

FOCI – A Roadmap to Compliance

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Introduction to FOCI

This presentation will brief on the Proxy Agreement Requirements and Compliance

Introduction to FOCI

“Foreign Ownership, Control or Influence (FOCI) – A company is considered to be operating under FOCI whenever a foreign interest has the power, direct or indirect, whether or not exercised, and whether or not exercisable, to direct or decide matters affecting the management or operations of that company in a manner which may result in unauthorized access to classified information or may adversely affect the performance of classified contracts.” *Definition provided by DCSA FOCI Website*

There are factors relating to a company, the foreign interest, and the government of the foreign interest that are reviewed to determine whether a company is under FOCI.

FOCI Affiliates are entities that are directly or indirectly controlled by a foreign parent or are under common control with the foreign parent or a U.S. company not under FOCI mitigation.

For more information about FOCI, visit the DCSA’s website at <https://www.dcsa.mil/FOCI>

Standard Form 328 (SF328)

The SF328 is known as the Certificate Pertaining to Foreign Interest and used to certify the foreign interests of an individual or organization. It is required for any business entity or person that has FOCl over their operations. This form is a critical element of DCSA's FOCl review process for those obtaining or maintaining a Facility Security Clearance.

On May 1st, 2025, the SF328 was updated to include improvements to increase the user's clarity and understanding of the questions and requirements. Updates include better scoped questions, comprehensive instructions, definitions, and a Statement of Full Disclosure of Foreign Affiliations used to report foreign employment through the form.

DCSA Information Paper, Dated: May 21st, 2025

[https://www.dcsa.mil/Portals/128/Documents/CTP/FOCI/Updated%20SF328%20-%20Industry%20Information%20Paper%20\(final\).pdf](https://www.dcsa.mil/Portals/128/Documents/CTP/FOCI/Updated%20SF328%20-%20Industry%20Information%20Paper%20(final).pdf)

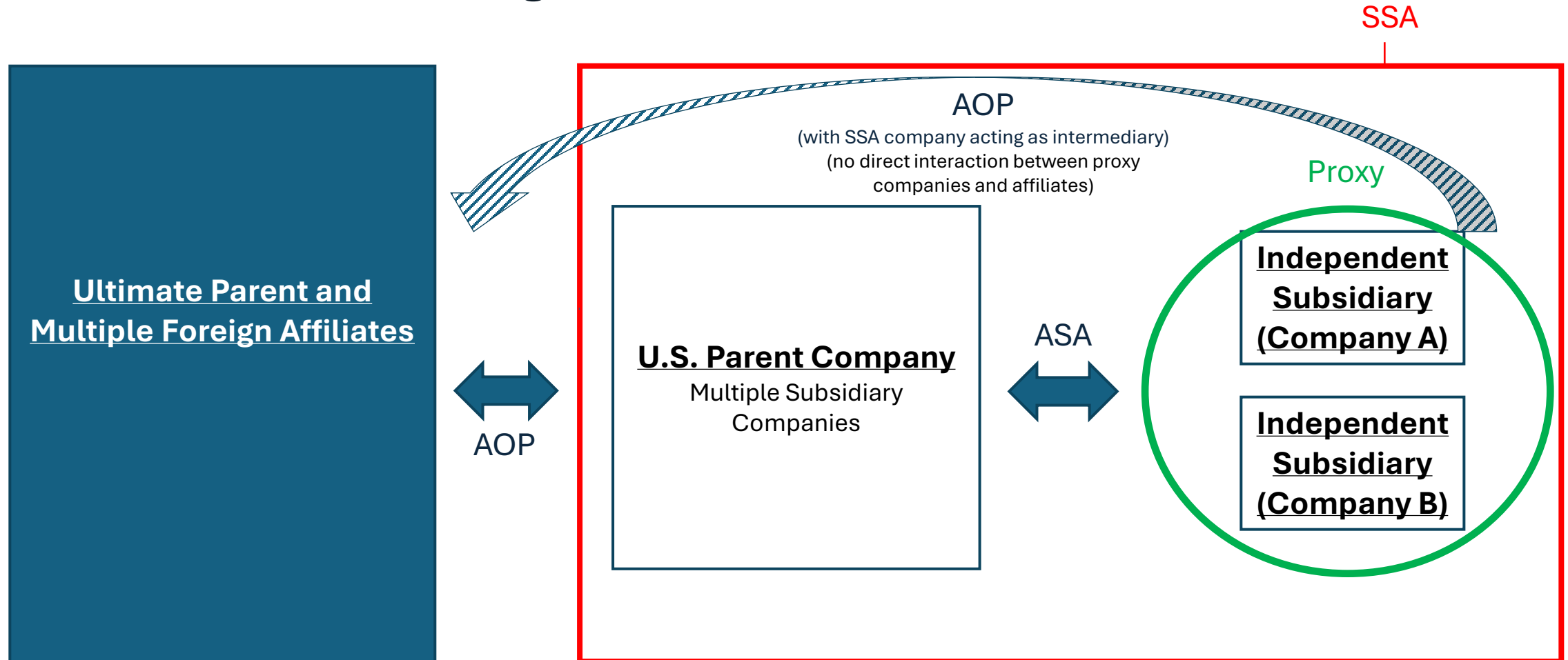
What is FOCI

- When defense contractors are owned by foreign companies, the U.S. Government is concerned that the foreign parent may “adversely influence” the performance of classified contracts by exercising Foreign Ownership, Control or Influence (FOCI)
- The FOCI risk must be mitigated in order for the foreign owned U.S.-based company to perform classified contracts:
 - ☐ (SECRET) – **Special Security Agreement (SSA)**
 - ☐ (Top Secret) – **Proxy Agreement**

NOTE: Goal of both approaches is to impose requirements that insulate U.S. company from their foreign ownership or Affiliates to prevent FOCI of the entities.

- Foreign ownership on its own does not mean disqualification from performance of classified programs, but the USG requires assurances that no controlled information flows to a foreign parent unless it has been approved for release by the USG (see Interaction Guidance)

Structure of FOCI Mitigations



FOCI Mitigation – Proxy Agreement

A DCSA Proxy Agreement is designed to ensure that foreign owned stock is effectively insulated from the cleared company, allowing the company to maintain access to classified information and complete for classified contracts. The agreement is used when a foreign entity controls a cleared company, and it allows cleared U.S. citizen to exercise voting rights on behalf of the foreign shareholder.

The Proxy Agreement also requires the following accompanying documents:

- Affiliated Operations Plan (AOP)
- Administrative Services Agreement (ASA)
- Electronics Communication Plan (ECP)
- Facilities Location Plan
- Technology Control Plan (TCP)
- Visitation Plan

Roles and Responsibilities

Proxy Agreement Required Personnel

Proxy Board and Government Security Committee

Proxy Board is composed entirely of American citizens, established under a Proxy Agreement by the U.S. Department of Defense's Defense Counterintelligence and Security Agency (DCSA) for foreign investors seeking to acquire certain American companies. This arrangement is primarily for national security reasons and applies mainly to defense contractors involved in highly classified contracts. The proxy board ensures that classified information is insulated from foreign exploitation while still allowing the parent company to benefit from its subsidiary's profits.

Government Security Committee (GSC) Board role is to ensure that the company maintains policies and procedures to safeguard classified information and export-controlled information in the possession of the company and that violations of those policies and procedures are promptly investigated and reported to the appropriate authority when it has been determined that a violation has occurred.

- The GSC ensures the company complies with U.S. export control laws and regulations, and does not take action deemed adverse to performance on classified contracts.
- The GSC consists of all cleared Outside Directors, Proxy Holders and Voting Trustees and all cleared officers/directors (if any). The typical structure includes a Chairman and Secretary as members; as well as the Facility Security Officer (FSO) and Technology Control Officer (TCO) as principal advisors to the GSC.

SSA Agreement

- The SSA levies many requirements, including:
 - ❑ Composition/Qualifications of the Board of Directors
 - ❑ Formation of a permanent committee of the board - Government Security Committee (GSC)
 - ❑ Tracking of Visits with Foreign Company and Foreign Affiliates
 - ❑ Control of and Monitoring of electronic communications with Foreign Company and Foreign Affiliates.
 - ❑ Control of Classified and Export-Controlled Information
- Foreign owner retains membership on U.S. Company Board
- U.S. Company cannot access proscribed information (TS, SCI, SAP, COMSEC & RD) – National Interest Determination (NID) required.
- Facility Security Officer (FSO) and Technology Control Officer (TCO) appointed to serve as advisors to the GSC to ensure compliance
- DCSA - recognized strong security program in place to protect controlled information

Proxy Agreement

- The Proxy Agreement requires independence from the Ultimate Parent (foreign owner):
 - ❑ **Foreign owner** not permitted membership on the Proxy Company Board
 - ❑ Must operate and be organized, structured and financed as a viable business entity independent from **foreign investor**
- Imposes governance requirements, including:
 - ❑ Composition/Qualifications/Role of the Proxy Holders
 - ❑ Formation of a permanent independent GSC
 - ❑ Tracking of Visits with Foreign Company and Foreign Affiliates
 - ❑ Control/Monitoring of electronic communications with Foreign Company and Foreign Affiliates
- Proxy Company has no access limitations to authorized proscribed information (TS, SCI, SAP, COMSEC & RD)
- Facility Security Officer (FSO) and Technology Control Officer (TCO) appointed to serve as advisors to the GSC to ensure compliance
- DCSA - recognized strong security program in place to protect controlled information

Proxy Security Officer

Proxy Security Officer, as referred to as the Facility Security Officer, serves as the principal advisor to the Government Security Committee (GSC) and is responsible for the day-to-day implementation of the FOCI mitigation agreement requirements.

Primary Role and Responsibilities include but not limited to:

- Abide by and enforce the mitigation agreement in place
- Ensure all company officers, directors, and employees comply with the provisions of the mitigation agreement
- Advise the GSC
- Assist the GSC in development and implementation of the TCP, ECP, Visitation Procedures
- Ensure Affiliates Services being provided between the FOCI company and the Affiliates that have been approved in advance by the GSC and DCSA
- Assists the GSC to develop and submit Facilities locations plan for DCSA and approval when applicable
- Maintain day-to-day oversight to ensure all Affiliated Services, FLPs, TCPs, ECPs, and Visitation Procedures are fully implemented and effectively mitigate the FOCI
- Ensure DCSA is advised of any known attempts to violate any provision of the FOCI mitigation agreement or relevant U.S. government contract provisions related to security, U.S. export control laws or the NISP and
- Communicate any material change to the DCSA ISR rep early and often.

Information obtained from DCSA Website –

<https://www.dcsa.mil/Industrial-Security/Entity-Vetting-Facility-Clearances-FOCI/Foreign-Ownership-Control-or-Influence/FOCI-Roles-Responsibilities>

Proxy Technology Control Officer

Proxy Technology Control Officer is the principal advisor to the GSC concerning protection of classified information, controlled unclassified information and proprietary technology information and data subject to regulatory or contractual control by the U.S. government.

The TCO's responsibilities includes the establishment and administration of all intracompany procedures, including employee training programs to prevent the unauthorized disclosure or export of controlled unclassified information, and to ensure that the Corporation otherwise complies with the requirements of the ITAR and the EAR.

Proxy Agreement

Accompanying Documents Awareness and Compliance Tracking

Affiliated Operations Plan (AOP)

The AOP outlines the procedures and requirements for coordinating business activities among affiliated entities, ensuring compliance and operational efficiency. The AOP serves as a framework for managing and overseeing the interactions between a company and its affiliates. It is designed to ensure that all affiliated operations are conducted in a manner that aligns with the company's policies and regulatory requirements. The AOP helps mitigate risks associated with shared services, operational leverage, and compliance with security protocols, particularly in contexts involving foreign ownership, control, or influence (FOCI).

- ☐ Affiliated Services
- ☐ Shared Thirty-Party Services
- ☐ Shared Persons
- ☐ Cooperative Commercial Arrangements

Foreign Parent and Foreign Affiliates Interactions

- Services between Proxy Company and Affiliates governed by Affiliated Operations Plan (AOP)
 - ***Each interaction*** must be ***individually approved*** by GSC
- Visits, to include telephonic conversations, between Proxy and Affiliates require a Visit Request
 - Visits (including calls) between FOCI and/or Affiliates and Proxy Companies need to be coordinated in advance (7 days)
- Not authorized to use Foreign Parent-customized or Foreign Parent-developed IT applications
- Any request for or dissemination of Protected Technical Information (PTI) to Affiliates requires Proxy GSC and CFIUS Management Agency (CMA) approval
 - If Foreign Parent contacts U.S. SSA or Proxy Company regarding PTI, the answer will be: “I can’t answer that question” – (additional information and approvals required)
 - If questions persist, contact must be reported to Security Officer promptly

Administrative Services Agreement (ASA)

The ASA outlines the Scope of Services from the U.S. Parent to the Proxy subsidiary for certain services including Coordination on Certain Corporate Practices, Decisions and Policies; Communications Services; Legal, Security and Ethics Compliance Services; Financial Services; Trade Compliance Services; Human Resources-related Services; Corporate Development; Operations Services and Business Development Services as set forth in the administrative services agreement approved by DCSA.

- ☐ Review of ASA throughout the year
- ☐ Brief to Proxy/GSC Board Members

U.S. Parent Company as a Non-Affiliate

- Because the U.S. Parent Company is also FOCI mitigated (SSA), it is not an Affiliate of the Proxy Companies
 - DCSA requires the SSA and Proxy Companies to ensure sufficient & proper protection of classified information
 - U.S. Parent (SSA) Company acts as “buffer” between Proxy Company and Foreign Parent
- The Non-Affiliate status has several impacts:
 - Security
 - Open collaboration and unclassified information sharing
 - The provision of services between Proxy and SSA Companies through the U.S. Government approved Administrative Services Agreement (ASA)
 - Financial Oversight
 - Requires U.S. Companies to report and satisfy foreign parent’s fiduciary responsibility through collaboration, information sharing, services, etc.
 - Joint Growth
 - Exploration of synergies – buying power, talent recruiting, etc.
 - Pursuit of integrated growth strategies
 - Proxy Companies to recognize the benefits of being part of a larger defense company – investment ability, resources, business opportunities, etc. to serve our customers
- It does not erase all restrictions; the Proxy Agreement does impose some restrictions between U.S. Parent (SSA) and Proxy Companies.

Interactions

Service Request Process for Interactions Between U.S. Parent Company (SSA) and U.S. Unique Subsidiary Proxy Companies

1. Initial Engagement

- Employees of either company may contact the other for services
 - Services must be requested – neither party may impose services on the other
- Ensure requested services is (1) within scope of ASA and (2) not a Restricted Category
- Communicate scope to Functional Representative

2. Functional Representative

- Each Function has a POC for coordinating service requests
- Utilize tracking tool to record summaries of all services provided
- Provide monthly report to Proxy and SSA Coordinators of services provided within their Function

3. Service Coordinators

- Confirm requested services are (1) within scope of ASA and (2) not a Restricted Category
- Assist in disputes of requested services and facilitate escalation to leadership/GSC, if necessary
- Meet monthly to discuss the provision of services and resolve any issues
- Prepare quarterly report to Proxy and SSA GSC

Proxy Company Visitation Policy

- U.S Parent Company employees **DO NOT** require an SSA/Proxy Foreign Parent or Affiliate Visit Request to meet face-to-face with Proxy employees, however coordination with Proxy counterpart is required before arriving and a Visitor Notification Form (VNF) must be completed.
- While visiting a Proxy facility, SSA employees are afforded unescorted access and a temporary visitor badge will be issued for the duration of the visit.

Interactions Between U.S. Parent Company (SSA) and U.S. Subsidiary Companies (Proxy)

Interactions

- Interactions between companies are guided by a document called the **Administrative Services Agreement (ASA)** and Proxy GSC memorandum.
 - Out of concern for foreign influence passing through U.S. SSA Parent Company, there are some restrictions on activities and the sharing of specific information. These are listed as “Restricted Categories”.
 - **Restricted Categories** between Proxy and SSA Companies:
 - ☐ Proxy Companies Information Technology and networks
 - ☐ Evaluation or management of Proxy employees’ performance or compensation
 - ☐ Data that is classified or technically sensitive to Proxy company customers
 - ☐ Direct interaction with Proxy customers

Provision of services or sharing of information connected to any
Restricted Category requires Proxy GSC approval

Proxy and Foreign Parent and/or Affiliates Interactions

- **Interactions between Proxy and Foreign Parent and/or Affiliates must comply with the Proxy AOP**

- Authorized affiliated operations:**

- (1) Affiliated Services / (2) Shared Third Parties / (3) Shared Persons / (4) Cooperative Commercial Arrangements**

- ☐ Services outside of the AOP require Proxy GSC approval

- **Use of Foreign-developed technology**

- ☐ U.S. customer must be informed of use
 - ☐ Failure to timely transfer technology creates “adverse influence” concern
 - ☐ Ensure USG customer interactions are coordinated through SSA/Proxy Security Officer – (GSC and/or DCSA notification)
 - ☐ Expect implementation of Zero Trust model (e.g., Software BOM, full source code transfer, etc.)

- **Collaboration Committees – defined agendas, participant lists and meeting minutes are required**

- **Visits – all in person visits require 7 days advance notice and accurate attendee list/agenda**

- **Information Requests**

- ☐ Communications may not be used to exert influence or control over business - (Proxy/SSA)
 - ☐ Classified/Export Controlled or CUI information may not be transferred without U.S. Government authorization

Proxy and Foreign Parent and/or Affiliates Interactions (cont.)

- Services between Proxy and Affiliates governed by Proxy Company Affiliated Operations Plan (AOP)
 - Same categories of Affiliated Operations as SSA but **each interaction** must be **individually approved** by GSC
- Visits, to include telephonic conversations, between Proxy and Affiliates require a Visit Request
 - Visits (including calls) between Foreign Parent and/or Affiliates and Proxy need to be coordinated in advance (7 days)
- Not authorized to use Foreign Parent-customized or Foreign Parent-developed IT applications
- Any request for or dissemination of PTI to Affiliates requires Proxy GSC and CMA approval
 - If foreign parent contacts SSA/Proxy regarding PTI, the answer will be: “I can’t answer that question”
 - If questions persist, contact must be reported to Security Officer promptly

Electronics Communications Plan (ECP)

The ECP is a detailed plan that outlines how electronic communications will be managed and secured between a cleared company and its foreign parent or investor. The ECP must include a network configuration diagram, firewalls, access controls, remote administration, monitoring, maintenance, retention, and the physical separation of systems to ensure that electronic communications do not disclose classified information or Export Controlled Information without proper authorization. It also ensures that electronic communications are not used to exert influence or control over the company's business or management in a manner that could adversely affect the performance of classified contracts.

- ☐ FOCI Email Review
- ☐ Network Sharing - Prohibited

Facilities Location Plan (FLP)

The FLP outlines the location and relationship between collocated entities, particularly in the context of FOCI mitigation agreements. It includes detailed floor plans, building diagrams, and descriptions of the organizational and functional relationship between the companies. The FLP is designed to ensure that the potential collocation does not result in unauthorized disclosure of classified information or export-controlled information, does not violate any OPSEC requirements, and complies with all FOCI mitigation requirements. It also includes measures that the FOCI Company will take to comply with all aspects of their FOCI mitigation agreement. The FLP must reflect the justification for the close proximity with affiliates, the description of the organizational and functional relationship, effective physical separation and access controls, and measures to ensure compliance with all aspects of their FOCI mitigation agreement.

Technology Control Plan (TCP)

The TCP is a comprehensive framework designed to establish controls over technology transfer, distribution, and access. It outlines specific procedures and policies to restrict unauthorized use and prevent technology theft or misuse. This plan is often required by government agencies, especially when dealing with controlled technologies that could pose national security or intellectual property concerns.

- Foreign Person Visitors
- Hosting responsibilities for Foreign Visitors
- Foreign Person Electronic Devices
- Badge Requirements for Foreign Visitors

Visitation Plan

A Visitation Plan is a requirement for FOCI-mitigated companies to ensure visitation with the Affiliates are controlled as required by the FOCI mitigation agreement and establishes requirements for visitation between the FOCI Company and their Affiliates. Any deviations from the requirements in the FOCI mitigation agreements must be approved prior to implementation by DCSA.

- ☐ Visit Request for FOCI
- ☐ Visit Request Approval by Proxy Security Officer, TCO, and GSC Board Members
- ☐ Visitor Notification Form (Local Requirement)
- ☐ Denied Party Screening
- ☐ Badging and Access to Facility
- ☐ After-Action Report

SSA/Proxy Visit Request Policy & Process Explained

- As required by the Proxy/SSA all requests for face-to-face interactions (“Visit Request”) between representatives (employee, contractor, or consultant) of the U.S. Company and Foreign Parent/Affiliate Companies must be submitted for approval seven (7) days in advance.
 - A visit request is required regardless of meeting location (e.g., Proxy/SSA facility, Affiliate facility, Trade Show, etc.)
 - It is critical to provide a detailed justification as to why the meeting must be face-to-face versus telephonic/video to avoid delays in the review and approval process.
 - Any Visit Request submitted less than **seven (7) days** prior to an in person visit with an Affiliate is considered an **Emergency Visit Request**.
 - If an Emergency Visit is requested additional scrutiny is placed on the VR by Security and the GSC and a compelling business justification must be presented as to why the meeting cannot be rescheduled.
- Face-to-face meetings with Affiliates SHALL NOT happen unless the **Requestor**, also known as the **Meeting Host**, receives approval from the designated Proxy Security Officer.
- All Affiliate visitors will receive a designated Foreign Person Visitor Badge even if they are a U.S. Citizen. They will need to be **escorted in the facility at all times**.

Key Takeaways

- Understand the U.S. Government is concerned that the foreign parent may “adversely influence” the performance of classified contracts by exercising Foreign Ownership, Control or Influence (FOCI). The FOCI risk must be mitigated in order for the foreign owned U.S.-based company to perform classified contracts.
- Two independent security and mitigation structures: DCSA & CFIUS
 - **DCSA**: two mitigation structures (**SSA and Proxy**) and implementing documents (**AOPs, ECPs, TCPs**) designed prevent **unauthorized access** to classified, export-controlled or CUI information and **adverse influence** on SSA and Proxy Companies
 - **CFIUS**: agreements to address national security risks; reflect U.S. Government’s desire to ensure “need to know” separation
- Recognize information sharing limitations (e.g., CUI, PTI) when requesting information
- Meet performance and technology transfer commitments
- Ensure export licenses/End User Certificates are available at the outset of the program
- Ensure engagements with U.S. customers are led by appropriate company, (SSA/Proxy Company)
- Follow SSA/Proxy Visit Request process when meeting with Foreign Parent and/or Affiliates
- Appreciate the U.S. Government’s security sensitivities (e.g., zero trust)

Nothing prevents the current business model
BUT
non-compliance or perceptions of influence directly impact our collective access to the U.S. defense market

When in doubt never hesitate to reach out to your local Security point of contact or Facility Security Officer

Proxy Compliance

Quarterly Report Structure

- Department Structure
- General DCSA Compliance
 - FCL Information
 - Classified Contracts
 - Classified Holdings
 - Classified Information Systems
 - PCL Information (Total Employees vs. Cleared Employees Graph)
 - Security Awareness and Training
 - Intelligence Intake and Sharing
 - Security Notable Updates
- Proxy Compliance
 - Affiliates Operations Plan Reporting
 - Administrative Services Agreement Reporting
 - Electronic Communications Plan Compliance
 - FOCI & Affiliate Contact and After-Action Reports
 - Technology Control Plan Compliance
 - Visitation Plan Compliance

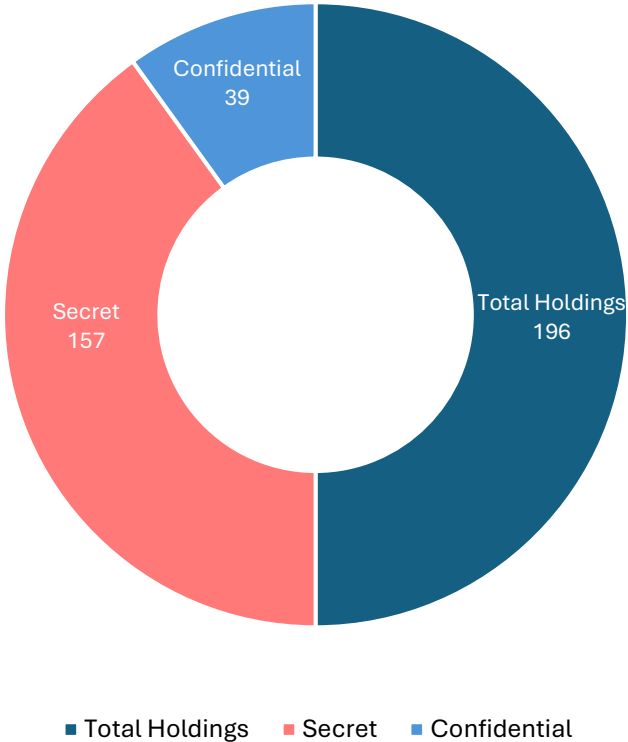
Annual Compliance Report Structure

The Annual Compliance Report is comprised of all changes, updates, or modifications to information during the year as reported in quarterly reports to the GSC board.

- Overview of the Organization
 - Changes during the year
- General DCSA Compliance
 - FCL Information
 - Classified Contracts
 - Classified Holdings
 - Classified Information Systems
 - PCL Information (Total Employees vs. Cleared Employees Graph)
 - Security Awareness and Training
 - Intelligence Intake and Sharing
 - Security Notable Updates
- Proxy Compliance
 - Affiliates Operations Plan Reporting
 - Administrative Services Agreement Reporting
 - Electronic Communications Plan Compliance
 - FOCl & Affiliate Contact and After-Action Reports
 - Technology Control Plan Compliance
 - Visitation Plan Compliance

Example - Classified Holdings & Contracts – Proxy Companies

Proxy Classified Holdings



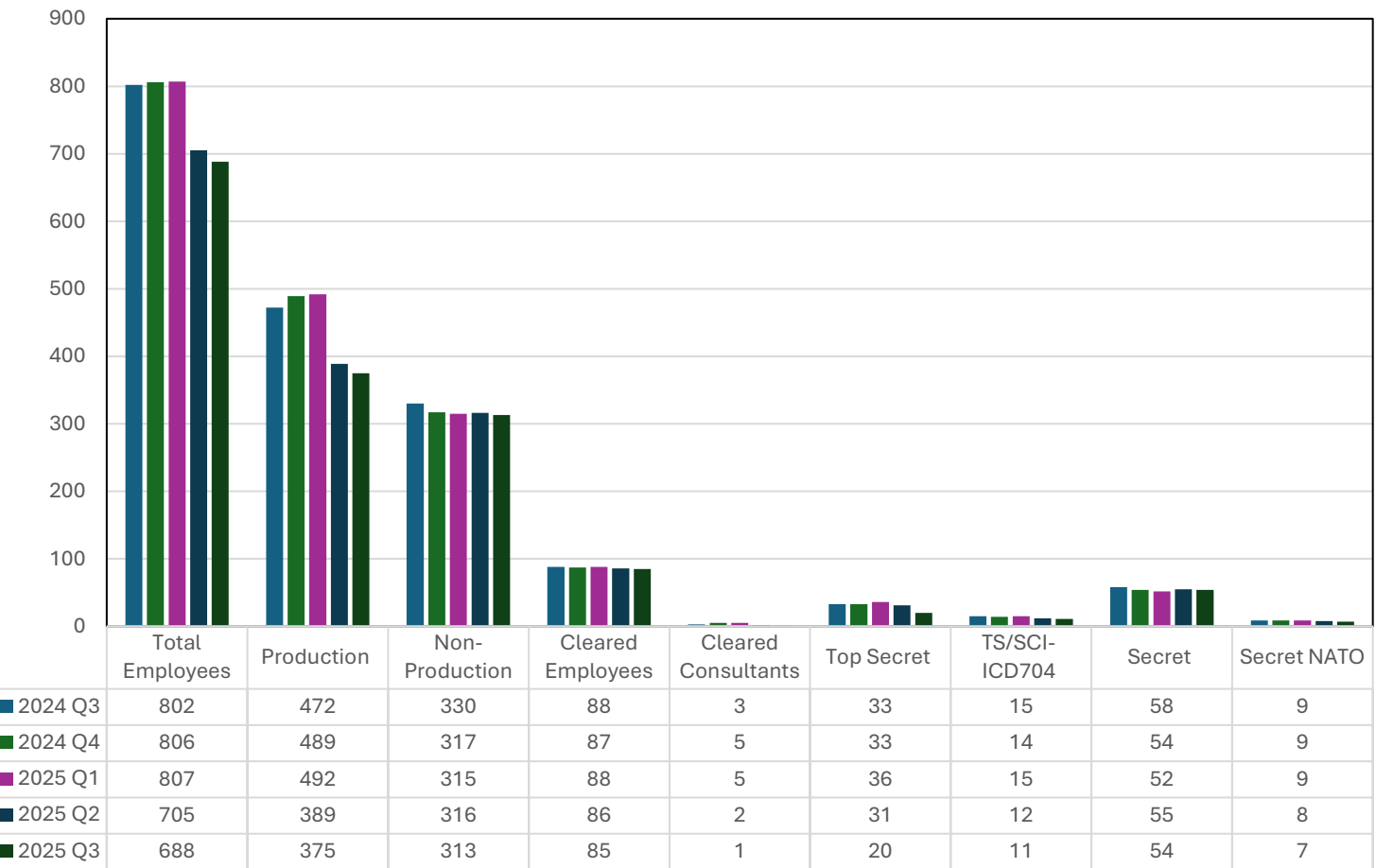
1 year or greater

9 months or less

3 months or less

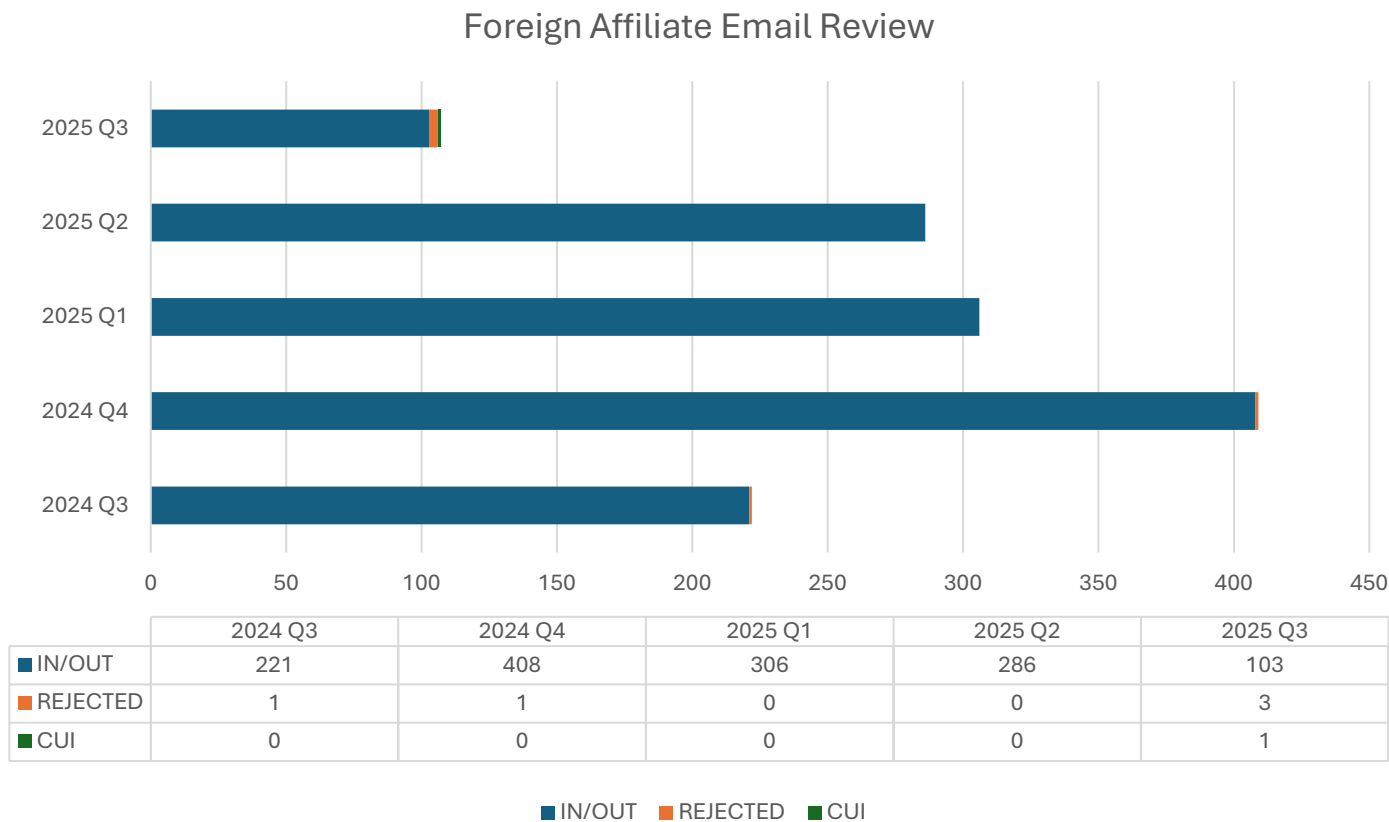
Contract Description	FCL	Safeguarding	Prime or Sub	POP
Development, Production, and Integration of Various Systems and related components	Secret	Secret	PRIME	03/25/2024-03/30/2029
Production of Special Mission products	Confidential	Confidential	PRIME	04/03/2022-07/30/2029
Engineering support for the development of a communications platform	Top Secret	Top Secret	SUB	01/17/2025-06/28/2026
Contract Description	FCL	Safeguarding	Prime or Sub	POP Expirations
End-to-end development of Communications Device	Secret	Secret	SUB	03/15/2018-11/09/2025
Engineering support services and Research and Development	Top Secret	Secret	SUB	10/18/2020-12/30/2025

Example - Total Employees vs. Cleared Employees – Proxy



Total Cleared Personnel	85
TS/Secret (of 688) - Total Employees	12.50%
TS/Secret (of 313) - Non-Production	27.48%
Total Top Secret	20
TS (of 85)	23.52%
TS (of 688) - Total Employees	2.90%
Total Top Secret/SCI	11
TS/SCI (of 86)	12.94%
TS/SCI (of 688) - Total Employees	1.60%
Total Secret	54
Secret (of 85)	63.52%
Secret (of 688) - Total Employees	7.84%
Total Secret (NATO)	7
Secret NATO (with TS - 1)	14.28%
Secret NATO (with TS/SCI - 4)	57.14%
Secret NATO (with Secret - 2)	28.57%

Example - Electronics Communications Plan (ECP) Compliance



The rejected emails were due to the following:

- **Distribution D (CUI) Statement Concerns**
 - Proprietary Information that listed Seller Data Requirements with Distribution Marking for the services provided.
- **Request for Access through Foreign Affiliate**
 - Proxy employee sends an email to Foreign Affiliate requesting administrative access to database to work on technical issues.
- **Attempted document shared with Foreign Affiliate**
 - Document sent as a template to recreate for use with SSA/Proxy and Foreign Affiliate that contained tech data examples.

Example - Visitation Plan Compliance

Proxy Company A

Are all the routine business visits approved by the FSO?

- **Total Visitors – 636**
 - US Parent Visits: 40
 - Proxy Board: 1
 - Foreign National Visits: 0
 - Government (DCSA, DCMA, Navy): 46
 - New Hires: 18
 - Other Visitors (Vendors, Contractors, etc.): 532

How many were Denied/Restricted/Pending.....Reasons?

- Zero (0) Denied
- Zero (0) Restricted

Any Concerns?

- None

Any acts of noncompliance, whether inadvertent or intentional, and the steps taken to prevent such acts from occurring again in the future;

- None

11/3/2025

Proxy Company B

Are all the routine business visits approved by the FSO?

- **Total Visitors – 30**
 - US Parent Visits: 9
 - Proxy Companies Visits: 7
 - Proxy Board - 1
 - Foreign National Visits: 0
 - Government: 7 (DCSA)
 - New Hires: 1 (Rehire)
 - Other Visitors (Vendors, Contractors, etc.): 6

How many were Denied/Restricted/Pending.....Reasons?

- Zero (0) Denied
- Zero (0) Restricted

Any Concerns?

- None

Any acts of noncompliance, whether inadvertent or intentional, and the steps taken to prevent such acts from occurring again in the future;

- None

35

Example - After Action Report

Virtual Meeting – Subcontracting Support

Interaction: **Foreign Affiliate with SSA/Proxy Companies** (Teleconference)

What Transpired: **Subcontracting Support Discussion**

Compliance Concerns: **None (No Technical Exchange)**

Reportable to: **Security Officer**

Note: Visitation Policy Section 4.2.5 allows for a 90-day approval period based on the following: Visits that exceed 30 consecutive business days or that cumulatively exceed 200 days in a single year shall also require DCSA approval. (Since this is not consecutive business days, it falls within the policy and allowable)

Virtual Meeting – International Business Sales

Interaction: **Virtual Meeting**

What Transpired: **International Sale Discussion using Foreign Parent as an In-country representative for Proxy.**

Compliance Concerns: **None**

Reportable to: **Security Officer**

Tradeshow

Interaction: **SSA/Proxy and Foreign Parent/Affiliate**

What Transpired: **Tradeshow– annual innovation, educational, and professional event to bring together U.S. Military, U.S. Defense Industrial Base and private sector U.S. companies.**

Compliance Concerns: **None**

Reportable to: **Security Officer**

Annual Meeting Compliance

DCSA requires an Annual Meeting with FOCI Signatories to discuss its security posture and compliance with the FOCI Mitigation Agreement. This meeting is usually held during the anniversary month of the Agreement and typically occurs after a security review is conducted by DCSA

Questions

FOCI – A Roadmap to Compliance

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