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CUSTOMS**

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Strategic Trade Scheme (STS) Bulk Permit and Best Practices to Strengthen Compliance Readiness

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Agenda

- Strategic Trade Scheme (STS) Bulk Permit
 - Objective and key features
 - Facilitation granted
- The 7 Internal Compliance Programme (ICP) elements
- Examples of best practices to strengthen compliance readiness

STS Bulk Permit

- The STS Bulk Permit allows businesses to obtain a single approval for the export, transshipment or transmission (including intangible technology transfers) of pre-approved strategic goods. Singapore Customs determines the validity of the Bulk Permit, which is designed for businesses with high transaction volumes or short lead times.



- More robust systems & internal controls and procedures



- Greater facilitation
- Faster permit approvals



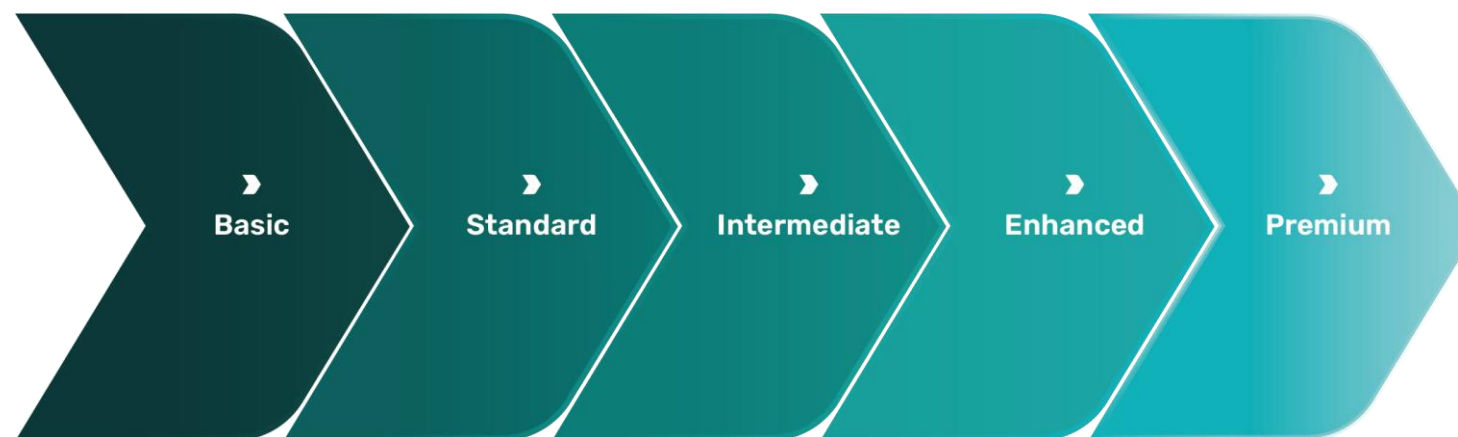
Identifying Low Risk / Compliant Companies

- Companies are assessed under the Trade Facilitation and Integrated Risk-based System (TradeFIRST)
- An integrated assessment framework which provides a holistic assessment of a company
- Assessments are mandatory for all companies applying for Singapore Customs schemes or licenses



STS Bulk Permit Requirements

- Singapore Customs adopts a risk-management approach to classify the level of facilitation under 5 bands
- Greater facilitations are granted to companies with higher TradeFIRST bandings
- STS Bulk Permit holders must achieve the enhanced banding or higher and meet STS Bulk Permit specific criteria



STS Bulk Permit vs Individual Permit

Permit Type	Purpose	Application Timeline	TradeFIRST required
Individual Permit	Required for each export, re-export, transshipment, or transit of strategic goods.	At least five working days before shipment	No
Bulk Permit	Provides pre-approval for multiple shipments or ITT over a period set by Singapore Customs.	Permit applications will be processed only after all required supporting documents are submitted	Yes

STS Bulk Permit

Permit Sub-Type	Types of Trade	Scope of Approval
Approval by specific entities	Export / Transshipment / Intangible Transfer of Technology	Pre-approved multiple products to multiple consignees/end-users
Approval by destination countries	Export / Intangible Transfer of Technology	Pre-approved multiple products to multiple destination countries

- Declare appropriate permit before cargo is lodged with the port operator or air cargo ground handling agent.

Internal Compliance Programme (ICP)

Internal Compliance Programme (ICP)

- Customs requires all STS Bulk Permit Holders to have an ICP in place, to ensure compliance to export control laws.
 - Takes into account:
 - Nature of business
 - Type of operations
 - Type of products dealt with
 - Nature of end user/consignees and countries dealt with, including relationship with these parties
- 



7 ICP Elements

Singapore's ICP requirement consists of 7 key elements:

Company's Commitment	The company is required to have a policy/statement to convey strict compliance with the SGCA and other regulations.
Nomination of Strategic Good Control Officer (SGCO)	The company must appoint a person responsible for the development, implementation and maintenance of the ICP.
Product Classification	The company should be able to classify their products as per the Strategic Goods Control List (SGCL) and determine if the products they are exporting are subject to export controls.
End-User Screening	The company should have processes to determine if their customers are parties of concern.

7 ICP Elements

Record Keeping	The company must maintain a record of all strategic goods transactions carried out.
Awareness and Training	The company is required to conduct regular awareness training for all employees and functional training for employees in export-control related roles.
Internal Audit	The company must verify if the implemented processes are achieving the intended outcomes. Remedial measures should be put in place if lapses are discovered.

- All 7 ICP elements must be met to qualify for STS Bulk Permit.

Best Practices to Strengthen Compliance Readiness

Strengthening Compliance Readiness

- To facilitate the conduct of internal audits Customs has published a checklist in the [STS handbook](#).
- This checklist will ensure that:
 - All ICP elements are properly implemented.
 - All ICP processes are followed within the company by carrying out documentary verification as well as interviews with the employees.



Strengthening Compliance Readiness

No	Questions	Additional Notes	Remarks by Assessor <i>(Please include names of employees interviewed, outcome as well as unique reference number of documents checked. Also indicate if there are any areas of concern or non-conformance detected.)</i>
A	Policy Statement		
1	Does the policy statement state the company's commitment to comply with the Singapore's Strategic Goods (Control) Act (SGCA)?		
2	Is the policy statement reviewed to ensure relevancy with current policy direction on export control?	State date the statement was last reviewed. If the date is more than a year away, state the reason why it was not reviewed after the previous review.	
3	Is the policy statement signed by a member of the company's senior management?		
4	Is the policy statement circulated to all staff?	Indicate how the policy was circulated (e.g. email/notification letter/acknowledgement in writing/induction training/etc) and the date when it was last circulated.	
5	Are the company's service providers, customers and suppliers made aware of the company's export control policy?	Indicate how the various parties are made aware of the company's export control policy.	

Strengthening Compliance Readiness

- In Mar 2026, Customs had updated the STS handbook to include Know your customer (KYC) and best screenings practices
 - Keep a record of all your customers and review them periodically.
 - Classify customers according to their “risk level”
 - Maintain a prohibited/denied list of customers and end-users.
 - Screen all your customers and known end-users, even for non-strategic goods shipments.
 - Enquire and verify the ultimate end-use of the product.



Strengthening Compliance Readiness

- Maintain awareness of export control regulations across all jurisdictions in which business activities are conducted.
 - Be aware of foreign export/re-export licence requirements.
 - Keep up to date on the changes to the control list (the SGCO 2025) and review the classification of your products accordingly.
 - Maintain a detailed list/database of all your products.
 - Timely update of any changes to staff, including those in sales and marketing.



Strengthening Compliance Readiness

- All orders should be screened for diversion [“red-flag” indicators](#).

Customer Red Flag	End-Use/Product Red Flag
Identity of the customer is unclear	Vague delivery locations
Customer has little/no business background	Product capability does not fit the buyers' line of business
Reluctance to declare end-use of the product	Abnormal shipping route
Declines installation, training or maintenance services	Freight forwarder listed as the end-user

- More examples of red-flags and information can be found at our website www.customs.gov.sg.



Thank You