



CATEGORY

Audit-Readiness Checklist for Trade Compliance

Use this checklist to evaluate your company's preparedness for an audit by U.S. Customs and Border Protection (CBP), BIS, OFAC, or other regulatory bodies.

A "yes" to most items indicates strong audit readiness.

A "no" reveals a potential vulnerability to address.

QUESTION

Classification & Tariffs

Do you maintain up-to-date HTS classifications for all imported products?

Do you have documented rationales or rulings for your tariff codes (e.g., CROSS rulings)?

Are you actively monitoring tariff shifts, exclusions, and trade agreement updates?

Valuation & Country of Origin

Are you properly declaring product value (no under/overvaluation)?

Do you have clear, accurate documentation proving country of origin (COO) for each good?

Are all COO markings and declarations consistent across documentation and packaging?

Documentation & Recordkeeping

Are commercial invoices, bills of lading, and packing lists accurate and consistent?

Do you retain all required import/export documents for at least 5 years (per 19 CFR §163)?

Is there a system in place for organized and searchable digital records?

Licensing & Export Controls

Do you know the ECCNs (Export Control Classification Numbers) for your export items?

Are applicable export licenses current and tracked per destination customer?

Do you screen all parties against restricted and denied party lists (DPL, SDN, etc.)?

Forced Labor & UFLPA

Do you screen your suppliers for risk of forced labor or UFLPA enforcement?

Can you trace materials and components to prove clean supply chain practices?

Do you retain evidence of supplier due diligence and ethical sourcing audits?

Internal Controls (Compliance Manuals, Policies, and SOPs)

Do you have written compliance manuals, policies, and SOPs for trade compliance, classification, and documentation?

Are these compliance manuals, policies, and SOPs updated annually and used consistently by staff?

Has your team been trained on the company's trade compliance manuals, policies, and SOPs within the past year?

Audit & Risk Mitigation

Have you conducted an audit or internal compliance review in the last 12 months?

Do you know how to respond to a CBP/BIS/OFAC audit notice?

Do you have access to external consulting support in the event of an investigation?