with external regulatory requirements, in this specific case with Exports and Imports.

It may be said that the ICP guides an organisation in establishing and maintaining trade compliance, and further helps in planning and maximising international trade. It includes steps, in varying capacities, for not only finished products but also for Licenses, Software and Counter parties, as it is in these matters that most violations occur.

From a trade association perspective, it is not only important to ensure that individual companies implement and adhere, but a that standard process is followed. It is quite common in developed countries that ICP related material is not only used for new employees but also is updated on a regular basis.

Using this Export Compliance Manual

Chapter 1 to 3 show the model of ICP for Indian companies/organisations which is made by referring to CISTEC (Centre for Information on Security Trade Control)'s model ICP with the cooperation by CISTEC. However, it is essential that each company/organisation customise this model Export Compliance Manual based on their operations, businesses, products, etc. when they establish their own ICP.

Some articles have separate sections for **MSMEs**. A company's responsibility and duty towards compliance is independent of its size. However, we recognise that an MSME may not have the resources to have a separate Trade Control department. This distinction is made in the module where it is clarified that an MSME may have a trade control officer who may either shares responsibilities with other department and/or may be singularly responsible for all export compliance related processes within the firm.

What is an Internal Compliance Programme?

Internal Compliance Programme or 'ICP' is a technical term for measures taken internal to an organization's business practices, with the aim to ensure that activities related to exports of controlled, dual-use items and technologies, occur within the ambit of current multilateral and national export regulations.

"Internal compliance" means following the procedures and best practices laid down by an organization in its ICP. It is an internal mechanism comprising of best practices, guidelines, and policies to minimise risk of legal and international policy violations.

Moreover, as the onus of executing checks of the end use and end user in case of a global authorisation fall on the exporter, ICP is especially relevant for export of items on the SCOMET list. It serves to safeguard transactions against potential proliferation risks arising from the export of such items. The ICP includes the necessary checks on the intended end use and end user at the earliest stage of the transaction process to ensure that potential risks are detected in time and appropriate action can be taken.

This ICP will act as a facilitating document for all activities relating to the Company's export policy. It details the checks and inspections needed to ensure the legitimate end use of the goods exported by the company, and that no applicable regulations relating to the transaction are violated.

Adhering to compliance requirements is extremely important to protect the integrity of **[Name of company]**, its employees, and its customers.

Export violations impact all of the company's businesses, not just the specific transaction in question or the unit of the company where the violation occurred.



Compliance Commitment

Statement by senior executive such as the CEO, Director or management board that the company is cognizant of all.

1. Export control laws and regulations applicable to them
2. The commitments made by the Government of India when entering Trade Control Regime and states the company's commitment to comply with them.

Article 1 (Objectives)

This ICP provides appropriate measures of Export Controls aimed at maintaining international peace and security.

Article 2 (Scope of application)

This ICP applies to operations concerning exports, including indirect exports, of items in which [**enter the company name**] (hereinafter referred to as "the Company") conducts business.

If necessary, the subsidiary rules of this ICP should be stipulated.

Article 3 (Definition)

"**The laws/regulations**" refers to the applicable laws, regulations and orders regulating the trade of items from the aspect of maintaining international peace and security.

"**Export**" refers to exports, including indirect exports, of items and release of software or technologies to foreign nations.

"**Items**" refers to products, components, materials, technologies, and software.

"**Regulated items**" refers to the items regulated by the laws/regulations.

"**List control items**" refers to items on the control list of the laws/regulations.

"**Catch-all control**" refers to end use and end user control for preventing the proliferation of WMD and military use.

"**Military use**" shall mean incorporation into items listed in SCOMET Categories 5D and 6 or for the use, development or production of military items listed in those categories

"**Dual Use Items**" Dual-use items are goods, software, technology, and materials which can be used for both civilian and military applications.

"**SCOMET**" SCOMET is an acronym for Special Chemicals, Organisms, Materials, Equipment and Technologies. SCOMET list is regulated as per the Foreign Trade

(Development & Regulation) Amendment Act 2010, and in consonance with India's Foreign Trade Policy 2015-19 (updated periodically).

"**WMD**" refers to Weapons of mass destruction, i.e. nuclear weapons, chemical weapons, biological weapons, and missiles for their delivery.

"**Developments and others**" refers to development, production, use and storage.

"**STC**" refers to Strategic Trade Control, used with Export Control in this document.

"**ICP**" refers to Internal Compliance Program on Strategic Trade Control.

"**Relevant Authorities**" may include organizations approved or certified by the competent authorities for providing classification/identification services.

Article 4 (Basic policies)

The Company's basic policies on strategic trade control are as follows:

1. No acts in violation of the laws/regulations shall be carried out during export of the regulated items.
2. To ensure that appropriate trade control is carried out in compliance with the laws/regulations, responsible personnel shall be assigned to strategic trade control, overseeing enhancement and execution of the trade control system.

Article 5 (Chief STC officer)

In order to carry out the work related to strategic trade control properly and smoothly in accordance with the basic policies, a representative director or another individual of comparable stature in the company hierarchy shall be assigned as Chief Strategic Trade Control Officer (hereinafter referred to as "Chief STC officer").

[Case of MSME]

In order to carry out the work related to strategic trade control properly and smoothly, and in accordance with the requisite policies, a representative director shall be assigned as Chief Strategic Trade Control Officer (hereinafter referred to as "Chief STC officer").

Responsibilities of "Chief STC Officer"

The CSTCO is responsible for:

- a. Development and revision of the ICP.
- b. Development and revision of Operation procedures.
- c. Represent the Company in matters related to export regulations, registration, licensing, commodity classification, and disclosures.
- d. Classification/Identification, screening, and approval of business transactions.
- e. Staying conversant with changes to relevant regulations and with any directions or guidance issued by relevant authorities.
- f. Guidance to subsidiaries and affiliates.

Article 6 (Corporate STC Organization)

1. An administrative department for strategic trade control (i.e. "the STC Admin Dept.") shall be established, of which the Chief STC officer or the person appointed by Chief STC officer shall be the head.
2. Composition of "STC Admin Dept."
 - a. The Senior Company management, Department Head of Research, Department Head of Legal, and the Director of Export Compliance are the Company's Empowered Officials for export control matters.

- b. In this capacity, the Empowered Officials have the authority to represent the Company before the export control regulators in matters related to registration, licensing, commodity jurisdiction and classification requests, and voluntary or directed disclosures.
 - c. While certain subsidiary or implementation functions may be delegated (albeit with appropriate oversight), only Empowered Officials may sign paperwork and bind the company in any proceeding before any government agency with export control responsibilities.
3. The STC Admin Dept. shall be engaged in the following:
- a. Distribution of an organizational chart to all employees that illustrates internal structures and responsibilities for export control within the exporter.
 - b. Formulations and revisions of ICP on strategic trade control.
 - c. Formulations and revisions of the subsidiary rules.
 - d. Classification, and screening and approval of business transaction.
 - e. General management of strategic trade control throughout the Company and providing the relevant instructions, notifications, requirements and so on.
 - f. Audit
 - g. Training and education
 - h. Guidance and assistance to subsidiaries and affiliates.
 - i. Requests for reports to the chiefs of relevant departments, execution of investigation or orders of remedial actions.
4. A 'Roles and Responsibilities' matrix is included as Appendix 1

[Case of MSME]

The Chief STC Officer shall be engaged in the following: a. through h. above

Article 7 (Administration of the Business Divisions)

1. A person in charge of strategic trade control management shall be assigned as a strategic trade control officer (hereinafter referred to as "STC officer") to each business division appointed by Chief STC officer with advice of the STC Admin Dept. in order to observe this ICP and to appropriately implement the strategic trade control management and work.
2. The STC officer in the business division shall perform the following activities as to strategic trade control within the said business division in accordance with the directions of the STC Admin Dept.
 - a. Formulations and revisions of the operational procedures of the said business division.

- b. Ensuring the personnel of the said business division know and understand the instructions, notifications, requirements and so on from the STC Admin Dept.
- c. Implementation of the operational procedures for strategic trade control within the said business division.
- d. Training and education within the said business division.

[Case of MSME]

1. A person in charge of strategic trade control management shall be assigned as a strategic trade control manager (hereinafter referred to as "STC manager") to the relevant business divisions appointed by Chief STC officer in order to observe this ICP and to appropriately implement the strategic trade control management and work.
2. The STC manager in the business division shall perform the following activities as to strategic trade control within the said business division in accordance with the directions of the Chief STC officer: a. through d. above

Article 8 (Classification)

[Case of Manufacturing Companies]

1. If the items are covered under the SCOMET list, transaction of the items should also comply with the Foreign Trade Development and Regulation (FTDR) Amendment Act, 2010 / Appendix 3 of schedule 2 of ITC (HS)
2. In case of export of items, it shall be determined whether the items fall under the list of controlled items.
3. The STC Admin Dept. shall appoint both the department in charge of classifying items and the department in charge of examining the contents of the classification result and thereby making the final decision.
4. The classification shall be made as follows:
 - a. In case of export of the items that are designed and developed by the Company, [Enter the name of the department in charge of classification] shall obtain necessary information on technologies and classify whether the items concerned fall under the list of controlled items according to the latest laws/regulations.
 - b. In case of export of the items that are procured from other companies, **[Enter the name of the department in charge of classification]** shall receive documents for the classification results from the original supplier and properly classify as in the case of 1) of this Article.
 - c. For either of case 5. a. or 5. b. of this Article, [Enter the name of the department in charge of examining the classification] shall examine the contents of classification and thereby make the final decision.
 - d. Consultation with the relevant authorities shall be conducted when appropriate.

[Case of Trading/Sales Companies]

1. If the item is covered under SCOMET list, the transaction of the items should also comply with the Foreign Trade Development and Regulation (FTDR) Amendment Act, 2010/ Appendix 3 of schedule 2 of ITC (HS).
2. In case of export of items, it shall be determined whether the items fall under the list control items.

3. The classification shall be made as follows:
 - a. In case of export of the items that are procured from other companies, the sales department, etc. shall receive documents for the classification results from the supplier and properly classify as in the case of 1) above.
 - b. In all cases, the sales department, etc. shall submit the classification result to the STC Admin Dept. and the STC Admin Dept. shall examine the contents of classification and thereby making the final decision. If necessary, the consultation with the relevant authorities shall be conducted.

Article 9 (End use verification)

1. When there is an inquiry to the sales department concerning export, it is necessary to confirm the end use as follows:
 - a. Whether the items will be used for the development of WMD or suspected to be used for the above.
 - b. Whether the items will be used for any military use other than the development of WMD or suspected to be used for the above.
2. Ensure that any non-listed dual-use items for a destination subject to a binding Government of India or United Nations arms embargo, or any relevant regional arms embargo, are not intended for a "military end-use".
3. If the end use falls under any of the above-mentioned ones, contact STCOfficer in the business division and the STC Admin Dept. for strategic trade control for a decision on whether export license applications are required and on whether the transaction should proceed.
4. STC Admin. Dept. should consult with the domestic authorities, when any question arises concerning export control.

Article 10 (End user verification)

1. When there is an inquiry to the sales department concerning export, it is necessary to confirm the contracting recipient or end user as follows:
 - a. Any of the parties are listed on any of lists of parties of concern or other early warning systems published by governments.
 - b. Records concerning the possibility of engaging or past records of engaging in the development of WMD, or any relevant information.
2. If the end user falls under any of the above-mentioned ones, contact STCOfficer in the business division and the STC Admin Dept. for strategic trade control for a decision on whether export license applications are required and on whether the transaction should proceed.
3. STC Admin. Dept. should consult with the domestic authorities, when any question arises concerning export control.

Article 11 (Transaction screening)

1. When the inquiry concerning export falls under any of the following, the Sales department shall fill out the "Transaction Screening Sheet" and apply for an examination of transaction to the STC Admin Dept.
2. The final decision of whether to execute the said transaction shall be made by the **[Enter the title of the decision maker of transaction]** in the STC Admin Dept.
 - a. When the said items come under the list control items
 - b. When the inquiry corresponds to either 1. a. or 1. b. concerning the verification of end use in Article 9
 - c. When the inquiry corresponds to either 1. a. or 1. b. concerning the verification of end user in Article 10
 - d. When the inquiry corresponds to the diversion risk/Red Flag in Article 12
 - e. When the competent authority informs Company that the license application is required
 - f. When unclear whether the inquiry falls under "a." through "e." of this article.
3. The destination, name of the items, the results of the classification, the end use, end user and the route of transaction shall be entered in the Transaction Screening Sheet, and the necessary documents for examination shall be attached.
4. When entering the Transaction Screening Sheet, the contents of the transaction must be precisely entered in conformity with the facts.
5. Even in the case of a domestic transaction, when it is known the items will be exported at the time of the domestic transactions (i.e. indirect exports), the procedures shall be the same as 1) of this Article.
6. The Sales department shall not proceed in the said transaction without the approval of **[Enter the title of the decision maker of transaction]** in the STC Admin Dept.

Article 12 (Diversion risk/Red Flag screening)

1. When any of the factors caused by Red Flag check has been identified, and follow-up inquiries have not satisfactorily resolved the doubts, the sales department may not proceed with the transactions in question before contacting the STC Admin Dept.
2. Red Flags are situations that all company personnel should be mindful of as they may necessitate contacting the STC Admin Dept. for review. These include:
 - a. The product's capabilities do not fit the buyer's line of business, such as an order for sophisticated equipment for a small electronics repair shop/ restaurant.

- b. The item ordered is incompatible with the technical level of the country to which it is being shipped, such as semiconductor manufacturing equipment being shipped to a country that has no electronics industry.
- c. Written or verbal communication from a party referring to export-controlled technologies.
- d. Research in or export of any items that may be used directly or after modification for
 - i. Military applications
 - ii. Satellite / space related technology
 - iii. For creating 'WMDs' (nuclear, chemical, biological, missiles)
- e. Restrictions on publication rights, foreign nationals' participation, dissemination of research results through any written or verbal communications or agreement with a sponsor or collaborator
- f. Party being opaque or unclear about the items 'End User' or 'End Use'.
- g. Receipt of unsolicited communication from any person or entity requesting assistance with modifying existing technology or software or requesting training/guidance in modifying technology or software for a potential military purpose.
- h. Sharing of encryption Source Code by any means.
- i. Party belongs to an embargoed/sanctioned country
- j. The customer has little or no business background.
- k. The customer is willing to pay cash for a very expensive item when the terms of sale would normally call for financing.
- l. The customer is unfamiliar with the product's performance characteristics but still wants the product.
- m. Routine installation, training, or maintenance services are declined by the customer.
- n. Delivery dates are vague, or deliveries are planned for out of the way destinations.
- o. A freight forwarding firm is listed as the product's final destination.
- p. The shipping route is abnormal for the product and destination.
- q. Packaging is inconsistent with the stated method of shipment or destination.
- r. When questioned, the buyer is evasive and especially unclear about whether the purchased product is for domestic use, for export, or for re-export.

3. Company personnel are encouraged to contact the STC Admin Dept. at any point of discrepancy in the understanding of export compliance and not only in the situations outlined in sections a. through g. above.

Article 13 (Applying for an Export License)

1. After being approved by the transaction screening given in Article 11 of this ICP, for those export which require an export license from the competent authority based on the laws/regulations, the Sales department shall apply for a license to the competent authority with the designated application form and attached documents.
2. For export which requires an export license based on the laws/regulations, the Sales department cannot make the said export unless the export license from the competent authority is acquired.

Article 14 (Shipment control)

1. Sales Dept. must ensure Classification/Identification and Transaction Screening procedures are complete prior to shipment.
2. **[Enter the name of the department in charge of providing commodities, software and technologies]** shall confirm that the classification given in Article 8 and the procedures of the transaction screening as given in Article 11 are performed and that the items to be shipped are identical to the description given.
3. For item requiring any export license based on the laws/regulations, the Sales department shall confirm that the export license from the competent authority has been acquired.
4. When the Sales department cannot confirm the above 1) of this Article by the shipment, the shipment shall be immediately cancelled, and consultation shall be made to the STC Admin Dept. for appropriate measures.
5. The Sales department shall immediately cancel the export procedures of commodities in case of an accident during customs clearance and report to the STC Admin Dept. The STC Admin Dept. shall take appropriate measures in consultation with the Sales department.
6. **[Enter the name of the department in charge of providing software and technologies]** department shall not provide any software and technologies unless verification is completed for the above 1) of this Article and a report must be made to the STC Admin Dept.

Article 15 (Audit)

1. The STC Admin Dept. shall conduct a periodic audit, with the time between each audit not exceeding a period of one year, to confirm that the strategic trade control within the Company is implemented appropriately based on this ICP.

2. It is recommended that the audit is carried out by a unit separated from sales or by an independent specialist, as the structure, size and other circumstances of the exporter permit.

Article 16 (Training and Education)

1. The STC Admin Dept. shall train every employee and notify them on the following
 - a. The export of certain products of the company are regulated by law and must be handled differently from other items.
 - b. The STC dept should be consulted if anyone has a concern about any item being controlled or any customer/query being suspicious.
2. The STC Admin Dept. shall carry out systematic training and education for officers and employees of relevant departments to:
 - a. Ensure that they are made aware of all relevant domestic export control laws, regulations, policies and control lists and all amendments to them as soon as they are made public.
 - b. Enable them to understand the significance and the requirements for the compliance with the laws/regulations as well as this ICP and thereby surely implement the articles described in the same.
3. Training and continued education should be carried out for employees at all levels, especially new staff, persons who work in sales, export related units, or are involved in technology transfer.
4. Provision of at desk training using electronic media, such as the internet and CD / DVDs, may be useful to supplement and reinforce formal training sessions.

Article 17 (Record Keeping)

1. All relevant staff must be cognizant of the practices and procedures for archiving export-related documents.
2. Archived records should made traceable.
3. Export-related documents may include export licences, end-use assurances, commercial invoices, clearance documents, product classification/identification sheets, communication with customer and shipper (email, fax, and summaries of phone conversations) and records of electronic transfers.
4. Documents and recording medium concerning export of regulated items shall be stored for at least **five** years from the date on which the items are shipped.
5. If controlled items are exported under exemption, records of how the transaction was assessed to be exempted (and by whom) must be kept even beyond the retention period. This would include the assessment by the STC Dept and/or written communication with a relevant government agency.

Article 18 (Guidance to subsidiaries and affiliates)

The STC Admin Dept. shall give instructions conforming to the actual situation to the subsidiaries and affiliates that handle export of regulated items.

Article 19 (Reports)

1. When the officers or employees are aware of the fact of any violation or any possibility of violation of the laws/regulations or this ICP, the officers or employees must make a prompt report to the STC Admin Dept. to that effect.
2. The STC Admin Dept. shall investigate the contents of the report submitted according to the above 1).
3. When any violation should be confirmed, the STC Admin Dept. shall report to Chief STC officer, and the Chief STC officer shall give instructions for the necessary measures to the relevant departments within the Company.
4. Chief STC officer must make a report to the competent authority without delay.
5. The Chief STC officer also shall take corrective measures to prevent future violations.
6. Mechanism for protecting the identity of whistle-blower by allowing for anonymous submission of information of violations should be implemented..

Article 20 (Penalty)

1. Persons who have intentionally or by gross negligence violated this ICP or/and the laws/regulations shall be subject to a penalty according to the company rules/regulations, separate from the penalty imposed by the Government of India.
2. The Company and its STC Dept will assist Government India agencies investigating the export control violations.
3. The Company will inform all employees that violation of the export control laws can result in both civil and criminal penalties, including fines and imprisonment. These may be applied to both - individual employess as well as the company management. In addition, in cases of deliberate violations, the company's IEC number/registration may be cancelled, or its export privileges terminated or suspended for a period until adequate remedial action is taken, and acknowledged by the competing Government Authority.

Appendix 1: Role & Responsibility

	Classification of Items	Identifying Issues	Guidance and Advisory	Identification of controlled item as per SCOMET	Identification of applicable regulations	Applying for licences from DAE, DGFT, DDP	Training of personnel	Maintaining Records	Point of contact with Govt. officials	Ensuring availability of resources	Security
Senior Management										✓	
Empowered Officials						✓				✓	
Chief STC Officer	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
STC Admin. Dept.	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
Research and Development		✓		✓			✓	✓			
Sales Dept.		✓			✓		✓	✓			
Finance Dept.		✓						✓			
Legal Dept.		✓	✓		✓						
Other		✓									



About FICCI

Established 90 years ago, FICCI is the largest and oldest apex business organization in India. Its history is closely interwoven with India's struggle for independence, its industrialization, and its emergence as one of the most rapidly growing global economies.

A non-government, not-for-profit organization, FICCI is the voice of India's business and industry. From influencing policy to encouraging debate, engaging with policy makers and civil society, FICCI articulates the views and concerns of industry, reaching out to over 2,50,000 companies. FICCI serves its members from large (domestic and global companies) and MSME sectors as well as the public sector, drawing its strength from diverse regional chambers of commerce and industry.

The Chamber with its presence in 14 states and 10 countries provides a platform for networking and consensus-building within and across sectors and is the first port of call for Indian industry, policy makers and the international business community.

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