



FOREIGN AGENTS REGISTRATION ACT (FARA) POLICY AND
COMPLIANCE GUIDE

VICC INTERNATIONAL
“FARA” POLICY AND
COMPLIANCE GUIDE

I. Purpose

This policy manual describes standard operating procedures and a code of conduct for the staff, employees, consultants, contractors, or agents (hereinafter “Employees”) employed either full time or part time by VICC International (“VICC”).

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Originator:	Office of Ethics and Compliance	Effective Date	April 1, 2022
Approver:	Chief Executive Officer	Revision	0

FOREIGN AGENTS REGISTRATION ACT COMPLIANCE GUIDELINES

I. Overview

VICC takes seriously the obligation to comply with the Foreign Agents Registration Act (“FARA”) and has reviewed its activities against statutory requirements. After a thorough review of its activities, VICC has determined that registration is not required at this time. Although VICC may have foreign government and private sector clients, VICC does not, however, engage in any covered activity (as defined below) as a foreign agent, in the United States.

To ensure compliance with FARA, VICC has established the following mandatory compliance guidelines for Employees. Any questions about this document, FARA in general, or contemplated activities that may conflict with this policy should be directed to VICC’s CEO, who shall provide guidance and consult outside counsel, as appropriate.

VICC conducts regular, quarterly reviews of their activities to certify ongoing compliance, whose results will be appended to this memorandum on an ongoing basis.

II. FARA Requirements

FARA requires an agent of a foreign principal to register with the Department of Justice if the agent engages, or even agrees to engage, in covered activity in the United States. An agent need not be compensated for the registration requirement to apply. A foreign principal includes any non-US government, a non-US political party, a person outside the United States, and non-US corporations organized under the laws of another country. An agent of a foreign principal is anyone who acts “at the order, request, or under the direction or control” of a foreign principal or of another person “directly or indirectly supervised, directed, controlled, financed, or subsidized” by a foreign principal.

The activities covered by FARA that trigger registration if undertaken within the United States are detailed below. The first two are explained in greater detail because they have specific meanings under the statute. The latter two, however, are self-explanatory and do not require additional description here.

1. Engaging in political activities

Political activities include any activity believed or intended to influence any agency or official of the Government of the United States or any section of the public within the United States regarding “formulating, adopting, or changing the domestic or foreign policies of the United States” or “the political or public interests, policies, or relations” of a foreign government or political party.

2. Acting as public relations counsel, publicity agent, information-service Employee, or political consultant

Political consulting means informing or advising another person about the “domestic or foreign policies of the United States” or the “political or public interest, policies, or relations of a foreign government or political party.” According to the Department of Justice, political consultants need only to engage in activity whose purpose is to further political activity. Thus, those who plan strategy, arrange meetings, or whose actions otherwise “fall short of direct lobbying” must register “even though they do not engage directly in political activity.”

Public relations counsel includes anyone who directly or indirectly informs, advises, or represents a foreign principal in any public relations matter “pertaining to political or public interests, policies or relations of such principal” with the purpose of furthering any political activity.

An information-service Employee includes anyone who engages in supplying, disseminating, or publishing information about any foreign country, foreign government, or foreign company with the purpose of furthering any political activity.

3. *Soliciting, collecting, disbursing or dispensing contributions, loans, money or other things of value; or*
4. *Representing the foreign principal’s interests before a US Government agency or official.*

FARA contains a handful of exemptions for otherwise covered activities wherein registration is not required. These include:

1. Private and nonpolitical activities in furtherance of a legitimate trade or commerce of a foreign principal (the so-called “commercial exemption”).
2. Soliciting or collecting funds and contributions to be used only for medical aid and assistance, or for food and clothing to relieve human suffering.
3. As a qualified practicing attorney, legally representing a foreign principal before a US court or agency of the US Government.
4. Engaging in activities in furtherance of “bona fide religious, scholastic, academic, or scientific pursuits or of the fine arts.”

III. Ensuring Compliant Activity

To ensure compliance with FARA, VICC’s Employees shall not engage in the following activities from within the United States. This includes writing any documents (even partial, incomplete ones) used in undertaking any such activity and/or sending or receiving any electronic communication or participating in any telephone conversation regarding such activity:

- Discussing how U.S. domestic or foreign policy is formulated, and/or how to influence or change U.S. policy, including identification of influential U.S. government decision makers or brainstorming about potentially effective messaging, with a foreign principal or agent of a foreign principal;
- Carrying messages to, arranging meetings with or meeting with, or otherwise communicating with U.S. government officials at the request or direction of a foreign principal or agent of a foreign principal;

- Discussing, advising on, or engaging in public relations-related activities, including authoring and/or publishing op-eds or articles, appearing in media broadcasts, or speaking publicly with or at the direction or request of a foreign principal or agent of a foreign principal;
- Gathering funds, donations, or other things of value, at the request or direction of a foreign principal or agent of a foreign principal;

I certify that:

1. I have received, read and understand the Foreign Agents Registration Act (“FARA”) adopted by VICC. I understand that VICC’s management are available to answer any questions I have.
2. I understand that any violations of the terms of the FARA may result in disciplinary measures being taken, including immediate dismissal “for cause”.
3. I will comply with the FARA.

Signature: _____

Printed Name: _____

Date: _____