PBM Addresses Compliance Requirements

PBM, Inc., an industrial valve manufacturing company located in Westmoreland County, Pennsylvania manufactures product for commercial and defense industry applications. The company manufactures and supplies valves for chemical, oil and gas, food and beverage, pharmaceutical; as well as, other industrial applications domestically and internationally. PBM, Inc. has grown significantly over the past ten years.

The PBM management team is committed to export compliance and developed an export compliance manual in 2010 after meeting with the Saint Vincent College SBDC consultant and attending export compliance training sessions. As the company sales have continued to grow domestically and internationally, the company has updated their compliance manual. PBM’s Export Compliance Manager wanted to have their export compliance program reviewed by someone other than their internal staff as a “second set of eyes” since an infraction could result in severe consequences. Fines, penalties, civil, and criminal charges can be imposed for compliance infractions.

PBM wants to do everything possible to make certain their compliance program and procedures are sufficient to address where they sell and ship product; including the people, products, places, and how product is used as the company continues to grow.

PBM asked, “Is there something we may be missing in our manual or procedures?”

“What do we need in terms of cybersecurity planning?”

“How will the EU Privacy policies impact how we do business?”

The Saint Vincent College SBDC offered to review their compliance manual, as a “second set of eyes”, with the stipulation that they would only make recommendations. It would be up to the company to decide if, how, and what they would implement into their compliance program. After compliance manual review, the Saint Vincent College SBDC Global Trade Manager suggested that a “mock audit” may be a good option.

The consultant offered to see if a team approach would be acceptable to the client. The client agreed. The Global Trade Manager at Saint Vincent College SBDC the Program Manager, International Trade, Kutztown SBDC; and the Senior International Trade Specialist, U.S. Commercial Service, Pittsburgh office made up the audit team.

After reviewing documents, several conference calls, a site visit, interviews with staff, and an export documentation review, the team put together a report with recommendations for PBM. As a result, the company will update their manual and procedures to more closely reflect the export compliance processes they perform at various order stages. Processes will be made more specific to their products, customers, and areas of exportation. Compliance training for their sales force will be more focused on potential areas for concern specific to their company’s products and markets. Information on cybersecurity planning was provided. PBM employees also attended the 10th annual U.S. Global Growth Conference for BIS, ITAR, and OFAC compliance updates, cybersecurity issues, and EU Privacy requirements.