LOCATION CORPORATE AUDIT REPORT
Report# CA-2018-04-0128-CAPA1-V2
Updated on Jun 7, 2018

MINH ANH KIM LIEN GARMENT JOINT STOCK COMPANY

This Report Applies Solely for SCAN – Supplier Compliance Audit Network

Completed on Apr 11, 2018

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LOCATION INFORMATION

MINH ANH KIM LIEN GARMENT JOINT STOCK COMPANY

Bac Vinh Industrial Zone, Hung Dong Commune
Hung Dong Commune, Nghe An Province
Vinh City, Nghe An, Vietnam
460000
84 0383511855

SCAN ID: VN70500117MI
Point of Contact Name: Not provided
Point of Contact Email: bayu@panpacific.co.id; Sustainability@panpacific.co.kr; jlee@ptnpc.co.id; jinnylee@ptnpc.co.id;
komeng.qa@ptnpc.co.id; jslee@panpacific.co.kr; msy326@panpacific.co.kr; kazahanul@panpacific.co.kr; ssuji99@panpacific.co.kr;
dorothy@vietpanpacific.com; sophie@vietpanpacific.com
Target Month: April
Vendor Name - Entered by SCAN Member: Pan Pacific
Vendor Email Address - Entered by SCAN Member: bayu@panpacific.co.id; Sustainability@panpacific.co.kr; jlee@ptnpc.co.id;
jinnylee@ptnpc.co.id; komeng.qa@ptnpc.co.id; jslee@panpacific.co.kr; msy326@panpacific.co.kr; kazahanul@panpacific.co.kr;
ssuji99@panpacific.co.kr; dorothy@vietpanpacific.com; sophie@vietpanpacific.com

<table>
<thead>
<tr>
<th>Contact Name</th>
<th>Phone</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>Location: MINH ANH KIM LIEN GARMENT JOINT STOCK COMPANY</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Primary Location: Yes</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Critical Location: No</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Assigned Auditor: BSI Group</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Schedule Date: 04/04/2018</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
93 % Compliance Score

Compliance by Category

- Business Partner Requirements: 71%
- Container & Trailer Security: 100%
- Conveyance Security: 80%
- Information Technology Security: 95%
- Personnel Security: 100%
- Physical Access Control: 91%
- Physical Security: 94%
- Procedural Security: 100%
- Security Training & Threat Awareness: 100%

93 % (Apr-18)

Post CAPA scoring – CAPA completed on April 17, 2018

100 % Compliance Score

Compliance by Category

- Business Partner Requirements: 100%
- Container & Trailer Security: 100%
- Conveyance Security: 100%
- Information Technology Security: 100%
- Personnel Security: 100%
- Physical Access Control: 100%
- Physical Security: 97%
- Procedural Security: 100%
- Security Training & Threat Awareness: 100%

100 % (Apr-18)

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<table>
<thead>
<tr>
<th>Profile Question</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Year Established</td>
<td>2009</td>
</tr>
<tr>
<td>Does the facility participate in any government, local customs, or World Customs</td>
<td>No</td>
</tr>
<tr>
<td>Organization (WCO) accredited facility security program?</td>
<td></td>
</tr>
<tr>
<td>Do you hold a Certification?</td>
<td>No</td>
</tr>
<tr>
<td>Has the facility been reviewed or audited by this program?</td>
<td>Yes</td>
</tr>
<tr>
<td>Primary Industry of Operations</td>
<td>Garment manufacturing</td>
</tr>
<tr>
<td>Product Type / Commodity</td>
<td>Clothing, T-shirt, Jacket, Jean, Dress, Clothing for children.</td>
</tr>
<tr>
<td>Grounds Size (Square Meters)</td>
<td>15000</td>
</tr>
<tr>
<td>Number of Buildings</td>
<td>4</td>
</tr>
<tr>
<td>Facility Size (Square Meters)</td>
<td>7500</td>
</tr>
<tr>
<td>Number of access points? (i.e. gates, exterior doors)</td>
<td>1</td>
</tr>
<tr>
<td>Hours of Operation</td>
<td>7.00am-5.00pm</td>
</tr>
<tr>
<td>Number of Employees</td>
<td>greater than 500</td>
</tr>
<tr>
<td>Number of Contract Employees</td>
<td>1800</td>
</tr>
<tr>
<td>Number of Security Guards</td>
<td>12</td>
</tr>
<tr>
<td>Number of Migrant Workers</td>
<td>0</td>
</tr>
<tr>
<td>Annual Revenue</td>
<td>5 - 10 Million</td>
</tr>
</tbody>
</table>
Business Partner Requirements

1. Does the facility utilize any contract services, such as security, transportation or manufacturing labor?

   Actual
   ✔ Yes
   ☐ No

   **Additional Comments:** The facility contracts transportation services to 01 logistic company, for container / trailer and truck: Cong ty TNHH Van tai va Xuat khau Hung Lien (The truck was appointed by customer). All relevant employees and staffs as well as security gaurds are being hired directly by the facility.

2. **Must** Does the facility have written, verifiable processes and procedures used in the selection of business partners including: material suppliers, manufacturers, and logistics service providers?

   Actual
   ✔ Yes
   ☐ No

   **Additional Comments:** Written procedure QUY TRINH DANH GIA VA QUAN LY NHA CUNG CAP (AN7-HD-01) is availabled in place to select business partners.

3. **Must** Does the facility incorporate and require minimum supply chain security requirement language in contracts with a business partners?

   Actual
   ✔ Yes
   ☐ No

   **Additional Comments:** Minimum supply chain security requirement language in contracts and Security Statement with logistics is determined accordingly.

4. **Must** Are contracted business partners required to conduct and provide an annual security risk assessment of their operation? These business partners include any contract services, such as security, transportation provider, freight consolidation or manufacturing labor.

   **CAPA Sent: 4/11/2018**
   **Due Date: 6/11/2018**

   **CAPA:** Please provide a timeline for including security risk assessment as part of your business partner requirement. Please note that requiring annual risk assessments will increase your score and raise your compliance. Doing a one time assessment is good but more frequent assessments are better and annual are best. This requirement will be reviewed at the next SCAN audit to confirm compliance.
5. **Should** Are contracted logistics service providers given an outline of minimum security standards in their local language?

**Actual**
- [x] Yes
- [ ] No
- [ ] NA

**Additional Comments:** Security Statement that including outline of minimum security standards in Vietnamese language given to logistic service provider.

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

**Actual**
- [x] Yes
- [ ] No
- [ ] NA

**Additional Comments:** International security seal (Bolt seals) are provided by the logistics service provider and taken to the facility by the drivers of the transportation company each time. As per the bolt seal certificate, the seals are compliant to ISO 17712:2013( E).

7. **Must** Does the facility have written and verifiable procedures to ensure that security seals are controlled and are properly applied to a container or trailer by a designated facility representative?

**Actual**
- [x] Yes
- [ ] No
8. **Critical** Are security seals stored in a secured location?

<table>
<thead>
<tr>
<th>Actual</th>
<th>01. Seal control.pdf</th>
</tr>
</thead>
<tbody>
<tr>
<td>✔ Yes</td>
<td></td>
</tr>
<tr>
<td>☐ No</td>
<td></td>
</tr>
<tr>
<td>☐ NA</td>
<td></td>
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</tbody>
</table>

*Additional Comments:* Seals were supplied by Vendor (The vendor who supplied truck service was appointed by customers) Seals was kept in secure box with lock pad and managed by designated person.

9. **Must** Does the facility have a designated employee with responsibility to maintain, distribute, and handle security seals?

<table>
<thead>
<tr>
<th>Actual</th>
<th></th>
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<tbody>
<tr>
<td>✔ Yes</td>
<td></td>
</tr>
<tr>
<td>☐ No</td>
<td></td>
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<tr>
<td>☐ NA</td>
<td></td>
</tr>
</tbody>
</table>

*Additional Comments:* Written procedure QUY TRINH KIEM SOAT CHI (AN6-HD-02 / 2016-07-22). The facility designated employees to manage and handle security seal, NGUYEN SY HUNG (IM-EX), NGUYEN THI TINH (PLAN).

10. **Must** Is the security seal number recorded on the bill of lading document and a copy of the bill of lading retained by the facility?

<table>
<thead>
<tr>
<th>Actual</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>✔ Yes</td>
<td></td>
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<tr>
<td>☐ No</td>
<td></td>
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<tr>
<td>☐ NA</td>
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</tbody>
</table>

*Additional Comments:* As copy bill of lading provided maintained by facility, security seal number recorded in bill of lading accordingly.

11. **Must** Does the facility have written and verifiable security procedures in place to report any unscheduled stops, compromised shipments, or any unattended shipments. These procedures should be provided to their contracted logistics provider and driver? Select all that apply.

<table>
<thead>
<tr>
<th>Actual</th>
<th></th>
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</thead>
<tbody>
<tr>
<td>☐ Nothing in place</td>
<td></td>
</tr>
<tr>
<td>✔ Reporting requirement</td>
<td></td>
</tr>
<tr>
<td>✔ Procedure is written</td>
<td></td>
</tr>
<tr>
<td>✔ Container/trailer cannot be left unattended</td>
<td></td>
</tr>
<tr>
<td>☐ NA</td>
<td></td>
</tr>
</tbody>
</table>

*Additional Comments:* Written procedure QUY TRINH KIEM SOAT HANG TREN DUONG VAN CHUYEN
12. **Must** Does the facility have a written and verifiable procedure in place indicating how to recognize a suspected or compromised security seal, container or trailer structure tampering, including how to report the issue to the freight forwarder and appropriate local law enforcement?

**Actual**
- [x] Yes
- [ ] No
- [ ] NA

**Additional Comments:** Written procedure QUY TRINH KIEM SOAT HANG TREN DUONG VAN CHUYEN (AN5-HD-01 / 2011-01-01).

13. **Must** Is a written and verifiable procedure in place to require that security or shipping personnel verify the security seal number against the bill of lading when the container or trailer departs the facility?

**Actual**
- [x] Yes
- [ ] No
- [ ] NA

**Additional Comments:** Written procedure THU TUC AN NINH XUAT NHAP KHAU AN6-HD-03 / 2015-12-25) in place to require that security seal number to be verified against the bill of lading.

14. **Should** Does the facility have a written procedure in place to take photographs of a loaded container or trailer with the security seal affixed, and is photo-taking part of the written process? Select all that apply.

**Actual**
- [x] Photos taken
- [x] Seal number in photos
- [x] Trailer/container number in photos
- [ ] No
- [ ] NA

**Additional Comments:** Written procedure QUY TRINH DONG HANG LEN CONTAINER/XE TAI (AN5-HD-01 / 2015-12-25) and HUONG DAN KIEM TRA CONTAINER 10 DIEM (AN12-HD-02 / 2013-12-26) in place to require that taking photos of all relevant loaded container with security seal affixed.

15. **Must** Is a loaded and stored container or trailer closed and secured with a security seal?

**Actual**
- [x] Yes
- [ ] No
- [ ] NA

**Additional Comments:** As per pictures in relevant shipment records provided by the facility, all relevant loaded containers closed and secured with a security seal.
16. **Must** 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?

**Actual**
- [x] Yes
- [ ] No
- [ ] NA

**Additional Comments:** Written procedure NHAN DANG VA XAC DINH DOI TUONG KHA NGHI (AN2-HD-01 / 2015-07-07) in place that requires to report unauthorized access to container / trailer, storage to facility management and supervisor.

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

**Actual**
- [x] Yes
- [ ] No
- [ ] NA

**Additional Comments:** Written procedure KIEM TRA CONTAINER/ XE TAI (AN12-HD-02 / 2013-12-26) in place to inspection the integrity of container / trailer and truck prior to loading.

18. **Critical** Prior to loading a trailer or container does the facility conduct a 7-point inspection using a documented checklist?

**Actual**
- [x] Yes  
- [ ] No  
- [ ] NA

**Additional Comments:** The facility conduct 10-point inspection for container. By reviewing procedure & inspection records and interview, related supervisor conducted 10-point inspection prior to loading.

19. **Must** Does the shipping area use equipment to conduct a 7-point container inspection? Select all that apply.

**Actual**
- [x] Laser distance measurer or Pre-measured string
- [x] Mirrors for undercarriage
- [x] Tap test tool (such as a hammer)
- [ ] No tools available
- [ ] NA

**Additional Comments:** Measuring tape, flashlight and hammer and mirror for undercarriage are used to conduct 10-point container inspection.

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

**Actual**
- [x] Yes
### Conveyance Security

**Question**

21. **Critical** Is driver information recorded and retained for all departing shipments?

**Actual**

- [x] Yes
  - [03. Driver control.pdf](#)
- [ ] No

**Additional Comments:** The training provided to related security guards, warehouse and shipment staffs. Last training done 2018-01-11

### Conveyance Security

**Question**

22. **Must** Is a written procedure in place instructing drivers to take designated routes between the origin and the port?

**CAPA Sent: 4/11/2018**  
**Due Date: 6/11/2018**

**CAPA:** Provide a timeline to create and implement a procedure to designate the preferred transportation route between the factory and the port or container staging area at the port. This requirement will be reviewed at the next SCAN audit to confirm compliance.

**Actual**

- [x] Yes
- [ ] No

**Additional Comments:** Please see attached file

### Conveyance Security

**Question**

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

**CAPA Sent: 4/11/2018**  
**Due Date: 6/11/2018**

**CAPA:** Provide a timeline to create and implement a procedure to periodically and randomly designate an alternative transit route between the factory and the port or container staging area at the port. This requirement will be reviewed at the next SCAN audit to confirm compliance.

**Additional Comments:** The facility has no designated routes from the facility to Hai Phong port and routes from the facility to Noi Bai airport.
24. **Must** What container or trailer tracking technologies does the facility require to be used by the contracted transportation company? Select all that apply.

**Actual**
- Yes
- No
- NA

**Additional Comments:** Written procedure CHINH SACH AN NINH DOI VOI DON VI VAN TAI (No code / approved date 2017-07-06) requires GPS device to tracking container / trailer to be used by transportation service. GPS data is available to all relevant shipments.

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

**Actual**
- Yes
- No
- NA

**Additional Comments:** Written procedure KIEM TRA CONTAINER (AN12-HD-02 / 2013-12-26) in place to inspection the integrity of container / trailer and truck prior to loading.

26. **Must** Is there a procedure in place that requires an LCL container or trailer to be sealed after each stop with either a tamper evident seal or a padlock? Select all that apply.

**Actual**
- No requirements
- Procedure is written
- Tamper evident seal
- Padlock with key controlled by either factory and/or driver
- NA

**Additional Comments:** Written procedure QUY TRINH DONG HANG LEN CONTAINER / XE TAI (AN05-HD-01 /
27. **Must** If the facility makes LCL shipments, does the facility have a procedure to validate tamper evident seals prior to removal at each stop, and do all seals accompany the load to the final destination?

<table>
<thead>
<tr>
<th>Actual</th>
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<tbody>
<tr>
<td>☑ Yes</td>
<td></td>
</tr>
<tr>
<td>☐ No requirements</td>
<td></td>
</tr>
<tr>
<td>☐ NA</td>
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</table>

**Additional Comments:** Written procedure KIEM SOAT HANG TREN DUONG VAN CHUYEN (AN5-HD-01 / 2015-12-25) in place to requires validation of cable seal prior to removal final stop.

28. **Must** If the facility makes air shipments, is there a written and verifiable procedure in place outlining steps required to document shipment movement from the facility all the way to delivery to the freight forwarder or airline?

<table>
<thead>
<tr>
<th>Actual</th>
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<tbody>
<tr>
<td>☑ Yes</td>
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<tr>
<td>☐ No</td>
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<tr>
<td>☐ NA</td>
<td></td>
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</tbody>
</table>

**Additional Comments:** Written procedure HUONG DAN THU TUC AN NINH XUAT NHAP HAU (AN6-HD-03 / 2015-12-25).

<table>
<thead>
<tr>
<th>Physical contact Control</th>
<th>NA</th>
</tr>
</thead>
</table>

29. **Critical** Is a written procedure in place that outlines access control to the facility, property and buildings? Procedure should include details covering issue, removal, and changing of access control devices and ID cards?

<table>
<thead>
<tr>
<th>Actual</th>
<th></th>
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<tbody>
<tr>
<td>☑ Yes</td>
<td></td>
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<tr>
<td>☐ No</td>
<td></td>
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</table>

**Additional Comments:** Written procedure QUY DINH KIEM SOAT NHAN VIEN VA KHACH RA VAO (AN2-HD-01 / 2017-07-07), that outlines access control to the facility, and for ensuring only the authorized employees who are wearing an ID badge have access the facility.

30. **Must** Are access control procedures or devices used to ensure that only authorized employees have access the facility?

<table>
<thead>
<tr>
<th>Actual</th>
<th></th>
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</thead>
<tbody>
<tr>
<td>☑ Yes</td>
<td></td>
</tr>
<tr>
<td>☐ No</td>
<td></td>
</tr>
</tbody>
</table>

**Additional Comments:** Authorized employees portrait fixed in front of door of restrict areas.
31. **Critical** Is a written and verifiable procedure in place to monitor and limit access to critical operational areas of the facility, such as warehouse picking, final packing or packaging, shipping and receiving? Access should be limited to only authorized employees.

**Actual**
- ☑ Yes
- □ No
- □ NA

*Additional Comments:* Written procedure QUY DINH AN NINH BO PHAN DONG GOI, KHO THANH THAM (AN5-HD-01 / 2015-12-25), that outlines access control to critical operational areas - Sensitive areas (warehouse, final packing, shipping areas).

32. **Critical** Is a written and verifiable procedure in place to require a visitor to present photo identification upon arrival and their information is recorded into a visitor log? Select all that apply.

**Actual**
- □ Nothing in place
- ☑ Procedure is written
- ☑ Visitor sign-in log in use
- ☑ Photo ID checked

*Additional Comments:* Written procedure QUY DIINH KIEM SOAT NHAN VIEN VA KHACH RA VAO (AN-NS-02 / 2017-07-07), for ensuring visitor have access the facility.

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

**Actual**
- ☑ Yes
- □ No

*Additional Comments:* Visitor, auditors bag checked before entering facility.

34. **Must** Is a visitor issued a numbered visitor badge which is displayed while at the facility?

**Actual**
- ☑ Yes
- □ No
- □ Badges issued, but not numbered
- □ NA

*Additional Comments:* Visitor’s badge is required to be displayed while at the facility.

35. **Must** Is a visitor escorted at all times while at the facility?

**Actual**
- ☑ Yes
- □ No

*Additional Comments:* Visitors are escorted all the time while at the facility.
36. **Must** Is a written and verifiable procedure in place to inspect a suspicious package and mail for dangerous materials prior to distribution?

   Actual
   - ✔ Yes
   - ❌ No
   - ❌ NA

   **Additional Comments:** Written procedure QUY TRINH AN NINH BUU PHAM - HANG HOA (AN4-HD-02 / 2018-01-04).

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

   **CAPA Sent:** 4/11/2018  
   **Due Date:** 6/11/2018

   **CAPA:** Please provide a timeline to incorporate a requirement for employees to be positively identified using an ID card or badge. If there are no concerns with contamination these ID’s should be displayed. This requirement will be reviewed at the next SCAN audit to confirm compliance.

   Actual
   - ✔ Yes
   - ❌ No
   - ❌ NA

   **Additional Comments:** Propaganda regulation on wearing ID badge at all times while at the facility everyday on speaker Training all employees on physical access control especially wearing ID badge at all times.

38. **Must** Is a written and verifiable procedure in place to identify, challenge, and remove an unauthorized person at the facility?

   Actual
   - ✔ Yes
   - ❌ No
   - ❌ NA

   **Additional Comments:** Written procedure QUY DINH NHAN DIEN VA XAC DINH TOI TUONG KHA NGHI (AN2-HD-02 / 2017-07-07).

**Question**

39. **Must** Is an employee hiring procedure documented and implemented? Select all that apply.
40. **Must** Are permanent and temporary job applicant(s) required to submit a written application for employment and provide proof of their identity? Select all that apply.

**Actual**
- [ ] Nothing in place
- [x] Policy is written
- [x] Procedures for hiring
- [x] Procedures for applications
- [x] Employee documentation
- [x] New employee screening

**Additional Comments:** Written procedure CHINH SACH VA QUY TRINH TUYEN DUNG (SA3-QT-01 / 2017-05-30) employee: LE THI NGUYEN - Security; NGUYEN DUY MINH - Finish-good warehouse; PHAM THI GIANG - Packing.

41. **Must** Is a written and verifiable 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.

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

**Additional Comments:** Written procedure CHINH SACH VA QUY TRINH TUYEN DUNG (SA3-QT-01 / 2017-05-30) Written application and personal ID card is required when hire.

42. **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 sensitive area of the facility, such as personnel, shipping, computer systems, or contract employees?

**Actual**
- [x] Policy is written
- [x] Criminal background checks
- [ ] No
- [ ] NA

**Additional Comments:** Written policy QUY DINH XAC MINH NHAN THAN (SA3-QT-01 / 2017-05-30) in place for conducting criminal background check. Every 12 months for employees in critical areas and once for the other. As per the latest check records the facility provided, it is noted that the facility have check restricted area employees’ criminal background on 21/03/2018.
43. **Must** Is a written and verifiable procedure in place to remove facility access, such as a facility issued ID badge or card and a computer access code from any employee who has resigned, was terminated, or takes an extended leave of absence?

   **Actual**
   - Yes
   - No

   **Additional Comments:** Written procedure QUY TRINH GIAI QUYET NGHI VIEC CHO NGUOI LAO DONG (NS12-HD-06 / 2018-07-07). Resigned employees: Code 0015626317 worked at Final product storage, Code 0004029573 worked at sewing production workshop.

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### Procedural Security

<table>
<thead>
<tr>
<th>Question</th>
</tr>
</thead>
<tbody>
<tr>
<td>44. <strong>Must</strong> Is a written and verifiable procedure in place that requires all information used in the shipping documents for merchandise/cargo to be legible, complete, and accurate?</td>
</tr>
</tbody>
</table>

   **Actual**
   - Yes
   - No

   **Additional Comments:** HUONG DAN THU TUC XUAT NHAP KHAU (AN6-HD-04 / 2016-04-16)

<table>
<thead>
<tr>
<th>Question</th>
</tr>
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<tbody>
<tr>
<td>45. <strong>Must</strong> Is a written and verifiable procedure in place that restricts access to shipping and receiving documentation? Access should be limited to only personnel required to complete and review the documents.</td>
</tr>
</tbody>
</table>

   **Actual**
   - Yes
   - No

   **Additional Comments:** HUONG DAN THU TUC XUAT NHAP KHAU (AN6-HD-04 / 2016-04-16)

<table>
<thead>
<tr>
<th>Question</th>
</tr>
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<tbody>
<tr>
<td>46. <strong>Should</strong> Is a written and verifiable procedure in place to communicate business information necessary for customs clearance within 24 hours of shipment departure from the facility?</td>
</tr>
</tbody>
</table>

   **Actual**
   - Yes
   - No
   - NA

   **Additional Comments:** Following Vietnamese Custom regulations

<table>
<thead>
<tr>
<th>Question</th>
</tr>
</thead>
<tbody>
<tr>
<td>47. <strong>Must</strong> Is an international shipment marked, counted, weighed, and properly reported on the commercial invoice and bill of lading? Note due to Safety of Life at Sea (SOLAS) accurate container weights are now required for all ocean going shipments FCL and LCL.</td>
</tr>
</tbody>
</table>

   **Actual**
   - Yes
48. **Critical** Is a written and verifiable procedure in place to protect against the introduction of unauthorized and un-manifested materials during the container and trailer loading and shipping processes?

<table>
<thead>
<tr>
<th>Actual</th>
<th>06. Local law enforcement notify and un-manifested materials.pdf</th>
</tr>
</thead>
<tbody>
<tr>
<td>✓ Yes</td>
<td></td>
</tr>
<tr>
<td>□ No</td>
<td></td>
</tr>
<tr>
<td>□ NA</td>
<td></td>
</tr>
</tbody>
</table>

**Additional Comments:** Written procedure QUY DINH AN NINH BO PHAN DONG GOI, KHO THANH THAM VA KHU VUC XUAT HANG (AN5-HD-01 / 2015-12-25).

49. **Must** Is a 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?

<table>
<thead>
<tr>
<th>Actual</th>
<th>06. Local law enforcement notify and un-manifested materials.pdf</th>
</tr>
</thead>
<tbody>
<tr>
<td>✓ Yes</td>
<td></td>
</tr>
<tr>
<td>□ No</td>
<td></td>
</tr>
<tr>
<td>□ NA</td>
<td></td>
</tr>
</tbody>
</table>

**Additional Comments:** Written procedure QUY TIRNH KIEM SOAT DU - THIEU HUT HANG HOA (AN12-HD04 / 2013-12-25).

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

<table>
<thead>
<tr>
<th>Actual</th>
<th>06. Local law enforcement notify and un-manifested materials.pdf</th>
</tr>
</thead>
<tbody>
<tr>
<td>□ Nothing in place</td>
<td></td>
</tr>
<tr>
<td>✓ Procedure is written</td>
<td></td>
</tr>
<tr>
<td>✓ Local law enforcement notified</td>
<td></td>
</tr>
<tr>
<td>✓ Customer notified</td>
<td></td>
</tr>
</tbody>
</table>

**Additional Comments:** Written procedure CHINH SACH CHONG BUON LAU HANG HOA VA CHE DAU NGUOI BAT HOP PHAP (SA11-CS-02/ 2013-12-26).

---

**Physical Security**

<table>
<thead>
<tr>
<th>Question</th>
</tr>
</thead>
<tbody>
<tr>
<td>97%</td>
</tr>
</tbody>
</table>

51. **Must** Is there a designated employee and visitor vehicle parking area separated from the shipping and receiving area? Select all that apply.

<table>
<thead>
<tr>
<th>Actual</th>
<th>06. Local law enforcement notify and un-manifested materials.pdf</th>
</tr>
</thead>
<tbody>
<tr>
<td>✓ Access controlled</td>
<td></td>
</tr>
<tr>
<td>✓ Shipping &amp; Receiving fenced</td>
<td></td>
</tr>
<tr>
<td>✓ No personally owned vehicles are permitted in Shipping &amp; Receiving area</td>
<td></td>
</tr>
</tbody>
</table>
52. **Must** Is the area adjacent to the shipping and receiving areas enclosed or otherwise monitored?

**Actual**

- ☑ Yes
- ☐ No

**Additional Comments:** POV and visitor vehicles park separately from production, shipping and receiving areas.

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

**Actual**

- ☑ Yes
- ☐ No

**Additional Comments:** Shipping and receiving areas enclosed and monitored by CCTV system.

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

**Actual**

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

**Additional Comments:** Procedure QUY DINH KIEM TRA NHA XUONG (VC12-HD4 /2013-12-26) Security guards patrol everyday to check.

55. **Must** Are facility gates through which vehicles and/or employees enter and exit guarded or monitored and secured when not in use?

**Actual**

- ☑ Yes
- ☐ No
- ☐ NA

**Additional Comments:** Facility gate and doors secured with lock and controlled by security guards, and monitored by CCTV system when not in use.

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

**Actual**

- ☑ Yes
57. **Should** Are facility buildings constructed of materials that will resist easy illegal entry?

**Actual**

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

**Additional Comments:** All buildings constructed from pre-engineered steel and concrete.

58. **Must** Are facility windows, gates, fences, and doors secured with locking devices to deter unauthorized access? (Note: a designated fire exit must never be locked from the inside that prevents employees from evacuating the building in an emergency situation.)

**Actual**

- [ ] Yes
- [ ] No

**Additional Comments:** All doors of building locked with lock pad and lock keys controlled by security guards.

59. **Must** Is a written and verifiable procedure in place to control the issue, removal, and changing of access devices such an ID badge, door and lock keys, access cards, and security alarm codes? Select all that apply.

**Actual**

- [ ] Nothing in place
- [ ] Procedure is written
- [ ] Checklist is included in Termination document,

**Additional Comments:** QUY DINH KIEM SOAT CHIA KHOA (VC-12-HD02 / 2013-12-26)

60. **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?

**Actual**

- [ ] Yes
- [ ] Nothing in place
- [ ] Interior lighting only
- [ ] Exterior lighting only

**Additional Comments:** Enough lighting is available onsite.

61. **Should** Does the facility have an anti-intrusion alarm system?

**Actual**

- [ ] Yes
- [ ] No

**Additional Comments:** 01 generators with capacity 1050 kvA.
62. **Should** Is a procedure in place to test and inspect the anti-intrusion security alarm system? Select all that apply.

**CAPA Sent: 4/11/2018**

**Due Date: 6/11/2018**

**CAPA:** This requirement has multiple response options. Not addressing all the areas requested will result in a partial score. Please note this is a “best practice” no further action is required. Implementing this requirement shows continuous improvement and will raise your score. Please confirm your understanding by adding “Acknowledged” in your additional comments section and submit with any other corrective actions as applicable.

**Actual**

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

**Additional Comments:** Acknowledged

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**Additional Comments:** The facility has installed anti-intrusion alarms in the warehouse doors.

---

**63. Should** Is a CCTV system used to monitor the facility and premises’ including entrances, exits, cargo storage, shipping, and other loading/unloading areas?

**Actual**

- [x] CCTV
- [ ] No CCTV or camera system
- [ ] Other surveillance system (please explain)

**07. CCTV system.pdf**

**Additional Comments:** 23 cameras installed in relevant areas including sensitive area, gates, in side and out side of buildings.

---

**64. Should** Is a procedure in place to test and inspect the CCTV system? Select all that apply.

**CAPA Sent: 4/11/2018**

**Due Date: 6/11/2018**
**CAPA:** This requirement has multiple response options. Not addressing all the areas requested will result in a partial score. Please note this is a “best practice” no further action is required. Implementing this requirement shows continuous improvement and will raise your score. Please confirm your understanding by adding "Acknowledged" in your additional comments section and submit with any other corrective actions as applicable.

**Actual**

- [ ] Nothing in place
- [x] Procedure is written
- [x] Regular testing
- [x] Regular inspections
- [ ] Preventative maintenance
- [ ] Maintenance logs kept
- [ ] NA

**Additional Comments:** Acknowledged

---

**Actual**

- [ ] Nothing in place
- [x] Procedure is written
- [x] Regular testing
- [x] Regular inspections
- [ ] Preventative maintenance
- [ ] Maintenance logs kept
- [ ] NA

**Additional Comments:** Procedure QUY DINH KIEM TRA NHA XUONG (VC12-HD4 /2013-12-26) Security guards patrol every month to testing and inspection the CCTV system. Auditor checked report from 01-03.2018, result is OK. However, no evidence for preventive maintenance of CCTV (repair only) and no log is kept.

---

65. **Should** If used, how many days are CCTV recordings kept?

**CAPA Sent: 4/11/2018**  
**Due Date: 6/11/2018**

**CAPA:** Please note this is a "best practice" no further action is required. Implementing this requirement shows continuous improvement and will raise your score. Please confirm your understanding by adding "Acknowledged" in your additional comments section and submit with any other corrective actions as applicable.

**Actual**

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

**Additional Comments:** Acknowledged
### Comments:
The facility operates under business license #2901107104, which is located in Vinh City, Nghe An Province. The facility has 01 main entrance gate. The main gate is connected to town road. There are totally 04 buildings, 01 for operating office and 03 other for production and warehouse.

### Comments:
A security guard station is located at the main gate for access control to the facility. Security guards work 24/7, and conduct security patrol everyday.

### Comments:
All buildings in the facility are built from pre-engineered steel and concrete. They are maintained in good condition and solid enough to resist unlawful entry.

### Comments:
The shipping and receiving areas maintain good condition, shipping and receiving dock enough space for one container and trailer at the same time. The shipping and receiving areas are separated from parking lot and production areas. CCTV cameras, enough lighting, enclosed fencing and restriction warning signs are installed.

### Comments:
Final packaging areas are located and separated from production area. CCTV cameras, enough lighting, authorized access staff name list and access restriction warning signs are available onsite. Visitors are required to take registration before entering and leaving packing section.

### Comments:
Auditor checked and CCTV system, it showed that the facility retained the record for 42 days.
Comments: Designated vehicle parking areas of the facility separated from production, warehouse. They are also far from the shipping & receiving area. The visitor's vehicles are separated and issued a vehicle permit. Enough lighting and security guards patrol at the site. There is no container or trailer stored in the facility during the onsite audit.

Security Training & Threat Awareness

<table>
<thead>
<tr>
<th>Question</th>
<th>100%</th>
</tr>
</thead>
<tbody>
<tr>
<td>72. <strong>Should</strong> Is a security Threat Awareness training program established and maintained? Is training provided to all new employees and current employees as an annual refresher? Select all that apply.</td>
<td></td>
</tr>
<tr>
<td>Actual</td>
<td></td>
</tr>
<tr>
<td>- Nothing in place</td>
<td></td>
</tr>
<tr>
<td>- Procedure is written</td>
<td></td>
</tr>
<tr>
<td>- Yes - to all employees, on hire</td>
<td></td>
</tr>
<tr>
<td>- Yes - to all employees, annually</td>
<td></td>
</tr>
<tr>
<td><strong>Additional Comments:</strong> Written procedure QUY TAC DAO TAO CONG TAC AN NINH TRONG CONG TY (ANDT-01 / 2018-01-02). Last training for all employees on date 2018-01-11.</td>
<td></td>
</tr>
<tr>
<td>73. <strong>Must</strong> Does Threat Awareness training identify unique risks for sensitive or restricted areas of the facility such as final packing, shipping and receiving?</td>
<td></td>
</tr>
<tr>
<td>Actual</td>
<td></td>
</tr>
<tr>
<td>- Yes</td>
<td></td>
</tr>
<tr>
<td>- No</td>
<td></td>
</tr>
<tr>
<td><strong>Additional Comments:</strong> Last training for IM-EX, warehouse, shipping on date 2017-12-01.</td>
<td></td>
</tr>
<tr>
<td>74. <strong>Must</strong> Does Threat Awareness training inform employees of procedures to report suspicious activity or a security incident?</td>
<td></td>
</tr>
<tr>
<td>Actual</td>
<td></td>
</tr>
<tr>
<td>- Yes</td>
<td></td>
</tr>
<tr>
<td>- No</td>
<td></td>
</tr>
<tr>
<td><strong>Additional Comments:</strong> Last training for security guards on date 2018-01-11.</td>
<td></td>
</tr>
<tr>
<td>75. <strong>Must</strong> 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.</td>
<td></td>
</tr>
<tr>
<td>Actual</td>
<td></td>
</tr>
<tr>
<td>- Nothing in place</td>
<td></td>
</tr>
<tr>
<td>- Shipping &amp; Receiving controls</td>
<td></td>
</tr>
<tr>
<td>- Seal controls</td>
<td></td>
</tr>
<tr>
<td>- Container/trailer inspections</td>
<td></td>
</tr>
<tr>
<td>- Container/trailer sealing</td>
<td></td>
</tr>
</tbody>
</table>
76. **Should** Does the training program include criteria critical to security programs such as Threat Awareness, Contraband, Human Smuggling and Terrorism? Select all that apply.

**Actual**
- [ ] Nothing in place
- [x] Threat awareness
- [x] Contraband
- [x] Human smuggling
- [x] Terrorism

**Additional Comments:** Last training for IM-EX, warehouse, shipping on date 2017-12-01.

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

**Actual**
- [ ] Nothing in place
- [x] Incentive/recognition program

**Additional Comments:** CHINH SACH KHEN THUONG AN NINH (QDAN-10.05 approved date 14.07.2016)  
Money award from 1000.000 VND to 5.000.000 VND

### Information Technology Security 100%

#### Question

78. **Must** Is a written information technology system security policy in place? Select all that apply.

**Actual**
- [ ] Nothing in place
- [x] Policy is written
- [x] Assignment and removal of access controls
- [ ] NA

**Additional Comments:** QUY DINH AN NINH THONNG TIN (AN1-CS-04/ 2018-01-02)

79. **Must** Do automated systems at the facility have individually assigned user accounts that require a periodic change of password? Select all that apply.

**Actual**
- [ ] Nothing in place
- [x] Individually assigned accounts
- [x] Periodic password changes
- [ ] NA

**Additional Comments:** Each PC assigned an user account and password. The password change within 30 days
80. **Should** Are written procedures and automated back-up capabilities in place to protect against the loss of data?

<table>
<thead>
<tr>
<th>Actual</th>
</tr>
</thead>
<tbody>
<tr>
<td>☑ Procedure is written - Automated back-up</td>
</tr>
<tr>
<td>☐ Nothing in place</td>
</tr>
<tr>
<td>☐ Procedure is Written - Manual back-up</td>
</tr>
<tr>
<td>☐ Procedure is written - No back-ups</td>
</tr>
<tr>
<td>☐ NA</td>
</tr>
</tbody>
</table>

**Additional Comments:** Acknowledged

---

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

<table>
<thead>
<tr>
<th>Actual</th>
</tr>
</thead>
<tbody>
<tr>
<td>☑ Yes</td>
</tr>
<tr>
<td>☐ No</td>
</tr>
<tr>
<td>☐ NA</td>
</tr>
</tbody>
</table>

**Additional Comments:** PC will be locked in case of 3 times incorrect password input

---

82. **Should** Are employees with computer systems access aware of and receive training about information technology system policies, procedures, and security standards; and is employee training documented and retained? Select all that apply.

<table>
<thead>
<tr>
<th>Actual</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ Nothing in place</td>
</tr>
<tr>
<td>☑ Employees trained</td>
</tr>
<tr>
<td>☑ Training material available</td>
</tr>
<tr>
<td>☑ Training documented and retained</td>
</tr>
<tr>
<td>☐ NA</td>
</tr>
</tbody>
</table>

**Additional Comments:** Last training for all employees on date 2018-01-11
83. **Should** Is an employee who violates or abuses the information technology policies and procedures subject to disciplinary action?

**Actual**

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

**Additional Comments:** No comments were provided

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

**Actual**

- [x] Yes
- [ ] No

**Additional Comments:** No comments were provided