



## **ASIA US INDUSTRIAL JOINT STOCK COMPANY**

Lot 1, Thai Hoa- Lien Son- Lien Hoa Industrial Zone, Hoa Son Town, Lap Thach District, Lap Thach, Vinh Phuc Province, Vietnam 15000 961489689

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

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Report #	EAC-2024-07-0387-CAPA-V4
Audit Submitted	Jul 22, 2024
Compliance Score	99%
Audit Type	EXTERNAL AUDIT



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

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## Location Information

### ASIA US INDUSTRIAL JOINT STOCK COMPANY

Lot 1, Thai Hoa- Lien Son- Lien Hoa Industrial Zone, Hoa Son Town, Lap Thach District, Lap Thach, Vinh Phuc Province, Vietnam 15000 961489689

SCAN ID VN83Z3318LAS  
Point of Contact Name Ms. Trinh Thi Phuong Anh/ Deputy Director  
Point of Contact Email anhttp@amy.vn

Contact Name	Phone	Email
		dungntv@amy.vn

Location ASIA US INDUSTRIAL JOINT STOCK COMPANY  
Primary Location Yes  
Critical Location No  
Assigned Auditor BSI Group  
Schedule Date Jul 15, 2024

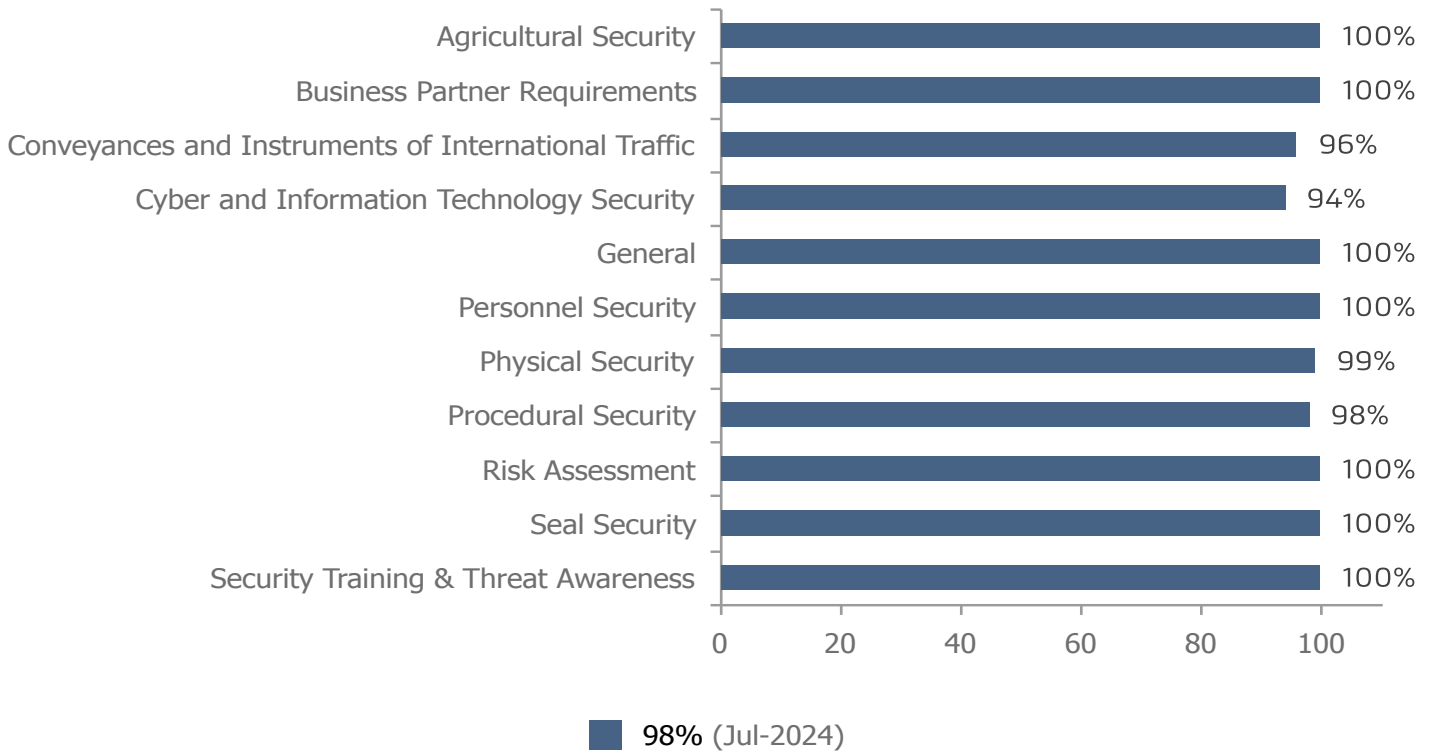
# Audit Summary

## Pre-CAPA

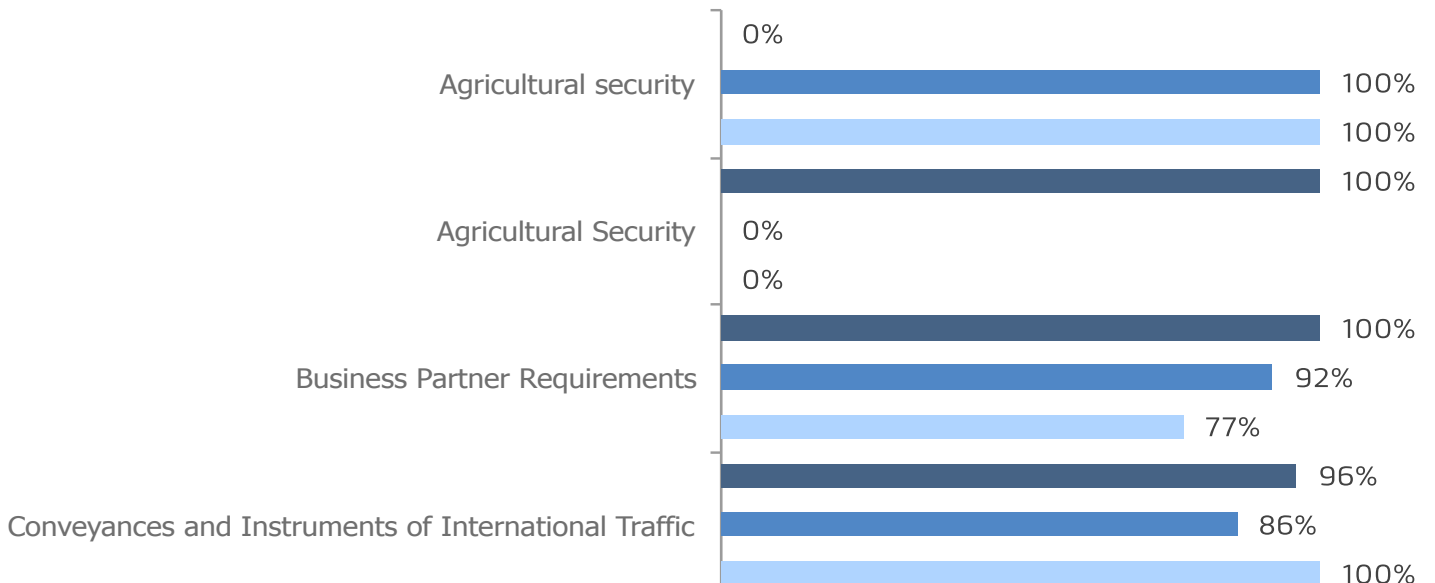
Audit Submitted  **Jul 22, 2024**

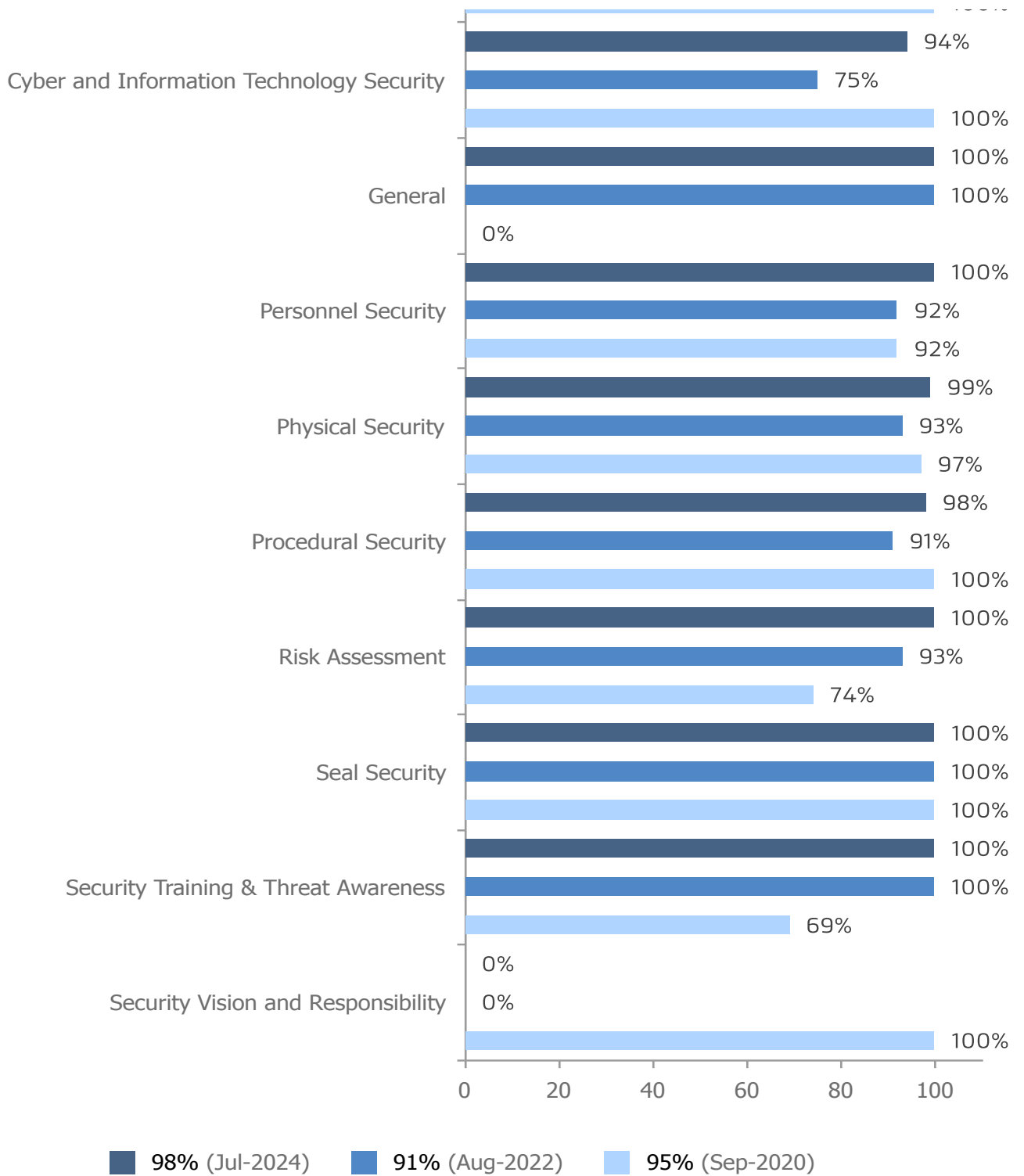
Compliance Score Pre-CAPA  **98%**

## Compliance by Category




## Compliance by Category - Last 3 Audits






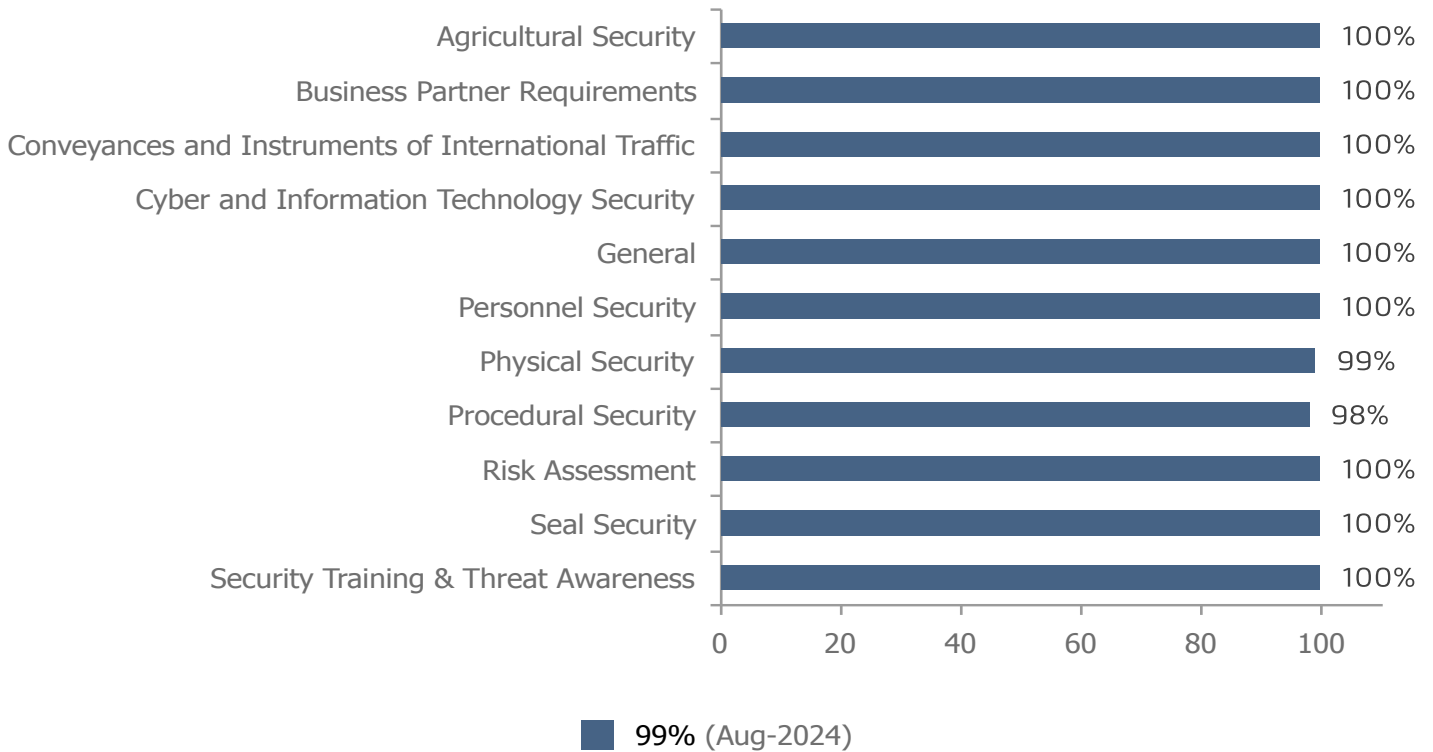
# Audit Summary

## Post-CAPA

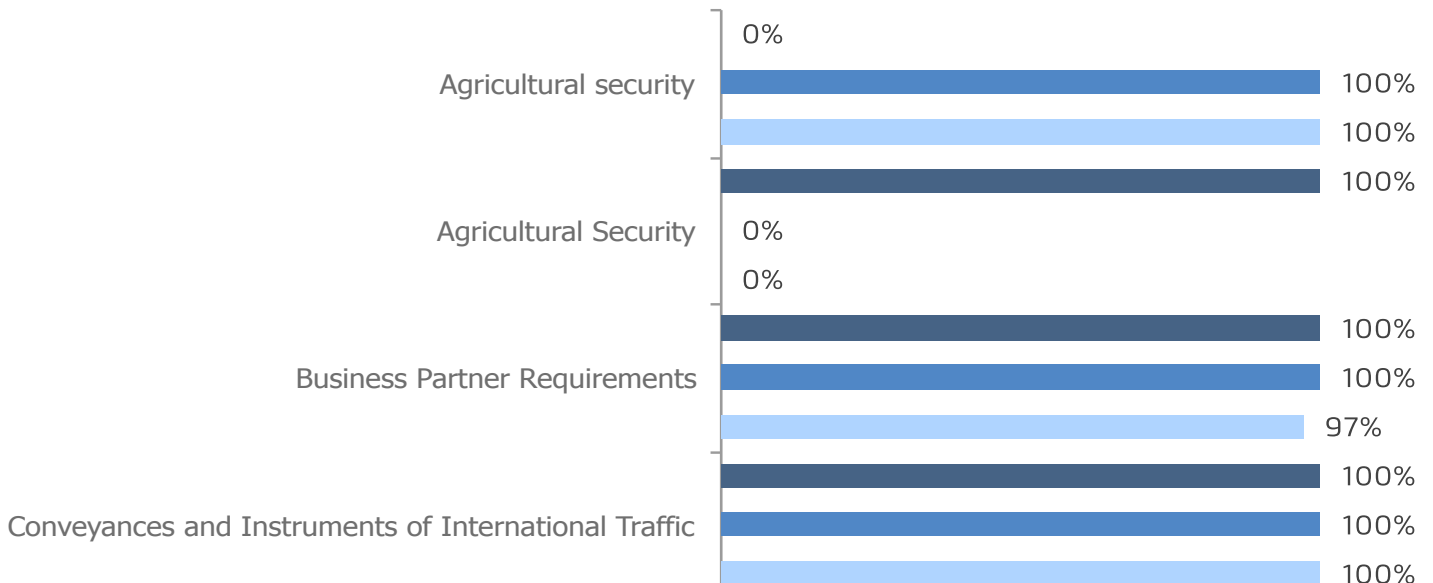
CAPA Submitted Date (Last)   
**Aug 02, 2024**

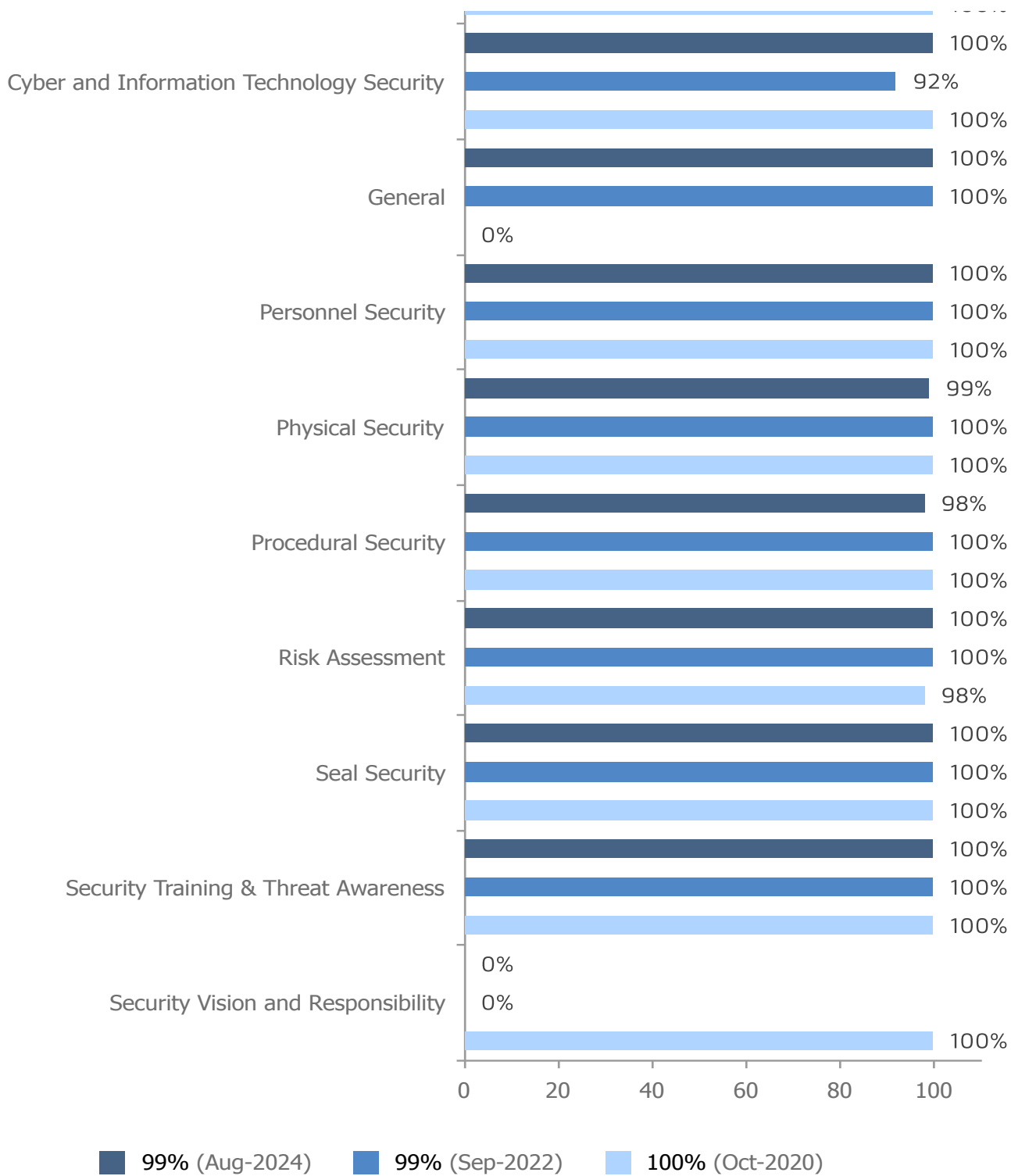
Compliance Score Post-CAPA   
**99%**

## Compliance by Category



## Compliance by Category - Last 3 Audits





## 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	Ceramic
Product Type / Commodity	Ceramic tiles and floor mats
Year Established	2015
Grounds Size (Square Meters)	320000
Number of Buildings	2
Facility Size (Square Meters)	280000
Number of access points? (i.e. gates, exterior doors)	1
Hours of Operation	Working days: Monday to Saturday Working hour for Office area: 8:00 A.M. - 5:00 P.M. Lunch break from 12:00 P.M. - 01.00 P.M. Working hour for Production area: Under 3 shifts: 6:00 A.M. - 2.00 P.M./2:00 P.M. - 10:00 P.M./10:00 P.M. - 6:00 A.M. Break time: 10:00 A.M. - 10:30 A.M./ 5:00 P.M. - 5:30 P.M./ 0:00 A.M. - 0:45 A.M.). And no overtime working.
Number of Employees	greater than 500
Number of Contract Employees	0
Number of Inhouse Security Guards	27
Number of Contract Security Guards	0
Number of Migrant Workers	0
Annual Revenue	10 - 50 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?	USA (60%), others (40%)
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
VIET A TRANSPORT SERVICE TRADING COMPANY LIMITED	Mr. Le Cong Quyet/Director.	Tel: 0914827356	20
AN TRANG LOGISTICS JOINT STOCK COMPANY	Mr. Ha Tuan Phuong/Director.	Tel: 0982971599	50
OPL LOGISTICS JOINT STOCK COMPANY	Mr. Le Vu Tung Lam/Deputy General Director.	Email: N/A Tel: 84 3203574188	30

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.

Lot 1, Thai Hoa - Lien Son - Lien Hoa Industrial Zone, Hoa Son Town, Lap Thach District, Vinh Phuc Province, Vietnam.

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

DungTien Tran

Auditor Certification #

249568-185573

Name of onsite Factory Representative (First and Last Name)

Ms. Trinh Thi Phuong Anh/ Deputy Director

Factory Representative Email Address

anhttp@amy.vn



# Audit Responses

Audit Assigned

**May 31, 2024**



Due Date

**Jul 15, 2024**



Overall Compliance Score

**99%**

## 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



[12.pdf](#)

**Comments:** The current location address of the facility on business license as Lot 1, Thai Hoa - Lien Son - Lien Hoa Industrial Zone, Hoa Son Town, Lap Thach District, Vinh Phuc Province, Vietnam.

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

- Yes  
 No

**Comments:** Ms. Trinh Thi Phuong Anh/ Deputy Director, appointed as POC regarding security matters.  
Email: anhttp@amy.vn  
Cellphone: 0961489689/ 0976831987

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:** Auditor reviewed previous SCAN audit CAPAs in preparation of this audit.

4 **None** During the current audit, were all previous CAPAs found to have been appropriately addressed/ mitigated as per the CAPA instructions provided?

- Yes  
 No

**Comments:** During the current audit, all previous CAPAs found to have been appropriately addressed/ mitigated as per the CAPA instructions provided.

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



[21.pdf](#)

**Comments:** The facility personnel have been completed SCAN Factory and Supplier Training within last 60 days in advance of this audit. The last training completed on 06.06.2024

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:** The facility has been audited of Social Compliance and Responsible Sourcing Audit.

- CB: TUV

- Date: 16-18.06.2024

- Score: C

## Risk Assessment

100%

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

- Yes  
 No

**Comments:** The facility had a risk assessment that identifies vulnerabilities and addresses in the business plan.

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

- Yes  
 No

**Comments:** The facility shared a copy of their risk assessment to business partners and contractors.

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

- Yes  
 No

**Comments:** The facility risk assessment included vulnerabilities specific to contracted service providers (transport service companies).

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:** The facility risk assessment updated on 15.06.2024 that show it has been updated within 12 months.

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:** A documented cargo map process in place including transit times from the origin to the final container yard, and included potential points where freight may be at rest.

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 facility has a documented crisis response plan date 01.07.2022 that included: Reporting crisis issues to business partners, alternative location if facility is rendered unusable.

## Business Partner Requirements

100%

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

- Yes
- No

**Comments:** The facility contracted with 01 transport service companies. Staffs and workers are employed directly by the facility .

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:** The facility reviews and provide a copy of security criteria to business partner involved in international supply chain activities. The security criteria written in Vietnamese.

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:** A documented security procedure "MH-HD.003 date 20.02.2024" in place to manage screening process of new and current business partners and require screening of business partners and monitoring for financial stability, looking for evidence of money laundering and terrorism funding to be done on annual basis (the latest logistic services, material supplier selection conducted on 04.07.2024).

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:** The facility's contracted business partners required to conduct an annual security risk assessment of their operation. The 03 Transportation services conducted latest on 04.07.2024

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 business partners are required to provide on an annually a signed statement of security compliance.

The signed compliance statement recently provided by transport service and security service, material suppliers company on 01.07.2024.

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:** The business partners are required to provide CAPAs in case of non-compliance with minimum security requirements are being found.

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

Yes

No

**Comments:** The facility has computer network system and internet connection.

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:** A documented cybersecurity procedure "HCNS-QC-003" in place that to protect IT systems and identify and resolve threats. The procedure reviewed on 25.08.2023 shows it updated within 12 months.

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:** The facility have firewall and anti-malware software installed to identify, protect, detect, respond and recover their network.

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:** The software updates are automatically deployed from the software providers

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:** IT Team conducts system tests to identify open ports and IP addresses that create vulnerable access to the internal network. The record is from 26-29.06.2024.

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

*No options available*

**Comments:** Isolate the associated computer  
Report to the Security Officer  
Report to the factory leader (in charge of security)  
Report to law enforcement and/or clients (if necessary)

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:** The facility defines reporting process that cybersecurity threats and attempts at unapproved access required to report to:

- IT team and facility high-level management,
- Internal business partners,
- External business partners,
- Customers, and
- Government agencies.

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:** User-account with login credentials in place to control access of computers. The computers are automatically locked in case of incorrect password input more than 03 times.

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:** The review process is conducted by high level personnels on every month regarding with restrict access computer and network, to sensitive data and documentation to authorized persons and job function requires (The latest was conducted on 06.07.2024)

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:** There is a written procedure to remove network access for employees who are terminated and long term leave than vacation.

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:** Login credentials with password is required to access computers. Login password is changed within 90 days and required with at least 8 characters but not required password must be complex.

CAPA Assigned **2024/07/24** | Due Date **2024/09/22**

Included in scoring

**CAPA:** Include in your cybersecurity policy to require password access to network systems.

- 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 policy must include at a minimum:

- computer access must be password protected
- Passwords must be complex and changed every 90 days or if there is unauthorized access/breach in IT security
- If no passwords are required, other forms of authentication (fingerprint, electronic ID cards, etc.) is acceptable.

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



29.jpg

**Comments:** We have established Security Policy and Procedure No. MR-CS.002 issued on July 25, 2024 (page 22, section 3.10) including:

- computer access must be password protected
- Password must be complex (consist of at least 8 characters, including: at least 1 capital letter, 1 special character and 1 numeric character) and be changed every 3 months or if there is unauthorized access/breach in IT security

**Acceptance Comments:** Accepted

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:** The facility cybersecurity allow customer to access to their network system remotely. When remote access requires the use of VPN but not allowed contractor access to their network system remotely.

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:** Use of personal IT devices not permitted connect to facility internal network system.

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

- Yes
- No

**Comments:** The IT security did not limit and monitor the downloading of software and access to external websites.

CAPA Assigned **2024/07/24** | Due Date **2024/09/22**

Included in scoring

**CAPA:** This is a best practice. Please consider developing a policy limiting who and how external websites can be accessed and who is permitted to download software.

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:** This policy must include at a minimum:

- monitoring access to external websites and downloading software
- criteria that limits access to external websites and downloading software

- Already implemented
- Acknowledged - Will consider implementation in future



[32.pdf](#)

**Comments:** We have established Information Technology Security Policy No. HCNS-QC.003 issued on August 25, 2023 (page 7&8, section 6.2) including: monitoring and criteria that limits access to external websites and downloading software We have been doing this since July 16, 2024 (see attached documents and photo evidence)

**Acceptance Comments:** Accepted

- Already implemented



Acknowledged - Will consider implementation in future



**Comments:** We have established Security Policy and Procedure No. MR-CS.002 issued on July 25, 2024 (page 23, subsection 8, section 3.10) including: monitoring and criteria that limits access to external websites and downloading software

**Reopen Comments:** Please refer to our CAPA guidance to describe how you implemented the requirement in the comments area, with a date of implementation 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:** The facility backup data at a minimum once per week.

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:** The backups are saved on HDD that are not stored in the same location as the original data to protect the data in the event of a disaster happen to the facility and the backups were encrypted.

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

- Yes
- No

**Comments:** There is a written procedure "HCNS-QC-003 date 25.08.2023, page 04" to address returning equipment slated for disposal back to IT.

## Conveyances and Instruments of International Traffic

100%

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

- Yes
- No

**Comments:** Cargo handling and shipping process including container loading is conducted at the facility location.

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)

[119.pdf](#)

Stored, loaded containers/trailers are secured with a seal

Container/trailer storage does not meet minimum security requirements

**Comments:** All loaded containers stored for any period of time are closed and secured with security seal.

The container storage area:

- Free from personal vehicle parking
- Secured with a fence and CCTV in place
- Monitored by security guard

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

Yes

No

**Comments:** The auditor able to observe a container inspection in process and a previously completed container inspection via CCTV recordings.

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

Yes

No

**Comments:** Documented procedure "PVT-HD.015 date 04.08.2022" in place to inspect the security integrity of a container / 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

**Comments:** The facility utilizes inspection checklist that to record details:

- Container number;
- Name of person conducting inspection;
- Condition of floor, roof, outside walls, undercarriage; and



[119.pdf](#)

- Inspection for pest contamination (eggs nests, dirt seeds).
- The size of container.
- Date of inspection.

However: The time of inspection was not noted.

The inspection checklists retained in paper and proper kept by shipping team.

CAPA Assigned **2024/07/24** | Due Date **2024/09/22**

Included in scoring

**CAPA:** Establish a written policy to document the inspection of the trailer/container.

Please provide summary of when and how the corrective action was completed/ implemented in the comments section. Please also upload a copy of a blank checklist and a completed one for review.

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

- checklist can be either paper or electronic
- size of container
- container number
- name of person conducting inspection
- time and date of inspection
- condition of the following: floor, roof, outside walls, undercarriage, Inspection for pest contamination (eggs nests, dirt seeds) included
- Container/Trailer/Instruments of International Traffic (IIT)number

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



[40.pdf](#)

**Comments:** We have established Checklist No. PVT-BM.032 (see attached file) including:

- size of container
- container number
- name of person conducting inspection
- time and date of inspection
- condition of the following: floor, roof, outside walls, undercarriage, Inspection for pest contamination (eggs nests, dirt seeds) included
- Container/Trailer/Instruments of International Traffic (IIT)number

**Acceptance Comments:** Accepted

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:** Photos of container loading are taken, including before, during and after cargo loading. CCTV videos are captured during cargo loading process to a container.

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
- No tools available/tools do not meet requirements



[119.pdf](#)

**Comments:** The facility uses equipment to conduct container inspections, this includes:

- Tape measure
- Mirror for inspecting vehicle undercarriages.
- Hammer to test walls
- Broom to sweep the inside of the container.

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:** The inspection of a container is conducted in secured ground shipping area and the CCTV can observe the entire inspection area, but camera can not view the inside of container from tail to nose.

CAPA Assigned **2024/07/24** | Due Date **2024/09/22**

Included in scoring

**CAPA:** This is a best practice. Please consider establishing a process where the trailer/container inspections are supervised and/or captured on CCTV. Please supervise inspections or capture inspections on CCTV showing tail to nose views.

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 inspections must be conducted in a secured area. The said policy should include at a minimum:

- All container/trailer inspections must take place in an access controlled area and recorded on CCTV
- Video must capture entire secured area, and inside of container/trailer from tail to nose

- Already implemented
- Acknowledged - Will consider implementation in future



[43.pdf](#)

**Comments:** We have established Security Policy and Procedure No. MR-CS.002 issued July 25, 2024 (pages 18 & 19, section B) which includes: All container/trailer inspections must take place in an access controlled area and recorded on CCTV. Video must capture entire secured area, and inside of container/trailer from tail to nose (see attached image)

**Acceptance Comments:** Accepted per comments and evidence.

- Already implemented
- Acknowledged - Will consider implementation in future



[43.jpg](#)

**Comments:** We have established Security Policy and Procedure No. MR-CS.002 issued July 25, 2024 (pages 18 & 19, section B) which includes: All container/trailer inspections must take place in an access controlled area and recorded on CCTV. Video must capture entire secured area, and inside of container/trailer from tail to nose

**Reopen Comments:** Please upload a captured CCTV photo of inside of trailer/container being visible from tail to nose on CCTV for review to get full score. Otherwise, please select "Acknowledged - Will consider implementation in future".

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

- Yes
- No

**Comments:** The training records showing employees are trained on container / trailer inspections. The recent training classes provided in 01.06.2024 and there 38 people participated to training.

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

- Yes
- No

**Comments:** The management level personnel conduct follow-up inspections to ensure container inspection processes are properly followed. The review is documented and done on 13.07.2024.

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

- Yes
- No

**Comments:** It's noted that container / trailer inspection process is being supervised by security staff and that supervisors also sign the inspection checklist.

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

- Yes
- No

**Comments:** The facility directly contracted with 03 logistics company to transport cargo from facility to final container yard.

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:** The facility no have a written procedure to require confirmation of arrival at destination (container yard or freight forwarder's location) for items shipped.

CAPA Assigned **2024/07/24** | Due Date **2024/09/22**

Included in scoring

**CAPA:** This is a best practice. Please consider developing and implementing a container trailer tracking process. 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 said process should include:

- how to confirm items shipped arrive at container yard/freight forwarder's warehouse/location
- examples include but not limited to:
  - requiring confirmation via phone of cargo arrival at destination from driver or carrier dispatch
  - tracking shipment via GPS

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



[48.jpg](#)

**Comments:** We have established Security Policy and Procedure No. MR-CS.002 issued on July 25, 2024 (page 21, section 3.9.2) including:

- requiring confirmation via phone of cargo arrival at destination from driver or carrier dispatch
- tracking shipment via GPS

**Acceptance Comments:** Accepted

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:** The factory has written agreement with transport service company requiring GPS is used to track all cargo shipments depart from facility to final container yard.

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:** The shipment schedule and routes are made by shipping team and the transit routes from the facility to final destination and container yard are randomly changed.

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:** The facility provides to transport service company a written in-transit map instruction, which require that only permit to stop at designated points and locations. The recent instruction was delivered on 25.08.2023

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



[119.pdf](#)

**Comments:** The facility security procedure requires drivers to present government-issued ID card to verify their identity. The facility utilizes logbooks to document details of drivers and vehicles for cargo arrival and departure, which includes:

- Date, arrival and departure time;
- Driver name and ID card number;
- Tractor number; logistic company / carrier name;
- Container number and seal number.

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

- Yes
- No

**Comments:** The facility has not conducted LCL and cargo truck shipment from facility to the final destination

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

Yes

No

**Comments:** The facility has not conducted air shipments.

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

Yes

No

**Comments:** The facility does not 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



[198.pdf](#)

**Comments:** Containers for international shipments are secured immediately after loading with an ISO 17712:2015 compliance high-security seal.

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



[198.pdf](#)

**Comments:** Documented security procedure "PVT-HD.016 date 01.07.2024" in place to control security seals, this includes:

- Seals are managed by assigned shipping staffs, and authorized persons have access to seal storage listed.
- Seals are kept and stored in locked cabinet at shipping department.
- Sealing process conducted by designated shipping staff.



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:** The facility conducts dirt and other debris removal from container's exterior prior to cargo loading.

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:** The facility has a procedure that to controls of pests include the use of bait stations, regular extermination and removal of debris storage and cargo shipping areas.

Observed that container storage / cargo loading areas are free from trash, bugs, food.

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:** The facility is not using wood packaging materials at the facility.

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:** The facility not have wood products or materials utilized in the manufacturing or packaging process.

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:** The wood pallets used in the shipping process heat treated and fumigated to kill pests and limit the possible introduction of pests at the loading facility.

The pallets stored inside the facility to limit the exposure to seeds, dirt and other forms of contamination.

## 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



[198.pdf](#)

**Comments:** The high security seals for international shipment that provided by the carrier are kept and stored in locked cabinet that cannot be easily removed from an area.

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



[198.pdf](#)

**Comments:** The facility maintains documented certificate / test report of security seal to validate the high security seals utilized for international shipments are meet with ISO 17712:2015 criteria.

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:** A security procedure "SEQP-QT.004 date 25.05.2024" in place regarding with management personnel conducts audits of security seal controls to verify that security measures are being followed.

The recent review conducted on 28.06.2024 and documented review showed it has been done by Senior Shipping Manager and Facility Director.

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.

- VVTT process included in seal application procedure
- Secondary testing and validation is checked by supervisors or security guard at time of exit from the facility
- Seal numbers are written on shipping documents
- Testing procedure recorded on CCTV footage
- 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:** The seal application process includes:

- All high-security seals are affixed properly to containers and are operating as designed VVTT process
- Secondary tests are performed by security guards before shipments departure the facility.
- Seal number properly written on shipping documents
- Communication of seal number with the consignee and facility be advised in case of seal number changed prior to departure from post of origin.

Observed that testing process of seal recorded on CCTV footage.

## 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



[240.pdf](#)

**Comments:** Perimeter wall and fence in place to enclose the cargo handling area and storage facilities. There security guard in place to monitor cargo and cargo handling areas.

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



[240.pdf](#)

**Comments:** The facility has documented procedure "MR-CS.002 date 25.08.2023 clause 3.8 page 17" that to report facility management and security officers any unauthorized access to restricted areas including containers, final packing and product storage areas.

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



[240.pdf](#)

**Comments:** The facility has s documented procedure "MR-CS.002 date 25.08.2023 clause 3.5 page 14 and 3.7 page 16" that to limit access to restricted areas including product storage, final packing and shipping areas.

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



[240.pdf](#)

**Comments:** The facility has documented procedure "PVT-HD.01 date 16.07.2021" that outlining measures to ensure the legibility, completion and accuracy of cargo shipping documents.

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



[240.pdf](#)

**Comments:** The facility has documented procedure "MR-CS.002 clause C, page 19 date 25.08.2023" that to resolve carton count, cargo shortages, overages and shipping documentation issues during the loading process and in transit.

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

- Yes (please attach photo of applicable documentation)
- No



[240.pdf](#)

**Comments:** The cargo shipments are being marked, counted weighed, and properly reported on commercial invoice and bill of lading.

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



[240.pdf](#)

**Comments:** The facility has documented procedure "MR-CS.002 clause 3.5, 3.7, 3.8...date 25.08.2023" regarding with access to shipping documents, and that access restricted to only authorized persons and individuals who create, process, and use them.

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:** Pre-printed papers used to prepare commercial documents are kept in locked drawer and properly controlled.

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:** The Import-Export Department uses a separate printer to print related documents.

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

- Yes
- No

**Comments:** Document packets either hard copy or electronic are sent with shipment at departure once information is verified as correct.

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



[240.pdf](#)

**Comments:** The facility has documented procedure "01/2022/QT-AM date 02.01.2022" that to notify custom administration, customer and other local law enforcement in case of illegal shipping activity or abnormality detected or found.

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

[240.pdf](#)

**Comments:** The facility has security procedure "MR-CS.002 - Chinh sach va quy trinh an ninh date 05.25.2023 caluse 3.3 page 11" that to control the facility entrance and exit of employees. Employees ID badge is required for positive identification at points of entrance and exit.

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



[240.pdf](#)

**Comments:** The facility has documented procedur "MR-CS.002 - Chinh sach va quy trinh an ninh date 05.25.2023 caluse 1.6 page 4" that to notify to business partners security issues include attempted theft, fraud or internal conspiracies.

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

Yes

No

**Comments:** Departing cargo / freight being loaded are verified against purchase or delivery orders by shipping team.

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



[240.pdf](#)

**Comments:** The facility has documented procedure "MR-CS.002 date 25.08.2023 caluse 2.1 page 6" that to control the issuing, removing and changing of ID badge, lock key, access card to employees (permanent, new hire and temporary and when employment ended). They do not use security alarm codes.

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

Yes

No

**Comments:** The facility has dedicated security guards on site.

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:** A security procedure "BV-DMCV.001-005 date 01.10.2018" in place regarding with roles and responsibilities of all security staffs, and security guards.

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:** The facility security procedure requires security guards to patrol the facility at all times of day. The patrols are documented through paper check lists.

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

- Yes
- No

**Comments:** It's noted that the reviews of compliance with security work instructions and policies are conducted by management team. Any discrepancies found are required corrective actions.

## Physical Security

99%

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



[282.pdf](#)

**Comments:** The facility has designated parking areas for employees and visitors separate from the shipping / receiving area. Observed that:

- Signs posted at designed parking area
- No personal vehicles park in shipping / receiving area.

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

- Yes
- No

**Comments:** The cargo is segregate by fencing or stored in separate areas based on domestic and international goods.

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:** A security procedure "HCNS-QC-003 clause 3.2 page 11 date 25.08.2023" in place regarding with regular inspections of facility's building and infrastructure, and preventive maintenance and repair conducted immediately in case of damage is discovered.

Regular inspections and maintenance are retained in written.

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



[282.pdf](#)

**Comments:** The facility has barrier and environmental at the main entrance gate and around factory controlling vehicle and personnel access. Security guards are presented when barrier open.

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



[282.pdf](#)

**Comments:** The gates and doors at restricted areas are closed when not in use. Security guard and CCTV cameras in place to monitor access of employees.

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:** The facility has sufficient interior and exterior lighting system cover at entrances, exits, cargo handling, storage, loading/unloading areas and along fence lines, and in good condition that able detect movement during periods of darkness.

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 facility incorporated security technology system includes:

- Closed-circuit television (CCTV)
- Access card
- Security alarm devices

The facility not utilizing:

- Other security technologies

CAPA Assigned **2024/07/24** | Due Date **2024/09/22**

**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



[95.pdf](#)

**Comments:** We have used security technology: installed CCTV cameras, security alarm systems and security guards to control the entrances (see CCTV layout diagram)

**Acceptance Comments:** Accepted

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

- Yes
- No

**Comments:** A documented procedure "HCNS-QC-003 date 25.08.2023" in place in regard with management of the use, maintenance, and protection of security technology.

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

- Yes
- No

**Comments:** CCTV camera system from HIKVision, and is installed by a licensed vendor.

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:** The facility contracted with a certified vendor to maintain CCTV camera system. Contract is in place.

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

- Yes  
 No

**Comments:** The CCTV control system is restricted access to high level management and other authorized personnels with job function require.

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:** There generators are in place operated as alternative electrical power source during a local power outage to support lighting and CCTV system.

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:** The CCTV cameras able to monitor the facility premise, covering: loading and unloading areas, packing and final product storage, and perimeter fencing, entrances/exits.  
The cameras coverage in production, office, vehicle parking and CCTV room.

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:** The CCTV system have failure alarm function in even of the system is offline by generating sound.

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

- Yes (please attach photo of applicable area)  
 No



[282.pdf](#)

**Comments:** Observed that the CCTV system operating and recording continuously in 24 hours a day and 7 days a week.

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

- Yes  
 No

**Comments:** Observed that the CCTV system recording is at the highest quality picture, FHD Mode.

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:** It's noted that review of CCTV footages is conducted by high level management personnel, the checklist showed the review done by Senior Management.

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:** CCTV recording kept from 05.04.2024

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

- Yes  
 IDs carried but not displayed  
 No

**Comments:** Observed that some employees carry ID badge according to regulations but not displayed.

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

**Comments:** The facility has documented procedure "MR-CS.002 date 25.08.2023 clause 3.3, page 11" regard with visitor access that includes requiring government-issued ID card presented to security guard or other authorized employees to identify the visitor. Details of visitor such as date, arrival time, visitor name, ID numbers recorded in a logbook.

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:** A documented procedur "MR-CS.002 date 25.08.2023 clause 3.3, page 11" in place that requires upon arrival and exit of facility all visitor's bags are being checked by guards or other authorized personnel.

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



[282.pdf](#)

**Comments:** Visitors are given facility-issued visitor badge and carried during the time at the facility.

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

- Yes
- No

**Comments:** Facility security policy requiring all visitors are escorted by management or other authorized employee while at the facility.

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

- Yes
- No

**Comments:** The facility has documented policy "HCNS-HD.008 date 25.08.2023" that to inspect mail and other packages upon arrival for contraband.

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:** There are no high value goods and hazardous material items kept or stored at the facility.

## 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:** Facility has documented procedure "HCNS-QT.001 date 01.11.2020" recruitment that to validate employment application information, this includes: checks of address, previous employment history, education, and personal/professional references.

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:** The facility personal security requires job applicants to submit a written application and provide a copy of government issued ID card.

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:** A documented security procedure "HCNS-QT.001 date 01.11.2020" in place to perform a background check for new hire and current employees who works in a sensitive area of the facility.

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

- Criminal Check
- Credit Check
- Other

**Comments:** The criminal check on an applicant and employees is conducted as part of the employee background screening. The facility not requires to check credit status and other.

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:** The facility has training program that outlining threat awareness training classes provide initial training to new hire and refresh training to all employees on annually.

The recent training classes on 09.07.2024 and its logs are kept recording attendant, and it's noted facility management level randomly review training documentation.

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

- Yes
- No

**Comments:** Threat awareness training cover important security related-issues.

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:** The evaluation of understanding is performed at the end of a training session and a minimum score is not achieved then retraining is required.

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:** The facility provides training classes specialized for job positions to related employees (newly hired and existing employees) who conducting security and agricultural inspections. Training materials outline specific criteria and training logs showed date of training, names of attendees.

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:** The training classes on supply chain security provided to new hire and existing employees, recently on 03-04.06.2024, including security criteria for final packing, cargo shipping and receiving areas. There are 180 staffs attended (combine for all sensitive areas)

Training materials outline specific criteria and training logs showed date of training, names of attendees.

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

- Yes
- No

**Comments:** The threat awareness training included a section of procedure for reporting suspicious activity and security incidents.

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:** The threat awareness trainings that provide to employees relating to cargo shipping and receiving processes have a section of specific instructions pertaining to shipments include container loading, container inspection, security seals and concerned issues.

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

- Yes
- No

**Comments:** Security training program and security awareness trainings included threat awareness, identifying signs of human smuggling, contraband and terrorism.

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

Yes  
 No

**Comments:** The facility has recognition program to employees reporting a security incident or improvement by promote an incentive bonus.

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

Yes  
 No

**Comments:** The agriculture contamination specific trainings included identifying pest contamination.

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

Yes  
 No

**Comments:** Security training documents and associated training materials outlining risks of cybersecurity.

**Misc**

NA

129 **None** Describe the front of the factory building including any signage. Please attach a picture.  
*No options available*



[282.pdf](#)

**Comments:** The main entrance gate is secured close with physical security barrier. Company signage located and displayed at the gate of the facility.

130 **None** Describe the guard station and facility access gates. Please attach a picture.  
*No options available*



[282.pdf](#)

**Comments:** The guard post located at main entrance, and there always security guards in place all time to control and monitor the entrance and exit the facility.

131 **None** Describe the buildings and structures for this location. Please attach a picture.  
*No options available*



[282.pdf](#)

**Comments:** All buildings of the facility are built from pre-engineered steel, bricks, and concrete, they are being maintained in good conditions and solid enough to resist unlawful entry.

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



No options available



**Comments:** The shipping and receiving areas are designed separately from parking lot and manufacturing areas. The shipping area is enough space for a container loading and maintained in good conditions.

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



[282.pdf](#)

**Comments:** The perimeter, fence over 2.0-meter-high, lake system, hills and mountains... are surrounding the facility and there motion detection devices installed to protect from unauthorized access from outside.

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



[282.pdf](#)

**Comments:** The final packaging area and product storage secured with physical fencing, monitored by security guards, and separated from other processing areas.

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



[282.pdf](#)

**Comments:** The vehicle parking area of the facility is designed separately from the building and other restricted areas. Unloaded container stopped within the secured shipping ground area.

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



[418.pdf](#)

**Comments:** Facility representative and auditor signed the opening and closing meeting document.

## Attached Documentation - Photos

### Cyber and Information Technology Security - Question # 29



#### CHÍNH SÁCH VÀ QUY TRÌNH AN NINH SECURITY POLICY & PROCEDURES

không bao gồm thời gian để giải quyết vấn đề hoặc rắc rối.

- Các tuyến đường vận chuyển từ công ty đến cảng hoặc vị trí điểm đến tiếp theo được thay đổi ngẫu nhiên để giảm thiểu khả năng dự đoán.

3. Trong quá trình giao hàng nếu có vấn đề gì khó khăn, vướng mắc (kẹt xe, đánh nhau, hỏng bánh xe...) thì tài xế của container gọi cho nhân viên logistics hoặc nhân viên kinh doanh xuất khẩu để được hướng dẫn.

#### 3.10 HƯỚNG DẪN AN NINH TẠI BỘ PHẬN IT

1. Nhân viên CNTT tạo "mật khẩu" để kiểm tra và kiểm tra lại có ai đó đăng nhập vào hệ thống mạng nội bộ, đăng nhập vào các dữ liệu bí mật hay không. Mật khẩu này được cung cấp cho nhân viên được chỉ định như: Trưởng bộ phận, và chỉ được phép đăng nhập vào hệ thống mạng của bộ phận mình, cần phải có sự cho phép (chấp thuận) của Giám đốc nếu muốn đăng nhập vào hệ thống mạng của một bộ phận khác.

2. Công ty yêu cầu kiểm tra định kỳ mỗi 6 tháng đối với mạng nội bộ

3. Máy tính, máy in mạng dùng chung (khi được sử dụng để chuẩn bị chứng từ xuất khẩu) phải được bảo vệ bằng mật khẩu, cụm mật khẩu mạnh (gồm ít nhất 8 kí tự, bao gồm: ít nhất 1 kí tự viết hoa, 1 kí tự đặc biệt và 1 kí tự số). Mật khẩu phải thay đổi 3 tháng một lần. Các cá nhân có quyền truy cập vào máy in mạng phải sử dụng các tài khoản được chỉ định cho từng cá nhân một.

4. Mật khẩu phải được bảo mật, không để nhân viên thông báo cho người khác khi chưa được phép của Trưởng bộ phận.

5. Nhân viên muốn đăng nhập internet phải được Trưởng bộ phận cho phép.

6. Không sử dụng trái phép email của công ty cho các mục đích cá nhân

7. Không thông báo bất kỳ thông tin bí mật nào cho các công ty hoặc đối tác bên ngoài khác nếu

next destination location randomly changed to minimize predictability

3. In the process of delivery, if there is any problem or difficulty (traffic jam, fighting, wheel is broken...) container's driver should call to Logistics staff / export salesman for instruction.

#### 3.10 SECURITY GUIDELINES AT IT DEPT.

1. IT staff should create "password" to check and recognize whether there is someone who log in internal network system, touch secret datas. This password is provided to designated personnel such as: Head of depts. are allowed to log in network system within their depts. Only, it should have permission (approval) from Director if they want to log in network system of another dept.

2. Company requires periodical checking per 6 months for internal network

3. Computer, shared network printers (when used to prepare export documents) are password protected, strong passphrases (contains at least 8 characters, including: at least 1 capital letter, 1 special character and 1 numeric character). Password should be changed every 3 months. Individuals with access to network printers must use individually assigned accounts.

4. Password should be kept secret, do not allow staff to inform it to other when there is not permitted by Head of this dept.

5. Staffs want to log in internet should be allowed by their Head dept.

6. It's unauthorized using company's email in personnel purposes

7. Do not inform any secret information to another external companies or partners if there is

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[29.jpg](#)

### Cyber and Information Technology Security - Question # 32

không được phép của Giám đốc

8. Không được phép truy cập không hợp lệ vào hệ thống nội bộ hoặc trang web bên ngoài và sao chép dữ liệu của trang web bên ngoài lưu vào máy tính của công ty, nếu có phải được Giám đốc chấp nhận. Tất cả những người vi phạm phải chịu các hình thức kỷ luật hợp lý.

9. Không cho phép người bên ngoài sử dụng máy tính của công ty nếu không được sự cho phép của Giám đốc.

10. Dữ liệu được sao lưu hằng ngày để tránh thất thoát dữ liệu khi các máy chủ dừng chung hoặc sản xuất bị xâm phạm/mất dữ liệu. Tất cả các dữ liệu nhạy cảm và tuyệt mật phải được lưu trữ ở dạng mã hoá. Các thiết bị dùng để lưu trữ dữ liệu sao lưu được lưu trữ ở ngoài nhà máy. Sao lưu dữ liệu vào đám mây được xem như một cơ sở “ngoại vi”.

11. Tất cả các thiết bị, phần cứng, hoặc các thiết bị IT khác có chứa thông tin nhạy cảm liên quan đến quá trình xuất/nhập khẩu phải được kiểm kê thường xuyên. Các thiết bị liên quan đến CNTT dự kiến xử lý được trả lại cho bộ phận CNTT để loại bỏ bất kỳ chi tiết và tài liệu kinh doanh nhạy cảm nào. Khi bị vứt bỏ, chúng phải được vệ sinh và/hoặc bị phá huỷ đúng cách tuân theo Hướng Dẫn Làm Sạch Thiết Bị của Viện Tiêu Chuẩn và Công Nghệ Quốc Gia (NIST) hoặc các hướng dẫn công nghiệp phù hợp khác.

- Phá Huỷ Ổ Cứng: <http://ewasteseecurity.com/nist-800-88-hard-drive-destruction/>

- Vệ Sinh Phương Tiện Ghi Dữ Liệu: <https://www.nist.gov/publications/nist-special-publication-800-88-revision-1-guidelines-media-sanitization>

12. Tất cả các yêu cầu trên phải được tuân thủ nghiêm túc bởi tất cả các nhân viên vận hành máy tính dưới sự giám sát của bộ phận IT. Các thiết bị cá nhân bao gồm các phương tiện lưu trữ như CD, DVD, thẻ nhớ và ổ đĩa USB dùng để thực hiện các

not allowed by Director

8. Do not be authorized access to internal systems or external site's datas and save into company's computer, if any should be accepted by Director. All violators are subject to reasonable disciplinary action.

9. Do not allow external person use company's computer if there is not permittance of Director

10. Data is backed up daily to prevent data loss when shared or production servers are compromised/lost. All sensitive and confidential data must be stored in encrypted form. The devices used to store backup data are stored outside the factory. Backing up data to the cloud is seen as an “offsite” facility.

11. All equipment, hardware, or other IT equipment containing sensitive information related to the import/export process must be regularly inventoried. IT related equipment slated for disposal returned to the IT department for elimination of any sensitive business details and documents. When disposed of, they must be properly cleaned and/or destroyed in accordance with the National Institute of Standards and Technology (NIST) Equipment Cleaning Guidelines or other appropriate industry guidelines.

- Destroy Hard Drive:

<http://ewasteseecurity.com/nist-800-88-hard-drive-destruction/>

- Cleaning Data Logging Media:

<https://www.nist.gov/publications/nist-special-publication-800-88-revision-1-guidelines-media-sanitization>

12. All above requirements should be serious followed by all employees who operate computer under the supervision of the IT department. Personal devices including storage media such as CDs, DVDs, memory cards and USB drives used to carry out corporate work are subject to the

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[32.jpg](#)

## Conveyances and Instruments of International Traffic - Question # 43

## B. KIỂM TRA XE TẢI / CONTAINER TRƯỚC KHI ĐÓNG HÀNG:

1. Có một cuộc kiểm tra toàn diện đối với rơ moóc / container được tiến hành trước khi xếp hàng vào container với sự tham gia của 3 bên (bên vận chuyển, thủ kho xuất, bảo vệ): (kiểm tra đối chiếu số container, số chỉ niêm phong, kiểm tra 7 điểm như tường trước, bên trái, bên phải, sàn, trần / mái, cửa trong / ngoài, bên ngoài / gầm xe, kiểm tra các loài xâm hại (ô trứng, hạt bẩn)). Sau khi hoàn thành, các thành viên tham gia kiểm tra sẽ ký vào biểu mẫu và lưu hồ sơ trong vòng 1 năm.
2. Trong trường hợp phát hiện có điều gì bất thường, kỹ là thì thông báo cho bộ phận logistics biết ngay lập tức để đưa ra phương án xử lý;
3. Tất cả việc kiểm tra container/rơmoóc phải diễn ra trong khu vực an toàn có kiểm soát ra vào và

## B. EMPTY TRUCK / CONTAINER INSPECTION:

1. There a comprehensive inspection of a trailer/container conducted prior to loading of the container with the participation of 3 parties (transporter, warehouse keeper, security guard): (checking to compare truck / container number, seal number, inspect 7 points such as front wall, left side, right side, floor, ceiling / roof, inside/ outside door, outside/undercarriage, Inspection for invasive species (eggs nests, dirt seeds)). After finishing, security guard will sign in form and keep record in 1 year.
2. In case, something unusual or strange is detected, notify the logistics department immediately to come up with a solution;
3. All container/trailer inspections must take

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## CHÍNH SÁCH VÀ QUY TRÌNH AN NINH SECURITY POLICY & PROCEDURES

được ghi lại trên camera quan sát. Video phải quay toàn bộ khu vực được bảo vệ, bên trong container/rơ moóc từ đuôi đến mũi

4. Việc kiểm tra container / rơ moóc được giám sát bởi Trưởng phòng vật tư. Người giám sát ký tên vào biểu mẫu kiểm tra để đảm bảo cuộc kiểm tra có giám sát. Các cuộc giám sát không báo trước được tiến hành và ghi lại hồ sơ lưu trữ trong vòng 1 năm.

### C. ĐÓNG HÀNG VÀO CONTAINER:

1. Các hộp thành phẩm cần được kiểm tra để so sánh các tiêu chuẩn về trọng lượng tại danh sách đóng gói, nhằm đảm bảo không có vật liệu lạ bên trong
2. Các hộp thành phẩm xuất khẩu được đặt trên pallet và lưu trữ tại “kho hàng xuất khẩu”; Hàng hóa tại khu vực này đều được ghi chú trên bảng & hồ sơ để tránh tình trạng ship sai mẫu, nhầm PO, ...
3. Trước khi xếp hàng vào container, nhân viên bảo vệ, thủ kho thành phẩm cần kiểm tra chéo số lượng xuất thực tế với lệnh đóng cont và ghi vào phiếu xuất kho. Tất cả thông tin trong tài liệu vận chuyển hàng hóa phải rõ ràng, đầy đủ và chính xác. Các lô hàng quốc tế phải được đánh dấu, đếm cân và báo cáo chính xác trên hóa đơn thương mại và vận đơn. Trường hợp có sai sót gì về mẫu mã, số lượng, thừa hoặc thiếu phải dừng bốc hàng thì

place in an access controlled area and recorded on CCTV. Video must capture entire secured area, and inside of container/trailer from tail to nose.

4. Container/trailer inspection is supervised by the Head of Materials Department. The supervisor signs the inspection form to ensure the inspection is supervised. Unannounced surveillance is conducted and records are kept for 1 year.

### C. LOADING GOODS INTO CONTAINER:

1. Finished boxes should be check to compare the standards about weight at packing list, in order to make sure there isn't any strange materials inside
2. Exported boxes are put on pallets and stored at “export warehouse”; Goods at these areas are noticed on boards & records to prevent ship wrong style, wrong PO...
3. Before loading exported cartons into container, security guards, representative of finished carton warehouse should cross check actual shipping quantity with packing list and record into form control of shipping quantity. All information used in the shipping documents for merchandise/cargo to be legible, complete, and accurate. International shipments marked, counted, weighed, and properly reported on commercial invoice and bill of lading. In case, there is anything wrong about style no., quantity,

43.jpg

## Conveyances and Instruments of International Traffic - Question # 48

niêm phong container / xe tải cẩn thận và thông báo cho bộ phận bảo vệ rằng container / xe tải này sẽ ở công ty qua đêm

3. Bộ phận bảo vệ phải bố trí người tuần tra xung quanh những khu vực đặt container / xe tải, phải ghi chép cẩn thận & cập nhật trạng thái vào hồ sơ an ninh vào cuối ca làm việc.

4. Ngoài ra, container / xe tải sẽ được lưu trữ tại khu vực hạn chế và không ai có thể tiếp cận nếu không có giấy phép. Các nhân viên bảo vệ sẽ canh gác 24/24 giờ cho đến khi hàng hóa được vận chuyển đi.

### 3.9 HƯỚNG DẪN AN NINH KHI VẬN CHUYỂN HÀNG HÓA

#### 3.9.1 QUY TẮC CHUNG:

- Công ty có hợp đồng với bên vận tải chuyên nghiệp
- Tất cả các tài liệu liên quan đến việc giao hàng phải được sự đồng ý của quản lý nhà máy và xác nhận của cả hai bên sau khi thông tin được xác minh dựa trên các đơn đặt hàng hoặc giao hàng là chính xác và phải được gửi cùng với lô hàng khi khởi hành (có thể là bản cứng hoặc bản điện tử)
- Khu vực bốc xếp hàng cần được giám sát bởi nhân viên bảo vệ và hệ thống camera
- Lộ trình vận chuyển giữa bên vận tải & nhà máy cần được xác định & thực hiện đúng

#### 3.9.2 KIỂM SOÁT VIỆC GIAO HÀNG ĐẾN CẢNG:

1. Nhân viên logistics & tài xế của container sẽ chịu trách nhiệm kiểm soát việc giao hàng, cập nhật trạng thái container bằng Hệ thống định vị toàn cầu (GPS) và chữ ký trong các tài liệu vận chuyển liên quan. Khi hàng hóa được vận chuyển đến bãi container/kho/địa điểm nhận hàng thì tài xế container phải xác nhận bằng điện thoại cho nhân viên logistics

sure there isn't suspicious materials, then seal container / truck carefully and inform security dept. that this container/ truck will be in company overnight

3. Security dept. should arrange persons to patrol around these areas are located containers / trucks, security should record carefully & updating the status in security's record at the end of shift.

4. Besides, container/truck would be stored at restricted area and no one can access without permit. The security guards would guard 24/24 hours until goods shipped.

### 3.9 SECURITY GUIDELINES FOR TRANSPORTION OF GOODS

#### 3.9.1 GENERAL RULES:

- Company has the contract with professional transport
- All documents concerning to deliveries of goods should be approved by factory management & confirmation by both sides once information is verified based on purchase or delivery orders as correct and must be sent with shipment at departure (can be either hard copy or electronic)
- Loading & unloading areas should be monitored by security guards & camera system
- The route of transportation between transport & factory should be determined & implemented properly

#### 3.9.2 CONTROL DELIVERY OF GOODS TO PORT:

1. Logistics staff & container's driver will take responsibility to control delivery of goods, status update container by Global positioning system (GPS) and signature in related shipping docs.

2. Control time, shipping route from company to port (*Export container shipping diagram*):

- From company to Hai Phong port: longest intend 480 minutes