PHU CAT GARMENT JOINT STOCK COMPANY

Phu Kim hamlet, Cat Trinh commune, Phu Cat district, N/A, Binh Dinh Province, Vietnam 592420 84-2563650299

SCAN SECURITY AUDIT (ONSITE)

Report #	EAC-2022-12-0096-CAPA-V5
Audit Submitted	Dec 07, 2022
Compliance Score	99%
Audit Type	EXTERNAL AUDIT

This Report Applies Solely for SCAN - Supplier Compliance Audit Network

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Location Information

PHU CAT GARMENT JOINT STOCK COMPANY

Phu Kim hamlet, Cat Trinh commune, Phu Cat district, N/A, Binh Dinh Province, Vietnam 592420 84-2563650299

SCAN ID	VNS0U77009PH
Point of Contact Name	NGUYEN HONG MINH, NGUYEN ANH DAO, NGUYEN THI CAM
Point of Contact Email	hongminh@phucatgarment.com.vn; anhdao@phucatgarment.com.vn; nguyencam@phucatgarment.com.vn
Target Month	*Not provided*

Contact Name	Phone	Email
cam nguyenthi	0942492435	nguyencam@phucatgarment.com.vn

Location	PHU CAT GARMENT JOINT STOCK COMPANY
Primary Location	Yes
Critical Location	No
Assigned Auditor	BSI Group
Schedule Date	Nov 30, 2022

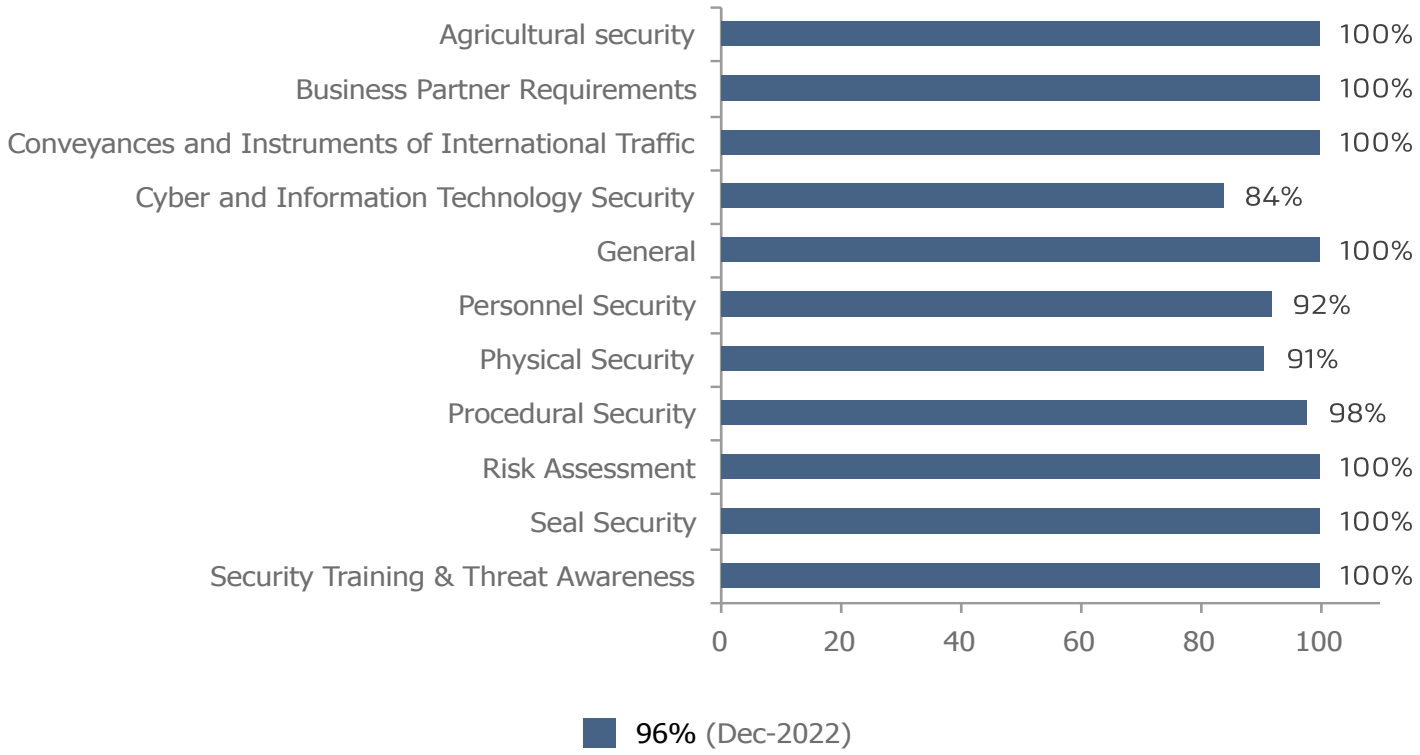
Audit Summary

Pre-CAPA

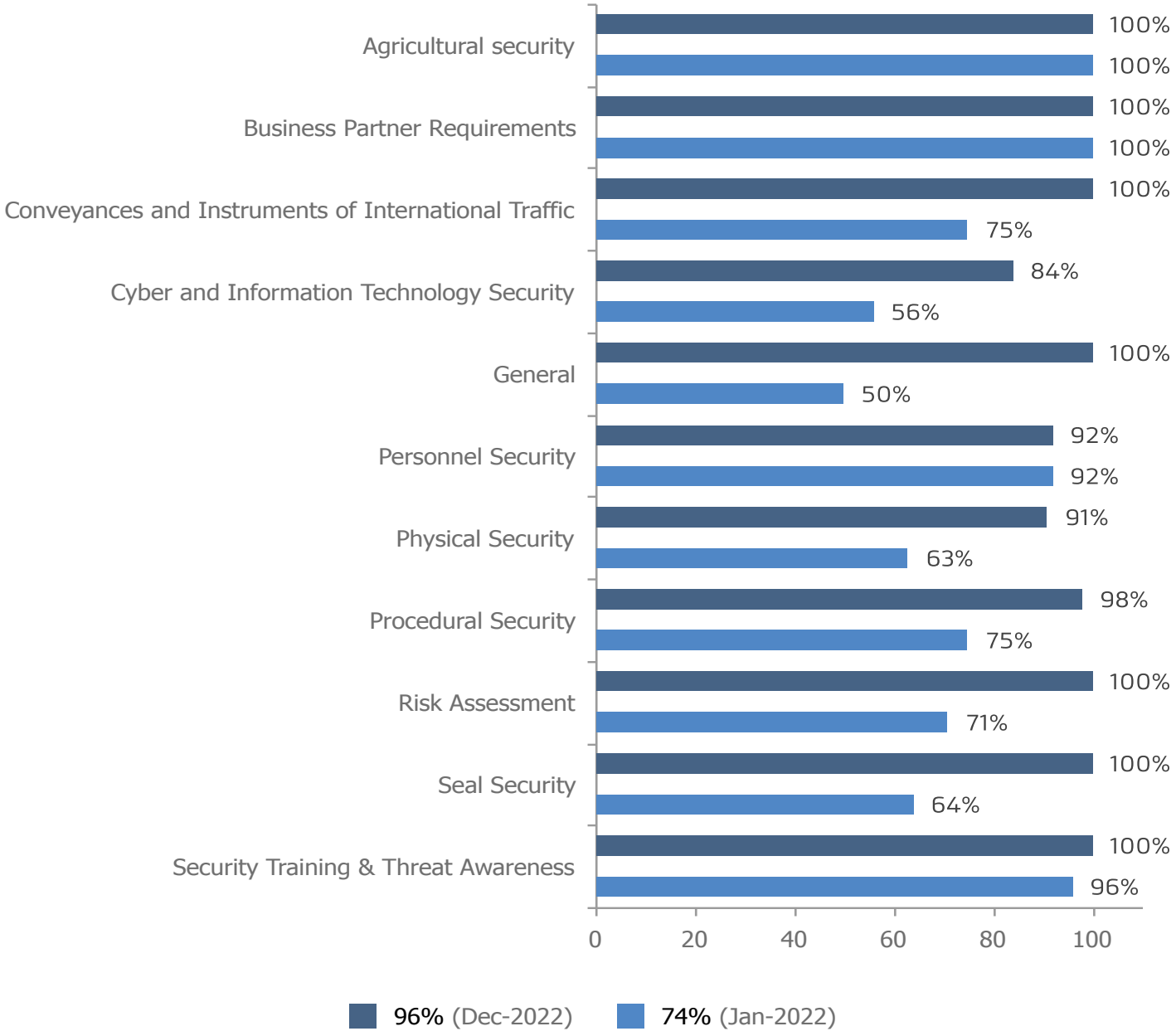
Audit Submitted
Dec 07, 2022

Compliance Score Pre-CAPA
96%

Compliance by Category



Compliance by Category - Last 2 Audits


Agricultural security
100%
100%
Business Partner Requirements
100%
100%
Conveyances and Instruments of International Traffic
100%
75%
Cyber and Information Technology Security
84%
56%
General
100%
50%
Personnel Security
92%
92%
Physical Security
91%
63%
Procedural Security
98%
75%
Risk Assessment
100%
71%
Seal Security
100%
64%
Security Training & Threat Awareness
100%
96%
0
20
40
60
80
100
96% (Dec-2022)
74% (Jan-2022)

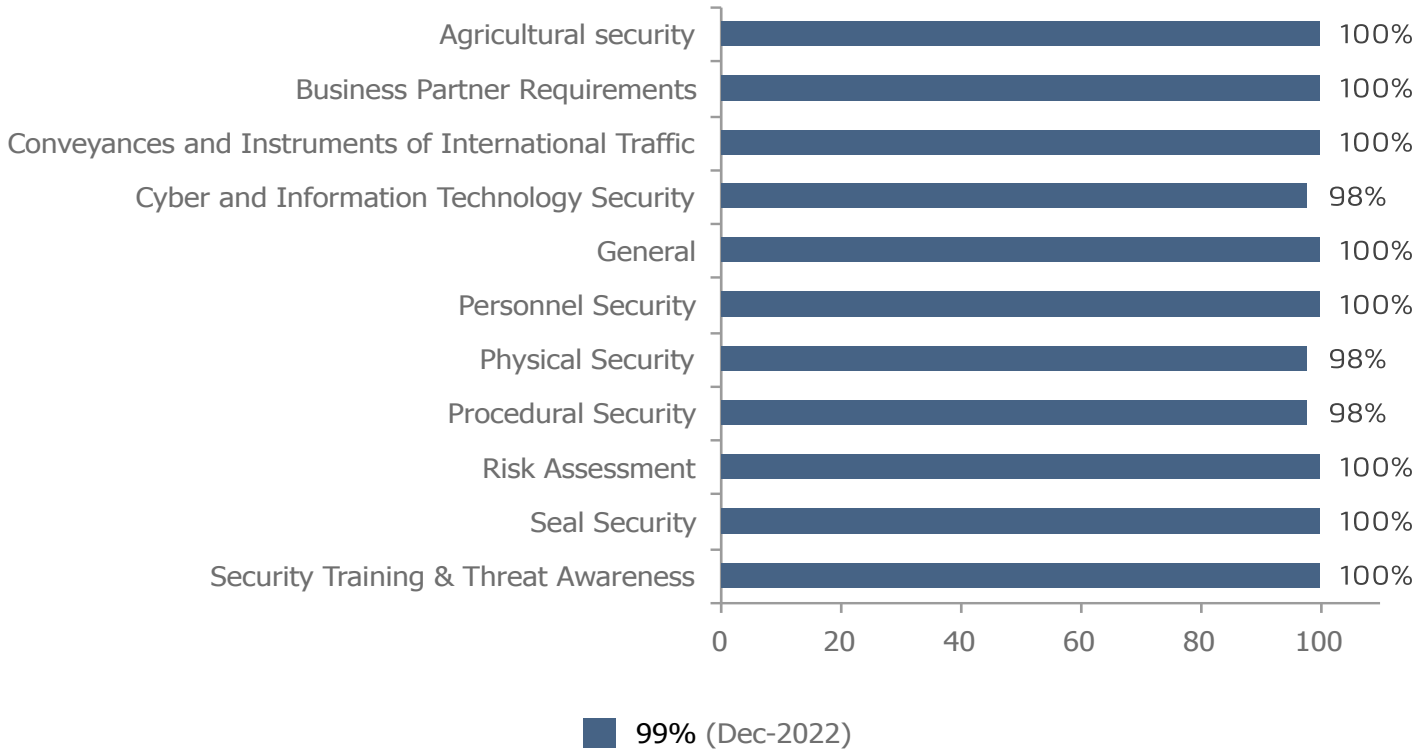
Audit Summary

Post-CAPA

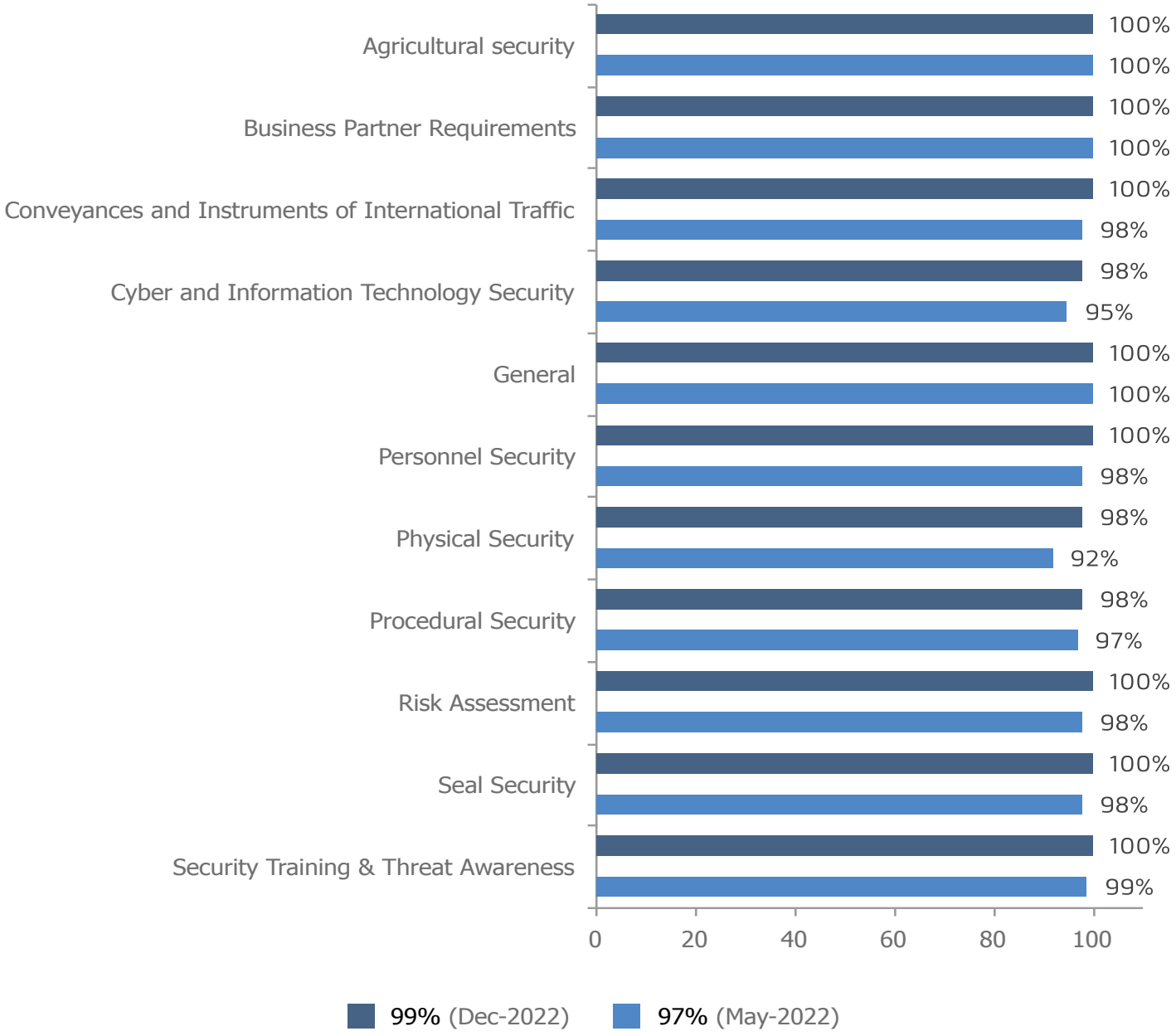
CAPA Submitted Date (Last)
Dec 30, 2022

Compliance Score Post-CAPA
99%

Compliance by Category



Compliance by Category - Last 2 Audits


Agricultural security
Business Partner Requirements
Conveyances and Instruments of International Traffic
Cyber and Information Technology Security
General
Personnel Security
Physical Security
Procedural Security
Risk Assessment
Seal Security
Security Training & Threat Awareness
100%
100%
100%
100%
100%
98%
98%
95%
100%
100%
100%
98%
98%
92%
98%
97%
100%
98%
100%
98%
100%
99%
0
20
40
60
80
100
99% (Dec-2022)
97% (May-2022)

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	Apparel
Product Type / Commodity	Jackets, Pans, Vest
Year Established	2010
Grounds Size (Square Meters)	56358
Number of Buildings	6
Facility Size (Square Meters)	18486
Number of access points? (i.e. gates, exterior doors)	2
Hours of Operation	Monday to Saturday from 7:30 A.M- 4:30 P.M, lunch break from 12:00 A.M. – 1:00 P.M. for all employees
Number of Employees	greater than 500
Number of Contract Employees	650
Number of Security Guards	6
Number of Migrant Workers	0
Annual Revenue	1 - 5 Million
Does the facility outsource any manufacturing services?	No
What countries does this facility export to?	Japan, United States
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
Hoang Dang Transportation Service Provider.	Mr. Huynh Ngoc Tung	Ngoctung.hoangdang@gmail.com	100

Does this facility partner with any sales agent or vendor representatives?	No
Enter location address as it appears on the business license for this location.	The factory is located at Phu Kim hamlet, Cat Trinh commune, Phu Cat District, Binh Dinh Province, Viet Nam
Name of Auditor Completing this Audit (First and Last Name)	Sy Truong
Auditor Certification #	216374-185571
Name of onsite Factory Representative (First and Last Name) and email address	Mr. Tran Ba Thanh _ CEO Director email:bathanh@phuccatgarment.com.vn

Audit Responses

Audit Assigned	Due Date	Overall Compliance Score
Oct 17, 2022	**Dec 01, 2022**	**99%**

General 100%

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

- (●) Yes
- ( ) No

1.pdf

Comments: The Business License matches the current location name and address as in the audit sheet. Business license number: 41011448345 was initially issued on Oct 21, 2010, update 4h on Jan 21, 2014 by the Business Registration of Binh Dinh Province.

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

- (●) Yes
- ( ) No

Comments: There is a primary point of contact (POC) identified regarding security matters:
Ms. Nguyen Thi Cam Compliance Executive
Phone: +84 0348351788
Email: nguyencam@phucatgarment.com.vn

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

- (●) Yes
- ( ) No
- ( ) NA

Comments: From the management interview, noted that the facility has provided previous SCAN audit CAPAs to the auditor in preparation for 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
- ( ) NA

Comments: The facility provides previous CAPA for review. Auditor verifies each Non-conformance (NC) with improved proofs. A few NCs are not closed and are combined in this audit finding.

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

2.pdf

Comments: Ms. Nguyen Thi My Duyen joined SCAN Security and Threat Awareness Training on Oct 18, 2022 with certificate number: 228941-252788

Risk Assessment 100%

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

- (●) Yes
- ( ) No

Comments: The facility risk assessment dates Nov 11, 2022 to identify vulnerabilities in the business plan.

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

- (●) Yes
- ( ) No

Comments: The facility risk assessment dates Nov 11, 2022 and the facility has shared its risk assessment with business partners.

8 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 dates Nov 11, 2022 includes vulnerabilities specific to contracted service providers such as contractors.

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 facility risk assessment dates Nov 11, 2022.

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

- [x] A written cargo process map is available
- [x] The cargo process map includes transit times from origin to final container yard
- [x] The cargo process map includes locations where freight may be at rest
- [ ] No written cargo process map is available
- [ ] NA

Comments: A written cargo process map is available and effective date Jan 01, 2022. It includes a) transit times from origin to final container yard, b) location where freight may be at rest.

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

- [x] Documented crisis plan available
- [x] Crisis plan includes reporting crisis-related issues to business partners as necessary
- [x] Crisis plan includes alternative locations if facility is rendered unusable
- [ ] No documented crisis plan available

Comments: The written crisis plan policy (No document number: Issue date: Jun 09, 2022) includes facility's crisis plan. The plan includes a) reporting crisis-related issues to business partners, b) alternative locations if facility is rendered unusable.

Business Partner Requirements 100%

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

- (●) Yes
- ( ) No

Comments: The facility has contract services with business partners.
Transportation provider - Hoang Dang Transportation Service Provider. The contract service signed date Jan 02, 2021 validation until end of business
The facility does not have security or manufacturing labor contractor.

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 business partner is provided security criteria in the local language and required to sign an annual Statement of compliance.

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)

- [x] Documented screening process is available

- [x] Screening process is done on an annual basis
- [x] Screening process includes looking for evidence of money laundering and terrorism funding
- [x] Screening process includes monitoring for financial stability
- [ ] No screening process takes place

Comments: The written business selection and evaluation control procedure (Document number: QTANM01, Revison 01, Issue date: Nov 11, 2022) includes screening process is done on an annual basics, inclues looking for evidence of money laundering and terrorism funding and monitoring for financial stability. Subcontractor reviews: Transportaion contractor-Hoang Dang Transportation Service Provider, recent audits date Nov 11, 2022.

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 business partners are required to conduct and provide an annual security risk assessment of their operation, the latest audit report on Nov 11, 2022

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)

- [x] Compliance Statement and/or Security Questionnaire required
- [x] Renewed annually
- [ ] No

Comments: The facility requires business partners to provide a Statement of compliance the Minimum-Security Requirements and controls that are in place.
Transportaion contractor-Hoang Dang Transportation Service Provider, recent audits date Nov 11, 2022.

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: The facility required corrective actions plans from the business partner with evidence of implementation retained.

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: The written Cyber Security Policy (Document number: C-TPAT-14, Issue date: Nov 11, 2022) includes Cyber security policy to protect information technology systems.

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: The facility has firewall and malware software deployed/set up to identify, protect, detect, respond and recover their network.

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: The firewall and malware software updates are automatically deployed from software providers. And, Manual updates installed by on site IT services as needed.

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 to identify open ports and IP addresses that create vulnerability to the internal network, the latest vulnerability test are conducted by IT personnel on Sep 10, 2022

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

No options available

Comments: The facility actions are taken when problems are identified while testing firewall, malware, and other network vulnerabilities

23 Material To whom does the facility report cybersecurity threats and attempts at unapproved

access to network systems?

- [x] Senior management
- [x] Internal business partners
- [ ] External business partners
- [ ] Customers / suppliers
- [ ] Government agencies
- [ ] No reporting process and procedure in place
- [ ] NA

Comments: The written Cyber Security Policy (Document number: C-TPAT-14, Issue date: Nov 11, 2022) to report Cyber security threats and attempts at unapproved assess to network systems to relevant departments such as Senior management, internal business partner however, it does not include external business partners, customers/ suppliers, and government agencies.

CAPA Assigned **2022/12/12** | Due Date **2023/02/10** Included in scoring

CAPA: Please consider establishing a plan to report cyber security threats and unauthorized attempts at accessing your network systems. Please comment that you acknowledge your consideration.

- [x] Senior management
- [x] Internal business partners
- [x] External business partners
- [x] Customers / suppliers
- [x] Government agencies
- [ ] No reporting process and procedure in place
- [ ] NA

23.pdf

Comments: The plant has developed a plan to report cybersecurity threats and attempts to gain unauthorized access to the company's network to contact:

1.Senior management

2. Internal business partner

3. Customers, suppliers

4. State agencies

Extensive investigation and treatment:

• Police 113 : 0256 3 113

• Cat Trinh Commune Police: 0982 445 994

• Binh Dinh Customs Branch: 02563 892 445

(to receive solutions from agencies and departments).

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: There are automated systems in place to monitor and prevent attempts of unauthorized access and tampering with systems and/or electronic data: system account and password, password change, ID suspension, screensaver, disciplining IT system violator.

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: From documents review and management interview found that there is no evident of management review conducted

CAPA Assigned **2022/12/12** | Due Date **2023/02/10** Included in scoring

CAPA: Develop a plan to regularly review the access requirements for all parties with authority to connect to electronic systems. Please provide summary in the comment 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.

- ○ Management reviews annually
- ○ Management reviews quarterly
- ◉ Management reviews monthly
- ○ No management review conducted
- ○ NA

25-Quan ly an ninh ... pdf

Comments: Plant Develop a plan to regularly review access requirements for all authorized parties connected to the electronic system (monthly check). APPLICATION ON 08/DEC/2022 which requires:

- Do not use the hard drive and USB connected to the computer.
- Do not use VPN to connect personal devices such as phones, laptops, desktops, Android, Iphone,... to the corporate network.
- Only use a separate Username and manage security records according to each department, function, and field.
- Only authorized employees of the Board of Directors have access to the internet. The company's wifi network will be password set and only available to authorized people.
- Employees are not allowed to access external Web sites to download software or download files without the permission of the Board of Directors.

- ○ Management reviews annually
- ○ Management reviews quarterly
- ◉ Management reviews monthly
- ○ No management review conducted
- ○ NA

25-Quan ly an ninh ... pdf

Comments: Plant Develop a plan to regularly review access requirements for all authorized parties connected to the electronic system (monthly check). which requires:
- Do not use the hard drive and USB connected to the computer.
- Do not use VPN to connect personal devices such as phones, laptops, desktops, Android, Iphone,... to the corporate network.
- Only use a separate Username and manage security records according to each department, function, and field.
- Only authorized employees of the Board of Directors have access to the internet. The company's wifi network will be password set and only available to authorized people.
- Employees are not allowed to access external Web sites to download software or download files without the permission of the Board of Directors.

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)

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

Comments: The written network access control procedure (No document number: Issue date: Mar 04, 2022) is available in place to remove network access for employees who are terminated or on leave longer than vacation, however, it does not includes employees on long term disability or meternity leave have access

CAPA Assigned **2022/12/12** | Due Date **2023/02/10** Included in scoring

CAPA: Develop a plan to regularly review the access requirements for all parties with the authority to connect to electronic systems. Please provide summary in the comment 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.

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

26.pdf

Comments: Plant Develop a plan to regularly review access requirements for all authorized parties to connect to electronic systems, APPLY FROM December 8, 2022 specifically:
- After leaving, all access rights while working at Phu Cat Garment Joint Stock Company of that employee are temporarily disabled. IT is responsible for locking out absentee employees' access to internal systems
Access is removed immediately for terminated employees Employees with long-term disability or maternity leave have access suspended
- The list of employees on maternity leave / long absences including full name, employee number, ID number, department, time of leave, ... will be updated and notified by the Human Resources department and the department IT department.

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

26.pdf

Comments: Access is removed immediately for terminated employees Employees with long-term disability or maternity leave have access suspended
- The list of employees on maternity leave / long absences including full name, employee number, ID number, department, time of leave, ... will be updated and notified by the Human Resources department and the department IT department.

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

- [x] Passwords are required
- [x] Passwords must be complex
- [x] Passwords are changed periodically.
- [ ] No passwords are required
- [ ] NA

Comments: System account and password: applied for relevant employees.
Password complexation: at least 08 characters in length including uppercase letters, lowercase letters, number and non-alphanumeric character
Password change: every 30 days

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: Employees/business partners/contractors/ consultants are not permitted to access the company system remotely.

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: The written Cyber Security Policy (Document number: C-TPAT-14, Issue date: Nov 11, 2022) in place requires that the factory not allow any personal devices that connect to the network.

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

- (•) Yes

- ○ No

Comments: Cyber security policy regulates not allow anyone to download and setup any software/hardware for his/her equipment. All installation is conducted by the IT administrators. Each equipment has IT administrator's account for install software.

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: Cyber security policy includes the network systems back-up. The data is backed up monthly. The recent backup dates Nov 09, 2022.

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 offside, encrypted by IT administrator.

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

- ◉ Yes
- ○ No

Comments: Equipment slated for disposal is returned to the IT department for disposal.

Conveyances and Instruments of International Traffic 100%

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

- ◉ Yes
- ○ No

Comments: Containers are utilized for international shipments and loaded at the facility.

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: Containers come to the facility when required. The facility keeps waiting containers at the receiving and shipping areas. The areas are separated from other areas and other parking lots. The areas are restricted to

authorized personnel. The facility installs CCTV system & sufficient lighting to monitor the areas. Stored, loaded containers/trailers are secured with a seal. Area is secured as described in CTPAT MSC requirements.

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

- (●) Yes
- ( ) No

Comments: Auditor observes a container inspection previously completed container inspection via CCTV recordings.

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 written container inspection control procedure (Document number: 11/QT-PCC, Issue date: Jac 01, 2021) includes the container inspection procedure. The procedure includes inspection of security integrity of a container or trailer prior to loading.

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

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

3.pdf

Comments: The facility performs container integrity and security verification by performing inspection with checklist in the local language prior to loading of the container. The checklist includes Size of container, Name of person performing the inspections, Date and time of inspection, Floor and roof of container intact, Outside walls free of damage, Undercarriage checked for damage, and the checklist include Inspection for invasive species (eggs nests, dirt seeds) . The checklist records available for review.

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

- [x] Photos are captured
- [x] Video is captured

- [ ] No visual documentation is recorded

Comments: Photos are taken and CCTV Video is captured during the container loading process.

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

- [x] Measurement tool
- [x] Mirrors for undercarriage
- [x] Tap test tool
- [x] Container Interior cleaning tool
- [ ] No tools available/tools do not meet requirements

4.pdf

Comments: The facility performs container integrity and security verification by performing inspection with checklist in local language prior to loading of the container. The facility does use equipment such as measurement tool, mirror for undercarriage,tap test tool, rubber hammer, flashing light and broom to perform the inspection.

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

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

Comments: The facility conducts container inspection at the shipping area prior to loading. The area is secured and captured by the CCTV system. Inside of trailer/container is visible from tail to nose on CCTV.

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

- (●) Yes
- ( ) No

Comments: Container inspection is conducted by security guard and shipping officer. The training on performing 7-point container inspection dates Nov 25, 2022.

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

- (●) Yes
- ( ) No

Comments: The written container inspection control procedure (Document number: 11/QT-PCC, Issue date: Jac 01, 2021) in place which requires shipping manager to conduct follow ups inspections.

44 Material Are container/trailer inspections supervised?

- (●) Yes
- ( ) No

Comments: Container inspection is conducted by the security guard and shipping officer. The shipping manager supervises the inspection.

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

- (●) Yes
- ( ) No

Comments: The facility has a valid contract service with a trucking contractor for goods movement from the facility to CFS, Customs station and Seaport.

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: The cargo routing and tracking control procedure (Document number: ANVCH-20, Revision 01, Issue date: Nov 11, 2022) includes tracking, tracing and requiring confirmation of arrival at destination.

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 facility requires the trucking contractor to use Global Positioning System (GPS) to monitor the container/trailer when departs the facility to CFS, Customs station and Seaport.

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: The transit routes from the facility to the port or next destination location randomly can be changed to minimize predictability and it is only done when required and approved by the facility management.

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: The facility has a valid contract with the Trucking contractor and the contract indicates preferred transit route(s) used by the driver, the allowable transit time limit, designated rest/meal stop locations.

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

- [x] Driver log is maintained
- [x] Tractor number listed
- [x] Container/trailer number listed
- [x] Photo ID required of drivers
- [x] Carrier name
- [x] Date
- [x] Arrival Time
- [x] Departure Time
- [x] Seal verification information for container/trailer departure
- [ ] No driver log available

Comments: Driver is required to present photo identification and arriving material notice for security verification and registration prior to entering the facility.
For departing material movement, driver is required to present delivery notice issued by the facility for verification and registration.
The facility driver log: tractor number, container number, photo ID number, carrier name, date, arrival time, departure time, seal number.

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

- ( ) Yes
- (●) No

Comments: As confirmed by the shipping manager, the facility does not have LCL shipments.

53 None Does the facility make air shipments?

- ( ) Yes
- (●) No

Comments: As confirmed by the shipping manager, the facility does not have any air shipments.

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

- ( ) Yes
- (●) No

Comments: Confirmed by the facility shipping officer, the facility only uses closed containers its shipments.

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: The International shipments are sealed with an PAS ISO 17712:2013 with seal testing number 417777-01-04-C21-0275, test dated April 23, 2021. The compliant high-security seal immediately after a container is loaded by the shipping manager and available for reviews

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

- [x] Policy is written
- [x] Seals are secured in storage
- [x] Specific employees are listed who have access to seal storage
- [ ] No written policy is available

5.pdf

Comments: The written seal control procedure (No document number: Issue date: Nov 26, 2021) The procedure includes affixing, replacing, recording and tracking the seals placed on containers and keeping. Security seals are controlled and are properly applied to a container. Seals are kept by shipping officer in locked cabinets.

Agricultural security 100%

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

- (●) Yes
- ( ) No

Comments: Container inspection procedure includes process to refuse to load damaged or dirty containers/ and evidence of pests such as egg masses.
Outside of container is visually identified leaks and swept to remove dirt or seeds prior to loading.

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: The written agricultural security control procedure (No document number: Issue date: Jan 02, 2020) includes Pest control procedure that is to inspect and review evidence of pest access: baited traps, periodic extermination, and removal of debris from shipping and storage facilities.

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
- [x] NA

Comments: Confirmed by the shipping officer, the facility does not utilize any wood packaging material in shipment.

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

- ( ) Yes
- ( ) No
- (•) NA

Comments: From facility observation, found that No wood and wood products utilized 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
- [x] NA

Comments: From sitetour observation, found that the company used plastic pallets for finished goods storage. No wood pallets used in the shipment process

Seal Security 100%

64 Critical Are security seals stored in a secured location?

- (•) Yes
- ( ) No
- ( ) NA

Comments: Seals are kept by shipping manager in locked cabinets with adequate access control.

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

Comments: The facility has a documented test report from vendor to validate the seals utilized meet the most recent ISO 17712 criteria. The bolt seal with the test 417777-01-04-C21-0275, test dated Aril 23, 2021.

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: Seal procedure includes affixing, replacing, recording and tracking the seals placed on containers and keeping. Security seals are controlled and are properly applied to a container. Seals are kept by shipping officer in locked cabinets. Shipping Manager conduct periodic audits of seal inventory, seal log and shipping documents and conveyances to validate that seal controls being followed. All steps are documented and available for review.

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: Seal procedure includes affixing, replacing, recording and tracking the seals placed on containers and keeping. The facility affixes security seal to loaded container immediately. The facility takes photographs of a loaded container with the security seal affixed. The facility has VVTT testing to ensure seal is correctly applied and prevent compromised seal. Secondary testing and validation are checked by shipping officer at time of exit from the facility. Seal numbers are written on shipping documents. Seal testing procedure is 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.

Procedural Security 98%

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

- ◉ Yes

No

Comments: The area adjacent to the shipping and receiving areas enclosed by walls and fences.

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

7.pdf

Comments: The written reporting unauthorized access procedure (Document number: 31/QT-PPC, Issue date: Jan 02, 2022) includes reporting unauthorized access to critical operational areas of the facility: warehouse picking, final packing or packaging, shipping area, receiving area. The reporting includes Area team leader, manager, security guard.

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

8.pdf

Comments: The written sensitive access control procedure (No document number: Issue date: Jan 02, 2022) includes monitoring and limiting access to critical operational areas of the facility: warehouse picking, final packing or packaging, shipping area, receiving area.
The areas are separated and secured, captured by the CCTV system. The accesses are limited to only unauthorized workers.

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

9.pdf

Comments: The written cargo shipping procedure (Document number: 17/QT-PCC, Issue date: Jan 02, 2022) includes Shortage and overage handling procedure. The procedure requires all information used in the shipping documents for merchandise or cargo to be legible, complete, and accurate.

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

10.pdf

Comments: The written shortage and overage control procedure (Document number: 20/QT-PCC, Issue date: Jan 02, 2021) is in place include resolving a carton count shortage, overage, or any documentation issue found during container or trailer loading; or after the shipment has departed the facility.

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

- (●) Yes
- ( ) No

11.pdf

Comments: The shipment records review noted that all international shipments were marked, counted, weighed, and properly reported on shipping documents

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

- (●) Yes
- ( ) No

12.pdf

Comments: The written document control procedure (Document number: 42/QD-PCC, Issue date: Mar 04, 2022) includes restricted access to shipping and receiving documentation regulation.

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

- [x] Documents are secured
- [x] Pre-printed paper documents are utilized
- [ ] Pre-printed documents are not utilized or secured

Comments: Pre-printed paper documents or forms 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 shared printers are used as the Shipping department has own printer for preparing export documents.

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

- (●) Yes
- ( ) No

Comments: Commercial document packets are sent with the shipment at departure by electronic copies.

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: The written security incident reporting procedural (Document number: 25/QT-PCC, Issue date: Mar 01, 2022)includes reporting security issues. The reporting includes local law enforcement, customer when illegal shipping activity or any abnormality is suspected or detected.

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 written access control regulation (Document number: 01/NQ-PCC, Issue date: Feb 09, 2022) is in place to required visitor or driver or vendor is required to present photo identification for security verification and registration prior to entering the facility. Employee is required to present employee badge prior to entering and during onsite 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: The written incidence notify procedural (Document number: 06/QT-PCC, Issue date: Jan 02, 2021) includes reporting security issues. The reporting includes notifying to Business Partners, Management, local Law enforcement of security issues: attempted theft, fraud or internal conspiracies

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

- (●) Yes
- ( ) No

Comments: Shipping officer validates the freight being loaded against the Purchase Order prior to departure.

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

- (●) Yes
- ( ) No

17.pdf

Comments: The written termination control procedure (Document number: 28/QT-PCC, Issue date: Jan 02, 2022) includes control the issue, removal, and changing of keys, ID badges. Other access cards and security alarm codes are not available.

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

- (●) Yes
- ( ) No

Comments: From facility observation and interview: there are total 27 security guards who are working 24/7.

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: Roles and responsibilities of security staff/guard are described Security Plan which requires the security guard conducts "patrol" the facility during the off business hours for the fence, gate, building, lighting, unauthorized access, etc, with the manual records maintained and available for reviews.

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: The security guard conducts "patrol" the facility during the off-business hours for the fence, gate, building, lighting, unauthorized access with the manual records maintained.

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

- (●) Yes
- ( ) No

Comments: From documents review and management interview found that the management verify compliance with security team monthly and records are kept by HR and available for review

Physical Security 98%

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

- (●) Yes
- ( ) No

Comments: The facility designates employee and visitor vehicle parking areas separate from the shipping and receiving areas. No personally owned vehicles are permitted in shipping & receiving areas. Shipping and receiving areas are under access control.

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

- (●) Yes
- ( ) No

Comments: The facility has a designated shipping and receiving areas. The area is separated from other areas and separated from all other parking lots. The area is restricted to authorized personnel only. The facility installed CCTV & sufficient lighting to monitor the areas.

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)

- [x] Procedure is written
- [x] Regular inspections are documented
- [x] Preventative maintenance logs kept
- [ ] Nothing in place

Comments: The structures of the buildings are reinforced concrete & steel. The boundary fence is 250CM high and made of concrete, brick and metal.
The facility conducts regular inspection daily basis of perimeter fencings, buildings, and structures for damages & attempted illegal access and retains records. Defects are reported to management for repairing or fixing.
Preventative maintenance logs are kept.

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

- [x] Gates are installed at all entrances/exits
- [x] Gates are monitored by guards/CCTV
- [ ] Nothing in place
- [ ] NA

Comments: There are 02 access gates with 24/7 security guards and CCTV system.

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

- (●) Yes
- ( ) No

- [ ] NA

Comments: Observation and interview: there are 02 access gates and those gates are locked and secured when not in use.

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?

- [x] Interior lighting
- [x] Exterior lighting
- [ ] Nothing in place
- [ ] NA

Comments: The facility installs sufficient lighting system at: entrance and exit, boundary fence, receiving and shipping area, packed goods storage area.

93 None Which of the following security technologies does the facility incorporate as part of its systems and controls? (Select all that apply)

- [x] CCTV
- [x] Access Control
- [x] Security Alarm
- [ ] Other
- [ ] None

Comments: The facility installs CCTV system at: facility entrance and exit, packing area, packed goods storage area, receiving area, shipping area, office area. Facility also installs access control system to the facility for employees, vendors and visitors inaddition the facility has installed security alarm system.

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

- [ ] Yes
- [x] No
- [ ] NA

Comments: No written procedures governing the use of security technology in place

CAPA Assigned **2022/12/12** | Due Date **2023/02/10** Included in scoring

CAPA: Establish a policy that highlights how security technology is deployed. Please provide summary in the comment 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.

- [x] Yes
- [ ] No
- [ ] NA

94-Quan ly an ninh ... pdf

Comments: The factory manages security by a burglar alarm system equipped with finished product warehouse area, CCTV system at the factory, export, import, office area. The office area is equipped with CCTV to promptly

detect intrusions and lose data. The hard drive is stored in the safe. Seal is stored in a locked cabinet.
- The factory has a battery charger in case of short-term power failure and hires a generator to operate the CCTV system in case of prolonged power failure (applicable from December 8, 2022).
- The factory established an information security policy, which was applied on December 8, 2022 with the following management contents:
1. Factory Set security technology deployment policy
2.Manage company accounts and electronic devices
3. Vulnerability Management
4. Manage remote access

- (●) Yes
- ( ) No
- ( ) NA

94-Quan ly an ninh ... pdf

Comments: Factory Set security technology deployment policy
1.Manage company accounts and electronic devices
2. Vulnerability Management
3. Manage remote access

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

- (●) Yes
- ( ) No

Comments: The security equipment is installed by the licensed contractor.

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: The facility has a contract service with a licensed contractor for security system maintenance when problems are uncovered.

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

- (●) Yes
- ( ) No

Comments: The facility has a separated and secured areas for IT server, CCTV recorder. Only unauthorized workers are allowed to access the areas.

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: From facility site tour and management interview found that no generator or device in place to ensure uninterrupted operation of electronic security systems in the event of a power outage.

CAPA Assigned **2022/12/12** | Due Date **2023/02/10** 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 comment 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

98-HỢP ĐỒNG TH... pdf

Comments: Factory Set up backup power system to supply power to important systems in case of power failure by signing a generator rental contract with Quang Tu Company, they will provide generators for the plant when there is a power failure. power failure. The contract is signed and takes effect from December 8, 2022 to December 8, 2023.

- (●) Yes
- ( ) No
- ( ) NA

98-HỢP ĐỒNG TH... pdf

Comments: Factory Set up backup power system to supply power to important systems in case of power failure by signing a generator rental contract with Quang Tu Company, they will provide generators for the plant when there is a power failure. power failure.

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)

- [x] All entrance(s)
- [x] All exit(s)
- [x] Storage/warehouse
- [x] Loading area(s)
- [x] Unloading area(s)
- [x] CCTV coverage in additional areas
- [ ] No CCTV

Comments: The facility installs CCTV system at: facility entrance and exit, packing area, packed goods storage area, receiving area, shipping area, office area.

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 has a failure alarm that indicates when the system is offline or no recording is underway and the system is connected to a backup power system.

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

- [x] Yes
- [ ] No

Comments: The CCTV system run 24 hours per day 7 days per week.
CCTV recording covering period Oct 10, 2022 to Nov 30, 2022 is randomly checked.

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

- [x] Yes
- [ ] No

Comments: The facility's CCTV system recording is at the FHD quality video.

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)

- [x] Yes
- [ ] No

Comments: The facility installs CCTV system at: facility entrance and exit, packing area, packed goods storage area, receiving area, shipping area, office area. The CCTV system run 24 hours per day 7 days per week, however the facility's management team does not conduct random documented reviews of CCTV footage periodically to ensure security procedures are being followed.

104 Critical How many days are CCTV recordings kept?

- [ ] 90 or more days
- [x] 45 - 89 days
- [ ] 30 - 44 days
- [ ] Less than 30 days
- [ ] Recordings not retained

Comments: The CCTV recording is kept for a period 45-89 days. The recording period Oct 10, 2022 to Nov 30, 2022 is verified.

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

- [x] Yes
- [ ] IDs carried but not displayed
- [ ] No

Comments: Employee is required to present employee badge prior to entering the facility and display it at all times while 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)

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

18.pdf

Comments: The written access control regulation (Document number: 01/NQ-PCC, Issue date: Feb 09, 2022) is in place and the procedure requires visitor or driver or vendor to present photo identification for security verification and registration prior to entering the facility. Visitor Log is utilized.

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: The written access control regulation (Document number: 01/NQ-PCC, Issue date: Feb 09, 2022) includes inspecting a visitor's bag or package before entering and leaving the manufacturing, production or shipping area of the facility.

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

- (●) Yes
- ( ) No

Comments: Visitor or driver or vendor is issued a numbered visitor badge which is displayed or carried while at the facility.

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

- (●) Yes
- ( ) No

Comments: Visitor or driver or vendor is escorted by the facility representative at all times while at the facility.

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: The written inbound mail and parcel screening policy (Document number: 12/QT-PCC, Issue date: Jan 02, 2022) includes inspecting a suspicious package and mail for dangerous materials and/or contraband prior to

distribution.

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: The facility has separate storage areas for hazardous materials and finished goods.

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)

- [x] Policy is written
- [x] Education check
- [x] Reference check
- [x] Previous employment check
- [ ] Nothing in place
- [ ] NA

Comments: The written recruitment control policy (Document number: CS25, Revision 01, Issue date: Apr 09, 2022) is in place, the procedure includes validating information of an employment application: address, previous employment history, education, personal or professional references, and a certification.

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)

- [x] Written application required
- [x] Government issued ID required
- [ ] No
- [ ] NA

Comments: The Recruitment procedure states that applicants are required to submit a written application for facility and provide proofs of their identity: CV, copy of ID, family booklet, health check, background check, education certificate, driving license certificate.
All 05 selected employee personnel files have such above documents.

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)

- [x] Written policy is available
- [x] Criminal background checks completed

- [ ] Credit check completed
- [ ] Nothing in place
- [ ] NA

Comments: The written recruitment control policy (Document number: CS25, Revision 01, Issue date: Apr 09, 2022) is available in place which states the requirements to perform a criminal background check on an application and employees.
The criminal background check is done annually on employees who work in restricted areas and once when hired by other employees. However, the credit check is not allowed by legal regulations, hence it is N/A.

CAPA Assigned **2022/12/12** | Due Date **2023/02/10**

Included in scoring

CAPA: If permitted, establish a process to do background checks of employees at the time of hire and this background check should be done periodically on active employees in critical positions. Please provide summary in the comment 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.

- [x] Written policy is available
- [x] Criminal background checks completed
- [x] Credit check completed
- [ ] Nothing in place
- [ ] NA

114-QUI TRÌNH TIẾP...pdf

Comments: The factory has a background check process for employees at the time of hiring and this background check should be performed periodically for employees who are active in important positions such as, apply from 08/12/2022.
Personal information, working history and candidate references are correct with the information declared or not.
- For sensitive positions such as IT, Warehouse, import and export, security, collection, it is required to confirm the background from the place of residence, the reason for leaving the old company (if any) – from the HR department of the old company or from a relative.
- certificate of conduct
.- verify at least once a year, the identity of employees currently working at the company in sensitive and important positions such as: packing department, loading and unloading, import and export, IT...
Regarding credit cards, the company will give new employees a bank card when they come in, so that the company can pay salaries in the system, and the company does not require employees to declare their accounts.
- Employees of the sensitive department will be required to declare their account identity at the website https://cic.gov.vn/#/ . at the time of receiving the application and periodically checking once a year at the company.

- [x] Written policy is available
- [x] Criminal background checks completed
- [ ] Credit check completed
- [ ] Nothing in place
- [ ] NA

114-QUI TRÌNH TIẾP...pdf

Comments: The factory has a background check process for employees at the time of hiring and this background check should be performed periodically for employees who are active in important positions such as, apply from 08/12/2022.
Personal information, working history and candidate references are correct with the information declared or not.
- For sensitive positions such as IT, Warehouse, import and export, security, collection, it is required to confirm the background from the place of residence, the reason for leaving the old company (if any) – from the HR department of the old company or from a relative.
- certificate of conduct
.- verify at least once a year, the identity of employees currently working at the company in sensitive and important positions such as: packing department, loading and unloading, import and export, IT...
Regarding credit cards, the company will give new employees a bank card when they come in, so that the company can pay salaries in the system, and the company does not require employees to declare their accounts

- [x] Written policy is available
- [x] Criminal background checks completed
- [x] Credit check completed
- [ ] Nothing in place
- [ ] NA

114-QUI TRÌNH TIẾP... pdf

Comments: The factory has a background check process for employees at the time of hiring and this background check should be performed periodically for employees who are active in important positions such as:
Personal information, working history and candidate references are correct with the information declared or not.
- For sensitive positions such as IT, Warehouse, import and export, security, collection, it is required to confirm the background from the place of residence, the reason for leaving the old company (if any) – from the HR department of the old company or from a relative.
- certificate of conduct
.- verify at least once a year, the identity of employees currently working at the company in sensitive and important positions such as: packing department, loading and unloading, import and export, IT...

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?

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

Comments: The facility establishes training plan and provides training for employees. The facility retains training records. The facility provides training for new employees at the entry date. The facility provides annual refresher training for employees on Oct 05-06, 2022. Management personnel randomly reviews documentation.

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

- (●) Yes
- ( ) No

Comments: The facility's has participated training on security threat awareness training cover security related issues dates Oct 05-06, 2022

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

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

Comments: The facility conducts the evaluation of understanding at the end of a training session by interviewing the participant and recorded. Retraining is required if a successful score is not achieved

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: The facility establishes training plan and provides training for employees who conduct security and agricultural inspection. Training material lists specific requirements. Training logs list employees working in this area. Training provides annually for existing employees with this job function. The recent trainings perform from Oct 05-06, 2022.

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

- [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: The facility establishes and maintains a Threat Awareness training program.
The training program includes security criteria for restricted areas of the facility such as final packing, shipping, and

receiving.
The recent trainings perform from Oct 05-06, 2022.

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

- (●) Yes
- ( ) No

Comments: The facility establishes training plan and provides training for employees to report suspicious activity or security incident. The facility provides training for employees from Oct 05-06, 2022

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)

- [x] Training includes shipping & receiving controls
- [x] Training includes how to conduct container/trailer inspections
- [x] Training includes container/trailer sealing practices
- [x] Training includes how to control seals
- [ ] No specific additional training is in place for shipping & receiving personnel

Comments: The facility establishes training plan and provides training for employees. The training program includes instruction to shipping and receiving employees regarding access controls, container and trailer inspection, and security seal control procedures. The recent training dates Oct 05-06, 2022.

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

- (●) Yes
- ( ) No

Comments: The facility establishes training plan and provides training for employees. The facility provides training on threat awareness, contraband, human smuggling and terrorism for employees from Oct 05-06, 2022.

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

- (●) Yes
- ( ) No

Comments: There is program to recognize employees and staff when reporting security incidents or recommending improvements

124 Must Does training include identifying pest contamination?

- (●) Yes
- ( ) No

Comments: From training records review, found that the training records from Oct 05-06, 2022 include identifying pest contamination and records are documented.

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

- (●) Yes
- ( ) No
- ( ) NA

Comments: The facility establishes training plan and provides training for employees. The facility provides training platform outning the risks of Cybersecurity for employees from Oct 05-06, 2022.

Misc NA

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

No options available

19.pdf

Comments: The factory is located at Phu Kim hamlet, Cat Trinh commune, Phu Cat district, Binh Dinh Province, Viet Nam with clear signal.
The Business License matches the current location name and address as in the audit sheet.
Business license number: 41011448345 was initially issued on Oct 21, 2010, update 4h on Jan 21, 2014 by the Investment and Plan Department of Binh Dinh Province.
The structures of the buildings are reinforced concrete & steel.

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

No options available

19.pdf

Comments: There are 02 access gate with 24/7 security guards and CCTV system.

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

No options available

19.pdf

Comments: The structures of the buildings are reinforced concrete & steel. The boundary fence is 250CM high and made of concrete, brick and metal

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

No options available

19.pdf

Comments: The shipping and receiving areas are separated from other areas and separated from all other parking lots. The areas are restricted to authorized personnel only. The facility installed CCTV & sufficient lighting to monitor the areas.

130 None Describe how the perimeter of the facility is protected from unauthorized access? Please attach pictures

No options available

19.pdf

Comments: The boundary fence is 250CM high and made of concrete, brick and metal. The facility installs sufficient lighting at the boundary fence. The security guard conducts daily inspection for the wall or fence, gate, building, lighting with the manual records maintained.

131 None Describe the final packaging area. Please attach a picture.

No options available

19.pdf

Comments: The final packing areas are physically separated from other production areas by walls and fences. The areas are restricted to authorized personnel. The facility installs CCTV system to monitor the areas.

132 None Describe any container storage and vehicle parking areas and please attach picture.

No options available

20.pdf

Comments: Containers come to the facility when required. The facility keeps waiting containers at the shipping and receiving areas. The areas are separated from other areas and other parking lots. The areas are restricted to authorized personnel. The facility installs CCTV system & sufficient lighting to monitor the areas.
Parking area: The facility designates employee and visitor vehicle parking areas separate from the shipping and receiving areas, goods handling areas.

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

- (●) Yes
- ( ) No

Comments: The Factory Representative and the Auditor signed the Opening/closing meeting letter.