

**Nuclear Suppliers Group**



**Good Practices for Internal Compliance and  
Corporate Standards**

**July 2025**

**Good Practices for Internal Compliance and Corporate Standards  
to support the efforts of the international Community in the non-  
proliferation of Weapons of Mass Destruction**

**July 2025**

This guidance recognises that proliferation of Weapons of Mass Destruction (WMD) has the potential to seriously threaten international peace and security; to undermine economic, commercial and social development; and recognises the important role that the diverse commercial sector can play in assisting multilateral efforts in non-proliferation of WMD.

There are many different entities that might be involved in an export, including those providing a service (for example, insurers or brokers) as well as those with a more direct involvement such as the exporting company, a shipper, or freight forwarder. There are also those with a less traditional role such as academia or consultancy firms. Any entity involved in the export of licensable items has a role to play in preventing the proliferation of WMD.

The suggestions made in this document are not legally binding - they are intended to provide a platform from which individual companies/entities/organisations may adopt internal practices and procedures and are not exhaustive. They may also form part of the ethical or social responsibility framework already in place within a company/entity/organisation. These practices complement existing legal obligations to comply with national law.

It is suggested that companies/entities/organisations should seek to:

1. develop, implement and maintain an internal compliance program that documents the business requirements that applicable export control laws and regulations impose; incorporate business requirements into regular operations; and institute mitigation measures to prevent goods, software and technology from playing a role in WMD proliferation;
2. create an internal organizational structure responsible for overseeing export control compliance. A senior management representative, executive, or individual of corresponding status should be designated as the head of compliance. Senior management should raise awareness of compliance obligations and promote a culture of compliance.
3. develop and record a process to determine if goods, software and technology are export controlled. Label all export-controlled items accordingly. If an item is not originally developed by the company/organization/entity, technical specifications and an item classification assessment should be obtained from the original supplier, distributor, or manufacturer. Companies/entities/organisations should

consult government export control authorities if uncertain whether or not an item is export controlled.

4. implement internal systems to ensure due-diligence checks are carried out on potential customers and partners and the goods, software, and technology that they wish to acquire. Checks should utilise public information such as early warning lists, red flag checklists and questionnaires provided by the United Nations, States and other parties with an interest in supporting the multilateral non-proliferation effort. Consult with the relevant government authorities as necessary;
5. monitor, collate and vet enquiries within the scope of due diligence, relating to the acquisition of proliferation sensitive goods, software and technology;
6. follow-up any concerns and don't take all information provided by customers or partners at face value; ask questions and seek independent verification;
7. increase awareness within your organisation about possible proliferation pathways, how undesirable approaches might be made, etc., and create the right environment where staff or colleagues feel able to raise concerns. Train staff, faculty or other individuals supporting the company, entity or organisation on export control compliance;
8. consult government export control authorities before having any dealings with entities identified as being of proliferation concern either from public sources, from internal monitoring systems, or from contact with relevant competent authorities in states themselves;
9. implement measures to control access to export-controlled goods, software, and technology. Security measures may include physical access control systems (proximity access, locked cabinets, etc.) or electronic network restrictions (password protection, zero-trust networks, firewalls) to limit access to items to authorized parties;
10. implement best efforts to share information about illicit attempts to procure items for WMD programmes with security and other relevant agencies and competent authorities in the state where they (the company/entity/organisation) are established. Liaise with partners and others in instances where the relevant competent authorities judge that broader publicity would be appropriate;
11. promote the adoption of due diligence and information sharing within the supply chain and with other partners within the boundaries of legitimate protection of relevant and/or proprietary information;
12. incorporate non-proliferation measures and export control compliance into existing ethical and/or social responsibility statements or a standalone compliance commitment statement, making clear the possible damage that

could be caused to the organisation (reputational, financial, etc.) if a WMD programme is inadvertently supported;

13. compile export-related operating policies and procedures in an export compliance manual. Routinely review the efficacy of operating policies and procedures, verify that all obligations imposed by applicable export control laws and regulations are met and update guidance as necessary. Provide staff, faculty or other individuals supporting the company, entity or organisation access to the export control manual;
14. encourage relevant industry-wide trade and professional bodies to recognise the importance of supporting and encouraging the non-proliferation effort and the measures set out herein; and
15. foster an open and transparent relationship with appropriate government and regulatory authorities.

Adoption and promotion of these suggestions will enhance active commercial sector support for non-proliferation by reducing the risk of inadvertent supply of items to illicit programmes.