



# Guangzhou Suihui Metal Manufacture Company

## 2020 SCAN Security Audit

---

Report #	CA-2020-05-0401
Audit Completed	May 22, 2020
Compliance Score	90%
Audit Type	CORPORATE AUDIT



### This Report Applies Solely for SCAN - Supplier Compliance Audit Network

Disclaimer: This Audit Report is prepared at the direction of and intended for the benefit and use of SCAN members only. None of the material contained in this Audit Report may be altered, transmitted, copied or distributed to any other party, without the prior express written permission of SCAN. The information contained within this Audit Report addresses third party facilities that are not affiliated with SCAN. The accuracy of the information contained in this Audit Reports is not guaranteed or warranted by SCAN. This Audit Reports should not in any way be construed as advice of any sort by SCAN. SCAN shall not be responsible or liable for the accuracy of this Audit Report. [www.scanassociation.com](http://www.scanassociation.com)

LOCATION INFORMATION

Guangzhou Suihui Metal Manufacture Company  
No.105 Shiyu Road  
Dongchong Nansha District  
Dongchong Town,Nansha District, Guangzhou City, Guangdong, China  
511453  
8620-87341010,87341012

SCAN ID: CN74J9424LGU

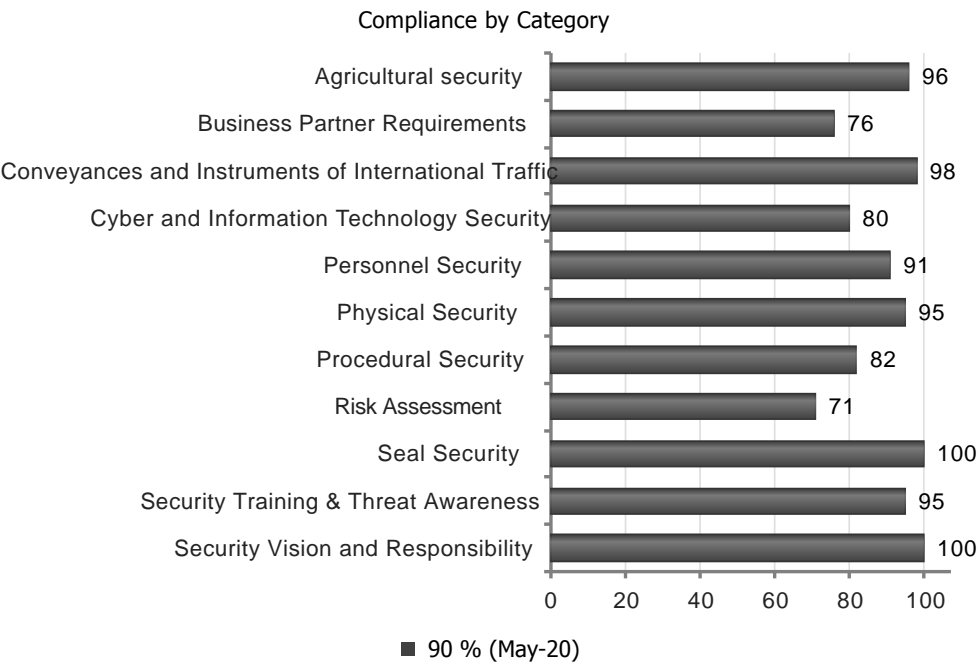
Point of Contact Name: Josie Yu  
Point of Contact Email: intl@unionco.cn  
Target Month: 06/12/20

Contact Name	Phone	Email
--------------	-------	-------

Location: Guangzhou Suihui Metal Manufacture Company  
Primary Location: Yes  
Critical Location: No  
Assigned Auditor: BSI Group  
Schedule Date: 05/15/2020

SCAN - 2020 SCAN Security Audit  
Audit completed on May 22, 2020

90% Compliance Score



## BUSINESS PROFILE INFORMATION

Profile Question	Response
Does the facility participate in any government, local customs, or World Customs Organization (WCO) accredited facility security program?	<i>No</i>
Do you hold a Government Supply Chain Security Certification?	<i>No</i>
Has the facility been reviewed or audited by this program?	<i>No</i>
Primary Industry of Operations	<i>Metal item</i>
Product Type / Commodity	<i>Drinking glass</i>
Year Established	<i>2015</i>
Grounds Size (Square Meters)	<i>4100</i>
Number of Buildings	<i>2</i>
Facility Size (Square Meters)	<i>4500</i>
Number of access points? (i.e. gates, exterior doors)	<i>2</i>
Hours of Operation	<i>For regular workers: 7:30-11:30 13:30-17:30 For security guard: 8:00-20:00 20:00-8:00</i>
Number of Employees	<i>101 - 500</i>
Number of Contract Employees	<i>0</i>
Number of Security Guards	<i>3</i>
Number of Migrant Workers	<i>0</i>
Annual Revenue	<i>10 - 50 Million</i>
Does the facility outsource any manufacturing services?	<i>No</i>
What countries does this facility export to?	<i>USA, EU</i>
Does this facility have affiliate locations where any work is conducted or product stored?	<i>No</i>
Does the facility outsource any transportation services?	<i>Yes</i>

Company Name	Contact Name	Contact Email	What % of Time Used?
Shenzhen Aiying Logistics Co., Ltd	Mr. Zhang Liu Jie	jackl@anying-express.com	100

---

*No*

Does this facility partner with any sales agent or vendor representatives?

---

## AUDIT RESPONSES

Overall Compliance Score: 90 %

Audit Sent: 5/22/2020

Due Date: 6/12/2020

### Security Vision and Responsibility

100%

#### Question

1. Does the Business License match the current location name and address as in the audit sheet? If no, please attach current scanned copy or picture of the facility's Business License.

Actual

- ☒ Yes  
☐ No

*Additional Comments:* No comments were provided

2. *Must* Is there a primary point of contact (POC) identified regarding security matters?

Actual

- ☒ Yes  
☐ No POC listed in contacts on factory profile

*Additional Comments:* A primary point of contact:

Name: Tom lu

Phone number: 86-20-87341010

Mobile phone number: 86-13609748444

Email: tom@unionco.cn

### Risk Assessment

71%

#### Question

3. *Must* Does the facility have a risk assessment that identifies vulnerabilities in the business plan?

Actual

- ☒ Yes there is a written risk assessment  
☐ No risk assessment available

*Additional Comments:* Security risk assessment procedure (Document number: C-TPAT -004; Version number: A0, issued on March 01, 2019) is in place.

4. *Must* Is the facility risk assessment shared with business partners and contractors?

Actual

- ☐ Yes the factory risk assessment is shared with business partners  
☒ No the factory risk assessment is not shared with business partners

*Additional Comments:* Risk assessment has not shared with business partners.

- 
5. *Material* Does the facility risk assessment include vulnerabilities specific to contracted service providers such as contractors, seasonal employees etc.?

Actual

- ☒ Yes  
☐ No

*Additional Comments:* Confirmed by reviewing the risk assessment form.

- 
6. *Must* Is the facility risk assessment updated periodically?

Actual

- ☐ No updates noted or last update greater than 24 months ago  
☒ Last update reflects a date within the past 12 months  
☐ Last update reflects a date between 12 months and 18 months  
☐ Last update reflects a date between 18 months and 24 months

*Additional Comments:* Security risk assessment form is established on July 22, 2019. The facility has updated the risk assessment annually.

- 
7. *Material* Define the facility's cargo mapping process. (Select all that apply)

Use NA only if the arrangement of transportation at origin is strictly managed by the customer or the customer's representative.

Actual

- ☒ A written cargo process map is available  
☐ No written cargo process map is available  
☒ 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

*Additional Comments:* The freight transportation contract signed with transportation company on April 23, 2020 defines facility's cargo mapping process, include transit times from origin to final container yard and locations where freight may be at rest.

- 
8. *Material* Define the facility's crisis plan. (Select all that apply)

Actual

- ☐ No documented crisis plan available  
☐ Crisis plan includes communication to business partners of crisis related issues  
☐ Crisis plan includes potential alternative locations if facility is rendered unusable  
☒ Documented crisis plan available

*Additional Comments:* Emergency issues handling procedure (Document number: C-TPAT -52; Version number: A0, issued on March 01, 2019), however it does not include communication to business partners of crisis related issues or potential alternative locations if facility is rendered unusable.

## Business Partner Requirements

76%

### Question

9. Does the facility contract services such as security, transportation or manufacturing labor?

Actual

- ☒ Yes  
☐ No

*Additional Comments:* The facility contracts transportation service to Shenzhen Aiying Logistics Co., Ltd. Moreover, a total of 6 major raw materials suppliers are used at present. The employee including IT staff, security guard, shipping staff and manufacturing staff are employed by the facility directly.

10. *Critical* Does the facility review and provide copies of security criteria to business partners, particularly those that support international supply chain activities?

Actual

- ☒ 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 to business partners.jpg](#)

*Additional Comments:* The facility provides copies of security criteria to all business partners.

11. *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 apply)

Actual

- ☒ 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



[Selection procedure of business partners.jpg](#)

*Additional Comments:* Supplier management procedure (Document number: C-TPAT-03; Version number: A0, issued on March 01, 2019) indicates the facility evaluates and selects all of its business partners including one transportation service contractor, and 6 major material suppliers etc. The facility arranges the annual security audit for the business partners. However, the screening process doesn't include a process of looking for evidence of money laundering and terrorism



funding.

12. *Must* Are the facility's contracted business partners required to conduct and provide an annual security risk assessment of their operation?

Actual

- ☐ No  
☒ Yes - Annually  
☐ Yes - Minimally every 2 years  
☐ Yes - At time of contract initiation only

*Additional Comments:* Supplier management procedure (Document number: C-TPAT-03; Version number: A0, issued on March 01, 2019) indicates that the onsite security assessment for the business partners should be conducted every year. The assessment records are provided for review during this audit.

13. *Must* Does the facility require business partners to provide a statement of compliance or complete a questionnaire highlighting the Minimum Security Requirements and controls that are in place? Is the statement or questionnaire renewed annually? (Select all that apply)

Actual

- ☒ Compliance Statement and/or Security Questionnaire required  
☐ No  
☒ Renewed annually



[Photo of Compliance Statement to business partner.jpg](#)

*Additional Comments:* The facility requires the business partners to provide a statement of compliance with the minimum security requirements annually.

14. *Must* If there are areas of non compliance found on the questionnaire, does the facility require corrective actions plans from the business partner with evidence of implementation?

Actual

- ☐ Yes  
☒ No

*Additional Comments:* The facility arranges the onsite assessment for the business partners. However, the facility does not require corrective actions plans from the business partner with evidence of implementation.

## Cyber and Information Technology Security

80%

### Question

15. *Must* Does the facility have a comprehensive written cyber security policy to protect information technology systems? Is the policy reviewed and updated annually?

NA is applicable only if there are no internet enabled network systems.

Actual

- ☒ Yes - Policy is written and was updated within the past 12 months
- ☐ Yes - Policy is written and was updated within the past 12-18 months
- ☐ Yes - Policy is written but last update was greater than 18 months ago
- ☐ No written policy is available
- ☐ NA



[Cyber security policy.jpg](#)

*Additional Comments:* Cyber security policy (Document number: C-TPAT-006; Version number: A1, issued on March 01, 2019) is in place to protect information technology systems, which is updated within 12 months.

- 
16. *Must* Does the facility have firewall and malware software deployed/set up to identify, protect, detect, respond and recover their network? (Select all that apply)

NA is applicable only if there are no internet enabled network systems.

Actual

- ☒ Firewall deployed
- ☒ Malware software installed
- ☐ No firewall or malware software deployed
- ☐ NA

*Additional Comments:* There are 21 computers in the facility; firewall and malware software are installed in each computer.

- 
17. *Must* How frequently are updates performed on firewall and malware software?

NA is applicable only if there are no internet enabled network systems.

Actual

- ☐ Manual updates installed by on site IT services as needed
- ☐ No updating is performed
- ☒ Software updates are automatically deployed from the software providers
- ☐ NA

*Additional Comments:* IT staff states the facility updates the firewall and malware software automatically.

- 
18. *Must* Are test scenarios conducted to identify open ports and IP addresses that create vulnerable access to the internal network?

NA is applicable only if there are no internet enabled network systems.

Actual

- ☐ Vulnerability tests are conducted by IT personnel
- ☒ No vulnerability tests are conducted
- ☐ NA

*Additional Comments:* No vulnerability tests are conducted by IT personnel.

---

19. What actions are taken when problems are identified while testing firewall, malware, and other network vulnerabilities?

*Comments:* No testing is conducted; if problems occur in the computer, the facility will ask for outside help.

---

20. *Material* To whom does the facility report Cyber security threats and attempts at unapproved access to network systems?

NA is applicable only if there are no internet enabled network systems.

Actual

- ☒ Senior management
- ☒ Internal Business partners
- ☐ External business partners
- ☐ Customers / suppliers
- ☐ Government agencies
- ☐ No reporting process and procedure in place
- ☐ NA

*Additional Comments:* The management explains cyber security threats will only be reported to senior management and internal business partners, but external business partners, customers/suppliers and government agencies are not included.

---

21. *Must* Are automated systems in place to monitor and prevent attempts of unauthorized access and tampering with systems and/or electronic data?

NA is applicable only if there are no internet enabled network systems.

Actual

- ☐ No
- ☒ Yes - Please describe systems
- ☐ NA

*Additional Comments:* 360 software is in place to monitor and prevent attempts of unauthorized access and tampering with systems and/or electronic data.

---

22. *Must* Does management regularly review the employees with network access in order to restrict access to only those applications required to perform current job requirements?

NA is applicable only if there are no internet enabled network systems.

Actual

- ☒ Management reviews annually
- ☐ Management reviews quarterly
- ☐ Management reviews monthly
- ☐ No management review conducted
- ☐ NA

*Additional Comments:* Management review the employees with network access authorization annually.

- 
23. *Must* Is there a written procedure to remove network access for employees who are terminated or on leave longer than vacation? (Select all that apply)

NA is applicable only if there are no internet enabled network systems.

Actual

- ☒ Access immediately removed for terminated employees
- ☐ Employees on long term disability or maternity leave have access suspended
- ☐ No written procedure is available
- ☐ NA



[Procedure to remove network access for terminated employees.jpg](#)

*Additional Comments:* Termination Management Procedures (Document number: C-TPAT-039; Version number: A0, issued on March 01, 2019) is in place to remove network access for terminated employees. However, the procedure does not define the employee on long term disability or maternity leave situation.

- 
24. *Must* How is computer access managed at the factory? (Select all that apply)

NA is applicable only if there are no internet enabled network systems.

Actual

- ☒ Passwords are required
- ☐ No passwords are required
- ☒ Passwords are required to be changed every 60-90 days
- ☒ Passwords must be complex
- ☐ NA

*Additional Comments:* Password is required for each computer access. The facility has ensured password must be changed every 60-90 days and define the password should be complex.

- 
25. *Must* Are employees/business partners/contractors/consultants permitted to access the company systems remotely?

NA is applicable only if there are no internet enabled network systems.

Actual

- ☐ Yes
- ☒ No

*Additional Comments:* The employees/business partners/contractors/consultants are not permitted to access the company systems remotely.

- 
27. *Must* Do all security policies and procedures apply to any personal devices that connect to the network?

NA is applicable only if there are no internet enabled network systems.

Actual

- ☒ Facility does not permit personal devices to connect to the network
- ☐ Yes - All security policies apply to personal devices
- ☐ No - Facility's security policies and procedures do not apply to personal devices
- ☐ NA

*Additional Comments:* All security policies apply to personal devices.

- 
28. *Material* Does IT security limit and monitor the downloading of software and access to non-internal websites?

NA is applicable only if there are no internet enabled network systems.

Actual

- ☐ No it does not monitor or limit access
- ☒ Yes - IT security monitors and limits access
- ☐ NA

*Additional Comments:* IT security limit and monitor the downloading of software and access to non-internal websites.

- 
29. *Material* Are network systems backed up?

NA is applicable only if there are no internet enabled network systems.

Actual

- ☐ No data back ups are performed
- ☐ Yes - Data is backed up daily
- ☐ Yes - Data is backed up weekly
- ☒ Yes - Data is backed up monthly
- ☐ NA

*Additional Comments:* The facility performs the data backup by USB disk once a month.

30. *Material* Is data backed up offsite and encrypted? (Select all that apply)

Actual

- ☐ Backed up data is offsite
- ☒ Backed up data is encrypted
- ☐ Backed up data is not kept offsite nor encrypted

*Additional Comments:* Backed up data is kept encrypted, but not offsite.

31. *Must* Is IT related equipment slated for disposal returned to the IT department for elimination of any sensitive business details and documents?

Actual

- ☒ Yes
- ☐ No

*Additional Comments:* No comments were provided

## Conveyances and Instruments of International Traffic

98%

### Question

32. Does the facility load trailers/containers or Instruments of International Traffic?

Actual

- ☒ Yes
- ☐ No

*Additional Comments:* No comments were provided

33. *Critical* While in the facility's control, are containers stored in a secured manner whether on-site or off site?

Actual

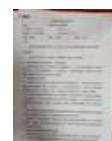
- ☒ Yes
- ☐ No

*Additional Comments:* No comments were provided

34. *Critical* Is there a written procedure in place to inspect the security integrity of a container or trailer prior to loading? (Select all that apply)

Actual

- ☒ Written procedure is in place
- ☐ No written procedure in place
- ☒ Procedure includes a process to refuse to load damaged or dirty containers



[Written procedure to inspect a container.jpg](#)

*Additional Comments:* Container inspection management procedure (Document number: C-TPAT-027; Version number: A0, issued on March 01, 2019) is in place.

35. *Critical* Is there a documented, comprehensive inspection of a trailer/container conducted prior to loading of the container? (Select all that apply)

Actual

- ☒ Size of container notated
- ☒ Name of person performing the inspections included
- ☒ Undercarriage checked for damage
- ☐ No inspections completed or documented
- ☒ Checklist is utilized
- ☒ Container number notated
- ☒ Date and time of inspection notated
- ☒ 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



[Container inspection record.jpg](#)

*Additional Comments:* Documented, comprehensive inspection of a trailer/container is conducted prior to loading of the container. However, inspection for invasive species (eggs nests, dirt seeds) is not included in the checklist.

36. *Material* Are photos and/or CCTV videos taken during the container/trailer loading process? (Select all that apply)

Actual

- ☒ Photos are captured
- ☐ No visual documentation is recorded
- ☒ Video is captured

*Additional Comments:* Container inspection management procedure (Document number: C-TPAT-027; Version number: A0, issued on March 01, 2019) is in place to require at least 4 photos should be taken, which are empty container, 100% loaded, door closing with container number, seal number. By sampling 5 shipments, photos are complete; loading process is monitored by CCTV.

37. *Critical* Does the shipping area use equipment to conduct a 7-point container inspection? (Select all that apply)

Actual

- ☒ Mirrors for undercarriage
- ☐ No tools available
- ☒ Laser distance measuring tool, pre-measured string or tape measure
- ☒ Tap test tool (such as a hammer)
- ☒ A broom or some type of blower air hose etc. is used to sweep or clean the inside of the container

*Additional Comments:* Hammer, brooms, laser distance measuring tool and mirrors for

undercarriage inspection are available onsite.

- 
38. *Material* Are container inspections conducted in a secure area and recorded in view of CCTV cameras? (Select all that apply)

Actual

- ☒ Inside of trailer/container is visible from tail to nose on CCTV
- ☒ Trailer inspection area is visible on CCTV
- ☒ Inspections are conducted in a secured area
- ☐ Inspections are not captured on CCTV nor in a secured area

*Additional Comments: No comments were provided*

- 
39. *Must* Does the facility maintain training records indicating which employees are trained to properly perform a 7-point container/trailer inspection?

Actual

- ☒ Yes
- ☐ No

*Additional Comments: No comments were provided*

- 
40. *Material* Is there a procedure where management or supervision conducts follow up inspections?

Actual

- ☐ Yes
- ☒ No

*Additional Comments: There is no procedure where management or supervision conducts follow up inspections.*

- 
42. Does the facility directly contract transportation service providers for any of your customers or business partners? This includes the movement to a consolidation location or between multiple production or storage facilities prior to export.

Actual

- ☒ Yes
- ☐ No

*Additional Comments: No comments were provided*

- 
43. *Material* Does the facility have a written procedure to track, trace and require confirmation of arrival at destination (container yard or freight forwarder's location) for items that you ship?

Actual

- ☒ Yes
- ☐ No



☐ NA

*Additional Comments:* Shipping department working instruction (Document number: C-TPAT-52; Version number: A0, issued on January 2, 2020) is in place.

44. *Material* What container or trailer tracking technologies does the facility require to be used by the contracted transportation company? (Select all that apply)

Actual

- ☒ Global positioning system carrier controlled  
☐ Global positioning system shipper controlled  
☐ Required cell phone check by carrier dispatch with status update  
☐ Required cell phone confirmation by driver  
☐ No document or report was available to review  
☐ Other please explain

*Additional Comments:* Global positioning system carrier controlled

45. *Material* Where possible, are transit routes from the facility to the port or next destination location randomly changed to minimize predictability?

NA is only an available response if there is only one direct route between the factory and the final destination. (i.e. container yard, consolidation location, port of export)

Actual

- ☒ Yes  
☐ No  
☐ NA

*Additional Comments:* The facility requires to change the transit routes from the facility to the port or next destination location randomly to minimize predictability.

46. *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

- ☐ No  
☒ Yes - Drivers are given written instruction to stop only for permitted instances



[Written instructions stops for transport company.jpg](#)

*Additional Comments:* The facility provides written instruction to transportation service drivers detailing that only required stops are permitted.

47. *Critical* Does the facility document driver and visitor information including photo ID, tractor ID number and conveyance ID number for arriving and departing material movements? (Select all that

apply)

Actual

- ☒ Visitor/ driver log is maintained
- ☒ Tractor number listed
- ☒ Container Number listed
- ☒ Photo ID required of drivers and visitors
- ☐ No verifiable documentation was available



[Driver log.jpg](#)

*Additional Comments:* Container in/out logs and vehicle in & out logs are used for recording driver's information, including tractor number, driver's full name, ID card number, container number, seal number, date of arrival and time of departure, visitor badge number and etc.

- 
48. *Critical* Is a written and verifiable security procedure in place with contracted less than container load (LCL) service providers?

NA is only an available response if no (LCL) movements are done from this facility.

Actual

- ☐ Yes
- ☐ No
- ☒ NA

*Additional Comments:* No (LCL) movements are done from this facility.

- 
50. Does the facility make air shipments?

Actual

- ☐ Yes
- ☒ No

*Additional Comments:* No air shipment is used.

- 
52. Does the facility make any shipments in open top, open sided, ventilated (livestock), soft sided containers?

Actual

- ☐ Yes
- ☒ No

*Additional Comments:* The facility does not use shipments in open top, open sided, ventilated or soft sided container.

- 
54. *Critical* Are international shipments sealed with an ISO 17712:2013 compliant high-security seal immediately after a container or trailer is loaded?

NA is only an available response if no containers are loaded at this location.

Actual

- ☒ Yes
- ☐ No
- ☐ NA

*Additional Comments:* High-security seals are provided by transportation service provider for full containers. Sales supervisor seals the loaded container immediately after the loading.

- 
55. *Critical* Does the facility insure that all loaded and stored containers or trailers are closed and secured with a security seal?

NA is only an available response if no containers are loaded at this location.

Actual

- ☒ Yes - All loaded and stored containers are closed and sealed
- ☐ No - Loaded containers are observed on yard without seals
- ☐ NA

*Additional Comments:* No comments were provided

- 
56. *Critical* Does the facility have written and verifiable procedures to ensure that security seals are controlled and are properly applied to a container or trailer by a designated facility employee(s)? (Select all that apply)

NA is only an available response if no containers are loaded at this location.

Actual

- ☒ Written policy includes keeping seals secured
- ☒ Policy designates a facility employee whom is responsible for seal control
- ☒ Policy includes that someone, other than the party whom applied the seal, performs the required "TUG TWIST TURN" testing to insure seal is correctly applied. This step is intended as a validation of proper application.
- ☐ No written policy is available
- ☐ NA

*Additional Comments:* Seal purchase, storage, using, change, recording and tracking management procedure (Document number: C-TPAT-054; Version number: A0, issued on March 01, 2019) is in place.

---

## Agricultural security

96%

### Question

57. *Material* Does the facility run water over or otherwise remove dirt and other debris from the outside of the shipping containers prior to loading and before departure from the facility? (Select all that apply)

Actual

- ☒ Outside of container is inspected for dirt and evidence of pests such as egg masses
- ☒ Outside of container is run through a water bath/shower to remove dirt and loose debris; identify leaks prior to loading. Other methods of removing dirt or seeds are acceptable please document these methods.
- ☐ No washing or inspection for dirt/debris removal is conducted

*Additional Comments: No comments were provided*

- 
58. *Material* Does the facility have a procedure to inspect and review evidence of pest access such as baited traps, periodic extermination, and removal of debris from shipping and storage facilities? (Select all that apply)

Actual

- ☐ Bait stations are visible
- ☒ Extermination contract is available for review
- ☒ Shipping and receiving area appears clean
- ☐ No evidence of process or procedure available
- ☐ Area outside and around the shipment and container storage are noted to have trash and evidence of bugs, rodents (i.e. droppings, food sources)

*Additional Comments:* The facility provides the extermination contract for review. The shipping and receiving area appears clean. However, no evidence of process or procedure available. No bait stations are visible.

- 
59. *Must* Is wood packaging material heat treated or fumigated to kill pests and limit the potential for introduction of pests at the container stuffing location? (Select all that apply)

NA is an available answer only if no pallets or wood packaging material are shipped from this location.

Actual

- ☒ 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

*Additional Comments: No comments were provided*

- 
60. *Must* Are wood and wood products utilized in the manufacturing process identified by source and species?

NA is only an available and appropriate response if no wood packaging material is utilized in this facility.

Actual

- ☐ Yes  
☐ No  
☒ NA

*Additional Comments:* No wood and wood products used in the manufacturing process.

61. *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)

NA is only an available and appropriate answer if no wood pallets are utilized in the international shipment process.

Actual

- ☒ Pallets are heat treated or fumigated  
☒ 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

*Additional Comments:* No comments were provided

## Seal Security

100%

### Question

62. *Critical* Are security seals stored in a secured location?

NA only applicable if the seals used are supplied by the Ocean service provider or other transportation service provider and as a used basis.

Actual

- ☒ Yes  
☐ No  
☐ NA



[Seal storage location.jpg](#)

*Additional Comments:* Security seals are stored in a drawer with lock at office.

63. *Must* Does the facility have documented test reports or statements from the seal vendor to validate that the seals utilized meet the most recent ISO 17712 criteria?

NA is only an applicable response if the seals are not provided by the factory.

Actual

- ☒ Yes
- ☐ No
- ☐ NA

*Additional Comments:* The facility has provided document test reports or statements from the seal vendor to validate that the seals utilized meet the most recent ISO 17712 criteria.

64. *Must* Is there a procedure in place requiring management level personnel to conduct periodic audits of the seal inventory, seal log, and shipping documents and conveyances to validate that the seal controls are being followed. All steps must be documented. (Select all that apply)

NA is only an available and appropriate response if no containers or trailers are loaded at this facility.

Actual

- ☒ A written procedure is available
- ☒ Audits are conducted
- ☒ Audits are documented
- ☐ No written procedure or practices are in place
- ☐ NA

*Additional Comments:* Seal purchase, storage, using, change, recording and tracking management procedure (Document number: C-TPAT-054; Version number: A0, issued on March 01, 2019) is in place.

65. *Critical* Describe the facility's seal application process. (Select all that apply)

NA is only an available and appropriate response if no containers or trailers are loaded at this facility.

Actual

- ☒ VTT 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
- ☒ 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

*Additional Comments:* Seal purchase, storage, using, change, recording and tracking management procedure (Document number: C-TPAT-054; Version number: A0, issued on March 01, 2019) is in place.

66. *Critical* Is the area adjacent to the shipping and receiving areas enclosed or otherwise monitored?

Actual

- ☒ Yes  
☐ No

*Additional Comments:* No comments were provided

67. *Critical* Is 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?

Actual

- ☒ Yes  
☐ No



[Reporting unauthorized access to container and product storage areas.jpg](#)

*Additional Comments:* Finished product shipping management procedures (Document number: C-TPAT-028; Version number: A0, issued on March 01, 2019) is in place.

68. *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? Access should be limited to only authorized employees.

Actual

- ☒ Yes  
☐ No



[Restricted areas management procedure.jpg](#)

*Additional Comments:* Restricted areas management procedure (Document number: C-TPAT-023; Version number: A0, issued on March 01, 2019) is in place.

69. *Critical* Is a written procedure in place that requires all information used in the shipping documents for merchandise/cargo to be legible, complete, and accurate?

Actual

- ☒ Yes  
☐ No

*Additional Comments:* Goods receipt management procedure (Document number: C-TPAT-061; Version number: A0, issued on March 01, 2019) is in place.

70. *Critical* Is a written procedure in place to resolve a carton count shortage, overage, or any documentation issue found during container or trailer loading; or after the shipment has departed the facility?

NA is only an available option if no containers are loaded at this location.

Actual

- ☒ Yes  
☐ No  
☐ NA

*Additional Comments:* Goods receipt management procedure (Document number: C-TPAT-061; Version number: A0, issued on March 01, 2019) is in place to resolve a carton count shortage, overage, or any documentation issue found during container or trailer loading; or after the shipment has departed the facility.

71. *Critical* Is an international shipment marked, counted, weighed, and properly reported on the commercial invoice and bill of lading?

NA is only an available option if no containers are loaded at this location.

Actual

- ☒ Yes  
☐ No  
☐ NA

*Additional Comments:* No comments were provided

72. *Critical* Is a written and verifiable procedure in place that restricts access to shipping and receiving documentation?

Actual

- ☐ No written procedure is available  
☒ Yes - Written procedure is available

*Additional Comments:* Goods receipt management procedure (Document number: C-TPAT-061; Version number: A0, issued on March 01, 2019) is in place.

73. *Material* Are pre-printed paper documents/forms used to prepare commercial documents and properly secured? (Select all that apply)

Actual

- ☐ Documents are secured  
☐ Pre-printed paper documents are utilized  
☒ Pre-printed documents are not utilized or secured

*Additional Comments:* The facility did not establish written procedure to ensure pre-printed paper documents/forms used to prepare commercial documents and properly secured.



74. *Material* Are shared network printers password protected when used to prepare export documents?

Actual

- ☐ Yes - Shared network printers are password protected  
☒ No passwords are utilized for network printers  
☐ No shared network printers are utilized at this facility

*Additional Comments:* The facility did not protect network printers' password when used to prepare export documents.

- 
75. *Critical* Are commercial document packets sent with the shipment at departure?

Actual

- ☒ Document sent in either hard copy or electronically  
☐ No documentation is submitted

*Additional Comments:* Documents are sent electronically.

- 
76. *Critical* Is a written procedure in place to notify local law enforcement and the customer when illegal shipping activity or any abnormality is suspected or detected? (Select all that apply)

Actual

- ☐ Nothing in place  
☒ Procedure is written  
☐ Local law enforcement notified  
☐ Customer notified  
☐ Origin Customs is notified

*Additional Comments:* Emergency issues handling procedure Goods receipt management procedure (Document number: C-TPAT-064; Version number: A0, issued on March 01, 2019) is in place for handling illegal shipping activity or illegal shipping activity or any abnormality and reporting to security supervisor, not including local law enforcement, customer and origin customs.

- 
77. *Critical* Are access control procedures or devices used to ensure that only authorized employees have access to the facility?

Actual

- ☒ Yes  
☐ No

*Additional Comments:* Badges and visitor card management procedure Goods receipt management procedure (Document number: C-TPAT-077; Version number: A0, issued on March 01, 2019) is in place.

- 
78. *Critical* Is there a procedure in place to notify Business Partners of security issues such as attempted theft, fraud or internal conspiracies? (Select all that apply)

Actual

- ☐ Nothing in place
- ☒ Yes Procedure is written
- ☐ Local Law enforcement is notified
- ☐ Business partners notified
- ☐ Origin Customs notified

*Additional Comments:* Emergency issues handling procedure Goods receipt management procedure (Document number: C-TPAT-064; Version number: A0, issued on March 01, 2019) is in place to notify security supervisor of security issues such as attempted theft, fraud or internal conspiracies, not including business partners, local Law enforcement and origin Customs

- 
79. *Material* Does the shipping department validate the freight being loaded against the Purchase Order prior to departure?

Actual

- ☒ Yes freight is validated prior to loading via manual count
- ☐ Freight being loaded is scanned and reviewed against PO/ delivery order prior to departure
- ☐ No not validated

*Additional Comments:* The freight is validated by loading supervisor prior to loading via manual count

- 
80. *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? (Select all that apply)

Actual

- ☐ Nothing in place
- ☒ Procedure is written
- ☐ Checklist is included in Termination document

*Additional Comments:* Badges and visitor card management procedure Goods receipt management procedure (Document number: C-TPAT-067; Version number: A0, issued on March 01, 2019) is in place

- 
81. Do you have dedicated security staff/guards on site?

Actual

- ☒ Yes
- ☐ No

*Additional Comments:* There are 3 security guards on site.

- 
82. *Must* Are written job descriptions in place outlining the roles and responsibilities of security staff or staff performing dual roles that include security functions. (Select all that apply)

Actual

- ☒ Job descriptions are in place
- ☒ Job descriptions available for review at time of audit
- ☐ No job descriptions exist or were unavailable for review at the time of the audit
- ☒ Management review occurs as required
- ☒ Electronic or written logs are kept and reviewed regarding duties of security guards such as building/facility tours

*Additional Comments:* Security guard management responsibilities Document number: C-TPAT-069; Version number: A0, issued on March 01, 2019) is in place.

83. *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

- ☐ Yes - Patrols are required; documented electronically or via CCTV
- ☒ Yes - Patrols are required; documented via paper only
- ☐ Yes - Patrols are required; no documentation available
- ☐ Patrols are not required nor documented

*Additional Comments:* Patrols are conducted once every 2 hours during off business hours and paper records are kept.

84. *Must* Does management verify compliance with Security company work instructions and policies? (Select all that apply)

Actual

- ☐ No
- ☒ Reviews are conducted
- ☒ Reviews are documented

*Additional Comments:* Internal security audit is conducted at least once per year.

## Physical Security

95%

### Question

85. *Critical* Is there a designated employee and visitor vehicle parking area separate from the shipping and receiving area? (Select all that apply)

Actual

- ☒ Shipping & Receiving fenced
- ☐ No
- ☐ No personally owned vehicles are permitted in Shipping & Receiving area
- ☐ Access controlled

*Additional Comments: No comments were provided*

86. *Material* Does the shipping area have a fence, a wall, or other controls separating domestic, hazardous, high value, and international goods and materials?

Actual

- ☒ Yes  
☐ No

*Additional Comments: No comments were provided*

87. *Material* Is a preventative maintenance procedure in place that requires a regular inspection of perimeter fencing or other barriers, buildings, and structures? (Select all that apply)

Actual

- ☐ Nothing in place  
☒ Procedure is written  
☒ Regular inspections are documented  
☒ Preventative maintenance logs kept

*Additional Comments: No comments were provided*

88. *Critical* Are facility gates through which vehicles and/or employees enter and exit guarded or monitored?

NA is only an available and appropriate response for locations such as bulk packaging and shipment facilities such as coal yards, fresh fruit and vegetable locations.

Actual

- ☒ Yes gates are secured and monitored  
☐ No gated or other controls in place to limit access  
☐ gates are secured but not monitored  
☐ NA



[Facility gate.jpg](#)

*Additional Comments: No comments were provided*

89. *Critical* Are gates locked or otherwise secured when not in use?

NA is only an available and appropriate response for locations such as bulk packaging and shipment facilities such as coal yards, fresh fruit and vegetable locations.

Actual

- ☒ Yes  
☐ No  
☐ NA

*Additional Comments: No comments were provided*

90. *Must* Does the facility have sufficient lighting at entrances, exits, cargo handling and storage areas, along fence lines, and in parking areas to detect movement during periods of darkness?

NA is only an available and appropriate response if the location is a bulk packaging facility or a fresh fruit and vegetable packaging facility operated only during daylight hours.

Actual

- ☐ Nothing in place
- ☐ Interior lighting only
- ☐ Exterior lighting only
- ☒ Yes - Sufficient exterior and interior lighting
- ☐ NA

*Additional Comments:* No comments were provided

---

91. Does the facility incorporate security technology as part of its systems and controls?

Actual

- ☐ Other
- ☒ CCTV
- ☐ Access Control
- ☐ Security Alarm

*Additional Comments:* CCTV is used in this facility.

---

92. *Must* Do you have written procedures governing the use of the security technology? (Select all that apply)

Actual

- ☒ Policy and procedures are written
- ☒ Written documentation includes testing and corrective actions
- ☐ No written procedures in place

*Additional Comments:* CCTV management procedure (Document number: C-TPAT-072; Version number: A0, issued on March 01, 2019) is in place.

---

93. *Material* Was security equipment installed by a licensed/certified contractor?

Actual

- ☐ System was installed by a specialized licensed/certified contractor
- ☒ System was installed by factory personnel or an electrical contractor
- ☐ Systems were installed in facility by building owners (this is leased space)

*Additional Comments:* System is installed by an specialized electrical contractor.

---

94. *Material* Do you have maintenance contracts in place for your security systems?

Actual

- ☒ Yes, contracts are annually reviewed
- ☐ Yes, contracts are only reviewed when problems are uncovered
- ☐ No contract is in place, or readily available for review

*Additional Comments: No comments were provided*

- 
95. *Must* Are Critical Security Infrastructure locations secured and authorized access limited to only those whose jobs require access.

NA is only applicable if the facility does not have CCTV or alarm systems.

Actual

- ☒ Yes
- ☐ No
- ☐ NA

*Additional Comments: No comments were provided*

- 
96. *Material* In the event of a power outage, does the facility have an alternate electrical power system to ensure uninterrupted operation of electronic security systems?

NA is only applicable if the facility does not have CCTV or alarm systems.

Actual

- ☒ Yes
- ☐ No
- ☐ NA

*Additional Comments: No comments were provided*

- 
97. *Critical* Is a CCTV system used to monitor the facility and premises' including entrances, exits, cargo storage, shipping, and other loading/unloading areas?

Actual

- ☐ No CCTV or camera system
- ☐ Other surveillance system (please explain)
- ☒ Yes



[CCTV monitor.jpg](#)

*Additional Comments: 17 channels of CCTV are installed to monitor the entrance/exit, warehouses, packing workshop, loading/receiving area, parking area, and etc.*

- 
98. *Material* Does your CCTV system have a failure alarm that indicates when the system is off line or no recording is underway? (Select all that apply)

Actual

- ☒ System is connected to a back up power system

- ☒ CCTV system has a failure alarm  
☐ No failure alarm available

*Additional Comments:* CCTV system has connected to a back up power system and a failure alarm system.

---

99. *Critical* Does the CCTV system run 24 hours per day 7 days per week?

Actual

- ☒ Yes  
☐ No

*Additional Comments:* No comments were provided

---

100. *Must* Is the facility's CCTV system recording at the highest quality picture setting available?

Actual

- ☒ Yes  
☐ No  
☐ PO issued for upgraded system

*Additional Comments:* No comments were provided

---

101. *Must* Does the facility's management team conduct random documented reviews of CCTV footage periodically to ensure security processes and procedures are being followed? If found to be lacking corrective actions are taken. (Select all that apply)

Actual

- ☒ Reviews are documented  
☒ Yes - Periodic reviews are conducted  
☒ Corrective actions are taken for gaps identified  
☐ No reviews are conducted

*Additional Comments:* No comments were provided

---

102. *Critical* How many days are CCTV recordings kept?

Actual

- ☐ 90 or more days  
☐ Less than 30 days  
☐ Recordings not retained  
☒ 45 - 89 days  
☐ 30 - 44 days

*Additional Comments:* The CCTV records are kept for 48 days instead of 90 days.

---

103. *Must* Are employees required to display their ID badge at all times while at the facility?

Actual

- ☒ Yes
- ☐ No
- ☐ IDs carried but not displayed

*Additional Comments: No comments were provided*

---

104. *Critical* Is a written procedure in place to require an unknown visitor to present photo identification upon arrival? Is their information recorded into a visitor log? (Select all that apply)

Actual

- ☒ Written procedure is available
- ☒ Photo ID is required
- ☒ Visitor Log is utilized
- ☐ No written process is in place
- ☐ Photo IDs are not checked

*Additional Comments: Badges and visitor card management procedure (Document number: C-TPAT -77; Version number: A0, issued on March 01, 2019) is in place.*

---

105. *Must* Is a written procedure in place to inspect a visitor's bag or package before entering and leaving the manufacturing, production or shipping area of the facility?

Actual

- ☒ Yes - Written procedure in place and all bags were inspected
- ☐ Yes - Written procedure in place but auditors bag was not inspected or other visitors entering were observed not having bags inspected
- ☐ No written process or procedure in place

*Additional Comments: Badges and visitor card management procedure (Document number: C-TPAT -77; Version number: A0, issued on March 01, 2019) is in place.*

---

106. *Critical* Is a visitor issued a numbered visitor badge which is displayed or carried while at the facility?

Actual

- ☒ Yes
- ☐ No

*Additional Comments: No comments were provided*

---

107. *Critical* Is a visitor escorted at all times while at the facility?

Actual

- ☒ Yes
- ☐ No



*Additional Comments: No comments were provided*

108. *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.

NA is an available and appropriate response only if all packages and mail are delivered to another location prior to distribution to the factory.

Actual

- ☒ Yes  
☐ No  
☐ NA

*Additional Comments:* Mail and Package Check Procedure (Document number: C-TPAT -81; Version number: A0, issued on March 01, 2019) is in place to inspect a suspicious package and mail for dangerous materials and/or contraband prior to distribution.

## Personnel Security

91%

### Question

109. *Must* Does the facility have 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? (Select all that apply)

NA is an available and appropriate response only if background checks are not permitted by local law.

Actual

- ☐ Nothing in place  
☒ Policy is written  
☒ Education check  
☒ Reference check  
☒ Previous employment check  
☐ NA

*Additional Comments:* Human resource security policy and management procedure(Document number: C-TPAT -008; Version number: A0, issued on March 01, 2019) is in place.

110. *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

- ☒ Written application required  
☒ Government issued ID required  
☐ No requirements available

*Additional Comments: No comments were provided*

111. *Must* If allowed by local law, is a written procedure in place to perform a background check on 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)

NA is an available and appropriate response only if background checks are not permitted by local law.

Actual

- ☒ Written policy is available
- ☒ Criminal background checks
- ☐ Credit check completed
- ☐ No background checks or policy available for review
- ☐ NA

*Additional Comments:* Background check procedure (Document number: C-TPAT -084; Version number: A0, issued on March 01, 2019) is in place to perform a background check including criminal background check for all employees such as HR staff, shipping staff, IT staff, warehouse staff, packing and loading workers, security guards, and etc. Criminal background check is conducted once per year by local police station and latest one is conducted on March 25, 2020; but no credit check is conducted.

## Security Training & Threat Awareness

95%

### Question

112. *Must* Is a security threat awareness training program established and maintained? Is training provided to all new employees and an annual refresher course for current employees?

Actual

- ☐ Training provided annually
- ☒ Training provided for new hires
- ☐ There is no Threat Awareness training in place

*Additional Comments:* The facility established and maintained a security threat awareness training program; however, the training only provided to all new employees and missing annual refresher course for current employees.

113. *Must* Are training classes or meetings conducted to explain the critical reasons why documentation and security is critical in certain departments etc.? (Select all that apply)

Actual

- ☐ No training is conducted or documentation of training is unavailable
- ☒ Classes are conducted on security related issues
- ☒ Training logs are kept to insure required personnel attend the training
- ☒ Management personnel randomly reviews documentation

*Additional Comments:* No comments were provided

- 
114. *Material* Is there an evaluation of understanding included at the end of a training session? (Select all that apply)

Actual

- ☐ No evaluations are conducted
- ☐ Retraining is required if a successful score is not achieved
- ☒ Evaluations of effectiveness of the training classes are conducted

*Additional Comments: No comments were provided*

---

115. *Must* Does the facility provide training to employees who conduct security and agricultural inspections? (Select all that apply)

NA is only an available and appropriate response if no container or trailers are loaded at this facility.

Actual

- ☒ Training is conducted
- ☒ Training logs are kept and reviewed
- ☒ Refresher training conducted annually
- ☒ Training available in local language
- ☐ No training conducted or documentation available for review
- ☐ NA

*Additional Comments: No comments were provided*

---

116. *Must* Does threat awareness training identify unique risks for sensitive or restricted areas of the facility such as final packing, shipping and receiving?

Actual

- ☒ Yes
- ☐ No

*Additional Comments: No comments were provided*

---

117. *Must* Does threat awareness training inform employees of procedures to report suspicious activity or a security incident?

Actual

- ☒ Yes
- ☐ No

*Additional Comments: No comments were provided*

---

118. *Must* Does threat awareness training provide additional instruction to shipping and receiving employees regarding access controls, container and trailer inspection, and security seal control procedures? (Select all that apply)

Actual

- ☒ Training includes shipping & receiving controls
- ☒ 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

*Additional Comments: No comments were provided*

- 
119. *Must* Does the training program include criteria critical to security programs such as Threat Awareness, Contraband, Human Smuggling and Terrorism? (Select all that apply)

Actual

- ☒ Threat Awareness training is included
- ☒ Training includes how to identify and manage contraband found
- ☒ Training includes how to identify evidence of human smuggling
- ☐ No specific training is conducted

*Additional Comments: No comments were provided*

- 
120. *Material* Does the facility have a program to recognize an employee when reporting a security incident or recommending improvements?

Actual

- ☒ Yes - Incentive/recognition program is in place
- ☐ No incentive program is available at the facility

*Additional Comments: No comments were provided*

- 
121. *Must* Does the factory have a specific training platform for identifying pest contamination? (Select all that apply)

Actual

- ☐ No
- ☒ Training platform is available
- ☒ Documentation of trained personnel is kept and available

*Additional Comments: No comments were provided*

- 
122. *Must* Is there a documented training platform outlining the risks of Cyber security? (Select all that apply)

NA is only an available and appropriate response if the facility has no network connected computer systems or equipment.

Actual

- ☐ No
- ☒ Documentation of trained personnel is kept
- ☒ Training platform is available
- ☐ NA

*Additional Comments: No comments were provided*

Misc

NA

Question

123. Describe the front of the factory building including any signage. Please attach a picture.

*Comments:* The north side of the facility is the Shiyu Road and the opposite is a metal machine factory, the east side is an industrial zone and the south side is farmland, the west side is a metal factory. The management confirms that all around of the facility are normal organizations and has not heard or observed any abnormal activity so far.



[The front of the facility building with name.jpg](#)

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

*Comments:* There are 2 gate located at the north side of the facility, which is used as main entrance for person and truck. 3 security guards are stationed at the gate with 24 hours/7 days. CCTV system is installed for monitoring of the gate.



[Security guard station.jpg](#)

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

*Comments:* There are 2 buildings in facility which are constructed with bricks and concrete; it's maintained in good condition and solid enough to resist unlawful entry.



[Building structure.jpg](#)

---

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

*Comments:* The shipping and receiving area is fenced and separated from production areas. CCTV camera, enough lighting, authorized access staff name list & photo and access restriction warning signs are installed. The facility representative states that the warehouse supervisor will monitor the loading and receiving area while loading and unloading.



[Loading and receiving area.jpg](#)

---

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

*Comments:* The facility is protected by the perimeter all around. The perimeter is with the height of 3 meters.



[Perimeter of the facility.jpg](#)

---

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

*Comments:* Final packaging area is located at 1st floor of the assembly production building; CCTV camera, enough lighting, authorized access staff name list and access restriction warning signs are available onsite. Moreover, visitors are required to have a documented registration before entering and leaving packing section.



[Packing area.jpg](#)

---

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

*Comments:* Vehicles are parked at designated area, which is monitored by security guards and CCTV; container is not stored in the facility at night.



[Vehicle parking area.jpg](#)

---

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

Actual



Yes



No



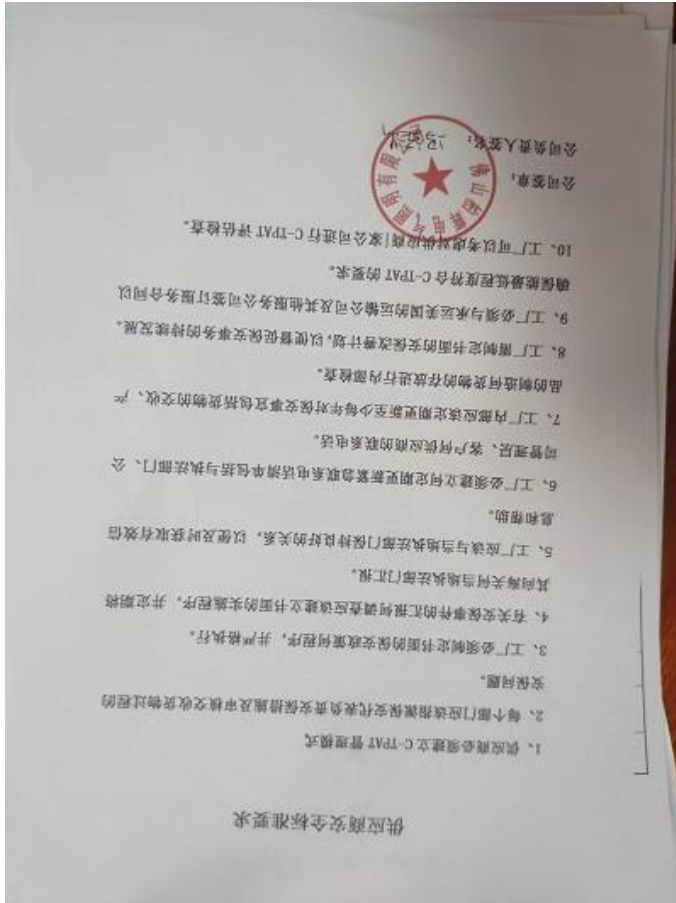
[Opening meeting letter.jpg](#)

*Additional Comments:* No comments were provided

---

## ATTACHED DOCUMENTATION - PHOTOS

### Business Partner Requirements - Question # 10



### Business Partner Requirements - Question # 11



广州德辉金属制品有限公司  
C-TPAT 认证程序

广州德辉金属制品有限公司			
名称:	供应商选择管理程序		
文件编号: C-TPAT-003	版本号: A/0		
制定部门: 人事部	生效日期: 2019-03-01		
编制: 黄清华	审核: 卢志斌	批准: 江桥	

1. 总则

1.1 制定目的

响应全球各界反恐怖行动, 确保货物财产/人员安全, 确保货物, 交通工具快速运送, 明确供应商出货的安全。

1.2 适用范围: 所有供应商

1.3 权责单位

1.3.1 管理部: 采购员必须按照该规定履行该岗位的职责, 保安主任确保该规定的贯彻与实施, 管理部负责人抽查监督岗位职责的实施情况。

1.4 名词定义: 对供应商产品生产及出货每个环节的严格把关;

2. 内容:

对供应商 C-TPAT 的基本要求:

- 1) C-TPAT 的遵守——供应商有责任去履行 C-TPAT 的要求。
- 2) 供应商需要在公司的产品上执行预防丢失和报告的程序。
- 3) 供应商需要允许本公司的审核员在其工厂执行安全和质量方面的审核。
- 4) 供应商有责任去确保跟随 C-TPAT 指引的变更以及符合所进行的变更。
- 5) 供应商有责任去进行 C-TPAT 方面的自我评估, 并向本公司报告在 C-TPAT 方面未能完全符合的事项, 我们会授予实际需要给予供应商一个有限度的改善期限。

3. 管理职责和支持

1. 供应商需要指派一个或多个安全经理去负责联络本公司, 了解和推行 C-TPAT, 并负责在其内部执行自我评估, 审核和调查, 并制定相应的改善措施。
2. 安全的过程和政纲需要使用文件形式去介定和适当张贴, 并需要做好防盗措施。C-TPAT 程序需要被推行以防护未列入付运清单的物料会被传入供应链, 安全控制包括: 监控货物的传入和迁移; 适当标识、秤重、计算、验证核对货物/货物设备是否符合装运清单; 监测和报告短缺和盈余; 有程序去指引如何处理附在货柜、货车上的封条, 监控进出迁移的货物。
4. 实际现场的安全

## Supply Chain Guarantee

### 供应链保证书

供应商 (厂商):

广州穗辉金属制品有限公司 C-TPAT 美国海关商贸反恐合作计划, 该计划是对整个供应链的安全提出要求, 所以望贵公司在今后的合作中, 也考虑尽快加入该计划, 并签订此保证书。

贵公司保证符合以下要求:

1. 配件不可被再次制造成武器;
2. 提供物品中之不得藏匿武器及零配件;
3. 贵厂人员不能对我方货车、人员、工厂进行伤害;
4. 不得进行恐怖活动等;
5. 积极配合我方实施 C-TPAT;
6. 如贵厂出现安全事故及隐患应及时通知我厂相关人员;
7. 保证货物的运输/搬运和储存相关的过程完整及安全;
8. 如因贵方原因造成我方在 C-TPAT 方面所遭受到的损失, 将由贵厂承担一切经济损失。

The following requirements should be claimed to be met.

1. All the accessories must not be remade into weapons.
2. Weapons and their accessories must not be hidden in the goods.
3. No harm can be made to the container trucks, employees and factory of Concord by the people from your factory.
4. No terrorist activities are allowed.
5. Cooperate actively with Concord to execute C-TPAT.
6. Inform the related person in Concord in time if a safety accident happened or a potential safety hazard is discovered in your factory.
7. All the economic loss of Concord related to C-TPAT because of any reasons from your side should be born by your company.

Approved by :

Signature & Date: 2023-1-13

Name : 符A

Designation : 经理

Managing Director / GM / Plant Manager

Company Chop

请贵公司签字、盖公章后回传, 以表示同意此文件内容回复。Please sign, stamp with company chop and fax back to reply your agreement with this document.

广州耀辉金属制品有限公司			
名称:		资讯信息安全控制程序	
文件编号: C-IPAT-006		版本号: N/1	
制定部门: 人事行政部		生效日期: 2019-03-1	
编制: 黄清华	审核: 卢志斌	批准: 江 桥	

## 总则

一、目的：为加强涉及公司秘密的基础信息数据的计算机网络系统的管理，确保公司秘密安全，根据有关法律、法规，结合本公司实际情况制定本规定。

二、适用范围：在本公司区域内从事采集、处理、存储、传输、检索、分发属于公司秘密的基础数据（以下简称涉密数据）计算机网络系统（以下简称涉密计算机网络系统）的管理。

三、权责单位：计算机部门主管应当加强对涉密数据和涉密计算机网络系统保密管理工作的指导和监督。

四、要求：任何个人发现涉密计算机网络系统已经泄密或可能泄密采取补救措施，并及时报告有关部门，有关部门接到报告后，应当立即作出处理。

## 内容

### 一、涉密单位人员管理

1：涉密计算机网络系统的部门（以下简称涉密部门）保密管理实行领导负责制，并指定部门或专人负责具体的日常工作。

2：涉密部门应当根据涉密计算机网络系统所涉及的基础数据密级等制定相应的网络安全保密管理制度；加强对涉密计算机网络系统工作人员（以下简称涉密人员）的管理，进行上岗前的保密培训，并定期进行保密教育和检查；涉密计算机网络系统的系统管理人员应当经过严格审查，定期进行考核，并保持相对稳定；涉密单位与涉密人员应当签订保守国家秘密的协议。

3：涉密单位和涉密人员应当遵守保密法律法规，认真执行公司制定的涉密计算机网络系统的保密规定，任何部门各个人不得利用涉密计算机网络系统处理属于公司秘密的基础数据，危害公司安全、损害公司、集体和他人的合法权益；不得从事其它违法犯罪活动。

4：涉密人员调离岗位，应当继续履行公司规定的保守公司秘密的义务。

### 二、网络系统管理

1：涉密部门对涉密计算机网络系统工作场所，应当按照保密要害部位的保密管理要求进行管理，建立保密工作制度责任制，制定严格的保密防范措施，并组织实施。

2：涉密计算机网络系统工作场所应当根据涉密程度和有关规定设立控制区，无关人员不得进入，涉密计算机网络系统应当采取身份认证机制、系统访问控制、数据保护和系统安全保密监控管理等

# 广州穗辉金属制品有限公司

## 离职通知单

2020年04月30日

工号	8121	姓名	黄嘉俊	到职日	2012.7.10
部门	冲压部	职称	冲压工	离职日	2020.4.30
原单位	事项	处理明细	经办人		
原单位	1. 保管物品 2. 工作移交 3. 遗失物品	退回： 职务交接人： 扣款：	黄嘉俊		
管理课	1. 退回个人使用文具用品 2. 工衣 3. 厂证 4. 保管钥匙 5. 职务印章 6. 固定资产保管移交	退回： 扣款： 交接人：	黄嘉俊		
宿舍	退宿手续	□ 手续齐全 □ 未缴回物品： 扣款：	黄嘉俊		
电脑系 板处理	1. 公司电脑回收 2. 电脑账户回收 3. 管理账户回收 4. 公司QQ回收	退回： 扣款： 交接人：	黄嘉俊		
人事主管确认流程完成：					

名称：员工离职通知及终止合作管理标准	版本：A/0
文件编号：C-TPAT-039	生效日期：2019-03-01
制定部门：人事行政部	审核：卢志斌
编制：黄清华	批准：江桥

### 1. 总则

#### 1.1 制定目的

为有效控制离职员工和终止合作客商进入厂区，严格遵守 GSV 有关控制非准许进入的要求

#### 1.2 适用范围

适用于我公司所有离职人员和已终止合作的客商（含供货商、承包商）

#### 1.3 权责单位

##### 1.3.1 管理部

保安主任：负责制定有效控制离职员工和终止合作客商出入厂区的措施，并组织实施

##### 1.3.2 人力资源部、相关部门：配合管理部保安组相关措施的执行

1.3.3 离职人员电脑使用的邮箱，管理账户或使用账户均需人事部门回收处理，并更改使用密码何账号保存。

### 2. 0 内容：

#### 2.1 员工离职

2.1.1 员工离职需亲临人事组填写「员工离职申请表」（清楚注明离职人员姓名、时间、原因），经部门主管批准后交予人事主管审核，后经副总经理核准的离职单交予人事组存档。在离职当日离职人员需填写「离职通知单」，并据需要填写「工作清册」。经相关部门人员确认后交予人事组存档，人力资

源组在每天下班之前需告知保安组当天离职人员明细，避免此人再次入厂

2.1.2 员工离职需将厂证交回人力资源组，管理员对计算机密码及系统权限清单

办理撤销权限手续，经核实后方可结算工资

2.1.3 保安人员密切注意自离职人员利用其未被撤销的厂证混入厂区，发现此类事

件，可强行收缴其厂证，拒绝其进入

2.1.4 一般情况下，被解雇的员工是不可再次聘用，自动离职和辞工的员工也须

在最少 2 个月后才可被聘用

2.1.5 如果是由于参加恐怖团体或非法组织而离职的人员，在法律的允许下将其

第 1 页 / 共 2 页

**C-TPAT**

广州穗晖金属制品有限公司		
名称:	货柜密封安全管理程序	
文件编号: C-TPAT-027	版本号: A/0	
制定部门: 人事行政部	生效日期: 2019-03-1	
编制: 黄清华	审核: 卢志斌	批准: 江 桥

一、目的

确保成品运输过程的安全性, 有力实施 C-TPAT 要求确保货物的安全到达目的地;

二、使用范围

适用于本公司仓库、货运部、业务联络部、船运、报关等部门;

三、装运区域的安全和货柜的验证、密封控制程序

1. 为预防货物的遗失或者未经授权付运的物品的传入, 工厂货仓部会按照有关《成品验货、入仓、走货及货物搬运行程序》、《收货程序》、《货仓周结程序》等程序去作为运作指引, 确保运作过程的安全和符合运作要求。
2. 装运区域的安全控制
  - 1) 为预防货物的遗失或者未经授权或者未被付运的物品的传入, 成品货柜的装运和收货的区域必须有清晰划定划分(装卸货区, 出口成品的货柜装运区), 并只能允许那些被明确识别在此区域内工作的雇员(货仓、收发货组及仓库管理人员)才能进入和操作。
  - 2) 为了确保没有被授权或者被确认的人员无端接近付运和收货区域, 货仓部会在显眼地方(货仓总部门口)张贴收发货程序/告示去告知有关之注意事项, 以及在收发货区会安排有值班保安去检查和监测: 非授权人士不能进入仓库区、收发货过程是否正常、车辆有无异常等。
  - 3) 外来人员的货车和私家车需要按规定停靠在指定停车场, 防止停靠近成品付运和货物储存区域; 当需要进行收发货时, 按照指定区域和指引进行收发货。
  - 4) 在需要时, 工厂将会考虑设立可操作功能(例如有监控和记录功能的) CCTV (中央监控系统) 去监测、记录停靠在收发货区域、成品/货柜装运区域以及工业区内停放的货柜车、拖车的装运过程。
3. 装运货柜/车辆的验证和密封措施控制
  - 1) 装运来料货车在进入厂房时, 需要经过大门保安的验证和登记, 装货出厂的货车在出厂时, 需要向大门保安提交《车辆/货物放行条》和打开车厢接受装载货物的核实检查。

Conveyances and Instruments of International Traffic - Question # 35



# 货柜车进出7点检查记录

车牌号: <u>鄂EY429</u>	封柜号: <u>EMCWL1714</u>	司机: <u>李</u>
柜号: <u>401/311</u>	柜型公司: <u>上海外运</u>	运往地点: <u>香港</u>
货物名称: <u>汽车配件</u>	货物总件数: <u>400</u>	检查日期: <u>2020.3.21</u>
检查项目	检查结果	备注
1.前门		
前门是否变形、前门是否有明显的损坏	<input checked="" type="checkbox"/>	
前门是否变形、前门是否有明显的损坏	<input checked="" type="checkbox"/>	
前门上下是否变形或损坏、前门	<input checked="" type="checkbox"/>	
前门是否变形	<input checked="" type="checkbox"/>	
2.左右门		
前门是否变形或损坏	<input checked="" type="checkbox"/>	
前门是否变形或损坏	<input checked="" type="checkbox"/>	
前门是否变形或损坏	<input checked="" type="checkbox"/>	
前门是否变形或损坏	<input checked="" type="checkbox"/>	
3.后门		
后门是否变形或损坏	<input checked="" type="checkbox"/>	
后门是否变形或损坏	<input checked="" type="checkbox"/>	
后门是否变形或损坏	<input checked="" type="checkbox"/>	
后门是否变形或损坏	<input checked="" type="checkbox"/>	
4.侧门		
侧门是否变形或损坏	<input checked="" type="checkbox"/>	
侧门是否变形或损坏	<input checked="" type="checkbox"/>	
侧门是否变形或损坏	<input checked="" type="checkbox"/>	
侧门是否变形或损坏	<input checked="" type="checkbox"/>	
5.内门		
内门是否变形或损坏	<input checked="" type="checkbox"/>	
内门是否变形或损坏	<input checked="" type="checkbox"/>	
内门是否变形或损坏	<input checked="" type="checkbox"/>	
内门是否变形或损坏	<input checked="" type="checkbox"/>	
6.下门		
下门是否变形或损坏	<input checked="" type="checkbox"/>	
下门是否变形或损坏	<input checked="" type="checkbox"/>	
下门是否变形或损坏	<input checked="" type="checkbox"/>	
下门是否变形或损坏	<input checked="" type="checkbox"/>	
7.侧门		
侧门是否变形或损坏	<input checked="" type="checkbox"/>	
侧门是否变形或损坏	<input checked="" type="checkbox"/>	
侧门是否变形或损坏	<input checked="" type="checkbox"/>	
侧门是否变形或损坏	<input checked="" type="checkbox"/>	
8.后门		
后门是否变形或损坏	<input checked="" type="checkbox"/>	
后门是否变形或损坏	<input checked="" type="checkbox"/>	
后门是否变形或损坏	<input checked="" type="checkbox"/>	
后门是否变形或损坏	<input checked="" type="checkbox"/>	

审核: 王

检查人: 王

## 货物运输委托合同

委托方：广州德辉金属制品有限公司（以下简称“甲方”）

受托方：深圳市安鑫国际货运代理有限公司（以下简称“乙方”）

双方经友好协商，本着相互合作，公平互利的原则，特协商由甲方委托乙方在广州的所有进出口货物运输一系列工作。双方达成如下协议，以便双方遵守合同。

### 一、服务内容：

乙方以综合的物流能力，向甲方提供货物运输（含空运、陆运、海运和多式联运）；物流设计方案：进出口货物的报关、清关、检验检疫、单证服务；仓储、分拨等物流服务。

### 二、委托运输货柜路线：

在合同期限内，必须按规定的路线，（线路一：广州德辉金属制品有限公司——天益东路——南沙大桥——S6 广龙高速——G4 京港澳高速——皇岗路——滨河路——船步路——S30 惠深沿海高速——夹门山隧道 1-3——林场隧道——明珠大道——盐田国际集装箱码头，此路线为来回路线，预计 2.2 小时到达。线路二：广州德辉金属制品有限公司——天益东路——南沙大桥——S6 广龙高速——G4 京港澳高速——G15 深海高速——G0422 武深高速——盐田隧道——梧桐山大道——明珠大道——盐田国际集装箱码头，此路线为来回路线，预计 2.5 小时到达。3 个月换一次线路）

### 三、双方责任及义务：

#### （一）出口货物运输：

1. 甲方需在每次出口货物前 2 通知乙方，以便乙方提前做好运输装货工作。
2. 乙方需在甲方规定时间派拖车到甲方工厂装货，若有耽误和拒绝派车运输，由此引起的货物出口延误由乙方负责。若因甲方货物生产上耽误或工人拒装货而赶不上船期导致延误，甲方对此承担责任。如因乙方已派车到工厂而未装货，由此引起费用由甲方承担。
3. 装好货后由甲方自备封签并签锁好集装箱，货物运输过程中，在甲方自备封签完好无损情况下货物无放少缺，由甲方自行承担丢失责任。
4. 除自然灾害、货物无故自然和（第 3）等外，货物在运输过程中出现丢失，由乙

广州穗辉金属制品有限公司					
货柜进出登记表					
日期	运输公司	司机姓名	身份证件	车牌编号	进厂时间
2020.3.21	深圳安盛国际	陈建	430821197502183618	粤BFA429挂	10:17
2020.3.27	深圳安盛国际	田国	430421197305227130	粤BL515挂	13:40
2020.4.29	深圳安盛国际	陈康	430821197502183618	粤BSP79挂	9:23
2020.5.9	深圳安盛国际	田国	430421197305227130	粤BQZ84挂	9:17
出厂时间	保安签名				
11:05	刘成文				
14:50	刘成文				
10:15	刘成文				
10:22	刘成文				

日期	司机身份证号码	出货单号	柜号	车牌号码	封条号码
2020.3.21	430821197502183618	CPU20SC076H	OOLU3761248	粤BFA429挂	EMCWQL1718
2020.3.27	430421197305227130	CPU20SC001FB	OOLU3761248	粤BL515挂	EMCWKC7838
2020.4.29	430821197502183618	CPU20SC009H	EISU2002907	粤BSP79挂	EMCWLV2038
2020.5.9	430421197305227130	CPU20SC076H	TRLU9281267	粤BQZ84挂	K8996481

封条使用记录表

Seal Security - Question # 62



Procedural Security - Question # 67



广州穗辉金属制品有限公司		
名称:	成品出货管理程序	
文件编号: C-TPAT-2B	版本号: A/0	
制定部门: 人事行政部	生效日期: 2019-03-1	
编制: 黄清华	审核: 卢志斌	批准: 江 桥

1. 总则

1.1 制定目的  
对成品出货流程进行规范, 确保出货成品数量的准确性、时间的及时性及产品运输防护同安全的有效监控性。

1.2 适用范围  
公司所有成品出货包括散货和集装箱出货

1.3 权责单位

1.3.1 生产部: 负责产品出货的生产。

1.3.2 成品仓库: 负责依出货计划进行出货作业操作。

1.3.6 保安员: 负责对装货车辆安全的监控及对出货产品的数量进行稽查。

1.4 名词定义:

2. 内容:

2.1 成品仓管员接到业务部出具的「出货排程表」后, 认真核实出货数量, 规格等是否与仓存的货品一致, 并了解「出货排程表」是否经过管理部生管课相关负责人确认。

2.2 生产部人员对每批入仓成品进行个别称重, 确保实际重量与外包装箱上所标明的数量一致。

2.3 仓库人员了解清楚「出货排程表」后, 将货物备妥暂存于成品仓

2.4 当承运商的货柜及车辆到达出货区后, 出货负责人对司机的托运数据进行核对无误后, 方可通知司机的车辆停靠出货台。装车前, 出货人员须检查运输车辆及货柜的七点: 前板、左侧、右侧、底面、顶板、内/外门, 确保车辆外圈底部无破损、脏污及其它不明物体等影响货物贮存, 如有异常须及时向上级反馈, 直到问题解决, 方可装货。在装货过程中, 要做到前后重量接近, 以保证货柜运输安全。空柜/半柜/满柜/封柜分别拍照留档。

2.5 成品装货期间, 闲杂人员不得靠近货柜。仓库人员及保安有权对未带规定证件的不明身份人员进行询问, 当发现此身份可疑后迅速呼叫保安将其请出此区域。如未授权人员有意闯入或接近货柜及装货区域时, 由保安人员报告安全主任处理, 并控制其活动。

2.6 装车过程中须遵守「安全第一」的原则, 所有搬运操作人员必须通过产品防护、搬运安全等相关知识的培训, 严禁在货物上踩踏, 野蛮装卸、倒置及其它有损货物的行为。

第 1 页 / 共 2 页

## Procedural Security - Question # 68

广州穗辉金属制品有限公司		
名称:	敏感部门限制区域管理程序	
文件编号: C-TPAT-023	版本号: A/0	
制定部门: 人事行政部	生效日期: 2019-03-1	
编制: 黄清华	审核: 卢志斌	批准: 江 桥

1. 总则

1.1 制定目的  
响应全球各界反恐行动, 确保货物财产/人员安全, 确保货物安全快速付运, 明确授权及非授权人员的管理。

1.2 适用范围: 整个工厂。

1.3 权责单位

1.3.1 管理部: 必须按照该规定履行该岗位的职责, 保安主任确保该规定的贯彻与实施, 管理部负责人抽查监督岗位职责的实施情况。

1.4 名词定义

授权人: 经过政府公安部门及工厂进行背景调查合法公民; 工厂授权予部分人员担任公司重点岗位;

非授权人: 除授权以外的人员;

2. 内容:

授权部门及重点项目: 保安组、包装组、仓库(材料仓、半成品仓、成品仓)、装卸工、业务部、报关船务部、采购部、财务部、IT管理部、大堂、厂大门、机房、办公室;

对已经授权部门的基本要求:

1) 保安、实体保安及门禁管理要求: 保安部门对货物作业区域和存放区域设置围栏或有天然屏障及所有其他授权部门以阻止非授权人员进入;

1.1 对授权人员进行身份确认, 根据《保安大门岗位职责》《保安处理访客程序》《保安反恐手册》进行严格调查; 不能确认身份者, 暂阻止其行动, 立刻汇报上级, 情况严重者可立刻报警有公安部门处理;

1.2 对非授权人员, 根据本公司反恐要求及授权标志核实该人员不属于授权人员, 则阻止其当前的动作; 视情况根据公司制度处理; 情节严重的可有法制、公安部门处理;

第 1 页 / 共 7 页





Misc - Question # 123



Misc - Question # 124





Misc - Question # 125



Misc - Question # 126



Misc - Question # 127





Misc - Question # 128



Misc - Question # 129



Misc - Question # 130



#### What is SCAN?

SCAN is an industry trade association that provides a common approach to use acceptable global compliance standards to perform a facility security audit. SCAN has standardized the security audit format and content in order to share the audit result with other companies that use the same facility thereby reducing audit fatigue that the vendor and manufacturing community currently undergo. SCAN membership has grown and we encourage you to advise other business partners of SCAN and its goals and objectives.

- Another retailer or company can contact [www.scanassociation.com](http://www.scanassociation.com) or send an email to [info@scanassociation.com](mailto:info@scanassociation.com) with questions.

#### The Auditor Will:

- Be on time
- Be professional and courteous
- Maintain acceptable appearance standards
- Be a subject matter expert
- Will not ask for a gift in exchange for a favorable audit
- Will immediately report any attempts at gift giving to SCAN
- Will pay for his or her personal expenses to include a meal at the facility or provided transportation
- Will explain the purpose of the audit and how the audit will be accomplished
- Will have a closing meeting to discuss audit findings – the auditor cannot advise a pass or fail rating

#### About this Audit

- A Pre-Assessment Checklist was provided when you paid for the audit. By accurately completing the assessment and then making any necessary security improvements will support the overall audit result
- Provide the auditor with access to all areas of the facility that involve areas of the audit
- The auditor will take pictures of some documents or security requirements of the audit. Pictures are included in the audit report only
- The auditor will share audit findings during a closing meeting at the conclusion of the audit

#### Factory Obligations

It is strictly prohibited to share any results or reports of SCAN audits with "NON SCAN" member business partners. Factories/Vendors may only share the SCAN ID with other business partners along with any contact information of the organization should that business partner wish to inquiry further information. SCAN will notify the entire membership of any allegations or confirmations of a factory/vendor sharing SCAN audit outside the organization. SCAN will consider imposing additional penalties on the factory/vendor. Signing below acknowledges you understand this policy.

Updated December 2013

Page 1 of 2



Please document below that the audit was conducted and keep a copy for your records.

Audit Company Name	BST
Audit Date	2/22/15
Auditor Name	Adithyana
Auditor Signature	
Facility Representative Name	
Facility Representative Signature	

Contact the SCAN Program Administrator with a question or concern about this audit:

Email: [scan@scrsolutions.com](mailto:scan@scrsolutions.com)

Updated December 2013