



## **FUJIAN CHUANGSHI SANITARY CO., LTD.**

NO.196, TIANDANG, XIAXI VILLAGE, HESHI TOWN, LUOJIANG DISTRICT, QUANZHOU, Fujian, China  
362011 86-0595-87522718

### **SCAN SECURITY AUDIT (ONSITE)**

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|                  |                          |
|------------------|--------------------------|
| Report #         | EAC-2023-12-0395-CAPA-V4 |
| Audit Submitted  | Dec 27, 2023             |
| Compliance Score | 95%                      |
| Audit Type       | EXTERNAL AUDIT           |



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

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Location Information

FUJIAN CHUANGSHI SANITARY CO., LTD.

NO.196,TIANDANG,XIAXI VILLAGE,HESHI TOWN, LUOJIANG DISTRICT, QUANZHOU, Fujian, China 362011 86-0595-87522718

SCAN ID CN4767961HFU

Point of Contact Name Liyan Lu

Point of Contact Email infolu@cn-chuangshi.com

| Contact Name | Phone | Email                   |
|--------------|-------|-------------------------|
|              |       | infolu@cn-chuangshi.com |

Location FUJIAN CHUANGSHI SANITARY CO., LTD.

Primary Location Yes

Critical Location No

Assigned Auditor SGS

Schedule Date Dec 21, 2023

# Audit Summary

## Pre-CAPA

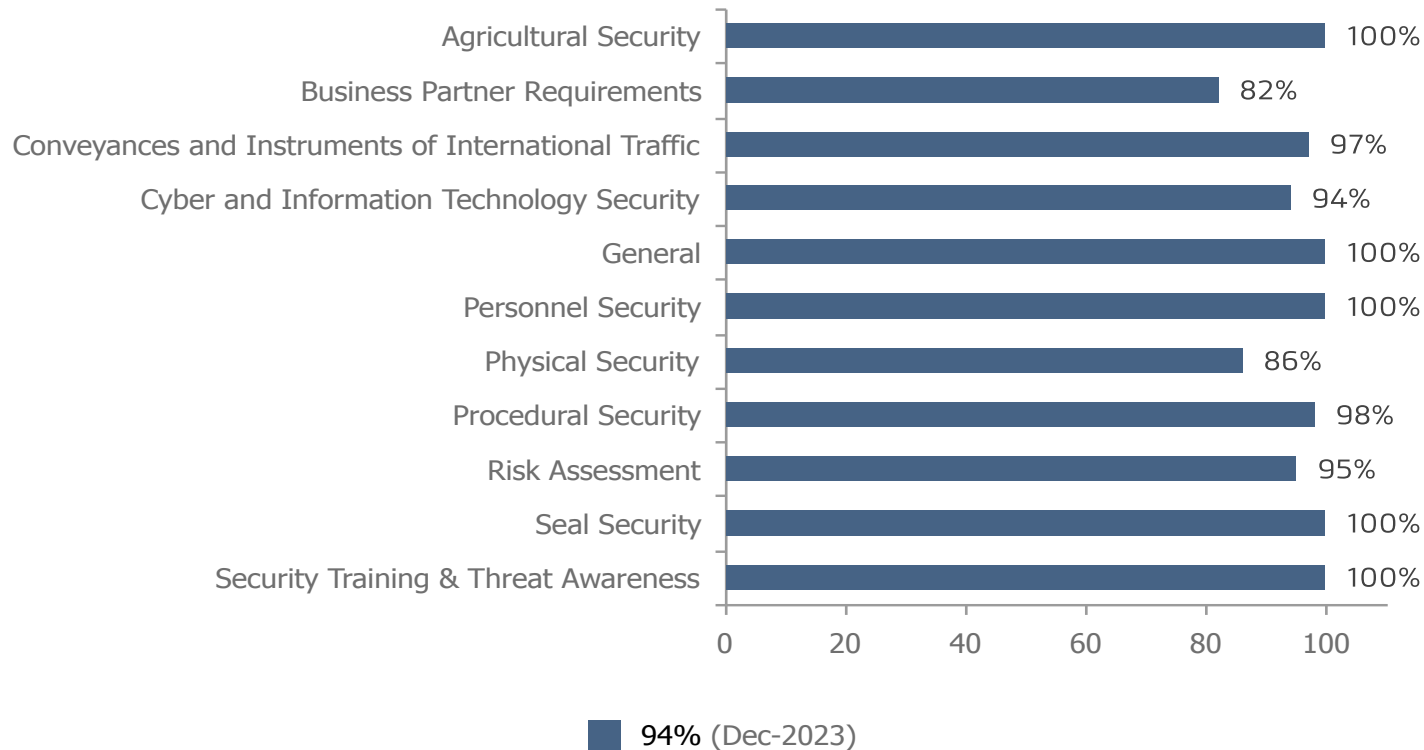
Audit Submitted  
**Dec 27, 2023**



Compliance Score Pre-CAPA  
**94%**



## Compliance by Category



# Audit Summary

## Post-CAPA

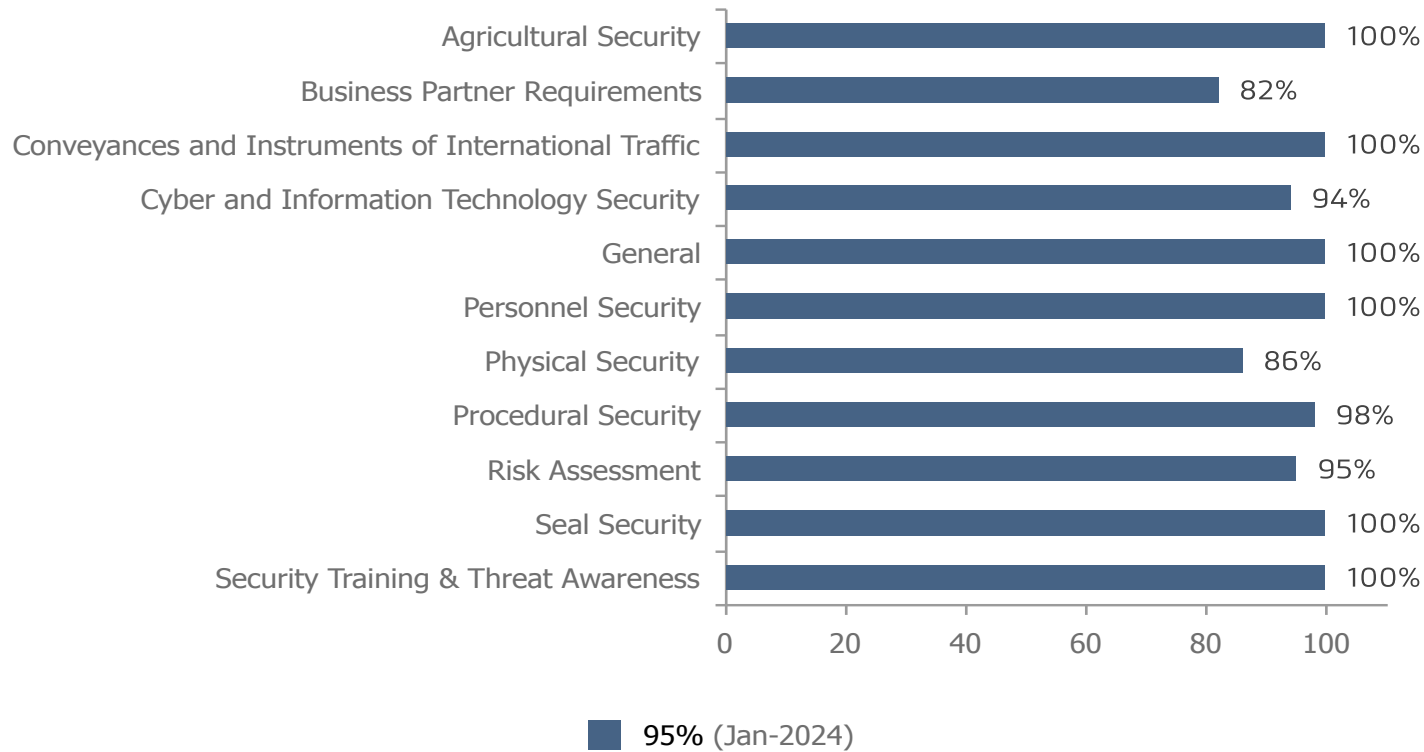
CAPA Submitted Date (Last)  
**Jan 12, 2024**



Compliance Score Post-CAPA  
**95%**



## Compliance by Category



## Business Profile Information

|                                                                                                                                           |                |
|-------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| Does the facility participate in any government, local customs, or World Customs Organization (WCO) accredited facility security program? | No             |
| Does the facility hold a Government Supply Chain Security Certification?                                                                  | No             |
| Has the facility been reviewed or audited by this program?                                                                                | Yes            |
| Primary Industry of Operations                                                                                                            | Manufacture    |
| Product Type / Commodity                                                                                                                  | TOILET SEAT    |
| Year Established                                                                                                                          | 2018           |
| Grounds Size (Square Meters)                                                                                                              | 12000          |
| Number of Buildings                                                                                                                       | 3              |
| Facility Size (Square Meters)                                                                                                             | 10000          |
| Number of access points? (i.e. gates, exterior doors)                                                                                     | 1              |
| Hours of Operation                                                                                                                        | 8 hours        |
| Number of Employees                                                                                                                       | 51 - 100       |
| Number of Contract Employees                                                                                                              | 98             |
| Number of Inhouse Security Guards                                                                                                         | 0              |
| Number of Contract Security Guards                                                                                                        | 4              |
| Number of Migrant Workers                                                                                                                 | 65             |
| Annual Revenue                                                                                                                            | 5 - 10 Million |
| Does the facility outsource any manufacturing services?                                                                                   | No             |
| If yes to outsourcing any manufacturing services, please describe services outsourced and country location.                               | NA             |
| What countries does this facility export to?                                                                                              | US, Europe     |
| Does this facility have affiliate locations where any work is conducted or product stored?                                                | No             |
| Does the facility outsource any transportation services?                                                                                  | Yes            |

|              |               |               |                    |
|--------------|---------------|---------------|--------------------|
| Company Name | Contact Email | Contact Email | Percentage of time |
|--------------|---------------|---------------|--------------------|

|                                      |         |                     |     |
|--------------------------------------|---------|---------------------|-----|
| Xiamen Laixinshun Logistics Co., Ltd | Mr. Wei | 18850061605@139.com | 100 |
|--------------------------------------|---------|---------------------|-----|

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.

NO.196, TIANDANG, XIAXI VILLAGE, HESHI TOWN, LUOJIANG DISTRICT, QUANZHOU

Name of Auditor Completing this Audit (First and Last Name)

Amber Huang

Auditor Certification #

250470-211701

Name of onsite Factory Representative (First and Last Name)

Liyan Lu

Factory Representative Email Address

info@cn-chuangshi.com

## Audit Responses

Audit Assigned

**Nov 08, 2023**



Due Date

**Dec 23, 2023**



Overall Compliance Score

**95%**

### General

**100%**

- 1 **None** Does the business license match the current location name and address as listed on the audit sheet? Please attach photo of business license.

- ☒ Yes  
☐ No



[Business License.jpg](#)

**Comments:** Address on business license was same with address on the report.

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

- ☒ Yes  
☐ No

**Comments:** Admin manager Mr. Xie Shuangquan was the security matter contacting person, the telephone is 15980406004 and email is infolu@cn-chuangshi.com.

- 3 **None** Did the auditor review previous SCAN audit CAPAs in preparation of this audit?

Only select NA if there was not an audit previously conducted with CAPAs assigned.

- ☐ Yes  
☐ No  
☒ NA

**Comments:** The audit is initial audit.

- 5 **Critical** Has the audited location recently (within the last 60 days) participated in the free SCAN Factory and Supplier Training provided in advance of this Audit?

- ☒ Yes (please attach photo of training certificate)  
☐ No



[SCAN Online Traini... jpg](#)

**Comments:** The facility representative Sales manager Liyan Lu had participated in the free SCAN Security and Threat Awareness Training provided and obtained the certificate in audit date.

- 6 **Material** Has there been a Social Compliance or Responsible Sourcing Audit in the last 24 months

that addresses the facility's employment practices?

- ☒ Yes -- please provide audit date, audit firm who conducted audit, and audit score
- ☐ No -- Audit Report on file is older than 24 months
- ☐ Never/no record

**Comments:** BSCI was conducted on 4-5 May 2023 by Intertek and the grade was C.

## Risk Assessment

95%

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

- ☒ Yes
- ☐ No

**Comments:** No comments were provided

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

- ☒ Yes
- ☐ No

**Comments:** No comments were provided

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

- ☒ Yes
- ☐ No

**Comments:** No comments were provided

10 **Must** Is the facility risk assessment updated periodically?

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

**Comments:** No comments were provided

11 **Material** Define the facility's cargo movement management process. (Select all that apply)

Only select NA if the cargo movement is not managed or facilitated by the facility.

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



**Comments:** No comments were provided

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

- ☒ 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
- ☐ No documented crisis plan available

**Comments:** The factory established crisis plan, but the crisis plan didn't include reporting crisis-related issues to business partners as necessary or included alternative locations if facility is rendered unusable.

CAPA Assigned **2023/12/28** | Due Date **2024/02/26**

**CAPA:** This is a best practice. Please consider developing and sharing your facility crisis plan as this may become a requirement in the future.

If you have already implemented, please describe in the comment section when and how you completed the corrective action or implemented the process, and upload the photographic evidence of completion. Otherwise, please comment that you acknowledge your consideration of implementing this process in the future.

**CAPA Guidance:** It must be included in your crisis plan below listed information:

- Define types of crises
- Information on how the facility responds to each type of crises
- How facility communicates crises to affected business partners
- Information on alternate locations that would be used should the facility be rendered unusable due to crises

- ☐ Already implemented
- ☒ Acknowledged - Will consider implementation in future

**Comments:** The factory will develop a Crisis Plan Control Procedure by January 31, 2024, and ensure that the plan includes information on how the factory will respond to each type of crisis; How factories can transmit crises to affected business partners; If the factory is unable to use due to a crisis, information from other locations and related content will be used.

**Acceptance Comments:** Accepted

## Business Partner Requirements

82%

13 **None** Does the facility contract services such as security, transportation or manufacturing labor?

- ☒ Yes
- ☐ No

**Comments:** No comments were provided

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

- ☒ Yes - Security criteria reviewed and provided in local language
- ☐ Yes - Security criteria reviewed and provided in English only
- ☐ Yes - Security criteria is reviewed but not provided to business partners

☐ No - Security criteria is not reviewed with all business partners

**Comments:** *No comments were provided*

15 **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)

- ☒ 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
- ☐ Screening process includes monitoring for financial stability
- ☐ No screening process takes place

**Comments:** The factory established documented business partner screening process, and screening process was done on an annual basis, but which didn't include looking for evidence of money laundering and terrorism funding or monitoring for financial stability.

CAPA Assigned **2023/12/28** | Due Date **2024/02/26**

**CAPA:** Develop written procedures for the selection of business partners.

- If you have already implemented, please describe in the comment section when and how you completed the corrective action or implemented the process. Please attach a photo of the process with the title and description of document.

- If you will implement, please provide your corrective action plan and the timeline (future date) for completion and implementation of the process in the comment section

**CAPA Guidance:** The procedure must include at a minimum:

- verifying business profile; verifying financial status; assessing ability to accomplish proposed/contracted business; standards for employee hiring; security training

- key risk indicators for money laundering and terrorism financing must be used to identify suspicious cargo shipments when reviewing documents' legitimacy, which includes but isn't limited to: originate from or have unusual destination locations, are paid by cash or a certified check, use unusual routing methods, exhibit unusual shipping/receiving practices, provide vague, generalized, or a lack of information

Facility must include in their procedure how they communicate selection requirements with their business partners

Comments section must include actions completed or to be taken. If attaching a document, please explain which page will be the start of your process.

CAUTION: Selecting option "Will not implement/ will not comply with corrective action request" is indicating that you acknowledge that your final score for this question will lose points and may be negatively viewed by SCAN Members.

- ☐ Already implemented
- ☒ Will implement
- ☐ Will not implement/ will not comply with corrective action request

**Comments:** The factory will develop a "Control Procedure for Selecting and Evaluating Business Partners" before February 10, 2024, and ensure that the procedure includes: - verifying the business profile of the business partners; Verify financial status; Assess the ability to complete the proposed/contracted business; Employee

employment standards; Safety training; Does the legality of the document include key risk indicators for money laundering and terrorist financing to identify suspicious goods transportation, including but not limited to: unusual sources or destinations, payment by cash or verified checks, use of unusual route methods, exhibiting unusual transportation/receiving practices, or lack of information.

**Acceptance Comments:** Accepted

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

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

**Comments:** No comments were provided

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

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

**Comments:** The factory required business partners to provide a statement of compliance and completed a questionnaire highlighting CTPAT Minimum Security Requirements, but which weren't update annually.

CAPA Assigned **2023/12/28** | Due Date **2024/02/26**

**CAPA:** Please require a statement of compliance or submission of a self-assessment questionnaire or an audit to document compliance.

- If you have already implemented, please describe in the comment section when and how you completed the corrective action or implemented the process. Please attach a photo of the process with the title and description of document.

- If you will implement, please provide your corrective action plan and the timeline (future date) for completion and implementation of the process in the comment section

**CAPA Guidance:** Understanding the level of compliance your business partners have in place regarding security requirements is an important consideration in assessing your facility's risk.

The statement of compliance or submission of a self-assessment questionnaire or an audit to document compliance, must be reviewed annually and include: which business partners are providing compliance statement and which are providing questionnaire/self-audit; date(s) of compliance statement/questionnaire completion.

Comments section must include actions completed or to be taken. If attaching a document, please explain which page will be the start of your process.

CAUTION: Selecting option "Will not implement/ will not comply with corrective action request" is indicating that

you acknowledge that your final score for this question will lose points and may be negatively viewed by SCAN Members.

- ☐ Already implemented
- ☒ Will implement
- ☐ Will not implement/ will not comply with corrective action request

**Comments:** The factory will develop the "Selection and Evaluation of Business Partner Control Procedure" by February 10, 2024, and require business partners to conduct anti-terrorism risk self-assessment and form an assessment report by February 28, 2024. At the same time, it is required that corrective action plans must be developed for non conformities and a timeline for completing and implementing the process (future dates).

**Acceptance Comments:** Accepted

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

- ☒ Yes
- ☐ No

**Comments:** No comments were provided

## Cyber and Information Technology Security

94%

19 **None** Does this facility have internet and computer network systems?

- ☒ Yes
- ☐ No

**Comments:** No comments were provided

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

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

**Comments:** The written cyber security policy to protect information technology systems was established on 1 March 2021, which was update more than 18 months ago.

21 **Must** Does the facility have firewall and anti-malware software installed to identify, protect, detect, respond and recover their network? (Select all that apply)

- ☒ Firewall deployed
- ☒ Anti-malware software installed
- ☐ No firewall or anti-malware software deployed

**Comments:** No comments were provided

22 **Must** How frequently are updates performed on firewall and malware software?

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

**Comments:** *No comments were provided*

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

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

**Comments:** *No comments were provided*

24 **None** What actions are taken when problems are identified while testing firewall, malware, and other network vulnerabilities?

*No options available*

**Comments:** When problems are identified while testing firewall, malware, and other network vulnerabilities, the IT would upgrade software and download patches.

25 **Material** To whom does the facility report cybersecurity threats and attempts at unapproved access to network systems? (Select all that apply)

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

**Comments:** *No comments were provided*

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

- ☒ Yes
- ☐ No

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

27 **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?

- ☒ Management reviews monthly
- ☐ Management reviews quarterly

- ☐ Management reviews annually
- ☐ No management review conducted

**Comments:** *No comments were provided*

28 **Must** Is there a written procedure to remove network access for employees who are terminated or on leave longer than vacation?

- ☒ Yes, written process includes long term leave and terminated employee's access removal
- ☐ Yes, written process is available, but it does not include long term leave, only terminated employees access removal
- ☐ No written process was available for removing network access for terminated employees at the time of audit

**Comments:** *No comments were provided*

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

- ☒ Passwords are required
- ☒ Passwords must be complex
- ☒ Passwords are changed periodically.
- ☐ No passwords are required

**Comments:** *No comments were provided*

30 **Must** If employees and/or contractors are permitted to access information technology (IT) systems remotely, is a virtual private network (VPN) or similar software used to control access?

- ☐ 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 access
- ☒ Remote access is not permitted

**Comments:** No cyber security risk because remote access is not permitted.

31 **Must** Do all security policies apply to personal devices that connect to the network?

- ☐ All security policies apply and the facility does not permit personal devices to connect to the network without using a VPN or similar software
- ☒ All security policies apply to personal devices
- ☐ Security policies do not apply to personal devices

**Comments:** *No comments were provided*

32 **Material** Does IT security limit and monitor the downloading of software and access to external websites?

- ☒ Yes
- ☐ No

**Comments:** *No comments were provided*

33 **Material** How frequently is data backed up for this facility?

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

**Comments:** No comments were provided

34 **Material** Is the data backup stored offsite and encrypted? (Select all that apply)

- ☒ Data backup is stored offsite
- ☒ Data backup is encrypted
- ☐ Data is not stored offsite nor encrypted

**Comments:** No comments were provided

35 **Must** Is there a written procedure to address returning equipment slated for disposal back to IT?

- ☒ Yes
- ☐ No

**Comments:** No comments were provided

## Conveyances and Instruments of International Traffic

100%

36 **None** Does the facility load trailers/containers or Instruments of International Traffic (IIT)?

- ☒ Yes
- ☐ No

**Comments:** No comments were provided

37 **Critical** While in the facility's control are containers stored in a secured manner whether on-site or off-site? (Select all that apply) Please attach photo of each applicable area.

- ☒ Container/trailer storage area is free from personal vehicle parking and any other storage
- ☒ Container/trailer storage area is secured and/or monitored (please describe)
- ☒ Stored, loaded containers/trailers are secured with a seal
- ☐ Container/trailer storage does not meet minimum security requirements



[Container and traile...pdf](#)

**Comments:** Based on site observation, the container/trailer storage area was free from personal vehicle parking and any other storage, the container/trailer storage area was secured as described in CTPAT MSC requirements and stored, loaded containers/trailers were secured with a seal.

38 **None** Were you able to observe a container inspection in process or a previously completed container inspection via CCTV recordings?

- ☒ Yes

☐ No

**Comments:** No comments were provided

39 **Critical** Is there a written procedure in place to inspect the security integrity of a container or trailer prior to loading?

☒ Yes

☐ No



[Container and traile... jpg](#)

**Comments:** The facility had established procedure in place to inspect the security integrity of a container or trailer prior to loading.

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

- ☒ Checklist is utilized (please attach photo of checklist)
- ☒ Size of container notated
- ☒ Container number notated
- ☒ Name of person performing the inspections included on checklist
- ☒ Date and time of inspection notated
- ☒ Floor and roof of container intact no holes or leaks notated
- ☒ Outside walls free of damage notated
- ☒ Undercarriage checked for damage
- ☒ Inspection for invasive species (eggs nests, dirt seeds) included
- ☐ No inspections completed or documented



[Container and traile... jpg](#)

**Comments:** No comments were provided

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

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

**Comments:** No comments were provided

42 **Critical** Does the shipping area use equipment to conduct a 7-point container inspection? (Select all that apply) Please attach photo of all equipment used to conduct this container inspection.

- ☒ Measurement tool
- ☒ Mirrors for undercarriage
- ☒ Tap test tool
- ☒ Container Interior cleaning tool



[Container inspectio... jpg](#)



☐ No tools available/tools do not meet requirements

**Comments:** *No comments were provided*

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

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

**Comments:** *No comments were provided*

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

- ☒ Yes
- ☐ No

**Comments:** *No comments were provided*

45 **Material** Is there a procedure where management or supervision conducts follow up inspections?

- ☒ Yes
- ☐ No

**Comments:** *No comments were provided*

46 **Material** Are container/trailer inspections supervised?

- ☒ Yes
- ☐ No

**Comments:** *No comments were provided*

47 **None** Does the facility directly contract transportation service providers for any of their customers or business partners?

- ☒ Yes
- ☐ No

**Comments:** *No comments were provided*

48 **Material** Does the facility have a written procedure to require confirmation of arrival at destination (container yard or freight forwarder's location) for items shipped?

- ☒ Yes
- ☐ No

**Comments:** *No comments were provided*

49 **Material** What tracking technologies does the facility require to be used by the contracted transportation company to confirm cargo arrival?

- ☐ GPS carrier controlled
- ☐ GPS shipper controlled
- ☐ Cell phone check by carrier dispatch
- ☒ Cell phone confirmation by driver
- ☐ Other
- ☐ No tracking technologies used

**Comments:** No comments were provided

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

- ☒ Yes
- ☐ No
- ☐ Only one route is available

**Comments:** No comments were provided

51 **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.)

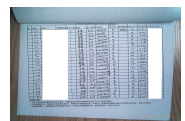
Only select NA if this facility is strictly leveraging only small packages via consolidator carriers.

- ☒ Yes
- ☐ No
- ☐ NA

**Comments:** No comments were provided

52 **Critical** Does the facility document driver information for arriving and departing material movements? (Select all that apply)

- ☒ Driver log is maintained (please attach photo of driver log in use)
- ☒ Tractor number listed
- ☒ Container/trailer number listed
- ☒ Photo ID required of drivers
- ☒ Carrier name
- ☒ Date
- ☒ Arrival Time
- ☒ Departure Time
- ☒ Seal verification information for container/trailer departure
- ☐ No driver log available



[Driver log.jpg](#)

**Comments:** *No comments were provided*

53 **None** Does the facility ship less than container load (LCL)?

☐ Yes

☒ No

**Comments:** No LCL shipment was used at the factory.

55 **None** Does the facility make air shipments?

☐ Yes

☒ No

**Comments:** The factory never made air shipments.

57 **None** Does the facility make any shipments in open top, open sided, ventilated (livestock), soft sided containers?

☐ Yes

☒ No

**Comments:** The factory didn't make any shipments in open top, open sided, ventilated (livestock), soft sided containers.

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

Only select NA if this facility is strictly leveraging only small packages via consolidator carriers.

☒ Yes (please attach photo of ISO approved seal utilized)

☐ No

☐ NA



[ISO approved seal u... jpg](#)

**Comments:** Based on site observation and document review, the international shipments were sealed with an ISO 17712:2013 compliant high security seal immediately after a container or trailer was loaded.

60 **Critical** Does the facility have written and verifiable procedures to ensure that security seals are controlled? (Select all that apply)

Only select NA if the seals are provided by a 3rd party such as a consolidator or carrier.

☒ Policy is written (please attach photo of applicable section of procedure)

☒ Seals are secured in storage

☐ Specific employees are listed who have access to seal storage

☐ No written policy is available

☐ NA



[The security seal pr... jpg](#)

**Comments:** Written and verifiable procedures to ensure that security seals are controlled was established, seals were stored in secured area with locker, but the specific employees who have access to seal storage wasn't listed on site.

CAPA Assigned **2023/12/28** | Due Date **2024/02/26**

Included in scoring

**CAPA:** Establish a policy to maintain control of inventory, issuance, and application of the high-security seals.

Please describe in the comment section when and how you completed the corrective action or implemented the process. Please attach a photo of the process with the title and description of document.

**CAPA Guidance:** The policy should highlight that only designated employees can access seal storage and apply seals to container/trailers.

Comments section must include actions completed or to be taken. If attaching a document, please explain which page will be the start of your process.

CAUTION: Selecting option "Will not implement/ will not comply with corrective action request" is indicating that you acknowledge that your final score for this question will lose points and may be negatively viewed by SCAN Members.

- ☒ Already implemented
- ☐ Will not implement/ will not comply with corrective action request



[08bff77614815c37f... jpg](#)

**Comments:** The factory has developed a "Seal Management and Seal Damage Control Procedure" to maintain control over high safety seal inventory, distribution, and application. And it is stipulated that the Safety Director shall be the manager of the safety seal, responsible for the management and issuance of the safety seal, and responsible for the sealing work of the cabinet. And it is required to carry out the control of security sealing in accordance with the provisions of the procedural documents from now on.

**Acceptance Comments:** Accepted

- ☒ Already implemented
- ☐ Will not implement/ will not comply with corrective action request



[08bff77614815c37f... jpg](#)

**Comments:** The factory will complete the Safety Sealing Control Procedure by January 31, 2024 to maintain control over the inventory, issuance, and application of high safety seals. And it is stipulated that the safety director is the manager of safety seals, with the safety director responsible for managing and issuing safety seals, as well as being responsible for sealing cabinet work.

**Reopen Comments:** This issue must be completed during the CAPA process. A future date (January 31, 2024) is not accepted. The auditor stated that "the specific employees who have access to seal storage wasn't listed on site." Please describe your corrective actions to address this issue in the comment area, with date of implementation provided.

- 61 **Material** Does the facility remove dirt and other debris from containers' exterior prior to loading?

Only select NA if this facility is strictly leveraging only small packages via consolidator carriers.

- ☒ Yes  
☐ No  
☐ Dirty or damaged containers are refused  
☐ NA

**Comments:** No comments were provided

- 62 **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?

- ☒ Yes  
☐ No

**Comments:** No comments were provided

- 63 **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)

Only select NA if the facility is not using wood packing material.

- ☐ 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

**Comments:** No pallets or wood packaging material are shipped from this location.

- 64 **Must** Are wood products or materials utilized in the manufacturing or packaging process identified by source and species?

Only select NA if the facility is not using wood products or packing material.

- ☐ Yes  
☐ No  
☒ NA

**Comments:** No pallets or wood packaging material are shipped from this location.

- 65 **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)

Only select NA if the facility is not using wood pallets.

- ☐ 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

**Comments:** No pallets or wood packaging material are shipped from this location.

## Seal Security

100%

66 **Critical** Are security seals stored in a secured location?

Only select NA if the seals are provided by a 3rd party such as consolidator carriers.

- ☒ Yes (please attach photo of seal storage location)
- ☐ No
- ☐ NA



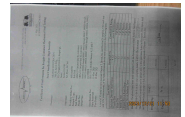
[Picture of seal stora...jpg](#)

**Comments:** No comments were provided

67 **Critical** 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?

Only select NA if the seals are provided by a 3rd party such as consolidator carriers.

- ☒ Yes (please attach photo of test report)
- ☐ No
- ☐ NA



[Seal test report or s...jpg](#)

**Comments:** No comments were provided

68 **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)

Only select NA if this facility is strictly leveraging only small packages via consolidator carriers.

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

**Comments:** No comments were provided

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

Only select NA if this facility is strictly leveraging only small packages via consolidator carriers.

- ☒ 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

**Comments:** No comments were provided

## Procedural Security

98%

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

- ☒ Yes (please attach photo showing enclosure and/or monitoring method)
- ☐ No



[Enclosed and monit... pdf](#)

**Comments:** Based on site observation, the shipping and receiving areas were enclosed and monitored.

71 **Critical** Is a written procedure in place to report unauthorized access to a container or a trailer, and/or product storage areas within the facility including whom to notify?

- ☒ Yes (please attach photo of applicable section of procedure)
- ☐ No



[The container acces... jpg](#)

**Comments:** No comments were provided

72 **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?

- ☒ Yes (please attach photo of applicable section of procedure)
- ☐ No



[The facility access c... jpg](#)

**Comments:** No comments were provided

73 **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?

☒ Yes (please attach photo of applicable section of procedure)

☐ No



[The shipping docum...jpg](#)

**Comments:** *No comments were provided*

74 **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?

☒ Yes (please attach photo of applicable section of procedure)

☐ No



[Shortage, overage or...jpg](#)

**Comments:** *No comments were provided*

75 **Critical** Are international shipments marked, counted, weighed, and properly reported on shipping documents?

☒ Yes (please attach photo of applicable documentation)

☐ No



[International shipm... pdf](#)

**Comments:** *No comments were provided*

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

☒ Yes (please attach photo of applicable section of procedure)

☐ No



[Shipping and receivi...jpg](#)

**Comments:** *No comments were provided*

77 **Material** Are pre-printed paper documents/forms used to prepare commercial documents and properly secured?

☒ Pre-printed documents are secured

☐ Pre-printed documents are not secured

☐ Pre-printed paper documents are not utilized

**Comments:** *No comments were provided*

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

Only select NA if there are no shared network printers being utilized.

☐ Yes

☐ No



☒ NA

**Comments:** No shared network printer was used in the factory.

79 **Critical** Are commercial document packets sent with the shipment at departure? Please explain process.

☒ Yes

☐ No

**Comments:** Commercial document packets were sent with the shipment at departure.

80 **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?

☒ Yes (please attach photo of applicable section of procedure)

☐ No



[Reporting security i... jpg](#)

**Comments:** No comments were provided

81 **Critical** Are access control procedures and devices used to ensure that only authorized employees have access to the facility?

☒ Yes (please attach photo of applicable documentation section and device)

☐ No



[Access control proc... jpg](#)

**Comments:** No comments were provided

82 **Critical** Is there a procedure in place to notify Business Partners of security issues such as attempted theft, fraud or internal conspiracies?

☒ Yes (please attach photo of applicable section of procedure)

☐ No



[Security issues noti... jpg](#)

**Comments:** No comments were provided

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

☒ Yes

☐ No

**Comments:** No comments were provided

84 **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?

- ☒ Yes (please attach photo of applicable section of procedure)  
☐ No



[Access devices cont... jpg](#)

**Comments:** No comments were provided

85 **None** Do you have dedicated security staff/guards on site?

- ☒ Yes  
☐ No

**Comments:** No comments were provided

86 **Must** Are written job descriptions in place outlining the roles and responsibilities of security staff or staff performing dual roles that include security functions?

- ☒ Yes  
☐ No

**Comments:** No comments were provided

87 **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?

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

**Comments:** No comments were provided

88 **Must** Does management verify compliance with security company work instructions and policies?

- ☒ Yes  
☐ No

**Comments:** No comments were provided

## Physical Security

86%

89 **Critical** Is there a designated employee and visitor vehicle parking area separate from the shipping and receiving area?

- ☒ Yes (please attach photo of applicable area)  
☐ No



[Employee and Visit... pdf](#)

**Comments:** No comments were provided

90 **Material** Are appropriate controls in place to segregate domestic goods from goods intended for international shipment?

- ☒ Yes  
☐ No

**Comments:** No comments were provided

91 **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)

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

**Comments:** No comments were provided

92 **Critical** Are there any barriers to limit the ingress and egress to the facility by vehicles and personnel? Please attach photos of applicable areas.

- ☒ Physical barriers  
☐ Environmental barriers  
☐ Combination of Physical and Environmental barriers  
☐ No barriers



[Barriers to control i... .jpg](#)

**Comments:** The physical barriers were available to limit the ingress and egress to the facility by vehicles and personnel.

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

Only select NA if gates are not present at the facility.

- ☒ Yes (please attach photo of applicable areas)  
☐ No  
☐ NA



[Picture of the gates.jpg](#)

**Comments:** No comments were provided

94 **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?

- ☒ Yes  
☐ No

**Comments:** No comments were provided

95 **Must** Which of the following security technologies does the facility incorporate as part of its systems and controls? (Select all that apply)

- ☒ CCTV
- ☒ Access Control
- ☒ Security Alarm
- ☐ Other Technologies Used
- ☐ None

**Comments:** The CCTV, security guards and security alarms system were used.

CAPA Assigned **2023/12/28** | Due Date **2024/02/26**

**CAPA:** Establish a written procedure that requires security technology is installed including the types of technology.

- If you have already implemented, please describe in the comment section when and how you completed the corrective action or implemented the process. Please attach a photo of the process with the title and description of document.

- If you will implement, please provide your corrective action plan and the timeline (future date) for completion and implementation of the process in the comment section.

**CAPA Guidance:** SCAN's expectation is to install CCTV, security alarms and access controls such as gates, security staff, etc. at the facility.

Comments section must include actions completed or to be taken. If attaching a document, please explain which page will be the start of your process.

CAUTION: Selecting option "Will not implement/ will not comply with corrective action request" is indicating that you acknowledge that your final score for this question will lose points and may be negatively viewed by SCAN Members.

- ☐ Already implemented
- ☒ Will implement
- ☐ Will not implement/ will not comply with corrective action request

**Comments:** The factory will develop and complete the "Physical Security Control Procedure" by January 31, 2024. At the same time, measures will be taken to install CCTV, infrared alarms, access cards and other security facilities in sensitive areas (such as factory gates, walls, security rooms, and finished product warehouses) by February 28, 2024. To ensure the physical integrity of the factory area.

**Acceptance Comments:** Accepted

96 **Must** Do you have written procedures governing the use of the security technology?

- ☒ Yes
- ☐ No

**Comments:** *No comments were provided*

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

☐ Yes

☒ No

**Comments:** No evidence was provided to show the security equipment such as CCTV was installed by a licensed/certified contractor.

CAPA Assigned **2023/12/28** | Due Date **2024/02/26**

**CAPA:** This is a best practice. Please consider including in your physical security procedure the requirement of having a qualified contractor install security equipment.

If you have already implemented, please describe in the comment section when and how you completed the corrective action or implemented the process, and upload the photographic evidence of completion. Otherwise, please comment that you acknowledge your consideration of implementing this process in the future.

**CAPA Guidance:** The procedure should include:

- Security technology should be installed by a professional contractor that specializes in that specific technology
- Contractor should be licenses/certified

Comments section must include actions completed or to be taken. If attaching a document, please explain which page will be the start of your process.

☐ Already implemented

☒ Acknowledged - Will consider implementation in future

**Comments:** The factory will sign a safety facility installation and maintenance agreement with a qualified third party before January 31, 2024 in accordance with SCAN regulations, and all safety facility installation and maintenance will be carried out by the contractor.

**Acceptance Comments:** Accepted

☒ Already implemented

☐ Acknowledged - Will consider implementation in future



[1b759808e5196c8d...jpg](#)

**Comments:** The factory will sign a security facility installation agreement with a qualified third party in accordance with SCAN regulations, and all future security facility installation and maintenance will be carried out by the contractor.

**Reopen Comments:** If the corrective action has been implemented, please do not use future tense. Please describe when you signed the contract and how you verified the license in the comments box. If it has not been implemented, please select "Acknowledged - Will consider implementation in future".

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

☐ Yes, current contracts are in place

☒ No current contracts in place

**Comments:** No maintenance contract was available for security system such as CCTV.

CAPA Assigned **2023/12/28** | Due Date **2024/02/26**

**CAPA:** This is a best practice. Please consider including in your physical security procedure to conduct annual maintenance on your system as part of your overall security program.

If you have already implemented, please describe in the comment section when and how you completed the corrective action or implemented the process, and upload the photographic evidence of completion. Otherwise, please comment that you acknowledge your consideration of implementing this process in the future.

**CAPA Guidance:** The procedure should include:

- Security technology should have annual maintenance
- Facility to provide maintenance contract as proof

Comments section must include actions completed or to be taken. If attaching a document, please explain which page will be the start of your process.

- ☐ Already implemented
- ☒ Acknowledged - Will consider implementation in future



[1b759808e5196c8d...jpg](#)

**Comments:** The factory will sign a security facility installation agreement with a qualified third party in accordance with SCAN regulations, and all future security facility installation and maintenance will be carried out by the contractor.

**Acceptance Comments:** Accepted

99 **Must** Are Critical Security Infrastructure locations secured and authorized access limited to only those whose jobs require access?

- ☒ Yes
- ☐ No

**Comments:** *No comments were provided*

100 **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?

Only select NA if there are no electronic security systems.

- ☐ Yes
- ☒ No
- ☐ NA

**Comments:** The factory didn't have an alternate electrical power system to ensure uninterrupted operation of electronic security systems when power outage.

CAPA Assigned **2023/12/28** | Due Date **2024/02/26**

**CAPA:** This is a best practice. Please consider establishing a backup power system to power critical systems in the event of a power failure.

If you have already implemented, please describe in the comment section when and how you completed the corrective action or implemented the process, and upload the photographic evidence of completion. Otherwise, please comment that you acknowledge your consideration of implementing this process in the future.

**CAPA Guidance:** Any security technology used at the facility must have a back up power source to allow systems to continue operating if electricity is lost. Examples include but are not limited to battery source or generator.

Comments section must include actions completed or to be taken. If attaching a document, please explain which page will be the start of your process.

- ☐ Already implemented
- ☒ Acknowledged - Will consider implementation in future

**Comments:** The factory will purchase UPS uninterruptible backup power supply system according to SCAN requirements before January 31, 2024, to ensure that in the event of power failure, relevant security facilities such as CCTV, infrared alarm system, and access control system can work uninterrupted.

**Acceptance Comments:** Accepted

101 **Critical** Is a CCTV system used to monitor the facility and premises' including entrances, exits, cargo storage, shipping, packing and other loading/unloading areas? (Select all that apply)

- ☒ All entrance(s) / exits
- ☒ Cargo storage / shipping
- ☒ Loading / unloading area(s)
- ☒ Packing area
- ☒ Perimeter
- ☒ CCTV coverage in additional areas. (Please describe in comments)
- ☐ No CCTV

**Comments:** CCTV system covered all entrances, all exits, storage/warehouse, loading areas, unloading areas and packing area, perimeter and office.

102 **Material** Does your CCTV system have a failure alarm that indicates when the system is off line or no recording is underway?

- ☒ Yes
- ☐ No

**Comments:** No comments were provided

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

- ☒ Yes (please attach photo of applicable area)
- ☐ No



[CCTV Monitors.jpg](#)

**Comments:** No comments were provided

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

- ☒ Yes
- ☐ No

**Comments:** No comments were provided

105 **Must** Does the facility's management team conduct random and documented reviews of CCTV

footage periodically to ensure security procedures are being followed?

- ☒ Yes  
☐ No

**Comments:** *No comments were provided*

106 **Critical** How many days are CCTV recordings kept?

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

**Comments:** The CCTV recording was kept less than 30 days, which was kept for 18 days since 3 Dec 2023.

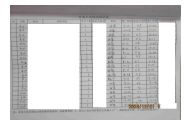
107 **Must** Do employees display their ID badge at all times while at the facility?

- ☒ Yes  
☐ IDs carried but not displayed  
☐ No

**Comments:** *No comments were provided*

108 **Critical** Is a written procedure in place to require visitors to present photo identification upon arrival and have security or other authorized employee record their information in a log? (Select all that apply)

- ☒ Written procedure is available  
☒ Photo ID are checked  
☒ Visitor Log is utilized  
☐ No written process is in place



[Visitor Log Book.jpg](#)

**Comments:** *No comments were provided*

109 **Must** 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?

- ☐ Yes  
☒ No

**Comments:** The written procedure was established to inspect a visitor's bag before entering and leaving the manufacturing, production or shipping area of the facility, but based on onsite observation and management interview, security guard did not inspect visitors' bag when they entering or leaving the factory.

CAPA Assigned **2023/12/28** | Due Date **2024/02/26**

**CAPA:** Include in your physical security procedure to inspect all bags and packages of all visitors entering and exiting your facility.



- If you have already implemented, please describe in the comment section when and how you completed the corrective action or implemented the process. Please attach a photo of the process with the title and description of document.
- If you will implement, please provide your corrective action plan and the timeline (future date) for completion and implementation of the process in the comment section.

**CAPA Guidance:** All visitors' bags must be inspected upon arrival and exit.

Comments section must include actions completed or to be taken. If attaching a document, please explain which page will be the start of your process.

CAUTION: Selecting option "Will not implement/ will not comply with corrective action request" is indicating that you acknowledge that your final score for this question will lose points and may be negatively viewed by SCAN Members.

- ☐ Already implemented
- ☒ Will implement
- ☐ Will not implement/ will not comply with corrective action request

**Comments:** The factory will develop a "Physical Complete Control Procedure" in accordance with SCAN requirements by January 31, 2024, and provide training to security personnel. Security personnel are required to verify the identity information of visitors, check their packages and register them after inspection according to the procedure documents, and issue a "Visitor Card".

**Acceptance Comments:** Accepted

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

- ☒ Yes (please attach photo of applicable item)
- ☐ No



[Visitors badge.jpg](#)

**Comments:** No comments were provided

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

- ☒ Yes
- ☐ No

**Comments:** No comments were provided

112 **Material** Is a written procedure in place to inspect packages prior to distribution?

- ☒ Yes
- ☐ No

**Comments:** No comments were provided

113 **Material** Are hazardous materials or high value goods segregated when stored at the facility?

Only select NA if there are no high value or hazardous material items at the facility.

- ☒ Yes  
☐ No  
☐ NA

**Comments:** *No comments were provided*

## Personnel Security

100%

- 114 **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)

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

**Comments:** *No comments were provided*

- 115 **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)

- ☒ Written application required  
☒ Government issued ID required

**Comments:** *No comments were provided*

- 116 **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?

Only select NA if not allowed by local law.

- ☒ Yes, written procedure is in place  
☐ No procedure is in place  
☐ NA

**Comments:** *No comments were provided*

- 117 **Must** Which type of check is conducted? (Select all that apply)

- ☒ Criminal Check  
☒ Credit Check  
☐ Other

**Comments:** No comments were provided

## Security Training & Threat Awareness

100%

118 **Must** Is a security threat awareness training provided to all new employees and an annual refresher course for current employees? (Select all that apply)

- ☒ Training program in place
- ☒ Training logs are kept to insure required personnel attend the training
- ☒ Management personnel randomly reviews documentation
- ☒ Training provided annually for all employees
- ☒ Training provided for new employees
- ☐ There is no Threat Awareness training in place

**Comments:** No comments were provided

119 **Must** Does security threat awareness training cover security-related issues?

- ☒ Yes
- ☐ No

**Comments:** No comments were provided

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

- ☒ Evaluations are conducted
- ☒ Retraining is required if a successful score is not achieved
- ☐ No evaluations are conducted

**Comments:** No comments were provided

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

- ☒ 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

**Comments:** No comments were provided

122 **Must** Does training include security criteria for restricted areas of the facility such as final packing, shipping and receiving? (Select all that apply)

- ☒ 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

**Comments:** *No comments were provided*

123 **Must** Does Threat Awareness training inform employees of procedures to report suspicious activity or a security incident?

- ☒ Yes
- ☐ No

**Comments:** *No comments were provided*

124 **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)

- ☒ 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

**Comments:** *No comments were provided*

125 **Must** Does the training program include Threat Awareness, Contraband, Human Smuggling and Terrorism?

- ☒ Yes
- ☐ No

**Comments:** *No comments were provided*

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

- ☒ Yes
- ☐ No

**Comments:** *No comments were provided*

127 **Must** Does training include identifying pest contamination?

- ☒ Yes
- ☐ No

**Comments:** *No comments were provided*

128 **Must** Is there a documented training outlining the risks of Cybersecurity?

☒ Yes

☐ No

**Comments:** No comments were provided

## Misc

NA

129 **None** Describe the front of the factory building including any signage. Please attach a picture.

No options available



[Building front inclu... jpg](#)

**Comments:** The factory entrances were monitored by security guards and CCTV cameras.

Signage was posted in security gatehouse in the entrance. Employment and visitors should show identification card when entering.

130 **None** Describe the guard station and facility access gates. Please attach a picture.

No options available



[Entrance gate and g... jpg](#)

**Comments:** Security guards and CCTV camera was available at the entrance. Visitors were checked by security guard and recorded.

131 **None** Describe the buildings and structures for this location. Please attach a picture.

No options available



[Building structures... jpg](#)

**Comments:** The audited factory had one 5-storey production building, one 2-storey production building and one 6-storey office and dormitory building in the yard. The buildings were constructed with bricks, concrete and steel; It's maintained in good condition and solid enough to resist unlawful entry.

132 **None** Describe the shipping and receiving areas. Please attach a picture.

No options available



[Shipping and receiv... pdf](#)

**Comments:** Access to the shipping area was authorized. The authorized name list was posted. The shipping and receiving area were fenced and there was a driver's lounge for drivers to rest in the security room. Unauthorized personnel were not allowed to enter and exit at will, the proper CCTV monitoring system and lighting facility were equipped there.

- 133 ☐ None Describe how the perimeter of the facility is protected from unauthorized access? Please attach pictures  
*No options available*



[Facility\\_perimeter\\_pr...jpg](#)

**Comments:** The factory was enclosed by perimeters all around above 2.2 meters high.

- 134 ☐ None Describe the final packaging area. Please attach a picture.  
*No options available*



[Final\\_packaging\\_area.jpg](#)

**Comments:** The final packing areas were monitored by appointed workers. Authorized name list was posted at the entrance of final packing area.

- 135 ☐ None Describe any container storage and vehicle parking areas and please attach picture.  
*No options available*



[Container\\_storage\\_a...pdf](#)

**Comments:** There were separate areas for container storage and vehicle parking, which were monitored by CCTV. Only the authorized person could access to the container storage area, and the relevant authorized name list was posted on site.

- 136 ☐ None Did the Factory Representative and the Auditor sign the Opening Meeting Letter? Please attach the signed copy.
- ☒ Yes  
☐ No



[Opening\\_and Closin...pdf](#)

**Comments:** *No comments were provided*

Attached Documentation - Photos

General - Question # 1



Business License.jpg

General - Question # 5



[SCAN Online Training Certificate.jpg](#)

**Conveyances and Instruments of International Traffic - Question # 39**



|            |            |                                                             |
|------------|------------|-------------------------------------------------------------|
| 福建创实卫浴有限公司 | 集装箱完整性检查程序 | 文件编号: CS-C-TPAT-032<br>页次: 1/2<br>版本: 1.2<br>生效日期: 2021.3.1 |
|------------|------------|-------------------------------------------------------------|

#### 1.0 目的

为了加强对本公司货物和货柜的运输安全,符合海关与C-TPAT安全标准要求,防止装运、运输过程中丢失货物或遭受非法入侵,避免恐怖威胁、走私及其他犯罪行为,确保货物准确按时的到达目的地,制订本程序。

#### 2.0 范围

集装箱检查与监督人员。

#### 3.0 内容:

3.1 所有进入本公司装运货物的集装箱都必须接受安全监管人员的检查,核对集装箱号。

3.2 货柜车进入本公司时,先由保安人员对车辆底盘与货柜底部进行检查,检查方法与注意事项请参考培训材料。

3.3 空柜集装箱车辆,在进入停放区域后应由安全监管人员立即开柜检查是否为空柜状态,如发现有货物或人员,应立即报告公司安全官员与相关负责人。

3.4 集装箱在装运作业前需要由安全监管人员按要求的7个点开始安全检查。

#### 4.0 检查方法:

##### 4.1 检查内容:

安全监管人员检查接受培训的方法进行:

4.1.2 对集装箱内外门进行检查,检查门闩、螺钉、门板,是否有改装、非正常维修等异常痕迹。

4.1.3 对集装箱左、右侧板进行检查,是否有改装、非正常维修等异常痕迹。

4.1.4 对柜头进行安全检查,是否有改装、非正常维修等异常痕迹。4.1.5 对集装箱顶板进行检查,是否有改装、非正常维修等异常痕迹,是否符合高度。

4.1.6 对底板进行安全检查,是否有改装、非正常维修、倾斜等异常痕迹。

4.1.7 检查过程中使用测量与标记工具,验证高度与声音异常情况。

##### 4.2 检查处理

4.2.1 如果发现集装箱有异常,检查人员应马上报告公司安全官员与相关负责人,由相关负责人联系货运公司。

2023-12-21-12-38-40

[Container and trailer inspection procedure.jpg](#)

## Conveyances and Instruments of International Traffic - Question # 40

## 集装箱十点检查表

要求：每个集装箱均须填写此表。  
 自集装箱装箱之日起，此表须保留至少一年。

|       |       |                     |             |                 |
|-------|-------|---------------------|-------------|-----------------|
| 货运信息  |       | 检查时间: 2023.8.3 7:58 |             | 检查人: [redacted] |
| 货物名称  | 吕林通   | 集装箱号                | 00LU1575835 |                 |
| 集装箱尺寸 | 45尺平柜 | 封签号                 | JAB4984     |                 |

装箱前须确认集装箱整体结构完好无损

| 检查区域                                                         | 是否合格                                                             | 不合格情况具体描述 |
|--------------------------------------------------------------|------------------------------------------------------------------|-----------|
| 1 外部/起落架：进入场所之前检查<br>• 可以看见支撑梁                               | 是 <input checked="" type="checkbox"/> 否 <input type="checkbox"/> |           |
| 2 门内外：安全可靠的锁闭装置<br>• 所有连接材料颜色相同<br>• 没有松动的螺栓/板及修补痕迹          | 是 <input checked="" type="checkbox"/> 否 <input type="checkbox"/> |           |
| 3 右侧：结构没有大修补<br>• 集装箱内壁的修补必须在外边可以看见<br>• 轻叩侧壁听是否有中空的声音       | 是 <input type="checkbox"/> 否 <input type="checkbox"/>            |           |
| 4 左侧：结构没有大修补<br>• 集装箱内壁的修补必须在外边可以看见<br>• 轻叩侧壁听是否有中空的声音       | 是 <input type="checkbox"/> 否 <input type="checkbox"/>            |           |
| 5 第五轮区：检查自然隔间/车底板                                            | 是 <input checked="" type="checkbox"/> 否 <input type="checkbox"/> |           |
| 6 箱顶/篷：填充块及通风孔可以看见<br>• 集装箱内壁的修补必须在外边可以看见<br>• 轻叩侧壁听是否有中空的声音 | 是 <input checked="" type="checkbox"/> 否 <input type="checkbox"/> |           |
| 7 货柜地板：地板与箱顶之间有规定的距离<br>• 地板平整，无大修补。                         | 是 <input checked="" type="checkbox"/> 否 <input type="checkbox"/> |           |
| 8 尾部：车牌完整<br>• 车身无破损                                         | 是 <input checked="" type="checkbox"/> 否 <input type="checkbox"/> |           |
| 9 外部：前面无破损，车牌完整<br>• 侧面无破损，前臂。无破损，无弯折。                       | 是 <input checked="" type="checkbox"/> 否 <input type="checkbox"/> |           |
| 10 生物多样性的检查：是否有虫卵，外来物种生物，<br>污染的土壤等                          | 是 <input checked="" type="checkbox"/> 否 <input type="checkbox"/> |           |

\*如发现不可接受的情况，集装箱则不得还用。应立即联系公司安全主管、报关人员、货动公司。请记录事件细节。

|                    |                |
|--------------------|----------------|
| 装箱主管签名: [redacted] | 日期时间: 2023.8.3 |
|--------------------|----------------|

|                 |              |             |
|-----------------|--------------|-------------|
| 货柜车发出货物运输途中监控记录 | 离厂时间:        | 11:02       |
|                 | 离厂后 1 小时确认结果 | 良好          |
|                 | 离厂后 2 小时确认结果 | 良好          |
|                 | 离厂后 3 小时确认结果 | 良好          |
|                 | 到达目的地时间      | 13:57 良好 顺利 |

2023-12-21-11:58:44

[Container and trailer inspection checklist.jpg](#)

## Conveyances and Instruments of International Traffic - Question # 42



[Container inspection tools.jpg](#)

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## Conveyances and Instruments of International Traffic - Question # 52



| No. | 日期   | 单位 | 司机姓名 | 随车人数 | 事由 | 进厂时间  | 车牌号       | 查货物清单否 | 抵押证件 | 来访卡号 | 离开时间  | 当班保安签名 |
|-----|------|----|------|------|----|-------|-----------|--------|------|------|-------|--------|
|     | 7.3  |    |      | 1    | 送货 | 9:23  | 皖C35579   | 是      | 驾驶员  | 01   | 10:37 |        |
|     | 7.5  |    |      | 1    | 送货 | 11:25 | 皖C35612   | 是      |      | 03   | 12:07 |        |
|     | 7.10 |    |      | 1    | 送货 | 8:27  | 皖C45768   | 是      |      | 06   | 10:35 |        |
|     | 7.12 |    |      | 1    | 送货 | 10:12 | 皖CM7327   | 是      |      | 05   | 11:48 |        |
|     | 7.13 |    |      | 1    | 送货 | 9:23  | 皖CM8371   | 是      |      | 02   | 10:59 |        |
|     | 7.14 |    |      | 1    | 送货 | 8:36  | 皖C418176  | 是      |      | 03   | 10:12 |        |
|     | 7.15 |    |      | 1    | 送货 | 9:25  | 皖C35612   | 是      |      | 01   | 10:31 |        |
|     | 7.20 |    |      | 1    | 送货 | 14:18 | 皖C4553841 | 是      |      | 06   | 15:47 |        |
|     | 7.21 |    |      | 1    | 送货 | 15:02 | 皖C03129   | 是      |      | 04   | 16:12 |        |
|     | 7.22 |    |      | 1    | 送货 | 9:02  | 皖C46273   | 是      |      | 02   | 10:03 |        |
|     | 7.23 |    |      | 1    | 送货 | 9:30  | 皖C70008   | 是      |      | 07   | 10:52 |        |
|     | 7.24 |    |      | 1    | 送货 | 8:35  | 皖CM5376   | 是      |      | 02   | 10:24 |        |
|     | 7.24 |    |      | 1    | 送货 | 10:12 | 皖C35579   | 是      |      | 07   | 11:11 |        |
|     | 7.26 |    |      | 1    | 送货 | 10:15 | 皖C455768  | 是      |      | 02   | 10:48 |        |
|     | 7.28 |    |      | 1    | 送货 | 16:22 | 皖C418337  | 是      |      | 05   | 17:53 |        |
|     | 7.30 |    |      | 1    | 送货 | 9:30  | 皖C418371  | 是      |      | 06   | 10:22 |        |
|     | 7.31 |    |      | 1    | 送货 | 8:35  | 皖C418371  | 是      |      | 05   | 9:40  |        |
|     | 8.5  |    |      | 1    | 送货 | 10:18 | 皖C418371  | 是      |      | 06   | 11:18 |        |
|     | 8.6  |    |      | 1    | 送货 | 8:23  | 皖C41516   | 是      |      | 03   | 10:12 |        |
|     | 8.8  |    |      | 1    | 送货 | 8:45  | 皖C27488   | 是      |      | 05   | 9:23  |        |
|     | 8.9  |    |      | 1    | 送货 | 10:12 | 皖C418371  | 是      |      | 07   | 11:55 |        |
|     | 8.11 |    |      | 1    | 送货 | 8:27  | 皖C55322   | 是      |      | 06   | 9:27  |        |

值班保安须知:

- 1、进出公司的货运车辆必须认真进行登记, 并抵押相关证件用以换取临时来访证卡后才让货运车辆进入。
- 2、货运车辆离开时, 当班保安应收回临时来访卡, 退还货车司机抵押的证件, 认真核对、检查货运车辆所云物质与登记资料是否相符, 无误后方可放行。
- 3、集装箱托离时, 当班执勤保安应收回临时来访卡, 交还货运司机抵押的证件, 查看货物清单, 无误后方可放行。

2023-12-21-13-29-04

[Driver log.jpg](#)

## Conveyances and Instruments of International Traffic - Question # 59



[ISO approved seal utilized\\_picture.jpg](#)

## Conveyances and Instruments of International Traffic - Question # 60

2023-12-21-12-38-31

- 1、目的: 为加强货柜出货的安全管理, 防止误用封签, 或被他人盗用, 特制定本规定。
- 2、封签: 指国际通用的货柜封签, 上面有唯一编号, 公司所使用的封签必须都是 ISO/PAS17712, 高度保安封签, 如螺栓式或子弹头式的封签, 否则必须要求提供方更换封签。
- 3、封签管理者: 装柜负责人
- 4、申请和使用程序:
  - 4.1 报关员或货运公司持船东确认单向船务公司购买相应数量的封签;
  - 4.2 正常情况下, 封签是由货运公司持有, 将随同集装箱到达公司装柜。若封签是由公司采购并直接存放在公司, 应由报关员将封签交给装柜负责人保管;
  - 4.3 装柜负责人向货柜司机或公司报送员取得封签后, 应当检查封签的完整性、可靠性, 如有破损应立即要求货柜司机或报关员换新封签, 并向业务部、报关员和公司安全主管报告, 取得新封签后, 应将新封签号码立即报告给报关员和业务部。
  - 4.4 遇到破损封签的情况时, 应对该空货柜进行最为严格的检查, 如有异常应立即要求换柜或直接受换柜。
  - 4.5 如果随在破封签而来的货柜是即将拼柜的货柜, 装柜主管应立即上报报关员, 而报关员必须通知一上厂家派员来检查此拼柜货柜, 所有物品要全部拆箱检查, 重新装柜。
  - 4.6 封签若完好, 装柜负责人应将封签上锁管理, 确保其不会被盗窃、更换, 锁匙应随身携带。
  - 4.7 产品装柜后, 装柜员上封签, 并在装柜记录上记录封签号。
  - 4.8 装柜号和封签号上报给业务部人员作单证。
  - 4.9 此柜号与封签号已成为唯一对应的匹配号。
  - 4.10 在使用过程, 如封签损坏、错封, 应立即报告给报关员和相关业务员, 并立即依照相关法定程序补申请新的封签, 所有原先的旧封签记录全部更改, 按新封签号填写。
  - 4.11 若封签丢失, 应立即报告给报关员和相关业务员, 报关员应立即向政府海关、货代公司报告封丢失事宜, 并申请撤销原先的封签号, 重新申请新的封签。
  - 4.12 若因海关抽检检测而损坏的封签, 依据海关出示的凭据申请新的封签, 并身务人员报备, 及提供相关凭据, 以确保货物顺利抵达目的地。
- 5、相关管理程序:
  - 5.1 《出货品装运安全管理程序》
- 6、相关管理图表
  - 6.1 封签管理记录表

| 编制 | 审核 | 批准 |
|----|----|----|
| 日期 | 日期 | 日期 |



|            |      |                |
|------------|------|----------------|
| 福建创实卫浴有限公司 | 受控状态 | 受控文件           |
| 反恐程序文件     | 文件编号 | WT-AT-002      |
|            | 版 次  | A/0            |
|            | 页 次  | 第 57 页 共 111 页 |

### 第三十三章、封条管理及封条破损处理程序

- 1.0 目的：本程序明确识别、管理封条，以保证我公司出货柜的封条清晰、完善，尽可能符合 ISO17712。从而对货物加强保护，避免被不法分子利用而制造盗窃或恐怖事件。
- 2.0 范围：适用于货仓工作人员、司机、保安等凡是接触封条的人员。
- 3.0 职责：
- 3.1 安全主任：负责封条的保管和登记发放。
- 3.2 业务部：负责封条的落实。
- 3.3 所有接触封条的人员在发现封条破损时均应立即予以报告管理人员或安全主任，及时处理。
- 4.0 内容：
- 4.1 由业务部定期向海关购买符合及超过 ISO17712 标准的高安全系数封条，如封条款式未在我厂使用过，由报关部人员判断不可用。将所有封条编号进行登记，列出清单。
- 4.2 封条购回后应放置安全主任保存。封条只允许被授权人员领取和使用，任何人如拾获封条必及时上交相关人员，并调查相关原因。
- 4.3 每次出货时由物流部凭签核完毕的《物料放行条》在财务领取封条并填写《封条登记表》，并将封条编号记录在《出货通知单》和《物料放行条》上。
- 4.4 由安全主任将封条封于货柜门锁处后，由保安人员核对封条号码、出货单号等内容。
- 4.5 物流部出货人员拍照、留档并邮寄给客户。
- 4.6 由于封条属于一次性配件，如果在封装过程中发生错误使用等情况时，由保安、成品仓联名提出更换封条，并在《封条使用记录表》上记录原有封条损

[08bff77614815c37f3b32201d1dadd6.jpg](#)

|            |      |           |         |
|------------|------|-----------|---------|
| 福建创实卫浴有限公司 | 受控状态 | 受控文件      |         |
| 反恐程序文件     | 文件编号 | WT-AT-002 |         |
|            | 版 次  | A/0       |         |
|            | 页 次  | 第 57 页    | 共 111 页 |

### 第三十三章、封条管理及封条破损处理程序

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- 2.0 范围：适用于货仓工作人员、司机、保安等凡是接触封条的人员。
- 3.0 职责：
- 3.1 安全主任：负责封条的保管和登记发放。
  - 3.2 业务部：负责封条的落实。
  - 3.3 所有接触封条的人员在发现封条破损时均应立即予以报告管理人员或安全主任，及时处理。
- 4.0 内容：
- 4.1 由业务部定期向海关购买符合及超过 ISO17712 标准的高安全系数封条，如封条款式未在我厂使用过，由报关部人员判断不可用。将所有封条编号进行登记，列出清单。
  - 4.2 封条购回后应放置安全主任保存。封条只允许被授权人员领取和使用，任何人如拾获封条必及时上交相关人员，并调查相关原因。
  - 4.3 每次出货时由物流部凭签核完毕的《物料放行条》在财务领取封条并填写《封条登记表》，并将封条编号记录在《出货通知单》和《物料放行条》上。
  - 4.4 由安全主任将封条封于货柜门锁处后，由保安人员核对封条号码、出货单号等内容。
  - 4.5 物流部出货人员拍照、留档并邮寄给客户。
  - 4.6 由于封条属于一次性配件，如果在封装过程中发生错误使用等情况时，由保安、成品仓联名提出更换封条，并在《封条使用记录表》上记录原有封条损

[08bff77614815c37f3b32201d1dadd6.jpg](#)

## Seal Security - Question # 66

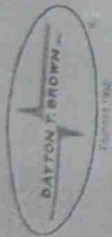




[Picture of seal storage location.jpg](#)

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**Seal Security - Question # 67**



1115 DAYTON STREET • DAYTON, OHIO 45424-1115  
AREA OFFICE: 216-297-4000



15 Mar. 2021  
413816-01-04-C14-0213

## Certificate of Conformance for Freight Container Mechanical Seal Testing

### Seal Classification: High Security

#### Customer:

MUWON CORPORATION  
30th Fl, Samil Bldg.,  
85, Cheonggyecheon-ro, Jongno-gu,  
Seoul

#### Attention:

Korea 110-748  
Km Byun, Jh Choi

#### Purchase Order No.:

MF14020701

#### Sample Type:

Bolt Seal

#### Seal Name:

MHS-331 (as provided by customer)

#### Model No.:

MHS-331 (as provided by customer)

#### Serial Nos.:

000001, 000003 through 000007, 000013 through 000017, 000020 through 000023, 000025, 000026, 000027, 000030 through 000034, 000036, 000037, and 000038

#### Specification No.:

ISO 17712:2013(E) Clauses: 4.1.3 and 5

#### Date Received:

15 Mar. 2021

#### Test Dates:

15 Mar. 2021

A total of 30 samples were received. Dayton T. Brown, Inc. certifies that 26 samples, 5 for each test and 1 for measurements, of the Seals referenced above were subjected to the following tests.

| Test Name                        | Paragraph No. | Classification Rating |
|----------------------------------|---------------|-----------------------|
| Bolt Seal Diameter Qualification | 4.1.3         | Meets Requirements    |
| Tensile Test                     | 5.2           | High Security         |
| Shear Test                       | 5.3           | High Security         |
| Bending Test                     | 5.4           | High Security         |
| Impact Test at Room Temp         | 5.5           | High Security         |
| Impact Test at Reduced Temp      | 5.5           | High Security         |

Remarks: The above listed tests were completed with no discrepancies noted. Refer to Test Report No. 413816-01-04-R14-0214 for complete details. **James Benincasa**  
The results contained herein pertain only to the specimens listed in this report. This report shall not be produced, except in full, without the written approval of Dayton T. Brown, Inc.

|              |              |
|--------------|--------------|
| Prepared by: | J. Benincasa |
| Engineer:    | T. Zimolys   |

[Seal test report or statement.jpg](#)

## Procedural Security - Question # 71

|            |           |                                                         |
|------------|-----------|---------------------------------------------------------|
| 福建创实卫浴有限公司 | 集装箱安全管理程序 | 文件编号：CS-C-IPAT-030<br>页次：2/3<br>版本：1.2<br>生效日期：2021-3-1 |
|------------|-----------|---------------------------------------------------------|

2023-12-21-12-38-13

7、报警系统和闭路电视监控系统：工厂装置有效的警报系统以防范非授权人员在非工作时间内进入货物装卸和存放区；在工厂的出入口包括人员进出口、紧急出口、装卸货区的出入口、拖车和集装箱的装卸箱的装卸区以及货物存入区需利用警报系统和闭路电视进行监控，以防止未经授权的人员进入；闭路电视录下的影像至少需要保持 30 天；录像带需每 3-6 个月更换一次，以确保录像质量或定期检查其质量。

8、货物管理：对于存放的国际、国内、高价值的货物和危险品必须加以标注并分开存放在安全有围墙的区域内。

9、沟通系统：拥有良好的内外沟通系统，确保能及时与内部保安人员或当地执法部门取得沟通。

物品管理：工厂应制定政策阻止员工携带私人物品进入工作区域，检查员工的随身物品防止带入不明物品或擅自带走公司财物。工厂需抽查垃圾有无可疑物品存在，并对存放垃圾的地方和托运垃圾的过程进行监控。

10、计算机系统：工厂应设立有效的措施以防止计算机系统遭非法进入如设置用户密码、系统防火墙、病毒防护装置和服务器安全等。

#### 11、进入管制：

1) 对于员工的进入管制，工厂必须建立一套员工档案数据系统，并可作为进入管制和识别工具；员工进入厂区应佩带厂牌（厂牌上的照片应与本人相符），保安人员应禁止无厂牌者进入和对其进行盘问。

2) 对于访客的进入管制，访客进入工厂时必须经管理层批准并出示带有相片的个人证件，以供识别和登记使用；所有访客在工厂范围内必须有保安人员或相关工作人员陪同，并佩带访客证。

3) 对于邮寄品/邮件的管制，收到的邮包或邮件应在分发前定期进行检查。

4) 对于未经授权人员的管制，工厂必须建立一套用以识别、查询驱逐未经授权人员进入的管理程序。

[The container access procedure.jpg](#)

## Procedural Security - Question # 72

2023-12-21-12-41-07

|            |  |          |  |                     |  |
|------------|--|----------|--|---------------------|--|
| 福建创实卫浴有限公司 |  | 限制区域管理程序 |  | 文件编号: CS-C:TPAT-044 |  |
|            |  |          |  | 页次: 1/1             |  |
|            |  |          |  | 版本: 1.2             |  |
|            |  |          |  | 生效日期: 2021-3-1      |  |

1、目的: 为防止不法人员进入禁止区域放入危险物品, 或将货物调包而制定本程序。

2、范围: 适用于仓库、包装车间、装卸货区域。

3、职责: 仓库、包装车间: 由本部门人员进行监督不允许外来人员进入, 如有则需进行登记。车间装卸货区域: 由保安负责监督除装柜车之外, 任何人及物都不可靠近此区。保安: 协助各部门管理共同监管。

4、程序:

4.1 我司限制区域为: 仓库、包装车间、装货区域等。

4.2 隶属部门员工不属限制范围内, 其它所有进入限制区域的人员都必须在《限制区域出入登记表》中注明: 进入日期、姓名、部门、进入时间、离开时间及进入原因。

4.3 每个车间人员不可擅自串岗, 如有工作需要, 须管理批准, 且包装车间在包装过程中其它人员不可进行打扰, 在完成工作情况下, 立即离开; (进出需进行登记)

4.4 凡不在《限制区域出入名单表》上出现的名单, 而因工作要进入受限区域, 需经部门主管批准才可进入。

4.5 如有访客进入限制区域, 需在公司管理人员的陪同下。

4.6 在我司限制区域内, 如有未戴厂证, 或不明可疑人物, 保安及我司厂内所有人员都有权进行盘问。

4.7 给我司授权、《反恐授权书》上面的人员, 进入任何区域都无需签名。

5、附件:

5.1 《反恐授权书》

6、表单:

6.1 《限制区域出入名单表》

6.2 《限制区域出入登记表》

|    |  |    |  |    |  |
|----|--|----|--|----|--|
| 编制 |  | 审核 |  | 批准 |  |
| 日期 |  | 日期 |  | 日期 |  |

[The facility access control procedure.jpg](#)

Procedural Security - Question # 73



| 福建创实卫浴有限公司 |       |      |
|------------|-------|------|
| 安全文件记录控制程序 | 文件编号  | CS-3 |
|            | 版本/版次 | A3   |

- 1 目的  
为了确保公司的 C-TPAT 反恐安全的文件与记录得到有效的管制，特制订本程序。
- 2 范围  
本程序适用于与本公司 C-TPAT 反恐安全有关的文件与记录数据。
- 3 程序
  - 3.1 外来文件的确认与详细识别
    - 3.1.1 美国海关 C-TPAT 反恐安全标准由安全主任每个月向美国海关 C-TPAT 网站或第三方认证机构查询并下载，且由管理者代表签名确认后存文件。
    - 3.1.2 公司应确保所有业务和货物数据是清晰、完整和正确的（包括计算机系统内数据的安全性），以防止篡改、丢失或提交不正确资料，相关人员（服务、货仓等）要随机核对与确认。
    - 3.1.3 公司对客户发来的数据（电脑或传真）如订单、加工合同、唛头及其它技术性数据要给予确认，以防止诈骗；确认的方式应通过电话与固定联系人核实。
    - 3.1.4 成品出货时，船务部门必须与运输公司预知货物的运输时间，运输车辆到厂时货仓人员必须确认托运单或出货资料是否属实，并按船务部门发出的出货资料、托运单进行装载。
    - 3.1.5 任何与货物处理的相关的文件和记录必须是保密的，只允许与此工作相关的人才可以接触和处理，公司应明确相关人员职责，以确保货物文件和记录的保密性和完整性。
    - 3.1.6 如果发现文件不符或者有假文件的诈骗现象必须通知客户、海关及当地执法机关及其它利益相关方等。
  - 3.2 记录的填写、标识与发出控制
    - 3.2.1 各部门根据开展的 C-TPAT 活动填写相关记录，按指定填写，字迹清晰、真实易于阅读，应准确记载相关信息，以确保有效地提供利益相关方及可供追溯。
    - 3.2.2 C-TPAT 记录应明确显示所涉及的相关活动资料，并易于识别。
    - 3.2.3 发送给客户的托运单、报关单及其它相关记录必须清晰、真实易于阅读，发送后须与客户对应人员进行电话确认数据是否收到，并核对和确认资料相关内容，避免发送的资料被篡改等非法活动。
    - 3.2.4 对于收发货单据，托运成品货单据等资料的原始单据于收发货后次日（最好在二十四小时内）交财务部有关分管负责人。
    - 3.2.5 货仓部保存货运单据复印件一个月，在每月月底将所有复印单据交公司传文件，对于公司的运输数据和数据系统要严格保密。

2023-12-21-13-58-57

[The shipping document procedure.jpg](#)

## Procedural Security - Question # 74

|            |           |                                                         |
|------------|-----------|---------------------------------------------------------|
| 福建创实卫浴有限公司 | 货物超数和短缺程序 | 文件编号：CS—C-TPAT—008<br>页次：1/2<br>版本：1.2<br>生效日期：2021-3-1 |
|------------|-----------|---------------------------------------------------------|

2023-12-21-12-32-02

- 1、目的：制订本程序以便对货仓物料进行盘点清查,报告物料的短缺及过剩进行处理,加强对公司物料的有效控制。
- 2、范围：本程序主要适用于货仓物料管理及其它相关人员。
- 3、职责：仓库主管统筹策划安排,仓管人员定期查物料并及时报告,仓库主管与采购部主管商讨处理措施,报生产经理审批。
- 4、程序：
  - 4.1 采购部当有新的《采购单》发出前,应通知仓库部对本次要采购的物料进行盘点,仓管人员亦须清点这些库存物料数量,与该物料所附《物料记录卡》核对,随后将每种物料清点情况作好记录,(注明物料名称、型号、数量、来货时间等),交采购部。
  - 4.2 仓管人员以《采购单》、《送货单》为依据点收来料,作好来料记录,分区摆放,并在物料上附《物料记录卡》。
  - 4.3 生产车间领取物料时,仓管人员要严格交收手续,并及时做好来料记录和《物料记录卡》。
  - 4.4 仓库部主管安排定期进行仓库物料检查,着重针对物料的使用期限,坏货情况,物料短缺和过剩等,将检查结果记录于《物料进销簿》,对客供物料的使用量亦须保持监察及管制,以《客供物料存量记录》报告给采购部。
  - 4.5 当有订单取消或生产完成时,要对相关物料进行清点,特别是客供物料,将积存之物料数量进行备案。
  - 4.6 过剩或短缺物料的处理
    - 4.6.1 由采购部和货仓部联合对物料的短缺和过剩进行追溯、调查、根据各途径查找原因。短缺调查:生产过程中的损耗,流通中的损耗和误存;因存放时间过长而变质或超过使用周期而损毁,不明丢失。造成物料过剩应调查:订购数量过多、不同型号物料的混入错以它种物料代发、取消订单等。将调查结果详细记录交采购部。
    - 4.6.2 跟单和货仓主管根据物料过剩和短缺的调查报告联决商讨处理方法、报生产经理审批,处理方法记录于《物料进销簿》,各相关部门亦根据决定对物料做出相关处理。
    - 4.6.3 跟单根据《客供物料存量记录》,对客供物料的坏料、损耗、积存及时与客户沟通,并协商处理方法。
    - 4.7 点数、称重的处理:

[Shortage,overage or documentation issue handling procedure.jpg](#)

## Procedural Security - Question # 76

|            |          |                                                             |
|------------|----------|-------------------------------------------------------------|
| 福建创实卫浴有限公司 | 货物凭据管制程序 | 文件编号: CS-C-TPAT-028<br>页次: 1/1<br>版本: 1.2<br>生效日期: 2021-3-1 |
|------------|----------|-------------------------------------------------------------|

#### 1、目的:

本程序明确有送货单据的开具、经手、保存等管制措施,以保证我公司出进货物的帐目清晰、手续完善。对运输资料或资料系统的控制以防无许可接触,以免被不法分子利用造成盗窃或恐怖事件。

#### 2、范围:

本程序适用于货仓工作人员、司机、接触运货单及运货资料的人员。

3、职责: 货仓工作人员核实收发货单据,点收或发放货物后签名确认,货仓主管审核、保存原始单据交公司财务负责人。

#### 4、程序:

4.1 货仓工作人员要收到相关的指令性文件资料方能进行收发货工作,如采购部发出的《采购单》、生产部发出的《出货通知书》等,货仓工作人员务必核实货物的名称、规格、数量等,在此过程中,一定要警惕非货单物料的进入,在确认无误后才可签收。

4.2 对于收发单据,托运成品货单据等资料的原始单据于收发货后次日(最好在二十四小时内)交财务部有关分管负责人。

4.3 货仓部只保存货运单据复印件一个月,在每月月底将所有复印单据交公司存盘。

4.4 对于公司的运输资料和资料系统要严格保密,特别是客户资料和系统要确保控制以防无许可的接触。

5、附件: 无

6、表单:

6.1 《采购单》      6.2 《出货通知书》

|    |  |    |  |    |  |
|----|--|----|--|----|--|
| 编制 |  | 审核 |  | 批准 |  |
| 日期 |  | 日期 |  | 日期 |  |

2023-12-21-12-37-45

[Shipping\\_and receiving documentation access control.jpg](#)

## Procedural Security - Question # 80



|            |  |       |            |
|------------|--|-------|------------|
| 福建创实卫浴有限公司 |  | 文件编号  | CS-2       |
| 安全问题汇报程序   |  | 版本/版次 | A3         |
|            |  | 页码    | 共1页, 第1页   |
|            |  | 制订日期  | 2023-12-01 |

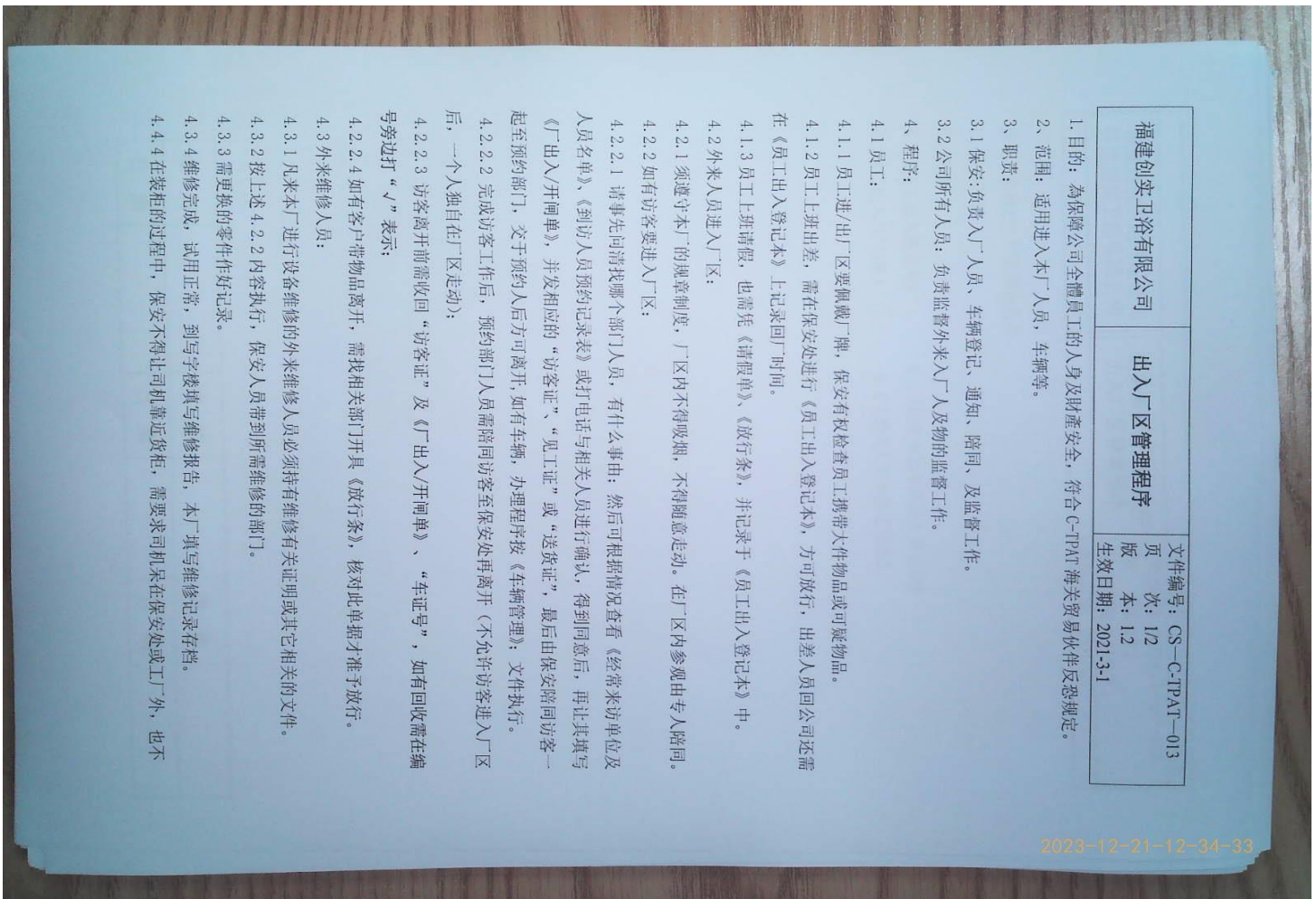
- 1、目的  
使本公司内一切安全事件得到及时调查和处理,最大程度地消除安全隐患,防止恐怖活动的发生。
- 2、适用范围  
设定本程序,要适用于本公司所有的涉及安全的活动。(反恐安全问题包括:非法运输、盗窃未遂、欺诈、内部阴谋事件等)
- 3、工作职责  
由安全经理负责策划和安排执行。
- 4、工作程序
  - 4.1 公司定期进行内部安全检查,将检查结果汇报给安全经理,其中存在安全问题的事项,安全经理要督促安排及时的调查,处理,跟踪检查并做好安全事件的调查处理报告存档。
  - 4.2 保安人员执行安全巡逻时,要保持警觉,发现有即将发生或正在发生的安全事件,实时向安全主管(或安全经理)报告,能及时排除的要及时处理。
  - 4.3 本厂各部门、各区域引起的涉及安全的事件,均实时与保安部门取得联系,须紧急处理的,可由相关人员现场处理,须经调查的,由相关部门配合保安部进行调查,研究处理方案,交由安全经理批准执行。
  - 4.4 本公司鼓励员工积极参与安全控制并举报安全信息,对于举报中有涉及安全隐患,甚至恐怖活动倾向的信息,应高度民主警觉,重视,交保安部存档,并由安全经理安排调查,谨慎处理。
  - 4.5 在安全维护活动中,如有的安全事件,事态较为严重,甚至有触及法律的行为,应及时由公司向当地公安局,派出所等执法机构汇报,并积极配合其调查处理。
  - 4.6 凡我公司所有的安全事件的调查,处理均须保安部记录存档。
  - 4.7 所有安全事件包括但不限于向业务合作伙伴、客户、国际国内反恐组织或是政府机构汇报。同时获得反恐支持。
- 5、相关文件  
《安全事件调查表》

2023-12-21-13-58-51

[Reporting security incidents or illegal shipping activity procedure.jpg](#)

## Procedural Security - Question # 81





[Access control procedure.jpg](#)

Procedural Security - Question # 82

|            |  |       |            |
|------------|--|-------|------------|
| 福建创实卫浴有限公司 |  | 文件编号  | CS-2       |
| 安全问题汇报程序   |  | 版本/版次 | A3         |
|            |  | 页码    | 共1页, 第1页   |
|            |  | 制订日期  | 2023-12-01 |

- 1、目的  
使本公司内一切安全事件得到及时调查和处理,最大程度地消除安全隐患,防止恐怖活动的发生。
- 2、适用范围  
设定本程序,要适用于本公司所有的涉及安全的活动。(反恐安全问题包括:非法运输、盗窃未遂、欺诈、内部阴谋事件等)
- 3、工作职责  
由安全经理负责策划和安排执行。
- 4、工作程序
  - 4.1 公司定期进行内部安全检查,将检查结果汇报给安全经理,其中存在安全问题的事项,安全经理要督促安排及时的调查,处理,跟踪检查并做好安全事件的调查处理报告存档。
  - 4.2 保安人员执行安全巡逻时,要保持警觉,发现有即将发生或正在发生的安全事件,实时向安全主管(或安全经理)报告,能及时排除的要及时处理。
  - 4.3 本厂各部门、各区域引起的涉及安全的事件,均实时与保安部门取得联系,须紧急处理的,可由相关人员现场处理,须经调查的,由相关部门配合保安部进行调查,研究处理方案,交由安全经理批准执行。
  - 4.4 本公司鼓励员工积极参与安全控制并举报安全信息,对于举报中有涉及安全隐患,甚至恐怖活动倾向的信息,应高度民主警觉,重视,交保安部存档,并由安全经理安排调查,谨慎处理。
  - 4.5 在安全维护活动中,如有的安全事件,事态较为严重,甚至有触及法律的行为,应及时由公司向当地公安局,派出所等执法机构汇报,并积极配合其调查处理。
  - 4.6 凡我公司所有的安全事件的调查,处理均须保安部记录存档。
  - 4.7 所有安全事件包括但不限于向业务合作伙伴、客户、国际国内反恐组织或是政府机构汇报。同时获得反恐支持。
- 5、相关文件  
《安全事件调查表》

2023-12-21-13-58-51

[Security issues notification procedure.jpg](#)

## Procedural Security - Question # 84

|            |            |                                                             |
|------------|------------|-------------------------------------------------------------|
| 福建创实卫浴有限公司 | 厂证及访客证管理程序 | 文件编号: CS-C-TPAT-007<br>页次: 1/2<br>版本: 1.2<br>生效日期: 2021-3-1 |
|------------|------------|-------------------------------------------------------------|

2023-12-21-12-31-60

- 1、目的：杜绝不法分子利用盗窃厂证及访客证进入本厂内进行策划恐怖袭击活动。符合美国海关的 C-TPAT（海关反恐联盟）安全指导，确保本厂财产及员工人身安全，进行对本厂内厂证及访客证进行统一管理及发放。
- 2、范围：适用于工厂全体员工及外来访人员。
- 3、职责：由人事负责监督及发放。
- 4、程序：
  - 4.1 厂牌的发放、更换及补发：
    - 4.1.1 新进员工入厂时需交照片给人事办理厂牌。
    - 4.1.2 厂牌若有遗失或损坏应及时到人事处补办。
  - 4.1.3 所有员工厂牌遗失需补办时，人事需记录于《厂牌遗失/补办记录表》中，并打一份《厂牌遗失通知》告知保安此为遗失之厂牌，即为作废，以后将加强检查。
  - 4.2 厂牌的使用：
    - 4.2.1 员工厂牌作为员工出入厂区之识别用，不得作为其它身分证明。
    - 4.2.2 上班时间，员工须配挂厂牌；在进出厂时也必须向保安展示以证名身份，否则禁止出入；没有厂牌者将会受到盘问。
    - 4.2.3 厂牌一律挂在胸前，不得以其外衣遮盖，更不得挂在其它地方，违者以未佩戴处理。
  - 4.3 访客证的使用：
    - 4.3.1 工厂应为来访人员制定专门的访客证，该访客证必须明显区别于员工厂证。
    - 4.3.2 所有的“访客证”都必须有独立、唯一的号码，来访人员做好登记后应派发“访客证”，并要求全程佩戴。
    - 4.3.3 访客证号码必须记录于《来访人员登记表》上，结束来访后保安必须核对和收回“访客证”，如果有回收需在“来访证”编号打“√”表示；
    - 4.4 厂证及访客证的检查：
      - 4.4.1 保安人员必须履行好检查的职责，凡未佩戴厂牌及访客证者一律拒绝进入，检查结果应上报人事部作相关处理。
      - 4.4.2 保安人员在巡逻时也要盘问那些没有佩戴厂牌及访客证的人员，并要查明原因；如属本厂员工则应上报人事处补办，非法进入者则立即报告行政部并根据情况决定是否报警。
      - 4.4.3 各部门主管应督促所属员工挂好厂牌，并由人事负责追踪考核工作，未挂厂牌者将给予警告一次。

[Access devices control procedure.jpg](#)

## Physical Security - Question # 92





[Barriers to control ingress and egress.jpg](#)

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**Physical Security - Question # 93**



[Picture of the gates.jpg](#)

### Physical Security - Question # 97

## 安防设施安装、维护、保养协议书

甲方：泉州劲鑫电子有限公司

乙方：福建创实卫浴有限公司

1、总则：乙方委托甲方负责乙方所有安防设施的安装、维护、保养事宜；主要工作内容包括：

1.1 所有安防设施的安装、维护和日常保养；

1.2 提供 5\*8 小时的技术支持（包括电话咨询、远程协助、现场支持）；7\*12 小时的电话服务

1.3 安装、维护、保养的安防设施包括：CCTV、红外线报警器、门禁系统等安防系统；服务器、电脑、打印机、传真机、扫描仪、复印机等办公系统

1.3 软件安装、调试、维护、软件升级；

1.4 应急响应服务；

1.5 设备巡检；

1.6 视频会议系统维护；

1.7 数据服务

1.8 考勤系统、综合信息网优化升级与维护服务

乙方在做好服务的同时，有义务、有责任和其他服务商建立良好的合作关系，共同做好承诺的服务内容。

2.1 维保对象：

① 台式电脑（包含组装机、戴尔和联想等品牌）

② 笔记本电脑

③ 复印机、打印机、传真机等

④ 扫描仪、碎纸机等

⑤ 小型局域网及相关设备、线缆等

⑥ 视频会议系统

⑦ 配件（光驱/主板/显卡等）

2.2.2 硬件的检测和诊断

对发生故障的设备进行检测，诊断问题的所在；

2.2.3 硬件的送修

故障设备若需要更换时，对于保内设备，联系厂商进行更换；

2.2.4 硬件代购

过保的设备，根据甲方需求推荐相关配件。甲方需要其他配件时由乙方代为采购

2.2.5 硬件的升级安装

如扩内存、扩硬盘、升级 CPU、增加网卡、打印服务器、双面打印单元、送纸器等。（只收取配件费用）

说明：硬件是指签约的台式电脑、笔记本电脑、打印机、传真机、显示器、键盘鼠标及外设。

2.3 软件维护

主要指甲方端的操作系统及应用软件的维护，包括：

2.3.1 电脑 Windows 系统的安装、调试及故障解决；

2.3.2 Microsoft Office 办公软件（包括 Excel、Word、PowerPoint），防、杀病毒软件，等等。

2.3.3 协助处理专业性较强的其它软件。

2.4 应急服务

出现大范围内的设备故障或重要部门、核心设备故障时，快速提出解决方案，并做出人员调配和应急措施。

2.5 建立用户档案

乙方对维护设备的型号、数量、硬件配置、办公设备的耗材使用情况、维修次数、等进行建档。

3、本合同的有效期为两年，即从 2024 年 1 月 5 日~2026 年 1 月 5 日；

4、维护保养费用：每年的费用尾 8000 元；

5、费用支付方式：合同签订后付 50%，每年到期在支付另外的 50%。

甲方签章：

签订日期：2024.1.5

乙方签章：

签订日期：2024.1.5

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## Physical Security - Question # 98



## 安防设施安装、维护、保养协议书

甲方：泉州劲鑫电子有限公司

乙方：福建创实卫浴有限公司

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1.2 提供 5\*8 小时的技术支持（包括电话咨询、远程协助、现场支持）；7\*12 小时的电话服务

1.3 安、维护、保养的安防设施包括：CCTV、红外线报警器、门禁系统等安系统；服务器、电脑、打印机、传真机、扫描仪、复印机等办公系统

1.3 软件安、调试、维护、软件升级；

1.4 应急响应服务；

1.5 设备巡检；

1.6 视频会议系统维护；

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过保的设备，根据甲方需求推荐相关配件。甲方需要其他配件时由乙方代为采购

2.2.5 硬件的升级安

如扩内存、扩硬盘、升级 CPU、增加网卡、打印服务器、双面打印单元、送纸器等。（只收取配件费用）

说明：硬件是指签约的台式电脑、笔记本电脑、打印机、传真机、显示器、键盘鼠标及外设。

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甲方签章：

签订日期：2024.1.5

乙方签章：

签订日期：2024.1.5

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## Physical Security - Question # 103



[CCTV Monitors.jpg](#)

## Physical Security - Question # 108

**外来人员进出登记表**

| NO | 日期   | 姓名 | 证件号码 | 来宾人数 | 被访人姓名 | 事由 | 进厂时间  | 来访卡号码 | 离厂时间  | 当班保安签名 |
|----|------|----|------|------|-------|----|-------|-------|-------|--------|
|    | 8.12 |    |      | 1    |       | 业务 | 9:25  | 05    | 10:05 |        |
|    | 8.13 |    |      | 1    |       | 业务 | 10:09 | 01    | 10:37 |        |
|    | 8.15 |    |      | 1    |       | 业务 | 15:12 | 03    | 15:51 |        |
|    | 8.16 |    |      | 1    |       | 业务 | 8:25  | 02    | 9:01  |        |
|    | 8.20 |    |      | 1    |       | 业务 | 11:12 | 04    | 11:55 |        |
|    | 8.21 |    |      | 1    |       | 业务 | 16:32 | 06    | 15:00 |        |
|    | 8.22 |    |      | 1    |       | 业务 | 9:11  | 08    | 9:44  |        |
|    | 8.24 |    |      | 1    |       | 业务 | 16:33 | 05    | 12:06 |        |
|    | 8.28 |    |      | 1    |       | 业务 | 8:50  | 01    | 9:29  |        |
|    | 8.27 |    |      | 1    |       | 业务 | 10:12 | 02    | 11:10 |        |
|    | 8.30 |    |      | 1    |       | 业务 | 9:27  | 04    | 10:06 |        |
|    | 8.31 |    |      | 1    |       | 业务 | 14:58 | 05    | 15:41 |        |
|    | 9.1  |    |      | 1    |       | 业务 | 9:27  | 03    | 15:28 |        |
|    | 9.5  |    |      | 1    |       | 业务 | 9:12  | 05    | 9:48  |        |
|    | 9.12 |    |      | 1    |       | 业务 | 10:25 | 02    | 11:12 |        |
|    | 9.20 |    |      | 1    |       | 业务 | 10:16 | 01    | 15:27 |        |
|    | 9.22 |    |      | 1    |       | 业务 | 15:36 | 02    | 16:18 |        |
|    | 9.27 |    |      | 1    |       | 业务 | 12:25 | 05    | 10:37 |        |
|    | 9.29 |    |      | 1    |       | 业务 | 9:26  | 05    | 10:28 |        |

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注：来访人员必须出示带有照片的证件，以证明身份；2、来访人员必须有被访人员接入工厂，或有保安引领，并当面交给受访人。

[Visitor Log Book.jpg](#)

## Physical Security - Question # 110





[Visitors badge.jpg](#)

**Misc - Question # 129**



[Building front including factory name signage.jpg](#)

### Misc - Question # 130



[Entrance gate and guard station.jpg](#)

### Misc - Question # 131





[Building\\_structures from outside.jpg](#)

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**Misc - Question # 133**



[Facility\\_perimeter\\_protection.jpg](#)

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**Misc - Question # 134**



[Final packaging\\_area.jpg](#)