TAM QUAN GARMENT JOINT-STOCK COMPANY

Tam Quan Industrial Zone, Tam Quan Ward, NA, NA, Hoai Nhon Town, Binh Dinh, Vietnam 55000
(+84) 2563765279

SCAN SECURITY AUDIT (ONSITE)

Report #	EAC-2023-02-0189-CAPA-V4
Audit Submitted	Feb 17, 2023
Compliance Score	98%
Audit Type	EXTERNAL AUDIT

Location Information

Tam Quan Garment Joint-Stock Company

Tam Quan Industrial Zone, Tam Quan Ward, NA, NA, Hoai Nhon Town, Binh Dinh, Vietnam 55000 (+84) 2563765279

SCAN ID	VN7065A5W0TA
Point of Contact Name	Lam Thi Thoa
Point of Contact Email	thoalam@tqj.com.vn
Target Month	3/10/2023

Contact Name	Phone	Email
Thoa Lam	0978689084	thoalam@tqj.com.vn

Location	Tam Quan Garment Joint-Stock Company
Primary Location	Yes
Critical Location	No
Assigned Auditor	SGS
Schedule Date	Feb 15, 2023

Audit Summary

Pre-CAPA

Audit Submitted		Compliance Score Pre-CAPA
Feb 17, 2023	📅	**98%** ⭕

Compliance by Category

Category	Score
Agricultural security	100%
Business Partner Requirements	100%
Conveyances and Instruments of International Traffic	100%
Cyber and Information Technology Security	98%
General	100%
Personnel Security	100%
Physical Security	93%
Procedural Security	100%
Risk Assessment	100%
Seal Security	100%
Security Training & Threat Awareness	96%

■ 98% (Feb-2023)
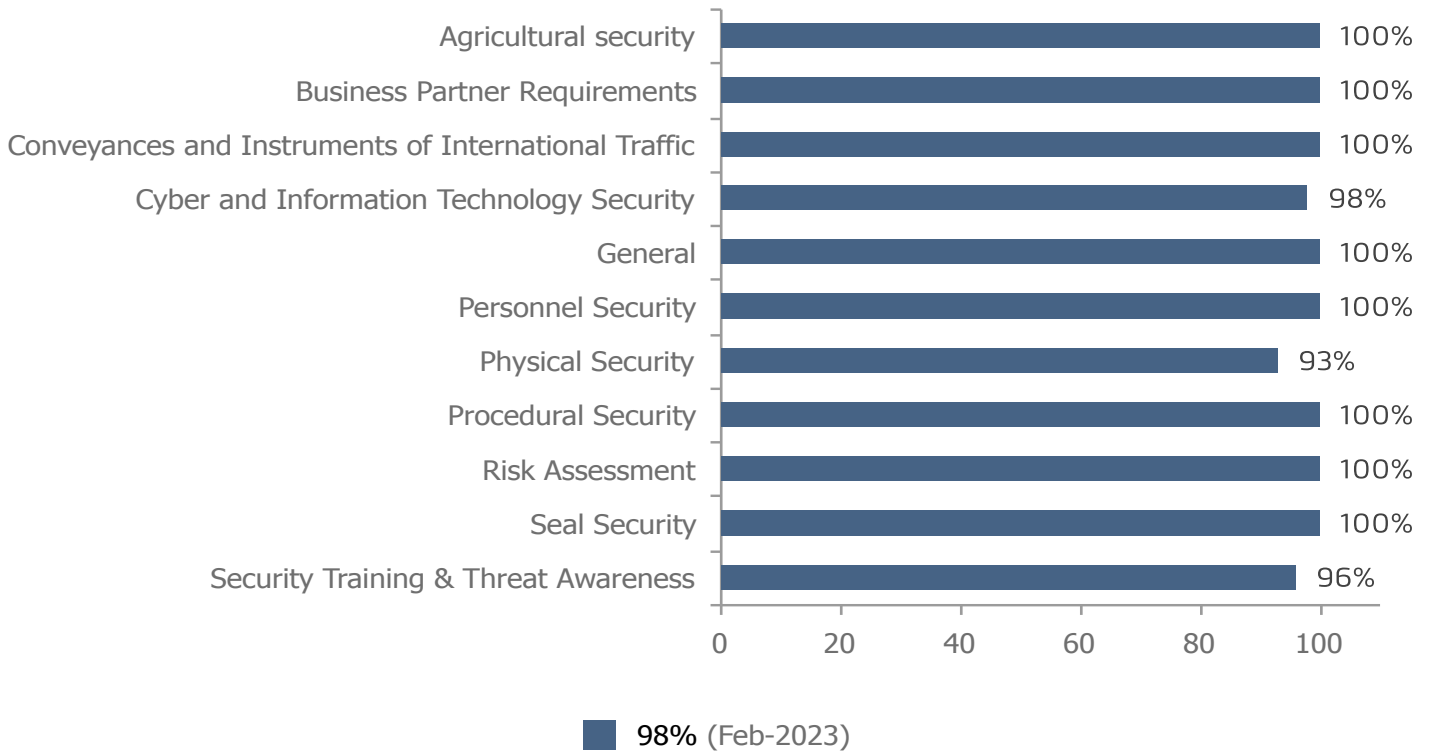
Audit Summary

Post-CAPA

CAPA Submitted Date (Last)
Mar 14, 2023

Compliance Score Post-CAPA
98%

Compliance by Category

Category	Score
Agricultural security	100%
Business Partner Requirements	100%
Conveyances and Instruments of International Traffic	100%
Cyber and Information Technology Security	98%
General	100%
Personnel Security	100%
Physical Security	93%
Procedural Security	100%
Risk Assessment	100%
Seal Security	100%
Security Training & Threat Awareness	100%

■ 98% (Mar-2023)
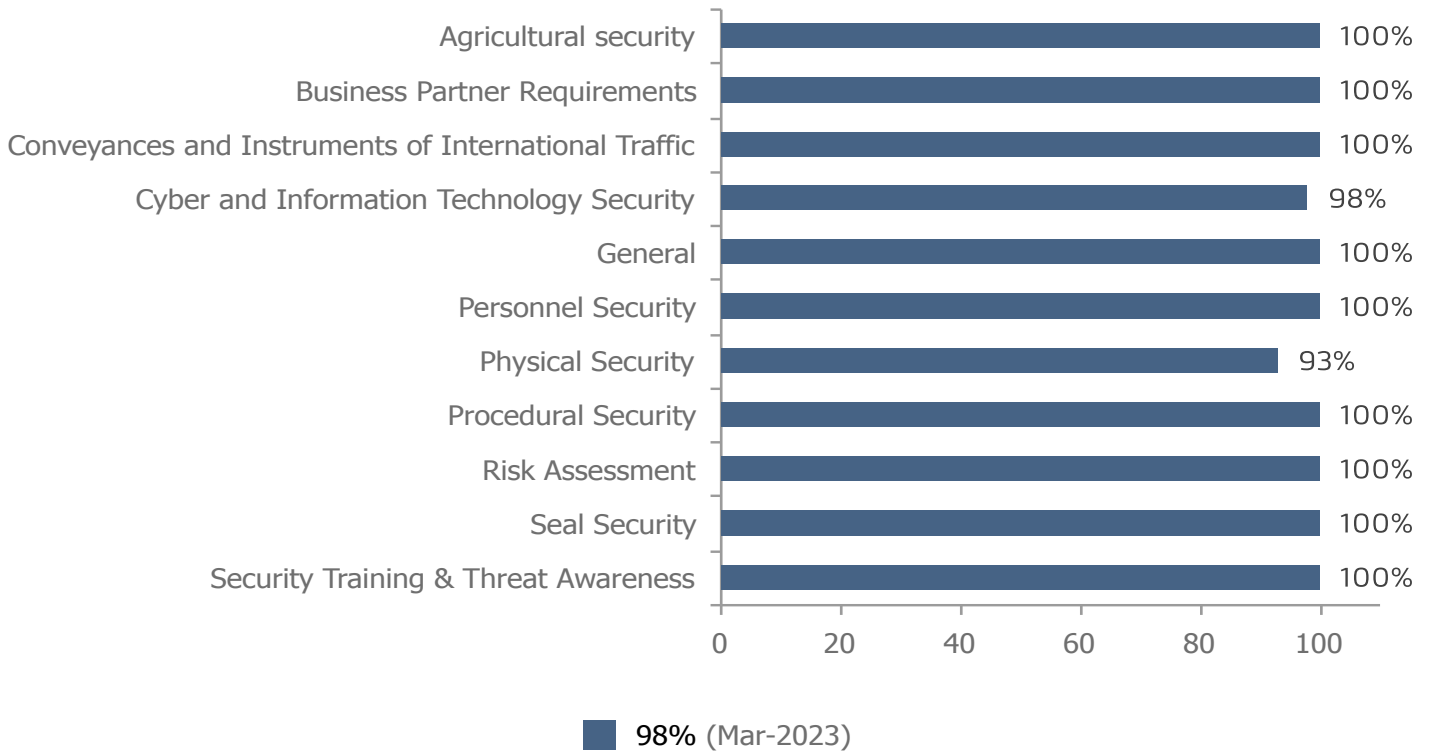
Business Profile Information

Does the facility participate in any government, local customs, or World Customs Organization (WCO) accredited facility security program?	No
Do you hold a Government Supply Chain Security Certification?	No
Has the facility been reviewed or audited by this program?	Yes
Primary Industry of Operations	Garments Manufacturing
Product Type / Commodity	Shirt, pants, sleepwear, swim short
Year Established	2009
Grounds Size (Square Meters)	54753
Number of Buildings	6
Facility Size (Square Meters)	15335
Number of access points? (i.e. gates, exterior doors)	2
Hours of Operation	7:30-11:30, 12:30-16:30, 17:00-20:00
Number of Employees	greater than 500
Number of Contract Employees	0
Number of Security Guards	9
Number of Migrant Workers	0
Annual Revenue	10 - 50 Million
Does the facility outsource any manufacturing services?	No
What countries does this facility export to?	USA
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
ANH TOAN PHAT TRANSPORT COMPANY Le Chan Street, Nai Hien Dong Ward, Son Tra District, Da Nang City	Le Dinh Canh (Mr.)/Director	Mail: canhledinh@gmail.com Phone: 0905161995	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.	Tam Quan Industrial zone, Tam Quan Ward, Hoai Nhon Town, Binh Dinh Province, Viet Nam
Name of Auditor Completing this Audit (First and Last Name)	Ngoc My Bui
Auditor Certification #	208984-217782
Name of onsite Factory Representative (First and Last Name) and email address	Lam Thi Thoa (Ms.) thoalam@tqj.com.vn

Audit Responses

Audit Assigned		Due Date		Overall Compliance Score
Dec 30, 2022	📅	**Mar 31, 2023**	📅	**98%**

General   100%

1 (None) Does the business license match the current location name and address as listed on the audit sheet?

◉ Yes

○ No

Comments: In accordance with Business License (No. 4100888925 on Jun 11, 2009, and update J 11, 2022, the currentfactory located in Tam Quan Industrial zone, Tam Quan Ward, Hoai Nhon Town, Binh Dinh Province, Viet Nam

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

◉ Yes

○ No

Comments: There was a primary point of contact identified regarding security matters Lam Thi Thoa (Ms.) (Ms.) Administration Supervisor and Tran Nhat Hung (Mr.)/ HSE Staff were responsible for security activities in the facility. Cellphone +84 978689084

Email: thoalam@tqj.com.vn

3 (None) Did the facility provide previous SCAN audit CAPAs to the auditor in preparation of this audit?

◉ Yes

○ No

○ NA

Comments: The CAPA was provided prior to conducting the SCAN audit previous to the auditor review.

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

○ NA

Comments: The facility implemented all CAPA responses and procedure/security updates provided to SCAN to achieve security compliance.

5   (Must)   Has the audited location recently (within the last 60 days) participated in the free SCAN Security and Threat Awareness Training provided in advance of this Audit?

- ◉ Yes
- ○ No

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Comments: There was a primary point of contact identified regarding security matters Lam Thi Thoa (Ms.)/ Administration Supervisor was responsible for security activities in the facility in which she attended online training on the 15th. January 2023

Risk Assessment	100%

6   (Must)   Does the facility have a risk assessment that identifies vulnerabilities in the business plan?

- ◉ Yes
- ○ No

Comments: *No comments were provided*

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7   (Must)   Is the facility risk assessment shared with business partners and contractors?

- ◉ Yes
- ○ No

Comments: *No comments were provided*

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8   (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*

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9   (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 risk assessment, which was completed on Jan 9, 2023, is available in place for review, that identifies vulnerabilities in the business plan.

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10   (Must)   Define the facility's cargo mapping process. (Select all that apply)

- ☑ 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: Written Cargo Map was available which Included Transit times from Original to Final container Yard and the cargo process map included locations where freight may be at rest.

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11 (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: Factory made a crisis plan which covered communication to business partners of crisis related issues, potential alternative locations if facility rendered unusable.

Business Partner Requirements   100%

12 (None)   Does the facility contract services such as security, transportation or manufacturing labor?

◉ Yes

◯ No

Comments: *No comments were provided*

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13 (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 at all

Comments: The facility review and provided copies of security criteria to business partners in local language, particular those that supported international supply chain activities. The last review was coducted on Jan 9 , 2023.

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14 (Must)   Does the facility have written procedures used in the selection of business partners including: material suppliers, manufacturers, and logistics service providers? (Select all that 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: Facility established a procedure on selection of business partners and updated every year. Further, looking for evidence of money laundering and terrorism funding, monitoring for financial stability were mentioned

in this procedure. The latest review and conducted on Jan 9 , 2023.

15　　(**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 transportation service provider is required to conduct a security risk assessment annually. The security risk assessment provided by the transportation service provider is available in place for review on Jan 9, 2023. In addition, The facility established a procedure on the selection of business partners and updated every year.

16　　(**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 facility required business partners to provide a statement of compliance and complete a questionnaire highlighting the Minimum Security Requirements on a yearly basis.

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

- ⦿ Yes
- ◯ No

Comments: *No comments were provided*

Cyber and Information Technology Security　　98%

18　　(**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
- ◯ NA

Comments: Document review and management interview indicated that facility established a comprehensive written cyber security policy to protect information technology system. The last facility updated on Oct 12, 2022

19 (Must)   Does the facility have firewall and 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
- ☐ NA

Comments: Document review and management interview indicated that the facility deploys windows firewall software and anti-malware KASPERSKY Internet Security software, which being installed on every single PC to identify, protect, detect, respond and recover their network. The last facility updated on Nov 30, 2022.

20 (Must)   How frequently are updates performed on firewall and malware software? (Select all that apply)

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

Comments: Based on checking computers, reviewing documents, and interviewing IT staff indicated that Software updates were automatically deployed from the software providers, and the manual updates were installed by onsite IT services as needed. The last facility was updated on Jan 30, 2023.

21 (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
- ◯ NA

Comments: Test scenarios were conducted by IT supervisor to identify open ports and IP addresses that create vulnerable access to the internal network.

22 (None)   What actions are taken when problems are identified while testing firewall, malware, and other network vulnerabilities?
No options available
Comments: IT supervisor will be responsible to solve problems. In the case the issues can not be solved by IT personnel, security team including senior manager will have a meeting to find out solutions.

23 (Material)   To whom does the facility report cybersecurity threats and attempts at unapproved access to network systems?

- ☑ Senior management
- ☑ Internal business partners
- ☑ External business partners
- ☑ Customers / suppliers

☑ Government agencies

☐ No reporting process and procedure in place

☐ NA

Comments: The facility have cybersecurity threats and attempts at unapproved access to network systems, The IT report to senior management immediately, Then The senior management will report to Internal business partners, External business partners, Customers/suppliers,
Government agencies. The procedure have updated since Nov 30 2022.

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

◉ Yes

○ No

○ NA

Comments: *No comments were provided*

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25 (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

○ NA

Comments: The Board of Directors of the facility will monthly conducted an internal security assessment of the Cyber and Information Technology Security, ex: access to the network of any employee to check the restricted access to only those applications required to perform the current job requirements, Check Passwords, and check IDs, to ensure that the company's impact is well maintained and improved measures to meet increasing security requirements. The last facility updated on Jan 30, 2023.

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

☑ Access immediately removed for terminated employees

☑ Employees on long term disability or maternity leave have access suspended

☐ No written procedure is available

☐ NA

Comments: A written security policy AN-TT02 on Nov 30, 2022, was available in place for review, which requires to removal of network access or PC for employees who are terminated or on leave longer than vacation such as employees on long-term disability or maternity leave.

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27 (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

☐ NA

Comments: Computer access were managed by passwords which were changed periodically, passwords were required to complex as requirement.

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28 (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 accesss

◉ Remote access is not permitted

Comments: The facility did not permit employees, business partners etc to access the company systems remotely.

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29 (Must) Do all security policies apply to personal devices that connect to the network?

○ Facility does not permit personal devices to connect to the network

◉ All security policies apply to personal devices

○ Security policies do not apply to personal devices

Comments: All personal devices must adhere to the factory's cybersecurity policies and procedures to include regular security updates and a method to securely access the company's network.

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30 (Material) Does IT security limit and monitor the downloading of software and access to external websites?

◉ Yes

○ No

Comments: *No comments were provided*

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31 (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: Base on the facility has a cybersecurity policy that requires backup monthly. The facility usually data packed up monthly as a requirement

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32 (Material) Is the data backup stored offsite and encrypted?

☑ Data backup is stored offiste

☑ Data backup is encrypted

☐ Data is not stored offsite nor encrypted

Comments: The backed-up data is saved in Cloud Technology and Hard Disk Driver that to be kept in a secured locker at the facility location. The backed-up data is required to encrypt.

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33 (Material) Is equipment slated for disposal returned to the IT department for disposal?

◉ Yes

◯ No

Comments: *No comments were provided*

Conveyances and Instruments of International Traffic | **100%**

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

◉ Yes

◯ No

Comments: *No comments were provided*

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35 (Critical) While in the facility's control are containers stored in a secured manner whether on-site or off site?

☑ Container/trailer storage area is free from personal vehicle parking and any other storage

☑ Area is secured as described in CTPAT MSC requirements

☑ Stored, loaded containers/trailers are secured with a seal

☐ Container/trailer storage does not meet minimum security requirements

Comments: The container/trailer storage area was secured as described in CTPAT MSC requirements and it is free from POV parking and any other storage.
The containers/trailers are monitored whether loaded or empty at the site of the facility. The loaded containers/trailers were secured with a seal.

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36 (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*

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

◉ Yes

◯ No

Comments: The factory established 7 points container inspection procedure to inspect the security integrity of a container prior to loading.

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38 (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
- ☑ Size of container 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

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Comments: The comprehensive inspection of a container/trailer is done by assigned Security Guards before container loading. The factory used a checklist to inspect containers/trailer which covered sufficient information as required.

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39 (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: The CCTV video and photos are captured during the container loading process for every single shipment.

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

- ☑ Measurement tool
- ☑ Mirrors for undercarriage
- ☑ Tap test tool
- ☑ Container Interior cleaning tool
- ☐ No tools available/tools do not meet requirements

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Comments: The facility used a tape measurer, mirrors for the undercarriage, a tap test tool, a hammer to check the container prior to loading, and a broom for container interior cleaning is available in place for container inspection.

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41 (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: Site observation and CCTV checking indicated that the inside of trailer/container was visible from tail to nose on CCTV. The CCTV captured entire inspection area , factory used fence to prevent unauthorized access and Inspections were conducted in a secured area.

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42 (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*

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43 (Material) Is there a procedure where management or supervision conducts follow up inspections?

◉ Yes

◯ No

Comments: *No comments were provided*

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44 (Material) Are container/trailer inspections supervised?

◉ Yes

◯ No

Comments: *No comments were provided*

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45 (None) Does the facility directly contract transportation service providers for any of their customers or business partners?

◉ Yes

◯ No

Comments: *No comments were provided*

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46 (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*

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47 (Material) What tracking technologies does the facility require to be used by the contracted transportation company to confirm cargo arrival? (Select all that apply)

◉ GPS carrier controlled

◯ GPS shipper controlled

◯ Cell phone check by carrier dispatch

○ Cell phone confirmation by driver

○ No document or report was available to review

○ Other

○ No tracking technologies used

Comments: The factory has documented procedures that list what tracking technologies are required to be used by transportation providers. Examples include GPS controlled by either the carrier or shipper, required cell phone checks by carrier dispatch, etc. The GPS data of the shipping route is provided by the transportation service provider.

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

◉ Yes

○ No

○ NA

Comments: *No comments were provided*

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49 (Material)   Does the facility provide written instructions to transportation service drivers detailing that only required stops are permitted? (i.e. inspections by governmental agencies, refueling etc.)

◉ Yes

○ No

○ NA

Comments: *No comments were provided*

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

☑ Driver log is maintained

☑ 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

Comments: Based on review random entries during the past 12 months, visitor/driver log included photo ID, tractor ID number and conveyance ID number for arriving, departing material movements and seal verification information for containers/trailers department .

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

◉ Yes

◯ No

Comments: There were 40% finish good products facility have load ship less than container load (LCL)

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52 (Critical) Does the written LCL security procedure exist that requires a LCL container or trailer to be sealed after each stop with either a tamper evident seal, a padlock or a high security seal?

◉ Yes

◯ No

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Comments: As per the management interview and document review indicated that the facility established clear a written procedure for managing LCL shipment and photos LCL container or trailer to be sealed after each stop with either a tamper evident seal, a padlock or a high security.

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53 (None) Does the facility make air shipments?

◯ Yes

◉ No

Comments: There was no air shipment at the facility.

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

◯ Yes

◉ No

Comments: It was not applicable in this facility.

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

◉ Yes

◯ No

◯ NA

Comments: Site observation and document review indicated that all seals stored in the factory compliant with ISO 17712:2013.

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

☑ Policy is written

☑ Seals are secured in storage

☑ Specific employees are listed who have access to seal storage

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☐ No written policy is available

Comments: The facility established a policy to maintain control of inventory, issuance, and application of the high-security seals. and boil seals. All loaded and stored containers or trailers were closed and secured with a security seal. The facility designated employees can access seal storage and apply seals to container/trailers.

Agricultural security	**100%**

59 (Material)   Does the facility remove dirt and other debris from containers' exterior prior to loading?

🔘 Yes

⚪ No

Comments: *No comments were provided*

60 (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*

61 (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 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 did not use wood packages materials at the container stuffing location and for international shipment.

62 (Must)   Are wood and wood products utilized in the manufacturing process identified by source and species?

⚪ Yes

⚪ No

🔘 NA

Comments: The facility did not use wood products in the manufacturing process.

63 (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)

☐ 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: There was no wood packaging material utilized in this facility.

Seal Security	100%

64 (Critical) Are security seals stored in a secured location?

◉ Yes

○ No

○ NA

Comments: *No comments were provided*

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

◉ Yes

○ No

○ NA

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Comments: The facility had document test reports from seal vendor to validate that the seals utilized meet the most recent ISO 17712 criteria.

66 (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)

☑ A written procedure is available

☑ Audits are conducted

☑ Audits are documented

☐ No written procedure or practices are in place

☐ NA

Comments: Document review and management interview indicated that facility have policy and validate that audits of seal inventory application and documentation on the shipping documents is accurate

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

☑ 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: VVTT was applied to test the integrity of a seal. The factory assigned shipping staff to be responsible for controlling, storing, distributing, and test seals first. Then warehouse staff and the security guard will check again. Seal numbers were written on shipping documents. The testing procedure was recorded on CCTV footage and the seal number ensures safety before departure from the port of origin.

Procedural Security	**100%**

68 (Critical)   Is the area adjacent to the shipping and receiving areas enclosed or otherwise monitored?

◉ Yes

○ No

Comments: There were fences enclosing in the shipping and loading area to prevent unauthorized person.

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69 (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

○ No

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Comments: There was a written procedure in place to report unauthorized access to a container or a trailer, or product storage areas within the facility including whom to notify.

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70 (Critical)   Is a written procedure in place to monitor and limit access to critical operational areas of the facility, such as warehouse picking, final packing or packaging, shipping and receiving?

◉ Yes

○ No

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Comments: The facility had a written and verifiable procedure to monitor and limit access to critical operational areas of the facility such as warehouse, final packing, shipping and receiving.

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71 (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

○ No

Comments: Factory established a procedure to require all information used in the shipping documents for merchandise/cargo to be legible, complete, and accurate.

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72 (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
- ◯ No

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Comments: Document review and management interview indicated that facility had written and verifiable 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.

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73 (Critical) Are international shipments marked, counted, weighed, and properly reported on shipping documents?

- ⦿ Yes
- ◯ No

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Comments: The finished products were properly marked, counted, weighed, documented, and reported on shipping document.

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74 (Critical) Is a written procedure in place that restricts access to shipping and receiving documentation?

- ⦿ Yes
- ◯ No

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Comments: Facility established a procedure that restricts access to shipping and receiving documentation.

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

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

Comments: Pre-printed paper documents/ form are used to prepare commercial documents and properly secured.

76 (Material) Are shared network printers password protected when used to prepare export documents?

(●) Yes

(○) No

(○) NA

Comments: *No comments were provided*

---

77 (Critical) Are commercial document packets sent with the shipment at departure?

(●) Yes

(○) No

13.pdf

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

---

78 (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

(○) No

14.pdf

Comments: A written procedure was established to outline the methodology and responsibility for notification to relevant authorities in case any abnormalities or illegal activities are detected, or suspected. Documentary evidence and worker interview indicated the procedures were implemented.

---

79 (Critical) Are access control procedures or devices used to ensure that only authorized employees have access to the facility?

(●) Yes

(○) No

15.pdf

Comments: The facility had a written procedure for an Access Control Program that described methods used to record and track of keys or other access devices issued to authorized employees for use within the facility.

---

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

(●) Yes

(○) No

16.pdf

Comments: Facility established a procedure to notify Business Partners of security issues such as attempted theft, fraud or internal conspiracies. This procedure covered origin Customs notified, local law enforcement and

business partners notified.

---

81   (Material)   Does the shipping department validate the freight being loaded against the Purchase Order prior to departure?

(●) Yes

(○) No

Comments: *No comments were provided*

---

82   (Critical)   Is a written procedure in place to control the issue, removal, and changing of access devices such as ID badge, door and lock keys, access cards, and security alarm codes?

(●) Yes

(○) No

PDF
17.pdf

Comments: The facility had written procedure in place and checklist was included in Termination document. In addition the facility collected back ID badge, uniform of terminated employees and records were kept on-site for review.

---

83   (None)   Do you have dedicated security staff/guards on site?

(●) Yes

(○) No

Comments: *No comments were provided*

---

84   (Must)   Are written job descriptions in place outlining the roles and responsibilities of security staff or staff performing dual roles that include security functions.

(●) Yes

(○) No

Comments: *No comments were provided*

---

85   (Must)   Does the facility require the security staff or contractors to "patrol" the facility during off business hours and "patrols" are documented either with CCTV surveillance, electronic recordings or with paper check lists?

(●) 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*

---

86   (Must)   Does management verify compliance with security company work instructions and policies?

(●) Yes

○ No

Comments: The management verify compliance with security company work instructions and policies.

Physical Security	**93%**

87 (Critical) Is there a designated employee and visitor vehicle parking area separate from the shipping and receiving area?

◉ Yes

○ No

Comments: *No comments were provided*

---

88 (Material) Are appropriate controls in place to segregate domestic goods from goods intended for international shipment?

◉ Yes

○ No

Comments: *No comments were provided*

---

89 (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: The security guards inspected the fencing, windows, gates and lighting, buildings for damage every day and reported to the factory management for repair immediately if any damage was found.

---

90 (Critical) Are facility gates through which vehicles and/or employees enter and exit guarded or monitored? (Select all that apply)

☑ Gates are installed at all entrances/exits

☑ Gates are monitored by guards/CCTV

☐ Nothing in place

☐ NA

Comments: Facility gates were secured and controlled by security guards. They were available at the factory for 24 hours a day, 7 days a week, and CCTV

---

91 (Critical) Are gates locked or otherwise secured when not in use?

◉ Yes

○ No

○ NA

Comments: The gates are locked when not in use. The security guards were available at the factory 24 hours in a day, 7 days a week.

---

92 (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?

- ☑ Interior lighting
- ☑ Exterior lighting
- ☐ Nothing in place
- ☐ NA

Comments: Lighting systems at entrance, exits , cargo handling and storage areas, along fence lines, and in parking area, loading and unloading areas in the facility were in good conditions in order to identify and recognize clearly all motions including vehicles and individuals all days and nights.

---

93 (None) 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
- ☐ None

Comments: The facility incorporated security technology as part of its systems and controls such as CCTV, access control . But, it was noted that the facility did not have security alarm at finish good warehouse.

---

94 (Must) Do you have written procedures governing the use of the security technology?

- ◉ Yes
- ○ No
- ○ NA

📄 **PDF**
18.pdf

Comments: Facility established a procedure regarding the use of the security technology. The system was tested and corrective actions were taken if they found any issues.

---

95 (Material) Was security equipment installed by a licensed/certified contractor?

- ◉ Yes
- ○ No

Comments: Facility's security system was installed by a licensed/certified company.

---

96 (Material) Do you have maintenance contracts in place for your security systems?

- ◉ Contracts are annually reviewed
- ○ Contracts are only reviewed when problems are uncovered

○ No contract is in place

Comments: There was maintenance contracts for security systems and annually reviewed .

---

97 (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*

---

98 (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?

○ Yes

◉ No

○ NA

Comments: Facility did not have adequate electrical power during a local power outage to support security systems, lighting etc.

CAPA Assigned **2023/02/19** | Due Date **2023/04/21**   [Included in scoring]

CAPA: Establish a backup power system to power critical systems in the event of a power failure. Please provide summary in the comments section of how this gap has been resolved by the due date provided. If additional time is required, please describe your plan and provide a timeline for completion and implementation.

○ Yes

◉ No

○ NA

Comments: At the present, we have security team to control in the event of a power failure.
In the futher, we will establish a backup power for CCTV system. The Timeline is 30/12/2024

○ Yes

○ No

◉ NA

Comments: At the present, we have security team to control in the event of a power failure.
In the futher, we will establish a backup power for CCTV system. The Timeline is 30/12/2024

---

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

☑ All entrance(s)

☑ All exit(s)

☑ Storage/warehouse

☑ Loading area(s)

☑ Unloading area(s)

☑ CCTV coverage in additional areas

☐ No CCTV

Comments: The CTVs were equipped in all entrance(s), all exit(s), Storage/warehouse, Loading area(s), Unloading area(s), and CCTV coverage in additional areas such as fence and office

---

100 (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 did not have a failure alarm that indicates when the system is off line or no recording is underway.

CAPA Assigned **2023/02/19**　|　Due Date **2023/04/21**　　　　[Included in scoring]

CAPA: Consider upgrading your system to include a failure alarm. Please comment that you acknowledge your consideration, provide a timeline for implementation or a purchase order highlighting the intention to implement.

◯ Yes

◉ No

Comments: At the present, we have security team to view every days and control in the event of a power failure. In the futher, we will establish a backup power for CCTV system. The timeline is 30/12/2024

◉ Yes

◯ No

Comments: At the present, we have security team to view every days and control in the event of a power failure. In the futher, we will establish a backup power for CCTV system. The timeline is 30/12/2024

---

101 (Critical)　Does the CCTV system run 24 hours per day 7 days per week?

◉ Yes

◯ No

Comments: *No comments were provided*

---

102 (Must)　Is the facility's CCTV system recording at the highest quality picture setting available?

◉ Yes

◯ No

Comments: *No comments were provided*

---

103 (Must)　Does the facility's management team conduct random documented reviews of CCTV footage periodically to ensure security procedures are being followed? (Select all that apply)

◉ Yes

◯ No

Comments: *No comments were provided*

104 (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: Per checking the CCTV system indicated that the data was available and IT staff said that the CCTV system stored for 32 days at the audit date. The date latest CCTV stored from Jan 13, 2022

---

105 (Must)   Do employees display their ID badge at all times while at the facility?

◉ Yes

○ IDs carried but not displayed

○ No

Comments: Based on site observation, employees wore their ID badge during the time at the facility.

---

106 (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 is required

☑ Visitor Log is utilized

☐ No written process is in place

☐ Photo IDs are not checked

[PDF]
19.pdf

Comments: Facility established a proactive policy requiring all visitors to show identification and sign in upon entering the facility. The facility had a visitor log to records visitors' information such as: full name, company, person contact, ID number with photo required, signature, time in/out the facility

---

107 (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: *No comments were provided*

---

108 (Critical)   Is a visitor issued a numbered visitor badge which is displayed or carried while at the facility?

◉ Yes

○ No

Comments: *No comments were provided*

109 (Critical) Is a visitor escorted at all times while at the facility?

- ⦿ Yes
- ◯ No

Comments: *No comments were provided*

---

110 (Material) Is a written procedure in place to inspect a suspicious package and mail for dangerous materials and/or contraband prior to distribution? A written procedure is in place to periodically inspect arriving packages for contraband.

- ⦿ Yes
- ◯ No
- ◯ NA

Comments: *No comments were provided*

---

111 (Material) Are hazardous materials or high value goods stored at the facility? If so, are hazmat goods or high value goods segregated from other items?

- ⦿ Yes
- ◯ No
- ◯ NA

Comments: *No comments were provided*

Personnel Security   100%

112 (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
- ☐ NA

Comments: A written security policy AN-NS05 [30/11/2022] is available in place for review, which
to validate information provided on employment application regarding to documentation, screens,
address, certificates for hiring, professional reference, and previous employment history.

---

113 (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

☐ No

☐ NA

Comments: During review of personal records, it was found that the facility had already conducted a vetting process on all of its prospective employees both in terms of past employment checks, new employee screening and criminal history checks for the past two years. All of 05 select samples employees have ID cards, Resume and personnel files which compliance with Vietnam Law.

---

114 (Must) If allowed by local law, is a written procedure in place to perform a background check on an applicant and employee who works in a sensitive area of the facility, such as personnel, shipping, computer systems, or contract employees? (Select all that apply)

☑ Written policy is available

☑ Criminal background checks completed

☑ Credit check completed

☐ Nothing in place

☐ NA

Comments: The facility has performed background check and credit check for all workers who work in sensitive areas of the facility, such as personnel, shipping, computer system, and contract employees. There were 5 selected samples of employees at packing , finishing and shipping employees had criminal backgroup as legal requirement.

Security Training & Threat Awareness   **100%**

115 (Must) Is a security threat awareness training provided to all new employees and an annual refresher course for current employees?

☑ 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: Security awareness trainings were provided to new employees during their orientation and existing employees via refresher training program. Security training records were maintained for review. The completed the procedure management level randomly review documentation in
May 7, 2022.

---

116 (Must) Does security threat awareness training cover security-related issues?

◉ Yes

◯ No

Comments: *No comments were provided*

---

117 (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
- [x] No evaluations are conducted
- [ ] NA

Comments: The factory did not conduct evaluation of understanding of security training course update new requirement .

CAPA Assigned **2023/02/19** | Due Date **2023/04/21** Included in scoring

CAPA: It is recommended that you establish an evaluation process regarding training. Please consider implementation of this before it becomes a requirement. Please comment that you acknowledge your consideration.

- [x] Evaluations are conducted
- [x] Retraining is required if a successful score is not achieved
- [ ] No evaluations are conducted
- [ ] NA

QUY DINH VE TAO ... pdf

Comments: We establish an evaluation process regarding training by testing record to evaluate effectiveness and acknowledge after training in next training on 27/4/2023. We will evaluation and retraining, if a successful score is not achieved. Please see SOP as attached

---

- [x] Evaluations are conducted
- [x] Retraining is required if a successful score is not achieved
- [ ] No evaluations are conducted
- [ ] NA

Comments: We establish an evaluation process regarding training by testing record to evaluate effectiveness and acknowledge after training in next training on 27/4/2023

- [x] Evaluations are conducted
- [x] Retraining is required if a successful score is not achieved
- [ ] No evaluations are conducted
- [ ] NA

Comments: We establish an evaluation process regarding training by testing record to evaluate effectiveness and acknowledge after training in next training on 27/4/2022

---

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

- [x] Training material lists specific requirements
- [x] Training logs list employees working in this area
- [x] Training provided annually for existing employees with this job function
- [x] Training provided for new employees with this job function

☑ No training logs for this specific criteria

☐ No training material for this specific criteria

Comments: Document review, workers interview, and management interview indicated that facility have trained programmed for all employees in sensitive positions who conducted security and agricultures inspections as a requirement. The training is provided annually with a log with the date of training, names of attendees, and training topics provided to auditor review including to new employees with this job function and the training provided annually for existing employees with this job function. The latest facility training to all employees on May 7, 2022.

---

119 (Must) Does training include security criteria for restricted areas of the facility such as final packing, shipping and receiving?

☑ 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 security training were provided to employees in the shipping and receiving areas to ensure the cargo/packed product integrity, seal control produces and container security. Security training records were available for review. . The training topics provided to auditor review including to new employees with this job function and the training provided annually for existing employees with this job function. The latest facility training to all employees on May 7, 2022.

---

120 (Must) Does Threat Awareness training inform employees of procedures to report suspicious activity or a security incident?

◉ Yes

○ No

Comments: *No comments were provided*

---

121 (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: Security trainings were provided to employees in shipping and receiving areas to ensure the cargo/packed product integrity, seal control produces and container security. Security training records were available for review. The latest facility training to all employees on May 7, 2022.

122 (Must) Does the training program include Threat Awareness, Contraband, Human Smuggling and Terrorism?

◉ Yes

◯ No

Comments: *No comments were provided*

123 (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*

124 (Must) Does training include identifying pest contamination?

◉ Yes

◯ No

Comments: *No comments were provided*

125 (Must) Is there a documented training platform outlining the risks of Cybersecurity?

◉ Yes

◯ No

◯ NA

Comments: *No comments were provided*

Misc	**NA**

126 (None) Describe the front of the factory building including any signage. Please attach a picture.
No options available

[20.pdf](20.pdf)

Comments: There were a security room and signed in front of the building.

127 (None) Describe the guard station and facility access gates. Please attach a picture.
No options available

[21.jpg](21.jpg)

Comments: The facility has manned gatehouses with security guard at all external main access points.

128   (None)   Describe the buildings and structures for this location. Please attach a picture.
No options available

22.jpg

Comments: Buildings are designed and constructed with materials appropriate to prevent unlawful entry (e.g., brick, stone, concrete, heavy gauge steel). In addition, physical components of the facility are reinforced or further secured (e.g. roof sealing, steel door frames, etc.) to prevent unlawful entry.

---

129   (None)   Describe the shipping and receiving areas. Please attach a picture.
No options available

23.jpg

Comments: There was CCTV quipped for controlling shipping and receiving areas.

---

130   (None)   Describe how the perimeter of the facility is protected from unauthorized access? Please attach pictures
No options available

24.jpg

Comments: There was sufficient fences and lighting around the perimeter of the facility. Besides, CCTVs were installed to monitor and prevent factory from unauthorized access.

---

131   (None)   Describe the final packaging area. Please attach a picture.
No options available

25.jpg

Comments: Final packing area was seperated into production area. If other people want to access, they must be approved by security team and register in visitor's log book in packaging room

---

132   (None)   Describe any container storage and vehicle parking areas and please attach picture.
No options available

26.jpg

Comments: Designated vehicle parking area of the facility separated from production and warehouse. They are also far from the shipping & receiving area. There is enough lighting and security guards patrol at the site. There is no container/trailer stored during visit in the facility.

---

133   (None)   Did the Factory Representative and the Auditor sign the Opening Meeting Letter? Please attach the signed copy.

- (●) Yes
- (○) No

27.pdf

Comments: The auditor explained clearly about audit process with factory management including opening meeting and factory representative sign the Opening Meeting Letter. Opening meeting letter signed by auditor and Facility representative Lam Thi Thoa (Ms.) Administration Supervisor.

Attached Documentation - Photos

Misc - Question # 127

21.Guard station.jpg

Misc - Question # 128

22.Building structure.jpg

Misc - Question # 129

23.Shipping area.jpg

Misc - Question # 130

24.The facility fencing.jpg

Misc - Question # 131

25.Final packing area.jpg

Misc - Question # 132

26.Employee parking area.jpg