

# 302: Implementing a Global Trade Compliance Program

April 20, 2020

Kevin Riddell, CCLP, CCEP



Construction  
Products Group

1

## Agenda

- Introduction
- What do I mean by "trade compliance"?
- 4 key elements:
  - Structure
  - Training
  - System
  - Auditing
- Regional concerns
  - Extraterritorial application of national law
  - Language
  - Culture
  - Regulatory
- Impact of global quarantines
- Questions?

2



# Introduction

3

Speaker bio



## Kevin Riddell

Director, Trade & Regulatory Compliance Tremco / CGP Group  
25 years at Tremco  
Canadian

4



## About the Construction Products Group



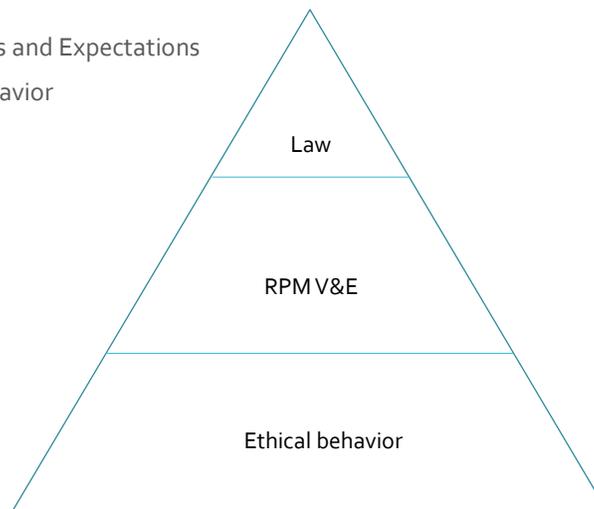
Tremco is leading the integration of other RPM products companies into the Construction Products Group\*

\*<https://www.rpminc.com/leading-brands/construction-products-brands/>

7

## Key concepts

- Company policy and procedures
- RPM Values and Expectations
- Ethical behavior



8



Legal requirements

- We must obey all applicable legal and regulatory requirements
- This standard applies to all: our partners, our customers, our competitors (level playing field)

9



RPM V&E

- RPM V&E sets a higher standard than the legal minimum
- This is a competitive advantage for us due to:
  - Lack of consequences
  - Reputation
  - Customer trust

**INTEGRITY:** Be open and honest. Accurately and openly disclose information in business transactions. Deception and retaliation have no place at RPM and will not be tolerated.

**COMMITMENT:** Follow the law, our policies and procedures. Safeguard our companies' property, assets and interests, and ensure our focus is on the collective goals of shareholders, employees, customers, consumers and communities.

**RESPONSIBLE ENTREPRENEURSHIP:** Search for innovative ways to compete and win in the markets we serve. Compete vigorously, but always do so fairly and in adherence to free enterprise and competition standards, environmental and human rights principles, and with respect for our suppliers, customers, competitors and the communities in which we operate.

**MORAL COURAGE:** Do the right thing, even when it is tough, and regardless of whether someone is watching or if you will receive credit.

10

## Ethical behavior

- An ethical corporate culture will always err on the side of compliance
- Do what is right
- If it doesn't feel right, stop
- When in doubt, seek advice
- If we act ethically we will comply (think of pyramid)

11

## Example of legal, unethical behavior



- From: <https://www.cbc.ca/news/world/philippines-recalls-envoys-canada-trash-1.5138105>

12



# What do I mean by “trade compliance”?

13



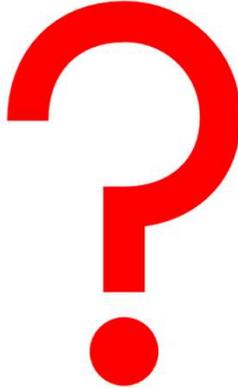
## “Trade compliance”

- Some industry definitions:
- “Trade compliance is the process by which goods enter the (name country here) in conformance with all laws and regulations”
- “trade compliance = export control compliance”
- “importers and exporters have a responsibility to self regulate and to ensure they are compliant with the international trade laws”
- “the process by which goods move from one country to another in compliance with the laws and regulations of both countries”

14

“Trade compliance”

- Clearly “trade compliance” can mean different things to different people



15

“Trade compliance”

- What I do mean (for the purposes of this talk):
  - Import customs
  - Export customs
  - Import/Export of controlled goods
  - Sanctions
  - Other international or domestic trade compliance tied to national security or safety
  - Preferential trade agreements
- For the countries involved in any transaction, *and any other country that applies extraterritorial jurisdiction against that transaction*

16

## “Trade compliance”

- What I don't mean (for the purposes of this talk):
  - Corruption and bribery
  - Incoterms and risk of loss/liability
  - Broad supply chain concerns such as forced labor, conflict minerals, packaging waste etc....

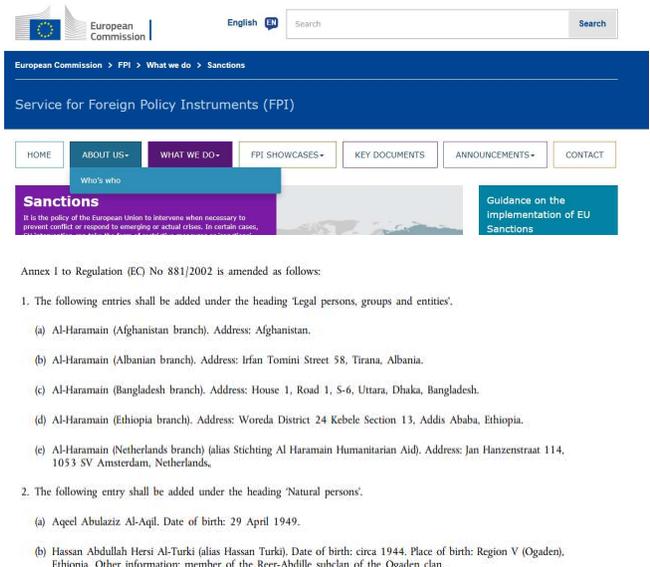
17

## “Trade compliance”

- Some things that often get overlooked:
  - Labelling (language, health and safety)
  - Marking of origin
  - Domestic sanctioned parties
  - End use or user concerns on otherwise uncontrolled products

18

Domestic  
sanction  
example



European Commission > FPI > What we do > Sanctions

Service for Foreign Policy Instruments (FPI)

HOME ABOUT US- WHAT WE DO- FPI SHOWCASES- KEY DOCUMENTS ANNOUNCEMENTS- CONTACT

Who's who

**Sanctions**  
It is the policy of the European Union to intervene when necessary to prevent conflict or respond to emergencies or actual crises, in certain cases.

Guidance on the implementation of EU Sanctions

Annex I to Regulation (EC) No 881/2002 is amended as follows:

1. The following entries shall be added under the heading 'Legal persons, groups and entities'.

- (a) Al-Haramain (Afghanistan branch). Address: Afghanistan.
- (b) Al-Haramain (Albanian branch). Address: Irfan Tomini Street 58, Tirana, Albania.
- (c) Al-Haramain (Bangladesh branch). Address: House 1, Road 1, S-6, Uttara, Dhaka, Bangladesh.
- (d) Al-Haramain (Ethiopia branch). Address: Woreda District 24 Kebele Section 13, Addis Ababa, Ethiopia.
- (e) Al-Haramain (Netherlands branch) (alias Stichting Al Haramain Humanitarian Aid). Address: Jan Hanzenstraat 114, 1053 SV Amsterdam, Netherlands.

2. The following entry shall be added under the heading 'Natural persons'.

- (a) Aqeel Abulaziz Al-Aqil. Date of birth: 29 April 1949.
- (b) Hassan Abdullah Hersi Al-Turki (alias Hassan Turki). Date of birth: circa 1944. Place of birth: Region V (Ogaden), Ethiopia. Other information: member of the Reer-Abdille subclan of the Ogaden clan.

19

End user  
example



U.S. Department of Justice

**Ronald C. Machen Jr.**  
*United States Attorney for the District of Columbia*

Judiciary Center  
555 Fourth St. N.W.  
Washington, D.C. 20530

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**PRESS RELEASE**

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**FOR IMMEDIATE RELEASE**  
Friday, July 8, 2011

**For Information Contact:**  
**Public Affairs**  
(202) 252-6933  
<http://www.justice.gov/iso/dco/news/2011/apr/news.html>

**Former Managing Director of [REDACTED] (Shanghai) Co., Ltd.,  
Charged with Illegally Exporting High-Performance Coatings  
To Nuclear Reactor in Pakistan**

• [https://isis-online.org/uploads/isis-reports/documents/Press\\_release.pdf](https://isis-online.org/uploads/isis-reports/documents/Press_release.pdf)

20



# 4 key elements of a trade compliance program:

- Structure
- Training
- System
- Auditing

21

First a quick note

- Various governments and agencies have drafted guidance for compliance programs generally, and trade compliance specifically
- Ensure you study those applicable to you, and integrate those suggestions
- My advice is in addition to any “best practices” or government guidance



U.S. Department of Justice  
Criminal Division

Evaluation of Corporate Compliance Programs



DEPARTMENT OF THE TREASURY  
WASHINGTON, D.C. 20220

**A Framework for OFAC Compliance Commitments**

The U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) administers and enforces U.S. economic and trade sanctions programs against targeted foreign governments, individuals, groups, and entities in accordance with national security and foreign policy goals and objectives.

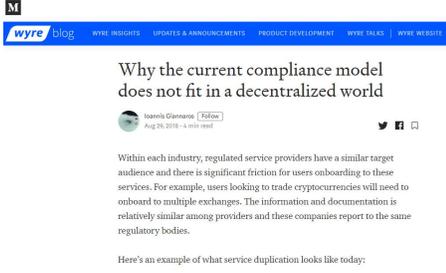


**Internal Compliance Programme**  
Guidelines for compiling an Internal Compliance Programme for Strategic Goods, Torture Goods, Technology and Sanctions

22

Structure

- Centralized vs. regional/local
- Up for debate?



**Why the current compliance model does not fit in a decentralized world**

Isabella Giannone Follow  
Aug 29, 2018 · 4 min read

Within each industry, regulated service providers have a similar target audience and there is significant friction for users onboarding to these services. For example, users looking to trade cryptocurrencies will need to onboard to multiple exchanges. The information and documentation is relatively similar among providers and these companies report to the same regulatory bodies.

Here's an example of what service duplication looks like today:



**Managing Trade Compliance Data across the Supply Chain Utilizing a Centralized Platform**

<https://blog.sendwyre.com/why-the-current-compliance-model-does-not-fit-in-a-decentralized-world-e8cacboof120>

<http://www.integrationpoint.com/documents/ManagingTradeComplianceData.pdf>

23

Structure

- Centralized vs. regional/local
- Recommend to centralize:
  - Sanctions enforcement and screening
  - Training
  - Auditing
  - Classification
  - Control of system
- Recommend to decentralize:
  - Customs declarations and facilitation
  - License and permit applications
  - Limited decision making (within an escalation plan)
  - Use of system

24

## Structure

- Compliance vs operations:
- Often trade compliance staff come from a role where they processed customs paperwork
- Is there a clear separation between trade compliance and customs facilitation?
- i.e.:
  - Logistics staff add HTS classifications to commercial invoice
  - Trade compliance audit their use of HTS classifications for accuracy and offer training

25

## Structure

- Other questions to consider:
- # of resources needed (both in operations and compliance) – advocate for adequate resources!
- Where should those resources sit? (Logistics? Customer service?)
- What's the escalation process if the operator is unsure or thinks there's a problem (we don't want the hotline used for minor errors in customs documents)

26

## Structure



"It really doesn't much matter where the trade compliance team is placed in the organization as long as it can effectively oversee and control the importing and exporting activities of the company."

• <https://www.shippingsolutions.com/blog/the-compliant-organization-where-does-international-trade-compliance-belong>

27

## Training

- Are the employees touching trade compliance adequately trained?
- Do they know what is required, right and wrong?
- Do they know who to contact for advice?
- My "ethical behaviour" model fails if people don't honestly know something is wrong

28

Training

- There are many good “canned” training programs, but...
- But nothing beats in house developed training that focuses on your:
  - Industry
  - Product mix
  - Geographic location
  - Culture
  - Etc....
  - Risk appetite



CPG Relevant Examples

- 3208-3210 and 3214:
  - “mastics”
  - “surfacing preparations”
  - “paints”
- 2715 vs 3214
- Adhesives
- “Synthetic rubber” vs. silicone
- “Polyurethane”
- Plastic tapes 3919-3921
- Multi-component items and kits

29

System

- Doesn't only mean a “software” or computer system, though it can (and in many cases should)
- Some compliance requires automation
- Also refers to the processes and tools given to those close to the action to research and investigate

30

System



- NAFTA example:
- \$4,000,000+ annual avoidance of duty through NAFTA
- We have:
  - 10 separate legal entities
  - Dozens of manufacturing locations
  - 10,000+ inventory SKUs
- Over a million product/plant/company combinations that each need to be checked against NAFTA rules of origin
- Auditing products manually requires unavailable resources

31

System

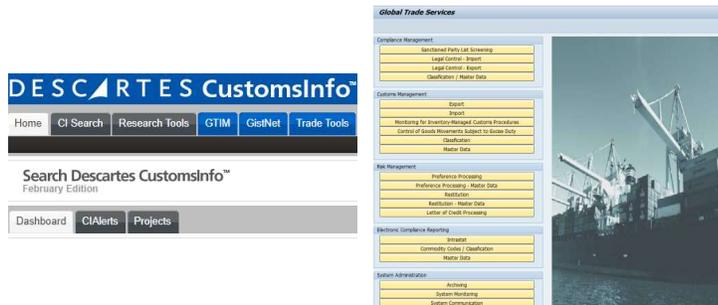


- Sanctioned party screening example:
  - Over a million business partners in ERP system
  - Thousands of global orders daily
- Impossible to check all of these against government sanctioned and restricted party lists manually

32

## System

- We use SAP Global Trade Services as our core trade compliance tool
- Augmented with several on demand research tools through Descartes
- There are lots of other automation solutions available



33

## Auditing

- Trade compliance must be audited internally
- Balance central compliance auditing with local auditing
- Advantage to local auditing:
  - Generally more resources available
  - Close to the action (physically present) and time zones
  - Customs administrations will want to speak to them (they may not recognize a central department from a foreign nation)
- Advantage to central auditing:
  - Ensures consistency across organization
  - Generally more experienced/trained in the issues
  - Second set of eyes

34

## Auditing

- Returning to the system discussion:
- A common system across regions will facilitate central auditing by increasing visibility

35

## Regional concerns:



Extraterritorial application of  
national law  
Language  
Culture  
Regulatory differences

36

## Extraterritoriality

- Understand which countries have jurisdiction
- Certainly:
  - Exporter
  - Importer
- Possibly:
  - Country where bank is located?
  - Country of transshipment?
  - Nationality of participants to transaction?
- Ownership concerns? ALWAYS consider the USA especially

37

## USA Extraterritoriality

- EAR (Export Administration Regulations) definition
- OFAC (Office of Foreign Asset Control) definition of "US Person"
- ITAR

38

USA  
Extraterritoriality



• “Subject to the EAR”

*(b) [Reserved]*

**§ 734.3 ITEMS SUBJECT TO THE EAR**

*(a)* Except for items excluded in paragraph (b) of this section, the following items are subject to the EAR:

**(1)** All items in the United States, including in a U.S. Foreign Trade Zone or moving intransit through the United States from one foreign country to another;

**(2)** All U.S. origin items wherever located;

**(3)** Foreign-made commodities that incorporate controlled U.S.-origin commodities, foreign-made commodities that are “bundled” with controlled U.S.-origin software, foreign-made software that is commingled with controlled U.S.-origin software, and foreign-made technology that is commingled with controlled U.S.-origin technology:

*(i)* In any quantity, as described in § 734.4(a) of this part; or

*(ii)* In quantities exceeding the *de minimis* levels, as described in §§ 734.4(c) or 734.4(d) of

**(4)** Certain foreign-made direct products of U.S. origin technology or software, as described in §736.2(b)(3) of the EAR. The term “direct product” means the immediate product (including processes and services) produced directly by the use of technology or software; and

*NOTE to paragraph (a)(4):* Certain foreign-manufactured items developed or produced from U.S.-origin encryption items exported pursuant to License Exception ENC are subject to the EAR. See § 740.17(a) of the EAR.

**(5)** Certain commodities produced by any plant or major component of a plant located outside the United States that is a direct product of U.S.-origin technology or software, as described in §736.2(b)(3) of the EAR.

39

USA  
Extraterritoriality



• OFAC definition of “US Person”

• Varies slightly by specific sanction, but here is good example:

Title 31: Money and Finance: Treasury  
PART 535—IRANIAN ASSETS CONTROL REGULATIONS  
Subpart C—General Definitions

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**§535.329 Person subject to the jurisdiction of the United States.**

The term *person subject to the jurisdiction of the United States* includes:

**(a)** Any person wheresoever located who is a citizen or resident of the United States;

**(b)** Any person actually within the United States;

**(c)** Any corporation organized under the laws of the United States or of any state, territory, possession, or district of the United States; and

**(d)** Any partnership, association, corporation, or other organization wheresoever organized or doing business which is owned or controlled by persons specified in paragraph (a), (b), or (c) of this section.

40

USA  
Extraterritoriality

41

USA  
Extraterritoriality

Details:					
Type:	Entity	Entity Name:	ENERGY ENGINEERS PROCUREMENT AND CONSTRUCTION	List:	SDN
				Program:	SDGT
				Remarks:	(Linked To: BAZZI, Mohammad Ibrahim)
Identifications:					
Type	ID#	Country	Issue Date	Expire Date	
Website	www.globaltradinggroup.com				
Additional Sanctions Information -	Subject to Secondary Sanctions Pursuant to the Hizballah Financial Sanctions Regulations				
D-U-N-S Number	37-117-1419				
Aliases:					
Type	Category	Name			
a.k.a.	strong	GLOBAL TRADING GROUP			
a.k.a.	strong	GLOBAL TRADING GROUP NV			
a.k.a.	weak	EEPC			
Addresses:					
Address	City	State/Province	Postal Code	Country	
Frankrijklei 39 2nd Floor	Antwerpen		2000	Belgium	
22 Liverpool Street Standard Chartered Bank Building, 2nd floor	Freetown			Sierra Leone	
Kaliraba Ave Rue de Canal G83 Zone 4G	Banjul			The Gambia	
01BP1280 Quartier les Cocotiers Avenue Pape Jean Paul II Lot 4274	Abidjan			Cote d'Ivoire	
Frankrijklei 156 (5th floor)	Cotonou			Benin	
	Antwerpen		2000	Belgium	

42

Extraterritoriality

• Is it just the USA?

**Government of Canada** / **Gouvernement du Canada**

Jobs | Immigration | Travel

Home → Business and industry → International trade and invest

Brokering Controls

Movement of controlled goods or technology between two countries, neither of which are Canada?  
(Excludes: Transfer of goods between affiliates of a corporation abroad so long as these items are not listed in Group 9)

**Yes** → Refer to export permit process

**No** → The movement is directed by any of the following:  
(a) a Canadian citizen,  
(b) a permanent resident of Canada,  
(c) a Canadian organization.  
(Excludes: Canadians abroad being directed by their non-Canadian employer, so long as they are not brokering Group 9 items)

**Yes** → Individual or organization is responsible for arranging and negotiating the terms and conditions for the movement of items on the Brokering Control List?

**No** → Not regulated by Canadian Brokering Controls

**Yes** → Destination is pre-defined, low-risk, country (list available here)

**Yes** → Apply for an **Individual Brokering Permit**

**No** → Notify intent of use of General Brokering Permit No. 1 and report against any brokering transactions, or lack thereof

43

Extraterritoriality

• Is it just the USA?

mondaq

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CONTRIBUTOR

WILMERHALE

WILMER CUTLER PICKERING HALE AND DORN LLP

ARTICLE

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China: China Publishes Draft Export Control Law

17 January 2020

by Lester Ross, Kenneth Zhou and Tingting Liu

WilmerHale

0 Liked this Article

- "Re-export" would no longer be a defined term and appears only in the supplementary provisions of the Draft ECL, but nonetheless would remain subject to the ECL. **This coverage would be similar to the US regime** and would likely expand China's extraterritorial reach and subject an overseas company to China's export control licensing requirement when it re-exports Chinese-origin controlled items or foreign-made items that contain Chinese-origin controlled items to a country or region outside China.

<https://www.mondaq.com/china/export-controls-trade-investment-sanctions/884486/china-publishes-draft-export-control-law>

44

## Language

- If you are giving training in a country where the official language is not one you speak, prepare ahead of time: ask an employee who is bilingual to translate (or bring a translator if needed)
- Ensure your policies and training materials are available in every official language of the countries you do business in
- Though many people also speak English, it's a mistake to assume they all do, and also people may react negatively



### The Values and Expectations of 168

- Worldwide Code of Conduct PDF Download (English - 5.2 mb)
- RPM International Home

The most current revision of RPM's Values & Expectations of 168 (RPM's Code of Conduct) was approved by RPM's Board of Directors on July 17, 2018. It is now being translated from English into multiple languages to reasonably assure its accessibility to RPM employees, its third parties and other stakeholders. The translations will be posted below as they become available.

#### Worldwide Code of Conduct Translations:

Arabic	Finch	Korean	Slovenian
Bulgarian	French	Malay	Serbian
Canadian French	German	Norwegian	Spanish
Chinese	Hindi	Polish	Swedish
Czech	Hungarian	Portuguese	Thai
Danish	Italian	Romanian	Turkish
Dutch	Japanese	Russian	Vietnamese

• <https://www.rpminc.com/about-rpm/worldwide-code-guidelines/>

45

## Language

- Also ensure your systems can be used in the user's native language (if possible)

Product: 123

Basic Data Commercial Description Classification

Number

Classification Period 01/01/2020 - 01/01/4000

Number 2517410000

Validity Period 01/01/1996 - 01/01/4000

A Official Description korrels, scherven, splinters en poeder van de steensoorten bedoeld bij de posten 2515 en 2516, ook indien zij een

Supplementary Units None

Remarks on Classification Decision: Maximum of 250 Characters

Attachments to Classification

File Name Created By Created On Level of Attachment

Technical Information

Legal Regulation CUSITL Customs Processing - Netherlands - Dutch

Number Scheme EU\_TARIC Integrated Tariff of the European Community (EU TARIC) - NL

Country-Dependent Nee Czezy (X) Nederland

46

## Culture

- Trigger words or negative connotations
- Political views
- Sensitivity to national sovereignty
  
- Remember: our goal is to have engaged employees who don't just "follow the rules" but believe in them. That may require a different approach at times

47

## Culture (trigger words)

- Trigger words or names: these statements could be inflammatory in certain regions
  
- "You have to make sure you aren't doing business with terrorists or bad actors in this region"
- "You can't do business with Iran or Iranians"
- "There are lots of narcotics organizations in Colombia and you must screen for them"
- Plain old "You" (vs. "We")

48

## Culture (trigger words)

- “We have a legal obligation to comply with the United Nations sanctions, along with any unilateral ones in the countries where we operate”
- Focus on our obligation, but...
- If the question of “why” comes up, be prepared to give an answer
- (Don’t say “Why is Cuba sanctioned? Just because – that’s why”)
- Have some examples that hit home, if possible

49

## Culture (trigger words)

- Example I have used in the past

By BOB ORR | CBS NEWS | October 25, 2011, 7:48 PM

### U.S. manufacturers' parts found in Iraq IEDs

f Share / Tweet / Reddit / Flipboard / Email



GENERIC, iraq, explosion, bomb, blast, flag / AP GRAPHICS

50

## Culture (political views)

- Be prepared that some employees may disagree with a rule for political reasons
- Example: disagreement whether Cuba should be sanctioned, or if Israel should be boycotted
- Remember: they may have a right to disagree publicly!

51

## Culture (political views)

Pew Research Center *Global Attitudes & Trends*

SEARCH

HOME U.S. POLITICS MEDIA & NEWS SOCIAL TRENDS RELIGION INTERNET & TECH SCIENCE HISPANICS GLOBAL METHODS

PUBLICATIONS TOPICS DATASETS QUESTION SEARCH GLOBAL INDICATORS METHODS EXPERTS

MAY 16, 2012

A Global “No” To a Nuclear-Armed Iran  
*Divisions on Sanctions and Use of Force*  
**Survey Report**

REPORT MATERIALS

Complete Report PDF

Table of Contents

Topline

### Differences Between E3+3 Members on Iran

	Fav opinion of Iran %	Oppose Iran nukes %	Back tougher economic sanctions* %	Military option to prevent nukes* %
U.S.	13	94	80	63
Britain	16	91	79	51
France	14	96	74	51
Germany	6	96	80	50
Russia	36	77	46	24
China	21	54	38	30

\* Asked only of those who oppose Iran acquiring nuclear weapons.

PEW RESEARCH CENTER Q8d, Q104, & Q104c-d.

<https://www.pewresearch.org/global/2012/05/18/a-global-no-to-a-nuclear-armed-iran/>

52

## Culture (political views)

- Your origination likely allows public discussion of policy, but...
- Do NOT allow discussion of political merits of policy in your training sessions
- Compliance is compliance: employees can advocate to change policy on their own time
- You are not there to argue for trade rules: merely to assist with and assure compliance with those rules



• Photo from: <https://themilitant.com/2019/05/18/us-hands-off-venezuela-us-hands-off-cuba/>

53

## Culture (Sovereignty)

- Be especially sensitive to the USA extraterritorial issue and local sovereignty but applies to any similar situation
- A message of "you're now owned by a US company, and you have to do things our way!" will not get the buy-in you need
- Consider a non-US trainer (I have had interesting responses as a Canadian)
- This does not mean that you belittle or treat negatively the US rules, merely that you take a sensitive approach

54

## Culture (Sovereignty)

- Focus on your company policy, not foreign laws
- Rather than
  - “you have to obey US law”, try
  - “this is our company policy, agreed to by our board of directors, and applies to all employees globally”
- Referencing company policy (which presumably they signed agreement to at some point) is often more favorable than implication that they have to follow another country’s laws

55

## Regulatory differences



### The Blocking Statute: protecting EU operators, reinforcing European strategic autonomy

The Blocking Statute is an important achievement of unified EU action to protect EU operators, whether individuals or companies, from the extra-territorial application of third country laws.

- “Blocking” legislation
- (Just because our jobs aren’t hard enough as it is)



#### About Canada's Foreign Extraterritorial Measures Act (FEMA)

Canada has measures in place under its *Foreign Extraterritorial Measures Act* (FEMA) to help protect Canadians and Canadian businesses from extraterritorial application of foreign laws. FEMA protects Canadian sovereignty, including Canada's international trading and commercial interests, by allowing the Canadian government to respond to unacceptable extraterritorial assertions of foreign jurisdiction.

56

Regulatory differences

- Navigating the differences can be tricky
- Review historical enforcement (or lack of), along with potential penalties
- Sometimes it boils down to: "who are you more afraid of?"



57

Regulatory differences

- Anti-boycott
- The Arab League boycott of Israel vs. The US Anti-boycott regulations



58

## Regulatory differences

- What other differences have I encountered?
- Disagreement over country of origin
- Different rules for marking of origin (“made in USA” for example)
- Tariff classifications (see next slide)

59

## Regulatory differences

- 38.24.40 means “Prepared additives for cements, mortars or concretes”
- India has chosen to add this line below 38.24.40:

India - IN

- 38 Miscellaneous chemical products
  - 3824 Prepared binders for foundry moulds or cores; chemical products and preparations of the chemical or allied industries (including those consisting of mixtures of natural products), not elsewhere specified or included.
    - 382440 Prepared additives for cements, mortars or concretes:
      - 38244010 Damp proof or water proof compounds
      - 38244090 Other

- Most other countries only interpret 38.24.40 to include items added to concrete at the time of mixture, NOT items poured over top of cured concrete

60



# Impact of global quarantines

61

Some things to consider as travel is restricted

- Language barriers can be aggravated
- Out of sight out of mind
- Be creative! Innovate your on line training (prizes for quizzes? New methods of delivery?)
- Most important? Don't lose touch – now more than ever work to preserve the relationships you've built!



62



Thank you!

Questions?