**WORKING DOCUMENT**

AI Trade Compliance Watchdog Tool

Purpose

Provide notice to HY’s Trade Compliance Team of developments in Trade Compliance related topics which impact the business and thereby minimize the risk of overlooking a development which impacts the business. AE 7.25.25

Intended Audience

The intended audience for AI Tool output is limited to the Trade Compliance Team. Information obtained through AI Tool will be vetted by Trade Compliance Team before information is provided to a wider audience. AE 7.25.25

Intended Scope

The intended scope of the AI Tool is global where the concept of global is constrained by:

1. Countries where HY has a manufacturing presence.
2. Countries where HY’s top suppliers are present.
3. Countries where HY’s top import/export activity exists.

AE 7.25.25

To Be Determined

1. Web-scraping

The extent to which web-scraping is needed and could satisfactorily be incorporated to achieve desired results. AE 7.25.25

1. Databases

The extent to which databases dedicated specifically to the AI Tool are needed (perhaps in combination with web-scraping) to improve performance of the AI Tool and allow for historical comparison and queries that involve versioning. AE 7.25.25

1. Other techniques and technologies

The extent to which techniques and technologies other than those mentioned above are needed. AE 7.25.25

1. Presentation

Preferred presentation of AI Tool output (e.g. something like a webpage, perhaps published on a SharePoint site which is locked down to approved members such as HY Trade Compliance Team). Organized by jurisdiction (?) By Topic (?) Etc.. AE 7.25.25

1. Paid Subscriptions

The extent to which paid subscriptions shall be incorporated into AI Tool e.g. subscription/purchase of The Explanatory Notes (not a subscription which currently exist, I’ve been told. Confirmation needed). AE 7.25.25

1. Use of Web Un- (or less-) constrained

The extent to which the use of the web (not constrained to a list of allowed primary or secondary sources) shall be incorporated, if at all. One reason to allow unconstrained (or less constrained) use of web is to ensure topics relevant to the business that are being talked about in the wider web, but not captured by the programmed list of allowed secondary sources, is captured. AE 7.25.25

Architecture

Structural Components [short list]

There are three structural components to the AI Tool:

1. *Context Feed*

The context feed is stuff that is fed into the AI Tool for the purpose of providing the AI Tool with context of HY business. This is done so that the AI Tool can take the supplied context into account when attempting to deliver answers to queries/prompts that are relevant to the business, tossing out anything that would be irrelevant or unimportant to the business based on understanding of the context.

1. *Allowed Primary Sources*

The allowed primary sources is the collection of resources approved for use by Trade Compliance Team that the AI Tool must reference in answering queries. It is what the AI Tool uses to support answers (citing references) after taking into consideration a) the prompt/query itself and b) what is being talked about per list of allowed secondary sources (and perhaps the wider internet) as constrained by AI’s understanding of the context feed.

1. *Allowed Secondary Sources*

The allowed secondary sources is the collection of resources approved for use by Trade Compliance Team that the AI Tool must refer to in order to formulate an understanding of a) what is being talked about at the secondary source level and b) how this may or may not be relevant to the business based on AI’s understanding of the context feed. This reliance on allowed secondary sources is done as a precursor to the validation and citation effort that occurs by reference to the allowed primary sources. AE 7.25.25

Structural Components [detail]

1) *Context Feed*

To increase the probability of getting better answers relevant to the business, context from various sources can be fed into the AI Tool. Below is a working list. AE 7.25.25

1. CBP ACE Portal Data
2. Customs Brokers’ Data

*United States, Canada, Mexico*

Livingston

Carmichael

EELCO

1. Countries of HY Manufacture

The countries in which HY has a manufacturing presence can be used to focus/constrain coverage of the AI Tool. Need to confirm the accuracy/completeness of the list of countries below. AE 7.24.25

*United States*

*Mexico*

*Brazil*

*Netherlands*

*Northern Ireland*

*Italy*

*China*

*Japan*

1. Top Countries by HY Suppliers

The countries of top suppliers for HY’s manufacturing can be used to focus/constrain coverage of the AI Tool. Need to get a list. AE 7.24.25

1. Top Countries by HY Import/Export Activity

The countries of top Import/Export activity for HY can be used to focus/constrain coverage of the AI Tool. Need to get a list. AE 7.24.25

*2) Allowed Primary Sources*

US

1. *US Customs And Border Protection (CBP)*
2. Trade News Snapshot

<https://www.cbp.gov/trade/snapshot>

Monthly updates on enforcement actions, trade programs, forced labor findings, and modernization efforts. AE 7.24.25

1. Customs Ruling Online Search System (CROSS)

<https://rulings.cbp.gov/home>

CROSS is a searchable database maintained by U.S. Customs and Border Protection (CBP) that provides access to official customs rulings. AE 7.24.25

1. Cargo Systems Messaging Service (CSMS)

<https://www.cbp.gov/trade/automated/cargo-systems-messaging-service>

Communication platform used by U.S. Customs and Border Protection (CBP) to keep trade partners informed about critical updates related to cargo processing and customs systems. AE 7.24.25

1. *World Customs Organization (WCO)*
2. Explanatory Notes

Official interpretive guides published by the World Customs Organization (WCO) to help customs authorities and trade professionals correctly classify goods under the Harmonized System (HS). AE 7.24.25

Requires a paid subscription. Note: full text of older editions is also generally not available for free on web. AE 7.24.25

1. *HTSUS*

<https://hts.usitc.gov/>

1. *Federal Register*

<https://www.federalregister.gov/>

The Federal Register is the official journal of the U.S. federal government, published every business day by the Office of the Federal Register (OFR) within the National Archives and Records Administration (NARA). It provides: legal notice of new and proposed regulations; transparency in government decision-making; a platform for public participation in rulemaking. AE 7.24.25

1. *White House website (Presidential Actions page)*

<https://www.whitehouse.gov/presidential-actions/>

For newly signed executive orders…afterward they are sent to the Office of the Federal Register. AE 7.24.25

1. *USITC Dataweb*

<https://dataweb.usitc.gov/>

Trade statistics, tariff rates, HTS classification tools, AVE duties. AE 7.24.25

1. *US Department of Commerce International Trade Administration (ITA)*

<https://www.trade.gov/>

Antidumping and countervailing duty investigations, rulings and updates. AE 7.24.25

1. *US Trade Representatives (USTR)*

<https://ustr.gov/>

Section 301 investigations, trade agreements and enforcement actions. AE 7.24.25

1. *ACE Portal*

<https://ace.cbp.gov/s/login/?ec=302&startURL=%2Fs%2F>

Customs filings, tariff classifications, and compliance data for importers and brokers. AE 7.24.25

1. *Regulations.gov*

<https://www.regulations.gov/>

Regulations.gov is the official U.S. government platform where the public can view, track, and comment on federal regulations proposed by agencies. It’s a cornerstone of the “notice and comment” rulemaking process established by the Administrative Procedure Act (for example docket = BIS-2025-0023 i.e. the docket number for the May 2025 submission window for Sec 232 Inclusions Process). AE 7.24.25

1. *Truth Social*

Truth Social is a social media platform launched by Trump Media & Technology Group (TMTG), founded by former U.S. President Donald Trump. Given the way this social media platform is used by President Trump to communicate on matters of trade, it is being listed here as an allowed primary source. AE 8.18.25

Canada

1. *Canada Border Services Agency (CBSA)*

Canada’s official customs authority is the Canada Border Services Agency (CBSA) — known in French as Agence des services frontaliers du Canada (ASFC).

The CBSA is responsible for:

* Customs enforcement and tariff collection
* Border security and immigration screening
* Trade facilitation and import/export compliance

<https://www.cbsa-asfc.gc.ca/menu-eng.html>

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Mexico

1. *Agencia Nacional de Aduanas de México (ANAM)*

In English: National Customs Agency of Mexico. Established: January 1, 2022, as a decentralized agency under the Ministry of Finance. Replaced: The former General Customs Administration (AGA), which operated under Mexico’s Tax Administration Service (SAT).

<https://anam.gob.mx/>

AE 7.24.25

1. *Secretaría de Economía (SE)*

In English: Ministry of Economy.

The federal agency responsible for:

* Promoting industrial and commercial development
* Overseeing foreign trade and investment
* Supporting small and medium-sized enterprises
* Regulating standards and intellectual property

[www.gob.mx/se](http://www.gob.mx/se)

AE 7.24.25

1. *Diario Oficial de la Federación (DOF)*

[www.dof.gob.mx](http://www.dof.gob.mx)

Mexico’s official government gazette — is published by the Secretaría de Gobernación (SEGOB).  The Diario Oficial de la Federación (DOF). is published by the Secretaría de Gobernación (SEGOB). The DOF is published electronically via dof.gob.mx and no longer distributed in print as of July 1, 2019. It serves as the legal vehicle for publishing laws, decrees, regulations, and official notices from all branches of Mexico’s federal government. Once published, the content becomes legally binding, and ignorance of it is no longer a valid defense. The DOF is analogous to US’ Federal Register:

|  |  |  |
| --- | --- | --- |
| **Feature** | **DOF (Mexico)** | **Federal Register (U.S.)** |
| Publisher | Secretaría de Gobernación (SEGOB) | National Archives (OFR/NARA) |
| Legal Function | Official publication of laws, decrees, and regulations | Legal notice of federal rules, proposals, and executive actions |
| Frequency | Published daily (electronically) | Published daily (business days) |
| Legal Effect | Laws become binding once published | Rules become enforceable after publication |
| Public Access | [dof.gob.mx](https://dof.gob.mx/) | [federalregister.gov](https://www.federalregister.gov/) |

AE 7.24.25

Brazil

1. *Receita Federal do Brasil (RFB)*

Brazil’s official customs authority is the Receita Federal do Brasil (RFB) — also known as the Federal Revenue Service of Brazil.

[www.gov.br/receitafederal](http://www.gov.br/receitafederal)

AE 7.24.25

European Union

1. *European Commission’s Directorate-General for Taxation and Customs Union (DG TAXUD).*

The customs authority for the European Union is coordinated by the European Commission’s Directorate-General for Taxation and Customs Union (DG TAXUD).

How EU Customs Works

Rather than a single centralized customs agency, the EU operates a Customs Union, where:

* Each Member State’s national customs administration enforces customs rules at its borders
* DG TAXUD sets and harmonizes customs policy, legislation, and digital systems across the EU

This means customs officers in Germany, France, or Italy all apply the same rules and tariffs to goods entering the EU from outside — but each country manages its own operations.

Key Institutions

|  |  |
| --- | --- |
| **Entity** | **Role** |
| **DG TAXUD** | Develops customs policy, oversees the Union Customs Code |
| **National Customs Administrations** | Implement customs controls and collect duties |
| **European Commission** | Negotiates trade agreements and represents the EU at the WTO |

<https://taxation-customs.ec.europa.eu/customs_en>

AE 7.24.25

1. *European Binding Tariff Information (EBTI) database*

A centralized system that stores Binding Tariff Information (BTI) decisions issued by customs authorities in EU Member States.

AE 7.24.25

Netherlands

Italy

United Kingdom

1. *His Majesty’s Revenue and Customs (HMRC).*

The customs authority of the United Kingdom is His Majesty’s Revenue and Customs (HMRC).

<https://www.gov.uk/government/organisations/hm-revenue-customs/about>

AE 7.24.25

Northern Ireland

China

1. *General Administration of Customs of the People's Republic of China (GACC).*

China’s official customs authority is the General Administration of Customs of the People's Republic of China (GACC).

<https://english.customs.gov.cn> [this link is blocked on my work computer, I think] AE 7.24.25

*3) Allowed Secondary Sources*

Law Firms

1. *Miller & Chevalier*

<https://www.millerchevalier.com/>

[this is outside counsel for HY]. AE 7.24.25

1. *Sandler, Travis & Rosenberg*

<https://www.strtrade.com/trade-news-resources/str-trade-report>

1. *Holland & Knight*

<https://www.hklaw.com/en/insights>

On Holland & Knight’s “Insights” page, there is a “Sign Up” button for subscribing to H&N publications. After signing up, there is a way to select topics (see Screenshots 1 and 2 pasted immediately below).

Screenshot 1:

Screenshot 2:

AE 9.23.25

1. *Steptoe LLP*

<https://www.steptoe.com/en/news-publications/Global-Trade-and-Investment-Law-Blog.html>

1. *Baker McKenzie*

<https://www.bakermckenzie.com/en/insight/publications/resources/trade-finance-insight>

1. *Wiley Rein LLP*

<https://www.wiley.law/insights?do_item_search=1&trending=17>

1. *Cassidy Levy Kent*

<https://www.cassidylevy.com/news/>

News

1. *Trade Law Daily*

Independent news service covering trade rulings and litigation.

<https://tradelawdaily.com/>

1. *National Law Review*

Aggregates legal articles from top firms, including trade law updates.

<https://natlawreview.com/>

1. *tariffcheck.org*

[On 7/24/25, stumbled upon this site. Interesting, but may ultimately decide not to use]. AE 7.24.25

1. *Yahoo Finance Tariff Tracker*

Paid Subscriptions

[by jurisdictional coverage?] AE 7.24.25