

BD Creation

28, 29, Maijgao, Pubail, Gazipur Sadar, Gazipur, Gazipur, Dhaka, Bangladesh 1721 8801714130276

SCAN Security Audit (Onsite)

Report # EA-2021-11-0030

Audit Submitted Nov 2, 2021

Compliance Score 86%

Audit Type EXTERNAL AUDIT



This Report Applies Solely for SCAN - Supplier Compliance Audit Network

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LOCATION INFORMATION

BD Creation

28, 29, Maijgao, Pubail, Gazipur Sadar, Gazipur Gazipur, Dhaka, Bangladesh 1721 8801714130276

SCAN ID: BD892I5M17BD

Point of Contact Name: Mr. Md. Anower_Manager_HR & Compliance

Point of Contact Email: hr@thebdcreation.com

Target Month: 10/20/2021

Contact Name Phone Email

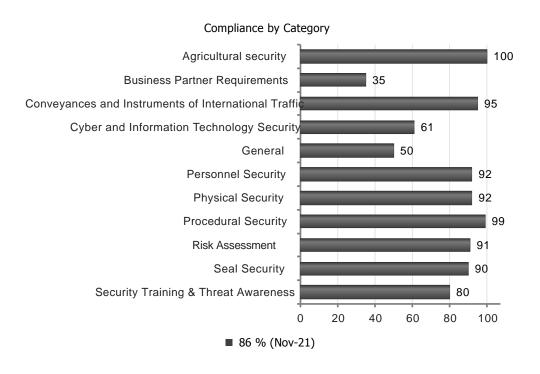
Location: BD Creation

Primary Location: Yes Critical Location: No

Assigned Auditor: Bureau Veritas Schedule Date: 10/28/2021

SCAN - SCAN Security Audit (Onsite)

86% Compliance Score



BUSINESS PROFILE INFORMATION

Profile Question	Response
	No
Does the facility participate in any government, local customs, or World Custo Organization (WCO) accredited facility security program?	ms
Do you hold a Government Supply Chain Security Certification?	No
Has the facility been reviewed or audited by this program?	No
Primary Industry of Operations	Handicraft
Product Type / Commodity	Basket, floor mat, rugs
Year Established	2011
Grounds Size (Square Meters)	1031
Number of Buildings	8
Facility Size (Square Meters)	5163
Number of access points? (i.e. gates, exterior doors)	1
Hours of Operation	The facility's general shift started from 8:00 am to 5:00 pm with 1 hour lunch break except finishing and packing section. Finishing and packing section had 2 shifts started from 8:00 am to 5:00 pm and another shift started from 8:00 pm to 5:00 am with 1 hour lunch break.
Number of Employees	101 - 500
Number of Contract Employees	0
Number of Security Guards	10
Number of Migrant Workers	0
Annual Revenue	5 - 10 Million
Does the facility outsource any manufacturing services?	No
What countries does this facility export to?	USA, Germany, Italy, Netherland, Spain etc.
Does this facility have affiliate locations where any work is conducted or	No

product stored?	
Does the facility outsource any transportation services?	No
Does this facility partner with any sales agent or vendor representatives?	No
Enter location address as it appears on the business license for this location.	28, 29, Maijgao, Pubail, Gazipur Sadar, Gazipur
Name of Auditor Completing this Audit (First and Last Name)	SK. Rezowan-Ul-Islam
Auditor Certification #	206143-215081

Name of onsite Factory Representative (First and Last Name) and email address *Email: hr@thebdcreation.com*

Mr. Md. Anower_Manager_HR & Compliance

Executive overview of the effectiveness of the security practices in place at the facility audited

Facility has effective security practices in place at the facility audited. It was observed that facility premises was secured through concrete wall, fencing, CCTV camera and security guard. It was found that the premises and inside the facility building was monitored 24 x 7 by CCTV camera and regular patrolling was done in day and night.

Any security short comings or weaknesses identified during the audit (not called out directly within the audit questions provided)

During the audit process and review of records no such short comings was identified which was not included in the questions provided.

	Best practices identified, as applicable
Business Partner Requirements	Security criteria had shared with the business partners and contractors. But had no written policy and procedure on business partner requirements and selection of business partner.
Personnel Security	The facility has detailed personnel security policy and procedures which allow personnel to work with compliance according to policy.
Procedural Security	It was noted that the facility has policy and procedure on procedural security and it has been effectively implement the procedures in the facility to comply with the requirement.
Physical Security	It was noted that the facility has policy and procedure on physical security. Moreover, CCTV records were kept for up to 27 days and facility's management team conduct random documented reviews of CCTV footage periodically to ensure security processes and procedures are being followed.
Security Training & Threat Awareness	The facility has threat and awareness program. Moreover, the facility management provided substantial training and awareness to the employees of all sections. But the Contraband, Human Smuggling and Terrorism and pest contamination sections were not included in the training.

Risk Assessment	It was noted that the facility was aware of the risk assessment. Moreover, facility had shared their risk assessment with business partners and contractors.
Cyber and Information Technology Security	The facility has IT and cyber security policy, procedures through which the information security is controlled. However, data back up files were not encrypted and had no cloud system. However, facility did not used any VPN or similar softwares for remote access.
Conveyances and Instruments of International Traffic	All international traffics are controlled by the client only.
Agricultural security	The facility is not dealing with any kind of agricultural activities. However, facility had pest control policy and procedures.
Seal Security	Facility has seal security policy, procedures through which the facility maintain seal in a controlled manner. However, facility did not conduct audits on seal.
Misc None	
General	Facility has vision to export safe and secured goods to the clients for which facility has implemented the CTPAT policies and procedures and trying their best to comply with all the requirements.

Overall Compliance Score: 86 % Audit Sent: 11/2/2021 Due Date: 11/11/2021

Gen	eral		50%
		Question	
1.	Does the business I sheet?	license match the current location name and address as listed on the audit	
		Yes No Business license	e.jpg
	Comments: Busine	ess License is matched with the current location.	
2.	Must Is there a pi	rimary point of contact (POC) identified regarding security matters?	
	Actual Expected		
	=	Yes No	
	Comments: Mr. Mc Email: hr@thebdcrea Mobile: 8801714130		
3.	Actual Expected	vide previous SCAN audit CAPAs to the auditor in preparation of this audit? Yes No NA	
	Comments: N/A as	s this was the initial audit of SCAN at this facility	
5.		dited location recently (within the last 60 days) participated in the free SCA at Awareness Training provided in advance of this Audit?	N
		Yes No	
	Comments: Facility 60 days in advance of	y did not participate in any free SCAN Threat Awarnesss training within the of this audit.	last

Risk	Assess	ment		91%
			Question	
6.	Must	Does the fa	acility have a risk assessment that identifies vulnerabilities in the business plan	n?
	Actual	Expected		
	✓	✓	Yes	
			No	
	Comm	ents: Facilit	ty have a risk assessment that identifies vulnerabilities in the business plan.	
7.	Must	Is the facili	ty risk assessment shared with business partners and contractors?	
	Actual	Expected		
	✓	√	Yes	
			No	
	Comm	ents: Facilit	ty had shared risk assesment with business partners and contractors.	
8.			e facility risk assessment include vulnerabilities specific to contracted service contractors, seasonal employees etc.?	
	Actual	Expected		
		√	Yes	
	✓		No	45"
			Risk assessmen	t.jpg
	Comm	anta. Diek s	accessment did not included vulnerabilities specific to contracted convice provi	idoro
			assessment did not included vulnerabilities specific to contracted service prov , seasonal employess etc.	iuei s
9.	Must	Is the facili	ty risk assessment updated periodically?	
	Actual	Expected		
			No updates noted or last update greater than 24 months ago	
	✓	√	Last update within the past 12 months	
			Last update between 12 months and 18 months	
			Last update between 18 months and 24 months	
	Comm	ents: Last (update within the past 12 months	
10.	Must	Define the	facility's cargo mapping process. (Select all that apply)	
	Actual	Expected		
	✓	✓	A written cargo process map is available	
			No written cargo process map is available	

facility is rendered unusable Comments: Facility has a documented crisis plan which includes communication to business partners of crisis related issues and potential alternative locations if facility is rendered unusable Business Partner Requirements Question 12. Does the facility contract services such as security, transportation or manufacturing labor? Actual Expected Yes No Comments: The factory had their own security and tranport system in the facility. 13. Must Does the facility review and provide copies of security criteria to business partners, particularly those that support international supply chain activities? Actual Expected Yes - Security criteria reviewed and provided in local language Yes - Security criteria is reviewed but not		Comments: Facility	The cargo process map includes transit times from origin to final container yard The cargo process map includes locations where freight may be at rest NA y just only made the cargo process map. The cargo map he final container yard and rest point but no written cargo p	
Actual Expected No documented crisis plan available Crisis plan includes reporting crisis-related issues to business partners as necessary Crisis plan includes alternative locations if facility is rendered unusable Documents: Facility has a documented crisis plan which includes communication to business partners of crisis related issues and potential alternative locations if facility is rendered unusable Comments: Facility has a documented crisis plan which includes communication to business partners of crisis related issues and potential alternative locations if facility is rendered unusable Business Partner Requirements Question 12. Does the facility contract services such as security, transportation or manufacturing labor? Actual Expected Yes No Comments: The factory had their own security and tranport system in the facility. 13. Must Does the facility review and provide copies of security criteria to business partners, particularly those that support international supply chain activities? Actual Expected Yes - Security criteria is reviewed and provided in local language Yes - Security criteria is reviewed but not provided to business partners No - Security criteria is not reviewed at all Yes - Security criteria reviewed and provided in English only. Comments: Security criteria was reviewed and provided copies of security criteria to business	11.	Material Define th	ne facility's crisis plan. (Select all that apply)	
Ouestion 12. Does the facility contract services such as security, transportation or manufacturing labor? Actual Expected Yes No No Comments: The factory had their own security and tranport system in the facility. 13. Must Does the facility review and provide copies of security criteria to business partners, particularly those that support international supply chain activities? Actual Expected Yes - Security criteria reviewed and provided in local language Yes - Security criteria is reviewed but not provided to business partners No - Security criteria is not reviewed at all Yes - Security criteria reviewed and provided in English only. Comments: Security criteria was reviewed and provided copies of security criteria to busines		Actual Expected Comments: Facility	No documented crisis plan available Crisis plan includes reporting crisis-related issues to business partners as necessary Crisis plan includes alternative locations if facility is rendered unusable Documented crisis plan available has a documented crisis plan which includes communicate	
12. Does the facility contract services such as security, transportation or manufacturing labor? Actual Expected ✓ Yes ☐ No Comments: The factory had their own security and tranport system in the facility. 13. Must Does the facility review and provide copies of security criteria to business partners, particularly those that support international supply chain activities? Actual Expected ☐ Yes - Security criteria reviewed and provided in local language ☐ Yes - Security criteria is reviewed but not provided to business partners ☐ No - Security criteria is not reviewed at all ✓ Yes - Security criteria reviewed and provided in English only. Comments: Security criteria was reviewed and provided copies of security criteria to busines	Bus	siness Partner Requir	rements	35%
Actual Expected Yes No Comments: The factory had their own security and tranport system in the facility. 13. Must Does the facility review and provide copies of security criteria to business partners, particularly those that support international supply chain activities? Actual Expected Yes - Security criteria reviewed and provided in local language Yes - Security criteria is reviewed but not provided to business partners No - Security criteria is not reviewed at all Yes - Security criteria reviewed and provided in English only. Comments: Security criteria was reviewed and provided copies of security criteria to busines			Question	
particularly those that support international supply chain activities? Actual Expected Yes - Security criteria reviewed and provided in local language Yes - Security criteria is reviewed but not provided to business partners No - Security criteria is not reviewed at all Yes - Security criteria reviewed and provided in English only. Comments: Security criteria was reviewed and provided copies of security criteria to business	12.	Actual Expected	Yes No	
particularly those that support international supply chain activities? Actual Expected Yes - Security criteria reviewed and provided in local language Yes - Security criteria is reviewed but not provided to business partners No - Security criteria is not reviewed at all Yes - Security criteria reviewed and provided in English only. Comments: Security criteria was reviewed and provided copies of security criteria to business				,.
	13.	particularly those the Actual Expected Comments: Security	Yes - Security criteria reviewed and provided in local language Yes - Security criteria is reviewed but not provided to business partners No - Security criteria is not reviewed at all Yes - Security criteria reviewed and provided in English only.	Security criteria.jpg

14. *Must* Does the facility have written procedures used in the selection of business partners

	including:	material	suppliers, manufacturers, and logistics service providers? (Select all that ap	ply)
	Actual Ex	pected		
		√	Documented screening process is available	
		√	Screening process is done on an annual basis	
		√	Screening process includes looking for evidence of money laundering and terrorism	
			funding	
	✓	✓	No screening process takes place Screening process includes monitoring for	
			financial stability	
	Comments take place	: No wr	ritten procedure on selection of business partners and no screening proces	SS
15.			ility's contracted business partners required to conduct an annual security ir operation?	risk
	Actual Ex	pected		
	✓		No	
		√	Yes - Annually	
			Yes - every 2 years Yes - At time of contract initiation only	
			, and the second se	
	Comments	: No an	nual security risk assessment is conducted for business partners	
16.	a question	naire hi	acility require business partners to provide a statement of compliance or coghlighting CTPAT Minimum Security Requirements that are in place? Is the tionnaire renewed annually? (Select all that apply)	mplete
	Actual Ex	pected		
		√	Compliance Statement and/or Security	
	G		Questionnaire required	
	✓	✓	No Renewed annually	
	Comments	: Minim	um security criteria or requirement was not required and reviewed annually	/
Cyb	er and Infor	matior	n Technology Security	61%
			Question	
18.			acility have a comprehensive written cyber security policy to protect inform ns? Is the policy reviewed and updated annually?	nation
		pected		
	✓	√	Policy is written and was updated within the past 12 months	
		√	Policy is written and was updated within the	
		\checkmark	past 12-18 months Policy is written but last update was greater than 18 months ago	

			No written policy is available NA
			y has developed a cyber security policy to protect information technology wed and updated annualy.
19.			acility have firewall and malware software installed to identify, protect, detect, ver their network? (Select all that apply)
	Actual Ex	xpected	
		√	Firewall deployed
	✓	~	Anti-malware software installed
			No firewall or anti-malware software deployed
			NA
	Comment	s: Anti-n	nalware software was installed but no firewall was deployed
20.	Must Ho	ow freque	ently are updates performed on firewall and malware software? (Select all that
	Actual Ex	xpected	
	✓	√	Software updates are automatically deployed
			from the software providers
	\checkmark	1	Manual updates installed by on site IT services as needed
			No updating is performed
			NA
			are updates are automatically deployed from the software providers. Moreover, talled by on site when IT services required
21.			enarios conducted to identify open ports and IP addresses that create vulnerable rnal network?
	Actual Ex	xpected	
		√	Vulnerability tests are conducted by IT personnel
			No vulnerability tests are conducted NA
		-	rsonnel of the facility has not conducted vulnerability test to identify open ports nat create vulnerable access to the internal network.
23.			m does the facility report cybersecurity threats and attempts at unapproved systems?
	Actual Ex	xpected	
	✓	✓	Senior management
		1	Internal business partners

		Customers / suppliers Government agencies No reporting process and procedure in place NA
	Comments: Facility cyber security.	ty management has designated Mr. Md. Kahir_Officer IT as responsible person for
24.		ated systems in place to monitor and prevent attempts of unauthorized access th systems and/or electronic data?
	Actual Expected	
		No Yes NA
		s noted that no automated system in place to monitor and prevent attempts of and tampering with systems and/or electronic data.
25.		agement regularly review the employees with network access in order to restrict ose applications required to perform current job requirements?
	Actual Expected	
		Management reviews annually
		Management reviews quarterly
		Management reviews monthly No management review conducted
		NA
	Comments: No m	anagement review had conducted
26.		written procedure to remove network access for employees who are terminated r than vacation? (Select all that apply)
	Actual Expected	
	\checkmark	Access immediately removed for terminated employees
	✓	Employees on long term disability or maternity
		leave have access suspended No written procedure is available
		NA
		s noted that factory have a written procedure to remove network access for terminated and long term disability or on maternity leave employees access be procedure.
27	Must How is con	nnuter access managed at the factory? (Select all that annly)

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	Based on documer every computer.Ho	Passwords are required No passwords are required Passwords are changed periodically. Passwords must be complex NA puter access managed at the factory by providing password for every computer. Into review & management interview, it was noted that password are required for owever, as per provided documents the factory is using complex er, factory had a system to change password periodically (90 days)			
28.	• •	ees and/or contractors are permitted to access information technology (IT)			
	Actual Expected	d			
		Remote access is permitted and VPN or similar			
		software is used Remote access is permitted but no VPN or similar software is used to control accesss			
	✓	Remote access is not permitted			
	Comments: Rem	ote access is not permitted			
29.	Must Do all sec	urity policies apply to personal devices that connect to the network?			
	Actual Expected				
	\checkmark	Facility does not permit personal devices to connect to the network			
		All security policies apply to personal devices			
		Security policies do not apply to personal devices			
	Comments: Facility does not permit personal devices to connect to the network.				
30.	Material Does I websites?	T security limit and monitor the downloading of software and access to external			
	Actual Expected	d			
		No Vari			
		Yes			
	Comments: IT see for external websit	ecurity limits and monitor the downloading of software but had no access control tes.			
31.	Material How fr	requently is data backed up for this facility?			
	Actual Expected	d			
		No data back ups are performed			

Actual Expected

		√	Data is backed up daily	
		✓	Data is backed up weekly	
	✓	√	Data is backed up monthly	
	Comments:	Data i	is backed up monthly	
32.	Material I	s the d	ata backup stored offsite and encrypted?	
	Actual Exp	pected		
	✓	✓	Data backup is stored offiste	
		✓	Data backup is encrypted	
			Data is not stored offsite nor encrypted	
	Comments:	Data l	backup is stored offsite, but is not encripted	
33.	Material I	s equip	oment slated for disposal returned to the IT department for disposal?	
	Actual Exp	pected		
	✓	1	Yes	
			No	
			y had a system for disposal of any sensitive business details and documents department for elimination.	
Con	nveyances an	d Instr	ruments of International Traffic	95%
			Question	
34.	Does the fa	cility lo	ad trailers/containers or Instruments of International Traffic (IIT)?	
	Actual Exp	pected		
	✓	V	Yes	
			No	
			s noted that facility did not use trailer or container or instruments of Rather the facility used covered van for shipping the goods and receiving r	aw
35.	Critical W	hile in t	the facility's control are containers stored in a secured manner whether on-	site or
	on site:			
		pected		
		pected	Container/trailer storage area is free from	
	Actual Exp		Container/trailer storage area is free from personal vehicle parking and any other storage Area is secured as described in CTPAT MSC	
	Actual Exp	√	Container/trailer storage area is free from personal vehicle parking and any other storage	

	stored and loaded covered vans.					
36.	Were you able to observe a container inspection in process or a previously completed container inspection via CCTV recordings?					
	Actual Expected					
	✓	Yes				
		No				
	Comments: Cove	red vans were inspected under the CC camera.				
37.	Critical Is there trailer prior to load	a written procedure in place to inspect the security inteding?	grity of a container or			
	Actual Expected	1	manal dilla			
	✓	Yes				
		No				
			7 point inspection			
			procedure.jpg			
	0 / F. 3	to be a second to the description of the second the second	L. Calaca D. L. Ca			
		ty has a written procedure in place to inspect the securi prior to loading also the procedure include a process to				
38.		a documented, comprehensive inspection of a trailer/cocontainer? (Select all that apply)	ntainer conducted prior			
	Actual Expected	l l				
		Size of container notated	7 point inspection			
	✓	Name of person performing the inspections included on checklist	<u>checklist.pdf</u>			
	✓	Undercarriage checked for damage				
		No inspections completed or documented				
	✓	Checklist is utilized				
	✓	Date and time of inspection notated				
	\checkmark	Floor and roof of container intact no holes or leaks notated				
	✓	Outside walls free of damage notated				
	✓	Inspection for invasive species (eggs nests, dirt seeds) included				
	Comments: Facili size of containers.	ty had maintained the criteria for 7 point inspections in	the checklist except the			

Material Are photos and/or CCTV videos taken during the container/trailer loading process?

39.

Comments: Facility used coverd van for shipping and storage area is free from personal vehicle parking, loaded covered van secured with seal and the facility met the minimum security criteria for

(Select all that apply) Actual Expected Container loading 1 Photos are captured \checkmark process.pdf No visual documentation is recorded 1 **V** Video is captured Comments: It was noted that CCTV videos and photos were taken during the container/trailer /covered van loading process. 40. Critical Does the shipping area use equipment to conduct a 7-point container inspection? (Select all that apply) Actual Expected \checkmark Mirrors for undercarriage No tools available/tools do not meet requirements **V** Measurement tool **Container inspection** 1 **✓** Tap test tool tools.jpg 1 Container Interior cleaning tool **V** Comments: It was noted that the facility had a system to conduct a 7-point container inspection in shipping area. However, the inspection system was included laser tool as measurement tool, Mirrors for undercarriage, Tap test tool (such as a hammer), broom is used to sweep or clean the inside of the container. Material Are container inspections conducted in a secure area and in view of CCTV cameras? 41. (Select all that apply) Actual Expected 1 **V** Inside of trailer/container is visible from tail to nose on CCTV **V** 1 Trailer inspection area is visible on CCTV 1 Inspections are conducted in a secured area **✓** Inspections are not captured on CCTV nor in a secured area Comments: Container inspections was conducted in a secure area. During inspection Inside of trailer/container/covered van was visible from tail to nose on CCTV. 42. Must Does the facility maintain training records indicating which employees are trained to perform a 7-point container/trailer inspection? Actual Expected 1 Yes No Comments: Facility management has provided training on 7 point inspection to the employees

which was documented. Last training was conducted on October 13, 2021 with 7 participants.

43.	Material Is there a procedure where management or supervision conducts follow up inspections?				
	Actual Expected				
	✓	Yes			
		No			
	Comments: Facili	ty management has a procedure to conduct follow up inspection.			
44.	Material Are cor	ntainer/trailer inspections supervised?			
	Actual Expected				
	✓	Yes			
		No			
	Comments: Cove	red vans were inspected and supervised.			
45.	Does the facility of business partners	lirectly contract transportation service providers for any of their customers or ?			
	Actual Expected				
	✓	Yes			
		No			
	Comments: The facility directly hired their own transportation service for customers or business partners and did not movement to a consolidation location or between multiple production or storage facilities prior to export.				
46.		ne facility have a written procedure to require confirmation of arrival at destination r freight forwarder's location) for items shipped?			
	Actual Expected				
	✓	Yes			
		No			
	Comments: Facili forwarders location	ty had written procedure to require confirmation of arrival at destination freight for items shipped			
47.		racking technologies does the facility require to be used by the contracted mpany to confirm cargo arrival? (Select all that apply)			
	Actual Expected	1			
	✓	GPS carrier controlled			
		GPS shipper controlled			
		Cell phone check by carrier dispatch Cell phone confirmation by driver			
		No document or report was available to			
		review			
		Other No tracking technologies used			
		no ducking technologies used			

	with them to track their shipment en route			
48.	Material Where possible, are transit routes from the facility to the port or next destination location randomly changed to minimize predictability?			
	Actual Expected			
	□ ✓ Yes			
	✓ No			
	□ NA			
	Comments: Alternate transportation routes are not viable from the facility to the port or next destination location randomly changed to minimize predictability			
49.	Material Does the facility provide written instructions to transportation service drivers detailing that only required stops are permitted? (i.e. inspections by governmental agencies, refueling etc.			
	Actual Expected			
	□ No			
	✓ Yes			
	□ NA			
	Comments: The facility had provided written instruction to their drivers detailing that only required stops are permitted			
50.	Critical Does the facility document driver information for arriving and departing material movements? (Select all that apply)			
	Actual Expected			
	✓ Driver log is maintained			
	✓ Tractor number listed			
	✓ Container/trailer number listed			
	Photo ID required of drivers <u>Driver log.jpg</u>			
	No driver log available			
	Carrier name			
	✓ Date ✓ Arrival Time			
	Departure Time			
	Seal verification information for			
	container/trailer departure			
	Comments: Facility have documented log for driver information for shipments. However, factory			
	did not include photo id, arrival time, departure time and seal verification information for			
	container/trailer departure information in the log.			
51.	Does the facility ship less than container load (LCL)?			

Comments: GPS is carrier controlled and facility sent escort and maintained verbal communication

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	Actual Ex	pected		
		1	Yes	
	\checkmark		No	
	Comments does it.	s: Facilit	y does not directly involve with international shipment.	. Nominated forwarder
53.	Does the f	acility m	ake air shipments?	
	Actual Ex	pected		
	□	√	Yes No	
	Comments	s: The f	actory does not ship product through air. Facility make	e shipments through sea.
55.	Does the f		nake any shipments in open top, open sided, ventilated	d (livestock), soft sided
	Actual Ex	pected		
		√	Yes	
	\checkmark		No	
	Comments soft sided o		ry do not make any shipments in open top, open sided s.	, ventilated (livestock),
57.	immediate	ly after	national shipments sealed with an ISO 17712:2013 con a container or trailer is loaded?	npliant high-security seal
		pected		
	✓	✓	Yes	
			No NA	
			NA .	
			ntainer or trailer used by the facility but all loaded and with ISO 17712 security seal immediately after loaded	
58.			facility have written and verifiable procedures to ensur t all that apply)	re that security seals are
	Actual Ex	pected		W. o. will 2 1 2 1 3
	✓	√	Policy is written	
	✓	√	Seals are secured in storage	
	✓	√	Specific employees are listed who have access	C- Summit
			to seal storage	Seal control
			No written policy is available	policy.jpg

Comments: Facility had written policy on seal security and seals are secured in storage. Moreover, authorized employee have accesses to seal storage.

Agricultural security 100%							
		Question					
59.	Material Does to Actual Expecte	he facility remove dirt and other debris from containers' exterior prior to loading? d Yes					
		No					
	Comments: Facil	ity remove dirt and other debris from containers exterior prior loading					
60.		he facility have a procedure to inspect and review evidence of pest access such as odic extermination, and removal of debris from shipping and storage facilities?					
	Actual Expecte	d					
		Yes No					
	baited traps, perio	ity have a procedure to inspect and review evidence of pest access such as dic extermination, and removal of debris from shipping and storage facilities. g and receiving area found clean.					
61.	•	ackaging material heat treated or fumigated to kill pests and limit the potential for ests at the container stuffing location? (Select all that apply)					
	Actual Expecte	d					
		Only heat treated or otherwise treated					
		packaging material is utilized at this location Origins of all wood used in the manufacturing process is documented and provided to the receiver					
		Factory cannot detail how wood packaging					
	✓	material is treated prior to utilization NA					
	_						
	management is usi	vooden item is used by the facility in manufacturing activities. Facility ng plastic palletes.					
62.	Must Are wood species?	and wood products utilized in the manufacturing process identified by source and					
	Actual Expecte	d					
	✓	Yes					
		No					
	\checkmark	NA					
	Comments: No wooden packiging item is used by the facility in manufacturing activities. Facility management is using plastic palletes.						

63.	I. Must Are wood pallets used in the shipping process heat treated or fumigated to kill pests and limit the possible introduction of pests at the loading facility? Are pallets stored inside the facility to limit the exposure to seeds, dirt and other forms of contamination? (Select all that apply)				
	Actual E	xpected			
		1	Pallets are heat treated or fumigated		
		\checkmark	Pallets are marked with a heat treated stamp or a Phytosanitary inspection certificate is issued with each pallet delivery		
		~	Pallets are stored inside the building		
			Pallets are observed stored outside and on		
			the ground		
	✓		Pallets are not heat treated nor fumigated NA		
	_				
	Comment	ts: Facilit	y management is using plastic palletes.		
Seal	Security			90%	
			Question		
64.	Critical	Are secur	rity seals stored in a secured location?		
	Actual E	xpected			
	✓	~	Yes		
			No		
			NA		
	Comment	's: Secur	rity seals (ISO 17712) stored in a secured location.		
65.			acility have documented test reports or statements from the seal vendor t seals utilized meet the most recent ISO 17712 criteria?	to	
	Actual E	xpected			
	✓	V	Yes	8	
			No	-	
			NA		
			Seal testin	_	
			<u>certificate.j</u>	<u>pg</u>	
	Comment ISO 17712		ty has a testing report from their seal manufacturer which meet the most r	recent	
66.	audits of	the seal	procedure in place requiring management level personnel to conduct period inventory, seal log, and shipping documents and conveyances to validate t are being followed. All steps must be documented. (Select all that apply)		
	Actual E	xpected			
	\checkmark	√	A written procedure is available		
		√	Audits are conducted		
		W.	Audits are documented		

		No written procedure or practices are in place NA	
	Comments: Faci documented.	ility had written procedure on bolt seal but no audit was conduc	ted and
67.	Critical Describ	be the facility's seal application process. (Select all that apply)	
	Actual Expecte	ed	
	✓	VVTT process included in seal application procedure	
	✓	Secondary testing and validation is checked by supervisors or security guard at time of exit from the facility	
	✓	Seal numbers are written on shipping documents	
	✓	Testing procedure recorded on CCTV footage	
	\checkmark	Seal numbers are communicated or otherwise transmitted to the consignee	
	✓	Facility is advised when seal numbers are	
	_	changed prior to departure from port of origin	
		NA	
	Comments: All t	the process regarding Security seals are properly maintained by t	he facility.
Prod	cedural Security		99%
		Question	
68.	Critical Is the a	area adjacent to the shipping and receiving areas enclosed or ot	herwise monitored?
	Actual Expecte		
	\checkmark	Yes	
		No	
		e shipping and receiving areas was enclosed by fence & security of stem was in place to monitor shipping and receiving areas.	guards. In
69.		itten procedure in place to report unauthorized access to a contast storage areas within the facility including whom to notify?	ainer or a trailer,
	Actual Expecte	ed	1 (01) 10 1 10 1
	✓	Yes No	Labil
			Restricted area
			access control
			procedure.jpg

Comments: Factory has a written procedure in place to report unauthorized access to a container/trailer and/or product storage areas within the facility including whom to notify.

70.	Critical Is a written procedure in place to monitor and limit access to critical operational areas of the facility, such as warehouse picking, final packing or packaging, shipping and receiving?					
	Actual	Expected	Yes No			
						Restricted area access control procedure1.jpg
	operation	al areas of	the facility, such a	s warehouse pickin	o monitor and limit acg, final packing or pac d installed CCTV in cri	ckaging, shipping and
71.				ace that requires all be legible, comple	information used in tete, and accurate?	the shipping
	Actual	Expected	Yes No			The state of the s
						Shipment procedure.jpg
				•	edure that requires a ible,complete and acc	all information used in curate.
72.		ntation iss			rton count shortage, ading; or after the sh	overage, or any nipment has departed
	Actual	Expected				amit Half . I I
		√	Yes No			
						Shortage & overage procedure.jpg
	Commen or any do			ocedure in place to	resolve a carton cou	int shortage, overage
73.	<i>Critical</i> docume		national shipments	marked, counted,	weighed, and properl	y reported on shipping
	Actual	Expected				
	✓	✓	Yes No			



Packing list.jpg

Comments: International shipments marked, counted, weighed and properly reported on shipping documents.

	Critical Is a written procedure in place that restricts access to shipping and receiving documentation?				
	Actual Expecte	ed			
		No			
	✓	Yes	A TRUE COMPANY		
			<u>Shipment</u> <u>procedure1.ipq</u>		
			procedure1.jpg		
	Comments: Fact receiving.	cory has a written procedure in place that restricts	access to shipping and		
75.	Material Are pre-printed paper documents/forms used to prepare commercial documents and properly secured? (Select all that apply)				
	Actual Expecte	d			
	✓	Documents are secured			
		Pre-printed paper documents are utilized			
	✓	Pre-printed documents are not utilized or secured			
	Comments: Based on factory tour and management interview that, factory did not use pre-printed paper documents/forms to prepare commercial documents. Moreover, factory was controlling and preparing commercial documents in a secured way by authorized person.				
'6.	Material Are sh	nared network printers password protected when	used to prepare export		
'6.			used to prepare export		
'6.	documents? Actual Expecte		used to prepare export		
6.	documents?	ed	used to prepare export		
′ 6.	documents? Actual Expecte	ed Yes	used to prepare export		

	Actual Expected Yes No		Commercial shipment document.jpg
	Comments: Commercial	document packets were sent via hard copy o	or electronically.
78.		cedure in place to notify local law enforcement any abnormality is suspected or detected?	ent and the customer when
	Actual Expected Yes No		
			Notify illegal shipping activity.jpg
		written procedure and notify local law enforeity or any abnormality is suspected.	cement and the customers
79.	Critical Are access cont have access to the facilit	rol procedures or devices used to ensure that y?	at only authorized employees
	Actual Expected Yes No		Attendance machine.jpg
	Comments: Facility have to the facility.	control procedures for ensuring only authori	
80.	Critical Is there a proce attempted theft, fraud o	edure in place to notify Business Partners of s r internal conspiracies?	security issues such as
	Actual Expected Yes No		
			Notify illegal shipping activity1.jpg
	Commenter It was note:	that factory had a procedure in place to se	tifu business partner for

Comments: It was noted that factory had a procedure in place to notify business partner for security issues such as attempted theft, fraud or internal conspiracies. But this procedure not included to notify Business Partners, Origin Customs.

81.	Material Does the shipping department validate the freight being loaded against the Purchase Order prior to departure?			
	Actual Expected Yes No			
	Comments: The shipping department validates the freight being loaded against the Purchase Order prior to departure.			
82.	Critical Is a written procedure in place to control the issue, removal, and changing of access devices such as ID badge, door and lock keys, access cards, and security alarm codes?			
	Actual Expected Yes No Termination condition.jpg			
	Comments: Facility has a procedure to control the issue, removal, and changing of access devices such as ID badge, door and lock keys, access cards, and security alarm codes. Moreover, facility also maintain checklist in termination			
83.	Do you have dedicated security staff/guards on site?			
	Actual Expected			
	✓ Yes □ No			
	Comments: Factory have 10 dedicated security staff/guards on site.			
84.	Must Are written job descriptions in place outlining the roles and responsibilities of security staff or staff performing dual roles that include security functions.			
	Actual Expected			
	✓ Yes □ No			
	Comments: Factory have written job descriptions in place outlining the roles and responsibilities of security staff for review at time of audit. Based on document review and management interview, it was found that electronic or written logs are kept and reviewed regarding duties of security guards such as building/facility tours. Moreover, Management review occurred as required			
85.	Must Does the facility require the security staff or contractors to "patrol" the facility during off business hours and "patrols" are documented either with CCTV surveillance, electronic recordings or with paper check lists?			

	Actual E	xpected		
	✓	√	Patrols are required; documented electronically or via CCTV	
		\checkmark	Patrols are required; documented via paper only	
		√	Patrols are required; no documentation available	
			Patrols are not required nor documented	
			ty have a procedure on patrolling the facility during off business hours and these ted both with CCTV surveillance and with paper check lists.	
86.	<i>Must</i> D	oes mana	agement verify compliance with security company work instructions and policies?	,
	Actual E	Expected	I	
	✓	✓	Yes No	
			ory management verified and reviewed compliance, with Security Company's nd policies. Besides this, all reviews were found documented.	
Phy	sical Secur	rity	92%	6
		,	Question	
87.		Is there a living area	a designated employee and visitor vehicle parking area separate from the shippira?	ıg
	Actual E	Expected	1	
		√	Yes No	
	shipping a Receiving	nd receiv were fend	bry have designated employee and visitor vehicle parking area separate from the ling area under proper monitoring and CCTV coverage. Moreover, Shipping & ced with access controlled. In addition, no personally owned vehicles are ling & receiving area.	
88.		/ Are apponal shipr	propriate controls in place to segregate domestic goods from goods intended for ment?	r
	Actual E	Expected	1	
	✓	√	Yes	
			No	
	Commen	ts: Facilit	ty had international shippment only	
89.		•	eventative maintenance procedure in place that requires a regular inspection of or other barriers, buildings, and structures? (Select all that apply)	

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	Actual Exp	ected				
			Nothing in place			
	\checkmark	1	Procedure is written			
		V	Regular inspections are documented			
		1	Preventative maintenance logs kept			
	conducted reg	gular a	noted that facility has a written preventative maintenance procedure and nd inspections of perimeter fencing or other barriers, buildings, and structures ated and preventative maintenance log are maintained.			
90.			y gates through which vehicles and/or employees enter and exit guarded or tall that apply)			
	Actual Exp	ected				
			Nothing in place			
	_	✓	Gates are installed at all entrances/exits			
		√	Gates are monitored by guards/CCTV			
			NA Facility main gate.jpg			
		_	tes and entrances of the facility are guarded by security people and monitored CCTV cameras.			
91.	Critical Are	e gates	s locked or otherwise secured when not in use?			
	Actual Exp	ected				
	✓	V	Yes			
			No			
			NA			
			security personnel monitoring and controlling the facility through patrol duty and oring system by rotation			
92.			cility have sufficient lighting at entrances, exits, cargo handling and storage lines, and in parking areas to detect movement during periods of darkness?			
	Actual Exp	ected				
			Nothing in place			
		1	Nothing in place Interior lighting			
	✓		Exterior lighting			
			NA NA			
	Comments:	The fa	acility has sufficient internal and external lighting facility in all factory areas with			
	IPS and generator power backup for lighting facility. Moreover, industrial lights were installed in the					
	perimeter fencing and controlled by the authorized personnel.					
93.	Which of the	e follov	ving security technologies does the facility incorporate as part of its systems and			

controls? (Select all that apply)

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	Actual E	expected	
	✓	✓	CCTV
	✓		Access Control
	✓		Security Alarm Other
			None
94.	the securit	ty system	cy installed CCTV, security alarm and guard posting in all sensitive areas to monitor of the factory . we written procedures governing the use of the security technology?
94.		-	
	Actual E	Expected	4 () () () () () () ()
	✓	✓	Yes
			No NA
			Security technology.jpg
	Commen	ts: Facili	ty had written procedure for governing the use of the security technology
95.	Materia	/ Was se	curity equipment installed by a licensed/certified contractor?
	Actual E	Expected	
	✓	√	Yes
			No
	Commen	ts: Secur	rity equipment was installed by a licensed contractor.
96.	Materia	/ Do you	have maintenance contracts in place for your security systems?
	Actual E	Expected	
	✓	~ /	Contracts are annually reviewed
			Contracts are only reviewed when problems are uncovered
			No contract is in place
	Commen	ts: Maint	enance contracts was in placed and contracts are annually reviewed
97.			Security Infrastructure locations secured and authorized access limited to only require access?
	Actual E	Expected	
	✓	/	Yes
			No
			tical security infrastructure are guarded and monitored by the security guards o ensure access only those job require.

98.	. <i>Material</i> In the event of a power outage, does the facility have an alternate electrical power system to ensure uninterrupted operation of electronic security systems?				
	Actual Expected				
	✓	√		Yes	
				No	
				NA	
	Comme observe			had integrated power back-up system, as the generator and IPS backup was t tour.	
99.				system used to monitor the facility and premises' including entrances, exits, ping, and other loading/unloading areas? (Select all that apply)	
	Actual	Expe	cted		
	✓	V		All entrance(s)	
	✓	V		All exit(s)	
	✓	√		Storage/warehouse	
	✓	√	_	Loading area(s) Unloading area(s) panel.jpg	
	✓	√	_		
	✓	✓		CCTV coverage in additional areas No CCTV	
				NO CCTV	
	Comme	ents: A	ıll requ	uired areas CCTV system were installed.	
100.	O. <i>Material</i> Does your CCTV system have a failure alarm that indicates when the system is off line or no recording is underway?				
	Actua	I Expe	ected		
		-	/	Yes	
	✓	[No	
	Comme	ents: C	CTV s	ystem had no failure alarm that indicates when the system is offline.	
				,	
101.	Critic	cal Doe	es the	CCTV system run 24 hours per day 7 days per week?	
	Actua	Expe	ected		
	✓	9	/	Yes	
				No	
	Comme	ents: C	CTV s	system of the facility runs 24 hours 7 days per week.	
102.	Mus	t Is the	e facili	ty's CCTV system recording at the highest quality picture setting available?	
	Actua	Expe	ected		
	✓	-	/	Yes	
				No	
	Comme	ents: It	t was	noted from factory tour and management interview that highest quality	

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103.	Must Does the facility's management team conduct random documented reviews of CCTV footage periodically to ensure security procedures are being followed? (Select all that apply)							
	Actual	Expected						
		✓	Yes No					
		f CCTV foot		•	•	m conduct random ses and procedures		
104.	Critica	al How mar	ny days are	CCTV recordir	ngs kept?			
	Actual	Expected						
		√	90 or more	•				
	✓	✓	Less than	•				
			_	s not retained				
		✓	45 - 89 da 30 - 44 da	•				
			30 - 11 ua	ys				
		nts: Facility ober, 2021)		nan 30 days ba	ackup for CCTV r	ecording (i.e. 1st C	ctober, 2021 to	
105.	Must	Do employe	ees display t	their ID badge	e at all times while	e at the facility?		
	Actual	Expected						
	✓	√	Yes					
			No					
			IDs carried	d but not displ	ayed			
	Commer	nts: Employ	yee found w	ith ID card an	d also displayed	at the facility durin	g the audit.	
106.		and have so	•	•	•	o present photo idend rd their information	ntification upon in a log? (Select all	
	Actual	Expected					CECET SERVICE	
	✓	/	Written pr	ocedure is ava	nilable		2	
		√	Photo ID is					
	✓	√	Visitor Log	is utilized			The state of the s	
			No written	process is in	place		Visitor log.jpg	
	✓		Photo IDs	are not checl	ked			

picture setting was available in facility's CCTV system recording.

Comments: Factory have a visitor log and written procedure for unknown visitor but it was not included photo ID is required so that photo ID is not checked.

107.	<i>Must</i> Is a written procedure in place to inspect a visitor's bag before entering and leaving the manufacturing, production or shipping area of the facility?						
	Actual Expected						
	Yes No						
	Comments: Factory has a written procedure in place to inspect any suspicious package and mail for identifying dangerous materials and/or contrabands prior to distribution. However, all visitors' packages were screened prior to being granted admission to the facility.						
108.	Critical Is a visitor issued a numbered visitor badge which is displayed or carried while at the facility?						
	Actual Expected						
	Yes No						
	Comments: Visitor was issued a numbered visitor badge which is displayed or carried while at the facility.						
109.	Critical Is a visitor escorted at all times while at the facility?						
	Actual Expected						
	Yes No						
	Comments: Visitors are escorted to send them to the relevant person. Moreover, escort ensures visitors are logged in and out and also responsible for returning the visitors temporary identification.						
110.	Material Is a written procedure in place to inspect a suspicious package and mail for dangerous materials and/or contraband prior to distribution? A written procedure is in place to periodically inspect arriving packages for contraband.						
	Actual Expected						
	✓ Yes						
	□ No						
	L NA						
	Comments: A written procedure was in place to inspect a suspicious package and mail.						
111.	Material Are hazardous materials or high value goods stored at the facility? If so, are hazmat goods or high value goods segregated from other items?						
	Actual Expected						
	✓ Yes						
	No No						
	L NA						

ersonnel Security 92%				
Question				
Must Does the facility have a written procedure in place to validate information provided on ar employment application, such as an address, previous employment history, education, personal professional references, and a certification? (Select all that apply)				
Actual Expected Nothing in place Policy is written Education check Reference check Previous employment check NA Comments: Facility has a written procedure in place to validate information provided on an employment application, such as an address, previous employment history, education, personal or professional references, and a certification. In addition, the facility check employment application, age, education, skills, and overall background of their potential employees prior to recruitment.				
 Must Are permanent and temporary job applicant(s) required to submit a written application for employment and provide proof of their identity? (Select all that apply) Actual Expected Written application required Government issued ID required No NA Comments: All job applicant(s) are required to submit a written application for employment and provide proof of their identity.				
 Must If allowed by local law, is a written procedure in place to perform a background check or an applicant and employee who works in a sensitive area of the facility, such as personnel, shipping, computer systems, or contract employees? (Select all that apply) Actual Expected Written policy is available Criminal background checks completed Credit check completed Nothing in place NA 	l			

Comments: Facility has a written procedure in place to validate information provided on an employment application, such as an address, previous employment history, education, personal or professional references and a certification. However, credit check is not conducted.

Question

115. <i>Must</i> Is a security threat awareness training provided to all new employee refresher course for current employees?			• • • • • • • • • • • • • • • • • • • •
	Actual	Expected	
	\checkmark	\checkmark	Training logs are kept to insure required personnel attend the training
	✓	✓	Management personnel randomly reviews documentation
			There is no Threat Awareness training in place
	✓	✓	Training program in place
	✓	√	Training provided annually for all employees Training provided for new employees
		nts: Threat ided to the e	awareness training provided to all new employess and annual refresher training employees.
116.	Must	Does securi	ty threat awareness training cover security-related issues?
	Actual	Expected	
	✓	✓	Yes
			No
	Commer	nts: Threat	awareness training had covered all security related issues
117.		<i>rial</i> Is there t all that app	an evaluation of understanding included at the end of a training session?
	Actual	Expected	
			No evaluations are conducted
	\checkmark	√	Retraining is required if a successful score is not achieved
	✓	√	Evaluations are conducted
			NA
	Commer	nts: At the	end of the training session evaluation of understanding was conducted
118.			cility provide training to employees who conduct security and agricultural at all that apply)
	Actual	Expected	
	✓	✓	Training material lists specific requirements
	✓	✓	Training logs list employees working in this
	✓	\checkmark	area Training provided annually for existing employees with this job function

	✓	∀	job function
			No training logs for this specific criteria
			No training material for this specific criteria
	Commer	nts: The fa	cility had provided training to employees on security and agricultural inspection.
119.		Does training and rece	ng include security criteria for restricted areas of the facility such as final packing, iving?
	Actual	Expected	I
	✓	✓	Training material lists specific requirements Training logs list employees working in this area
	✓	√	Training provided annually for existing employees with this job function
	✓	√	Training provided for new employees with this job function
			No training logs for this specific criteria
			No training material for this specific criteria
			ty criteria for restricted areas of the facility had included in the threat rity training
120.			at Awareness training inform employees of procedures to report suspicious ity incident?
	Actual	Expected	I
	✓	✓	Yes
			No
		nts: Thream	awareness training was informed the employees how to report suspicious incident.
121.	employ	yees regard	at Awareness training provide additional instruction to shipping and receiving ling access controls, container and trailer inspection, and security seal control ect all that apply)
	Actual	Expected	I
	✓	✓	Training includes shipping & receiving controls
	\checkmark	~	Training includes how to conduct container/trailer inspections
	✓	√	Training includes container/trailer sealing practices
	✓	√	Training includes how to control seals
			No specific additional training is in place for shipping & receiving personnel
	Commer program	nts: Emplo	yees who are engaged in loading/unloading received the relevant security

122.	. <i>Must</i> Does the training program include Threat Awareness, Contraband, Human Smuggling and Terrorism?									
	Actual	Expected								
	□	√	Yes No							
			ty training program did not include criteria critical to security programs such Contraband, Human Smuggling and Terrorism.	as						
123.	Material Does the facility have a program to recognize an employee when reporting a security incident or recommending improvements?									
	Actual	Expected	l e e e e e e e e e e e e e e e e e e e							
			Yes No							
			awareness training was provided to inform employees of procedures to reasonable a security incident including incentive	port						
124.	Must	Does traini	ing include identifying pest contamination?							
	Actual	Expected	i e e e e e e e e e e e e e e e e e e e							
	✓	√	Yes No							
	Commer the clean		y did not provide specific training platform for identifying pest contamination	n to						
125.	Must	Is there a	documented training platform outlining the risks of Cybersecurity?							
	Actual	Expected								
	✓	✓	Yes No							
			NA							
		Comments: Facility management provides IT training to the employees regularly and kept the training documents properly.								
Misc	,			NA						
			Question							
126.	Descri	be the front	t of the factory building including any signage. Please attach a picture.							

 ${\it Comments:} \ \, {\it Auditor found the sinage at the front gate}$



127. Describe the guard station and facility access gates. Please attach a picture.

Comments: Security office found located in front side of the main gate and security guards are working in different shift.



Security Guard post.jpq

128. Describe the buildings and structures for this location. Please attach a picture.

Comments: Facility has 6 buildings in the facility premises. Facility premises is restricted from the unlawful entry. The building includes the department of material storage, cutting, sewing, finishing and packing.



<u>Building</u> <u>structure.jpg</u>

129. Describe the shipping and receiving areas. Please attach a picture.

Comments: Shipping and receiving areas are monitored by CCTV and security guards (24x7)



Shipping and receiving area.jpg

130. Describe how the perimeter of the facility is protected from unauthorized access? Please attach pictures

Comments: The perimeter was fenced with concrete wall of 10 feet and security guard do patrolling at regular intervals on the boundary wall to identify

any trespassing.



Facility perimeter.jpg

131. Describe the final packaging area. Please attach a picture.

Comments: Final packaging area is located in well secured location in confection section with CCTV and Security monitoring (24X7)



Final packing area.jpg

132. Describe any container storage and vehicle parking areas and please attach picture.

Comments: Facility do not use any container for shipment purpose but they used covered van which have designated place for parking. Shipment and vehicle parking area was separated.



Car parking.jpg

133. Did the Factory Representative and the Auditor sign the Opening Meeting Letter? Please attach the signed copy.

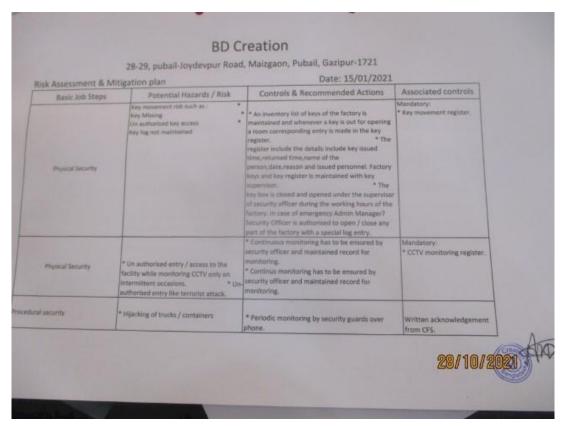
Actual	Expected	d	
✓	√	Yes No	Opening meeting letter.pdf

Comments: The opening meeting letter had been signed by the factory representative and auditor.

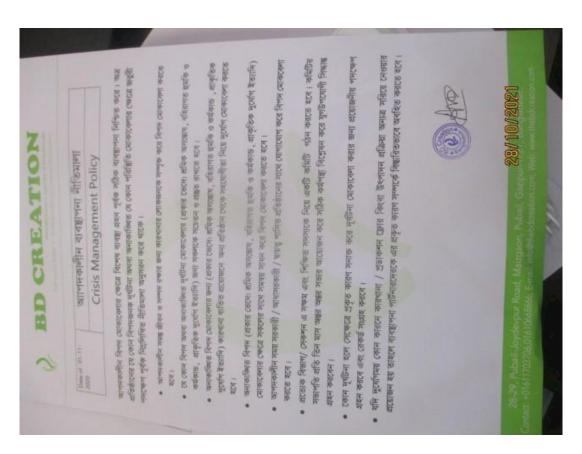
General - Question # 1



Risk Assessment - Question # 8



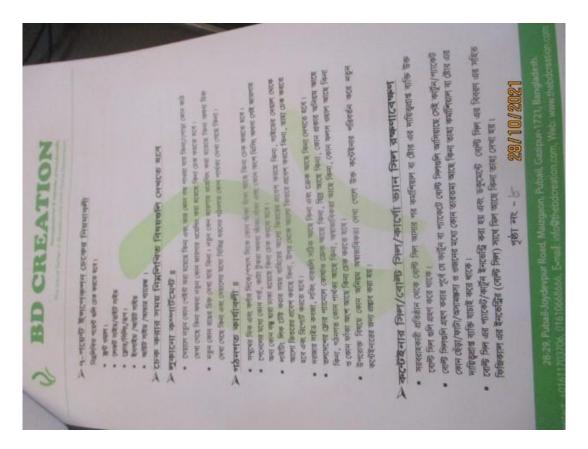
Risk Assessment - Question # 11



Business Partner Requirements - Question # 13



Conveyances and Instruments of International Traffic - Question # 37



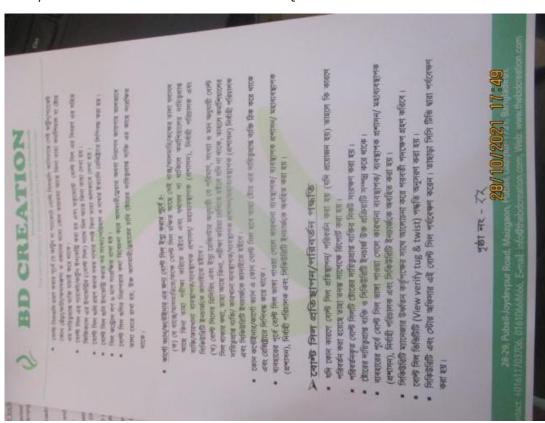
Conveyances and Instruments of International Traffic - Question # 40



Conveyances and Instruments of International Traffic - Question # 50

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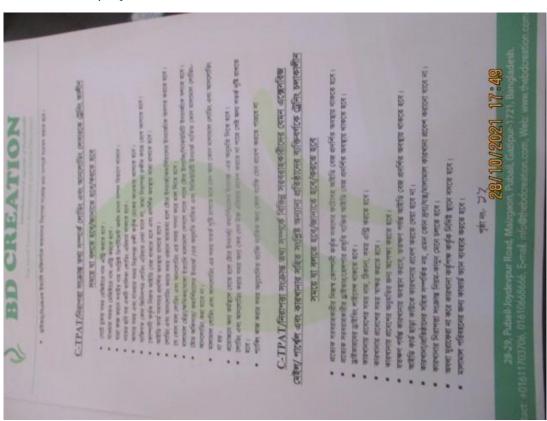
Conveyances and Instruments of International Traffic - Question # 58



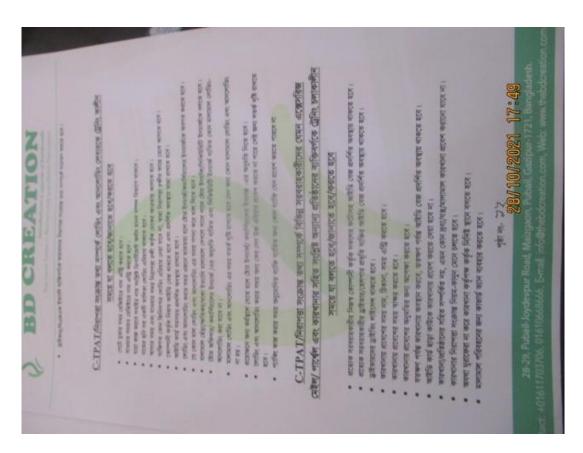
Seal Security - Question # 65



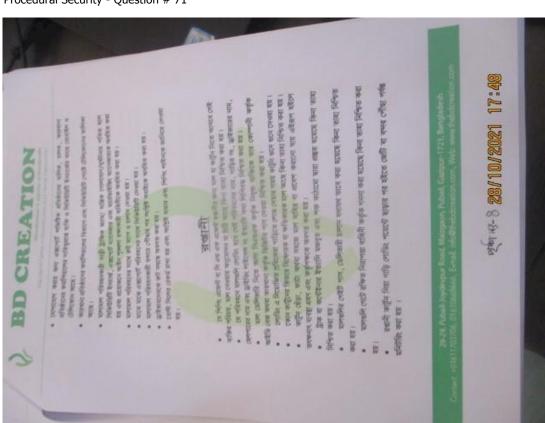
Procedural Security - Question # 69



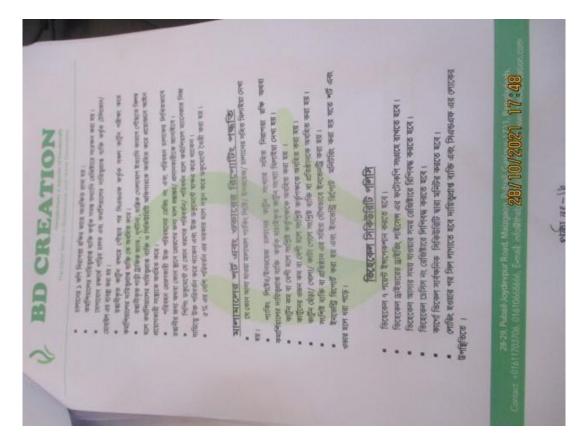
Procedural Security - Question # 70



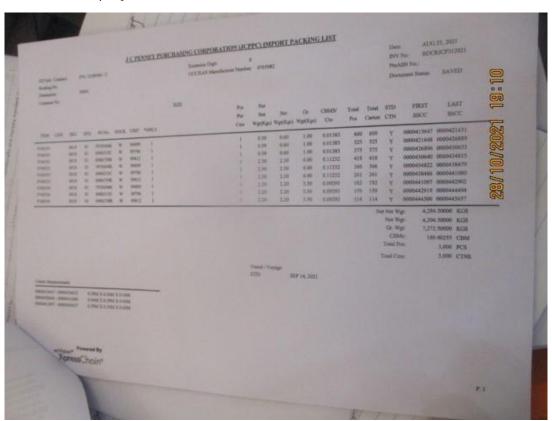
Procedural Security - Question # 71



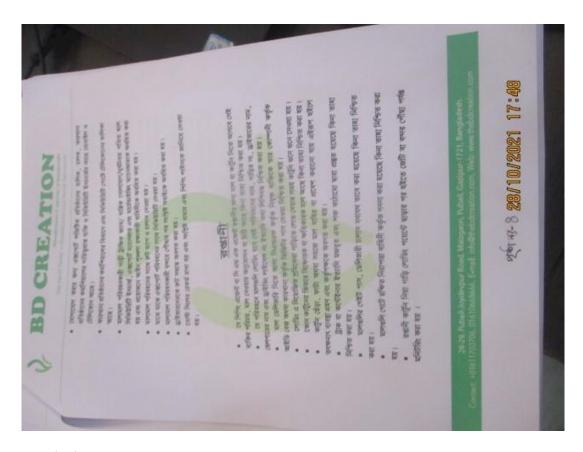
Procedural Security - Question # 72



Procedural Security - Question # 73



Procedural Security - Question # 74



Procedural Security - Question # 77



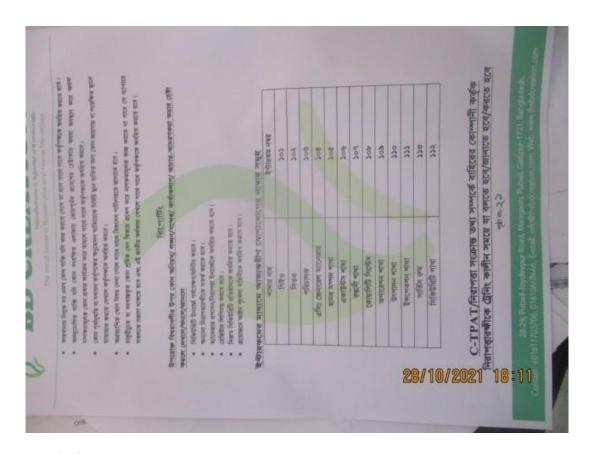
Procedural Security - Question # 78



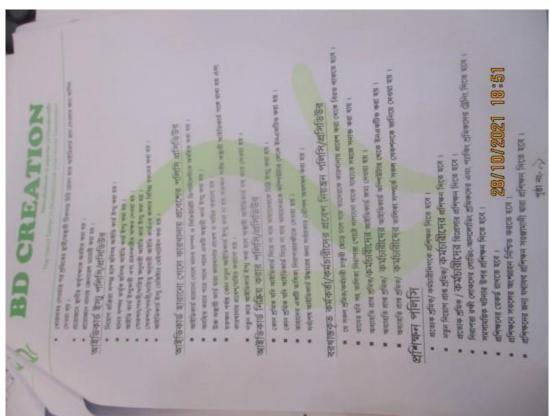
Procedural Security - Question # 79



Procedural Security - Question # 80



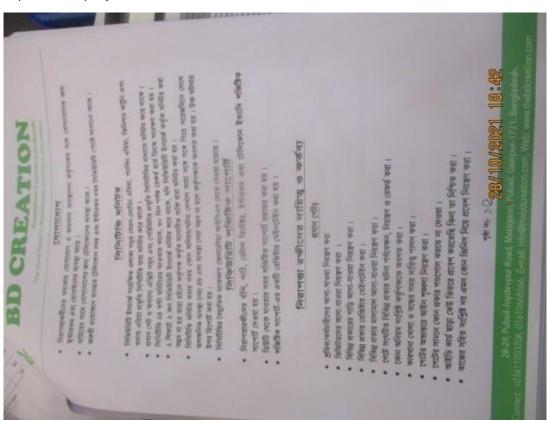
Procedural Security - Question # 82



Physical Security - Question # 90



Physical Security - Question # 94



Physical Security - Question # 99



Physical Security - Question # 106



Misc - Question # 126



Misc - Question # 127



Misc - Question # 128



Misc - Question # 129



Misc - Question # 130



Misc - Question # 131



Misc - Question # 132

