



**LOCATION CORPORATE AUDIT REPORT**

Report# CAC-2019-04-0159-CAPA1-V1

Updated on Jul 10, 2019

# ***Pointec Pens & Energy Private Limited***

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

**Completed on Apr 29, 2019**

## LOCATION INFORMATION

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### Pointec Pens & Energy Private Limited

26A Attibele Industrial Area,  
Hosur Road,  
Attibele  
Bangalore, Karnataka, India  
562107  
91-80-27820218

SCAN ID: IN23E8Q283PO

Point of Contact Name: Not provided

Point of Contact Email: randy@pointecpen.com; joshi.pointec@gmail.com; hr.pointec@gmail.com

Target Month: 04/22/2019

Contact Name	Phone	Email
	91-80-27820218/91-9243458637	<a href="mailto:joshi@pointecpen.com">joshi@pointecpen.com</a>

Location: Pointec Pens & Energy Private Limited

Primary Location: Yes

Critical Location: No

Assigned Auditor: Omega

Schedule Date: 04/22/2019

## AUDIT SUMMARY

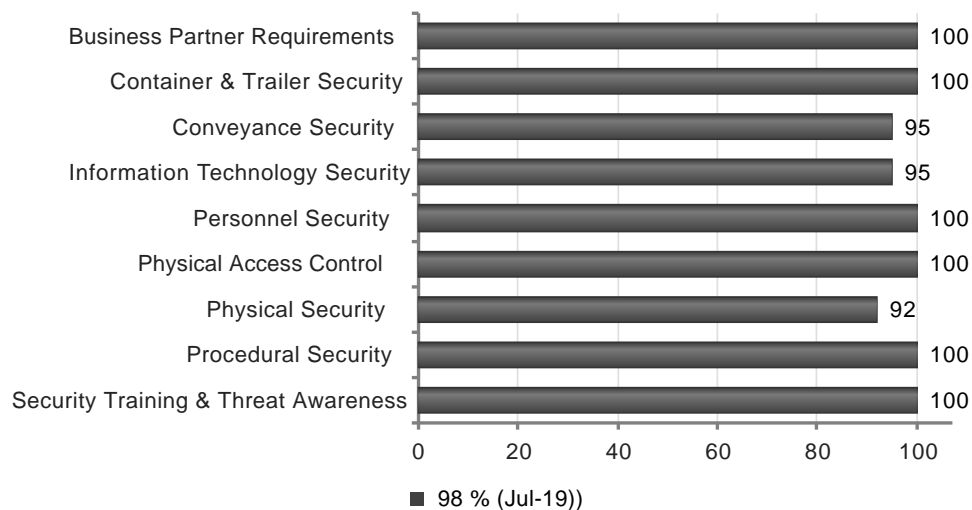
### SCAN - SCAN Security Audit Audit completed on April 29, 2019

No assessment round data with custom risk index

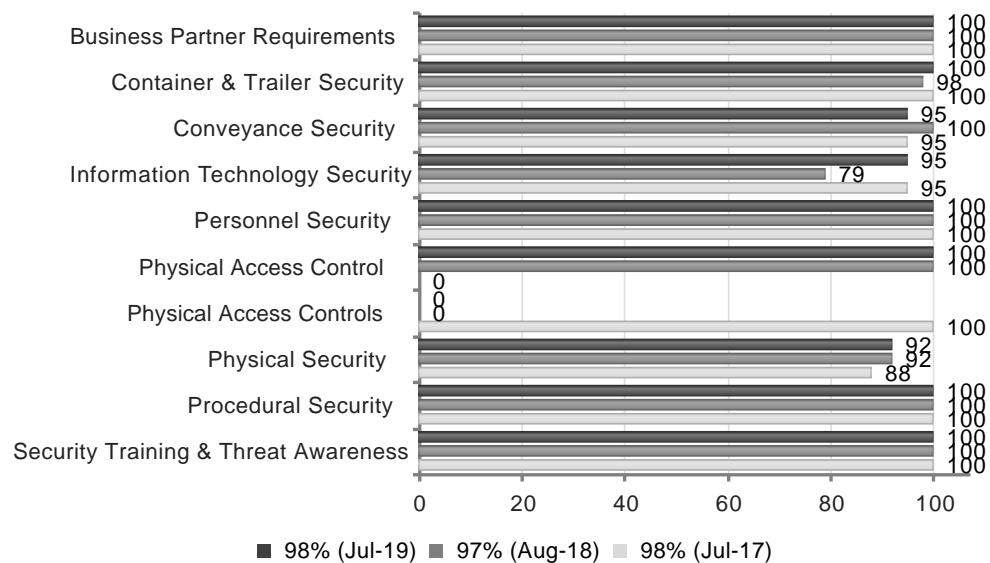
#### Post CAPA scoring – CAPA completed on July 10, 2019

**98 % Compliance Score**

Compliance by Category



Compliance by Category - Last 3 Audits



## BUSINESS PROFILE INFORMATION

Profile Question	Response
Year Established	1995
Does the facility participate in any government, local customs, or World Customs Organization (WCO) accredited facility security program?	No
Do you hold a Certification?	No
Has the facility been reviewed or audited by this program?	Yes
Primary Industry of Operations	Hardlines
Product Type / Commodity	Ballpens, Gel pens, Mechanical pencils
Grounds Size (Square Meters)	6456
Number of Buildings	3
Facility Size (Square Meters)	4040
Number of access points? (i.e. gates, exterior doors)	1
Hours of Operation	6:00 to 14:00; 14:00 to 22:00; 22:00 to 6:00; 9:00 to 17:30
Number of Employees	101 - 500
Number of Contract Employees	0
Number of Security Guards	5
Number of Migrant Workers	0
Annual Revenue	10 - 50 Million

## AUDIT RESPONSES

Overall Compliance Score: 98 %

Audit Sent: 7/10/2019

Due Date: 4/1/2019

### Business Partner Requirements

100%

#### Question

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.

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?

**CAPA Sent:** 5/3/2019

**Due Date:** 7/2/2019

**CAPA:** Please provide a timeline for creating a procedure to document the steps taken in vetting business partners. This requirement will be reviewed at the next SCAN audit to confirm compliance.

**Actual**

- ☒ Yes  
☐ No

[SECURITY Policy  
2019.doc](#)

**Additional Comments:** Financial status of all business partners and logistic suppliers will be reviewed . SOP enclosed page no 13 to 15

**Actual**

- ☐ Yes  
☒ No

**Additional Comments:** During the screening and selection process of the transporter, M/s. Sri Senthil Cargo Carriers, the facility did not verify the business profile, financial status and standards for employee hiring and security training. However, the facility has verified the business profile, ability to accomplish the requirement of the proposed business and a driver's background check prior to hiring for such transporter.

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

**CAPA Sent:** 5/3/2019

**Due Date:** 7/2/2019

**CAPA:** Please provide a timeline for including security requirement language in business partner contracts. This requirement will be reviewed at the next SCAN audit to confirm compliance.

**Actual**

- ☒ Yes  
☐ No

**Additional Comments:** For Senthil cargo we will maintain min supplychain security requirement language in contracts by 30.7.2019

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**Actual**

- ☐ Yes  
☒ No

**Additional Comments:** The facility has not incorporated and required minimum supply chain security requirement language in its contracts with all material suppliers and FCL cargo transporter M/s. Sri Senthil Cargo Carriers. However, the facility has incorporated and required minimum supply chain security requirement language in its contract with the LCL cargo transporter M/s. Alpha Roadways.

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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: 5/3/2019**

**Due Date: 7/2/2019**

**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.

**Actual**

- ☒ Yes - annually  
☐ Yes - minimally every 2 years  
☐ One time  
☐ No

**Additional Comments:** Risk assessment for Senthil cargo will be done and reviewed annually by 30.7.2019

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**Actual**

- ☐ Yes - annually  
☐ Yes - minimally every 2 years  
☐ One time  
☒ No

**Additional Comments:** No risk assessment document for the FCL cargo transporter M/s. Sri Senthil Cargo Carriers was available in the facility. However, the facility has conducted risk assessments of its LCL cargo transporter M/s. Alpha Roadways annually.

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5. **Should** Are contracted logistics service providers given an outline of minimum security standards in their local language?

**CAPA Sent: 5/3/2019**

**Due Date: 7/2/2019**

**CAPA:** This is a best practice. No further action is required however providing a copy of the minimum security requirements to each driver and service provider in the local language is a best practice and shows a higher commitment to security. Please confirm your understanding by adding "Acknowledged" in your additional comments section and submit with any other corrective actions as applicable.

**Actual**

- ☒ Yes  
☐ No  
☐ NA

**Additional Comments:** acknowledged , will plan to give security policy in local language to drivers by 30.7.2019

**Actual**

- ☐ Yes  
☒ No  
☐ NA

**Additional Comments:** The outline of minimum security standards in their local language (Tamil) was not provided to the FCL cargo transporter M/s. Sri Senthil Cargo Carriers. The facility provided an outline of minimum security standards in the facility's local language (Kannada) and not in the transporter's local language (Tamil) to the LCL cargo transporter M/s. Alpha Roadways.

**Container & Trailer Security****100%****Question**

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

**Actual**

- ☒ Yes  
☐ No  
☐ NA



[High security container seal.jpg](#)

**Additional Comments:** The facility affixes ISO 17712: 2013 compliant high security seal with RFID features, as required by Indian Customs, immediately after a container is loaded.

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?

**CAPA Sent: 5/3/2019****Due Date: 7/2/2019**

**CAPA:** Please provide a timeline to create and implement a procedure to control access to, the issuing of and application of security seals. This requirement will be reviewed at the next SCAN audit to confirm compliance.

**Actual**

- ☒ Yes  
☐ No  
☐ NA

[Name of person applying seal sop.pdf](#)

**Additional Comments:** babu and sandhya madam is responsible for checking intactness and seal applying person . we will maintain in register from august shipment onwards

**Actual**

- ☐ Yes  
☒ No  
☐ NA

**Additional Comments:** Name of person applying a seal' was not indicated on the seal control log whereas a seal number, date of seal applying and the container number were indicated on such log.

8. **Critical** Are security seals stored in a secured location?

**Actual**

- ☒ Yes  
☐ No  
☐ NA



[Seal storage location.jpg](#)

**Additional Comments:** The security seals were stored in a locked room with a key kept under custody by logistics department personnel.

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

**Actual**

- ☒ Yes  
☐ No  
☐ NA

**Additional Comments:** The logistics department staff was responsible for maintaining, distributing and handling the security seals.

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?

**Actual**

- ☒ Yes  
☐ No  
☐ NA

**Additional Comments:** The liner seal number was mentioned on the bill of lading. The liner seal number was affixed on the container at the port by the liner. The facility affixed a RFID security seal on the container at the facility after loading was completed as per Indian Customs requirements. This seal number was indicated on the Shipping Bill issued by Indian Customs.

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.



**CAPA:** This requirement has multiple response options. Not addressing all the areas requested will result in a partial score. A written procedure on reporting unscheduled stops, and instructions advising the drivers that leaving the trailer/container unattended is prohibited except at the final destination. (IE port of export, consolidator warehouse or container yard, steam ship line staging area). Please provide a time table for developing and implementing this requirement. Proof of implementation is not required. This requirement will be reviewed at the next SCAN audit to confirm compliance.

**Actual**

- ☐ Nothing in place
- ☒ Reporting requirement
- ☒ Procedure is written
- ☒ Container/trailer cannot be left unattended
- ☐ NA

**Additional Comments:** senthil cargo team also will be provided with security procedures same like what we have done with alpha roadways . completed by 10/7/2019

**Actual**

- ☐ Nothing in place
- ☐ Reporting requirement
- ☒ Procedure is written
- ☐ Container/trailer cannot be left unattended
- ☐ NA

**Additional Comments:** The facility has a written procedure in place to report any unscheduled stops, compromised shipments, or any unattended shipments and such procedure was not provided to the FCL cargo transporter M/s. Sri Senthil Cargo Carriers. However, such procedure was provided to the LCL cargo transporter M/s. Alpha Roadways.

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**

- ☒ Yes
- ☐ No
- ☐ NA

**Additional Comments:** No comments were provided

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**

- ☒ Yes
- ☐ No
- ☐ NA

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

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**

- ☒ Photos taken
- ☒ Seal number in photos
- ☒ Trailer/container number in photos
- ☐ No
- ☐ NA

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

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

**Actual**

- ☒ Yes
- ☐ No
- ☐ NA

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

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**

- ☒ Yes
- ☐ No

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

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

**Actual**

- ☒ Yes
- ☐ No
- ☐ NA

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

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

**Actual**

- ☒ Yes
- ☐ No
- ☐ NA

[Container Inspection Checklist.pdf](#)

**Additional Comments:** No comments were provided

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

**Actual**

- ☒ Mirrors for undercarriage
- ☐ No tools available
- ☒ Laser distance measurer or Pre-measured string
- ☒ Tap test tool (such as a hammer)
- ☐ NA

**Additional Comments:** A Measurement tape, a Mirror and a Hammer were used for container inspections.

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

**Actual**

- ☒ Yes
- ☐ No
- ☐ NA

**Additional Comments:** The facility provided training on 7-point container inspections once in 6 months. The latest training was conducted on 10th April 2019.

**Conveyance Security**

**95%**

**Question**

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

**Actual**

- ☒ Yes
- ☐ No



[Driver information record.jpg](#)

**Additional Comments:** No comments were provided

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

**CAPA Sent: 5/3/2019**

**Due Date: 7/2/2019**

**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**

- ☒ Yes
- ☐ No

[contractor control SOP.pdf](#)

**Additional Comments:** procedures instructing its drivers to take designated routes between the facility and the port like Mumbai and Airport Bangalore will be provided and made as part of agreement with logistic contractors. Completed

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**Actual**

- ☐ Yes  
☒ No

**Additional Comments:** The facility did not provide a written procedure instructing its drivers to take designated routes between the facility and the port (Chennai) to the FCL cargo transporter. And, the facility did not provide designated transit routes between the facility and ports, such as Mumbai port and Bangalore Airport, to the LCL cargo transporter whereas the designated route between the facility and Chennai port was communicated to such transporter.

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

**CAPA Sent: 5/3/2019**

**Due Date: 7/2/2019**

**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.

**Actual**

- ☒ Yes  
☐ No  
☐ NA

[contractor control  
SOP.pdf](#)

**Additional Comments:** Additional rule will be made as a part of agreement where possible are transit routes from the facility or next destination location randomly changed to minimize predictability

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**Actual**

- ☐ Yes  
☒ No  
☐ NA

**Additional Comments:** The facility did not have a method to randomly change the transit route used by a driver to deliver a container or truck to the port or the delivery destination.

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24. **Must** What container or trailer tracking technologies does the facility require to be used by the contracted transportation company? Select all that apply.

**CAPA Sent: 5/3/2019**

**Due Date: 7/2/2019**

**CAPA:** This requirement has multiple response options. Not addressing all the areas requested will result in a partial score. Please provide a timeline for creating and implementing a written procedure for tracking shipments in transit from the facility. Please provide descriptions of the methods to be used (GPS, timed travel with driver reporting arrival at destination or other). This requirement will be reviewed at the next SCAN audit to confirm compliance.

**Actual**

- ☒ Procedure is written
- ☐ No requirements
- ☐ GPS or other (please explain)

**Additional Comments:** Shipment made to mumbai port and Bangalore air port also will be tracked by calling drivers and getting mail from the concerned agency who is handling the cargo

**Actual**

- ☒ Procedure is written
- ☐ No requirements
- ☐ GPS or other (please explain)

**Additional Comments:** The facility has a written procedure to track their containers/ trucks by verifying with the facility's representative office at the port (Chennai) through phone and e-mail. However, there were no tracking methods in place for shipments made to the Mumbai port and Bangalore airport.

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:** *No comments were provided*

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.

**CAPA Sent: 5/3/2019**

**Due Date: 7/2/2019**

**CAPA:** This requirement has multiple response options. Not addressing all the areas requested will result in a partial score. Less than container loads (LCL) provide a unique risk to tampering and theft. Please provide a timeline for implementing a procedure requiring that some type of container sealing to be used by carriers picking up partial trailer or container loads. If these shipments are picked up by a "consolidator" who inspects the freight prior to container stuffing a not applicable response is allowed. This requirement will be reviewed at the next SCAN audit to confirm compliance.

**Actual**

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

**Additional Comments:** Same procedure will be followed to all shipments like FCL except for domestic shipment, padlock with key controlled by driver.

**Actual**

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

**Additional Comments:** The facility affixed ISO 17712: 2013 compliant high security seals on its LCL trucks. The LCL shipments were moved directly from the facility to the port/ airport and did not have any stops in between.

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?

**Actual**

- ☐ No requirements
- ☒ Yes
- ☐ NA

**Additional Comments:** The facility affixed ISO 17712: 2013 compliant high security seals on its LCL trucks. The LCL shipments were moved directly from the facility to the port/ airport and did not have any stops in between. The seal on the truck was validated at the port/ airport by the receiving party such as a freight forwarder.

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?

**Actual**

- ☒ Yes
- ☐ No
- ☐ NA

**Additional Comments:** No comments were provided

**Physical Access Control****100%****Question**

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?

**Actual**

- ☒ Yes
- ☐ No



[Access control procedure.jpg](#)

**Additional Comments:** No comments were provided

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

**Actual**

- ☒ Yes  
☐ No

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

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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



[Restricted area procedure.jpg](#)

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

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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



[Visitor log.jpg](#)

**Additional Comments:** A visitors' log book was maintained by the gate security personnel to capture the visitors names, his/her company name, photo ID proof number, mobile number, date and time of visit, purpose of visit, visitor's badge number and a visitor signature. However, on some occasions, it was noted that in cases of 2 or more visitors arriving from the same company or group, security staff only recorded one visitor name and the accompanying visitor(s) name was not recorded. It was marked as +1, +2, etc.

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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:** *No comments were provided*

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

**Actual**

- ☐ Badges issued, but not numbered  
☒ Yes  
☐ No  
☐ NA

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

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

**Actual**

- ☒ Yes  
☐ No

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

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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:** *No comments were provided*

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

**Actual**

- ☒ Yes  
☐ No  
☐ NA

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

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

**Actual**

- ☒ Yes  
☐ No

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

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**Personnel Security****100%****Question**

39. **Must** Is an employee hiring procedure documented and implemented? Select all that apply.



**Actual**

- ☐ Nothing in place
- ☒ Policy is written
- ☒ Procedures for hiring
- ☒ Procedures for applications
- ☒ Employee documentation
- ☒ New employee screening

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

- 
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**

- ☐ No requirement
- ☒ Written application required
- ☒ Government issued ID required

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

- 
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
- ☒ Policy is written
- ☒ Education check
- ☒ Reference check
- ☒ Previous employment check

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

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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?

**CAPA Sent:** 5/3/2019

**Due Date:** 7/2/2019

**CAPA:** This requirement has multiple response options. Not addressing all the areas requested will result in a partial score. Please provide a timeline to implementation of a written policy that includes a criminal background check. If this validation check is prohibited in your country please advise. This requirement will be reviewed at the next SCAN audit to confirm compliance.

**Actual**

- ☒ Policy is written
- ☒ Criminal background checks
- ☐ No
- ☐ NA

**Additional Comments:** Back ground check will be done for even HR personnel also

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**Actual**

- ☒ Policy is written
- ☐ Criminal background checks
- ☐ No
- ☐ NA

**Additional Comments:** No background check was in place for 1 sampled HR personnel. However, background checks through the local police department was in place for the sampled packers, shipping, computer systems and security personnel.

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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:** No comments were provided

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**Procedural Security****100%**

Question
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- |  |
|--|
| 44. <b>Must</b> 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? |
|--|

**Actual**

- ☒ Yes
- ☐ No

**Additional Comments:** No comments were provided

- 
45. **Must** 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.

**Actual**

- ☒ Yes
- ☐ No

**Additional Comments:** The facility restricted access to its shipping and receiving documentation and to the logistics department personnel only.

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46. **Should** 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?

**CAPA Sent: 5/3/2019**

**Due Date: 7/2/2019**

**CAPA:** This is a best practice. No further action is required however in order to demonstrate a commitment to supply chain security SCAN suggests that you develop and implement a plan to communicate shipment details to all important parties in the export transaction. Including reporting of discrepancies etc. Please confirm your understanding by adding "Acknowledged" in your additional comments section and submit with any other corrective actions as applicable.

**Actual**

- ☒ Yes  
☐ No  
☐ NA

[Communication for custom clearance.pdf](#)

**Additional Comments:** acknowledged

**Actual**

- ☐ Yes  
☒ No  
☐ NA

**Additional Comments:** The facility had a written and verifiable procedure in place to communicate business information necessary for customs clearance after a shipment's departure from the facility, but the procedure did not include the timeline of 24 hours.

47. **Must** 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.

**Actual**

- ☒ Yes  
☐ No  
☐ NA

**Additional Comments:** No comments were provided

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?

**Actual**

- ☒ Yes  
☐ No  
☐ NA



[Cargo integrity procedure.jpg](#)

**Additional Comments:** No comments were provided

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?

**CAPA Sent: 5/3/2019**

**Due Date: 7/2/2019**

**CAPA:** Please provide a timeline to create and institute a procedure to reconcile shipping and receiving discrepancies, documentation issues etc.. This requirement will be reviewed at the next SCAN audit to confirm compliance.

**Actual**

- ☒ Yes  
☐ No  
☐ NA

**Additional Comments:** in container report only we will ask them to report shortage or overage so that record can be created and informed accordingly

**Actual**

- ☐ Yes  
☒ No  
☐ NA

**Additional Comments:** The facility had a written procedure to resolve a carton count shortage or overage issue or any documentation issue found during container or truck loading; however, the facility had no verifiable records to ensure such procedure was in place during each shipment.

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.

**CAPA Sent: 5/3/2019**

**Due Date: 7/2/2019**

**CAPA:** This requirement has multiple response options. Not addressing all the areas requested will result in a partial score. This is a critical requirement. You must implement and provide evidence that a procedure is in place to notify local authorities and the overseas customer in the event of an illegal shipping activity or if other shipping abnormalities are detected. You need to provide a photocopy of the first page of this policy.

**Actual**

- ☐ Nothing in place  
☒ Procedure is written  
☒ Local law enforcement notified  
☒ Customer notified

[Notification to local authorities.pdf](#)

**Additional Comments:** procedure is amended to include the notification to local law enforcement and customer when illegal shipping activity or abnormality is suspected or detected

**Actual**

- ☐ Nothing in place  
☒ Procedure is written  
☒ Local law enforcement notified  
☐ Customer notified



[Abnormality reporting procedure.jpg](#)

**Additional Comments:** The written procedure to notify local law enforcement when illegal shipping activity or

any abnormality was suspected or detected did not require the facility to notify the customer, it only required someone to notify local law enforcement.

## Physical Security

92%

### Question

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

#### Actual

- ☒ Shipping & Receiving fenced
- ☐ No
- ☒ No personally owned vehicles are permitted in Shipping & Receiving area
- ☒ Access controlled

**Additional Comments:** The shipping and receiving processes was carried out in an open area of the premises with CCTV monitoring and security supervision. Personal vehicles were not permitted to enter or park in the shipping and receiving areas.

52. **Must** Is the area adjacent to the shipping and receiving areas enclosed or otherwise monitored?

#### Actual

- ☒ Yes
- ☐ No

**Additional Comments:** The shipping and receiving processes was carried out in a partially closed bay with CCTV monitoring and security supervision.

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:** *No comments were provided*

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:** *No comments were provided*

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



[Facility gates.jpg](#)

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

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  
☐ No  
☐ NA

**Additional Comments:** The facility had a power generator back-up.

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

**Actual**

- ☒ Yes  
☐ No  
☐ NA

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

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:** *No comments were provided*

59. **Must** Is a written and verifiable procedure in place to control the issue, removal, and changing of access devices such as 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:** *No comments were provided*

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**

- ☐ Nothing in place  
☐ Interior lighting only  
☐ Exterior lighting only  
☒ Yes

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

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

**CAPA Sent:** 5/3/2019

**Due Date:** 7/2/2019

**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**

- ☐ Yes  
☒ No

**Additional Comments:** acknowledged

**Actual**

- ☐ Yes  
☒ No

**Additional Comments:** No anti-intrusion alarm system was installed.

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**

- ☐ No CCTV or camera system  
☐ Other surveillance system (please explain)  
☒ CCTV



[CCTV system.jpg](#)

**Additional Comments:** A CCTV system was used to monitor the facility's main entrance & exit, cargo storage area, shipping area and receiving areas.

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

**Actual**

- ☐ Nothing in place  
☒ Procedure is written  
☒ Regular testing  
☒ Regular inspections

- ☒ Preventative maintenance
- ☒ Maintenance logs kept
- ☐ NA

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

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

**CAPA Sent:** 5/3/2019

**Due Date:** 7/2/2019

**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
- ☐ 45 - 89 days
- ☒ 30 - 44 days
- ☐ NA

**Additional Comments:** during audit time we have issue with DVR, now it is rectified

**Actual**

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

**Additional Comments:** There were no recordings for the CCTV cameras installed in the pencil packing area, pencil cargo storage area, both shipping areas, entrances and exits. The facility stated that their DVR recordings of the above cameras were corrupted. However, the facility had 30 days recordings for the CCTV cameras installed in the pen packing area and cargo storage area.

66. Describe the front of the factory building including any signage. Please attach a picture.

**Comments:** There were 2 gates (a large and a small) provided at the front of the facility's premises. The facility name in English and local language were posted in front of the factory building. A CCTV camera was placed to monitor the access gates. Employee and visitor parking lots were provided in front of the facility's front side perimeter.

[Facility frontage.docx](#)

67. Describe the guard station and facility access gates. Please attach a picture.

**Comments:** There were 2 access gates provided at the front of the facility's premises.

[Access gates and](#)



The small gate was used for people movement and the bigger gate was used for vehicles movement. A guard station was provided to guard the access gates. 2 security guards were posted at the guard station. The Security staff policy was posted at the guard station. A key control box, CCTV monitor, metal detector, bio-metric face reader, CCTV camera, visitor badges and security log books were maintained there.

[guard station.docx](#)

- 
68. Describe the buildings and structures for this location. Please attach a picture.

**Comments:** The facility had 2 production buildings and operations were carried out as below:

Building 1:

Ground floor: Moulding, Tool room, Raw material storage of Pencil products

First floor: Assembly, Packing and Finished goods warehouse of Pencil products

Building 2:

Ground floor: Moulding, Raw material storage, Inspection of Pen products

First floor: Office, Printing, Moulding of Pen products

Second floor: Dining hall, Office, Assembly, Packing and Finished goods warehouse of Pen products

4 more 1 story buildings were located on the facility's premises which housed a security office, power panel room, compressor room and a scrap yard.

[Facility  
Buildings.docx](#)

- 
69. Describe the shipping and receiving areas. Please attach a picture.

**Comments:** The shipping areas were located in open areas on the ground floor outside Production Building 1 and Building 2. The receiving area was located in open areas outside Production Buildings 1 and 2. The shipping and receiving areas were monitored by CCTV camera 24/7 and security guards during the loading/unloading process. Sufficient lighting was installed in these areas.

[Shipping and  
receiving areas.docx](#)

- 
70. Describe the final packaging area. Please attach a picture.

**Comments:** The final packaging area of the pencil product was located on the 1st floor of production building 1 and the pen products located on the 2nd floor of production building 2. These areas were monitored by CCTV cameras and a section of supervisors. Lists with names and photos of authorized employees to work in the area were posted. The ID badges of employees working in such area had uniquely colored lanyards. Restricted area sign boards were posted in such areas.

[Final packaging  
areas.docx](#)

- 
71. Describe any container storage and vehicle parking areas and please attach picture.

**Comments:** Containers were stored at the loading areas only. A parking lot was provided inside the facility's premises with sufficient lighting for management vehicles and it was monitored by the gate security guards. No visitor and employee parking lots were provided inside the premises.

[Parking areas.docx](#)

## Question

72. **Should** 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.

**CAPA Sent:** 5/3/2019

**Due Date:** 7/2/2019

**CAPA:** Please note this is a "best practice" no further action is required. Implementing this requirement shows continuous improvement and will raise your score. (Note this is a best practice because it states training is provided to all employees.) 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
- ☒ Procedure is written
- ☒ Yes - to all employees, on hire
- ☒ Yes - to all employees, annually

**Additional Comments:** At the time of audit feb we had less recruits which we combined training along with march recruits

**Actual**

- ☐ Nothing in place
- ☒ Procedure is written
- ☐ Yes - to all employees, on hire
- ☒ Yes - to all employees, annually

**Additional Comments:** A threat awareness training program was provided during orientation and a refresher was conducted once in 6 months. However, there were no records to verify that threat awareness training was provided during orientation since February 2019. The last semi-annual refresher training was 14th March 2019.

73. **Must** Does Threat Awareness training identify unique risks for sensitive or restricted areas of the facility such as final packing, shipping and receiving?

**Actual**

- ☒ Yes
- ☐ No

**Additional Comments:** Threat awareness training identifying unique risks for sensitive or restricted areas was provided once a year to the employees in the final packing, shipping and receiving areas. The last such training was 14th March 2019.

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

**Actual**

- ☒ Yes
- ☐ No

**Additional Comments:** No comments were provided

75. **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.

**Actual**

- ☐ Nothing in place
- ☒ Shipping & Receiving controls
- ☒ Seal controls
- ☒ Container/trailer inspections
- ☒ Container/trailer sealing

**Additional Comments:** The threat awareness training program provided additional instruction to the shipping and receiving employees regarding access controls, container inspections, and security seal control procedures once in 6 months. The last training was conducted on 14th March 2019.

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
- ☒ Threat awareness
- ☒ Contraband
- ☒ Human smuggling
- ☒ Terrorism

**Additional Comments:** Threat awareness training program covering threat awareness, terrorism, contraband and human smuggling was provided once a year to all employees. The last training was conducted on 14th March 2019.

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

**Actual**

- ☐ Nothing in place
- ☒ Incentive/recognition program

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

**Information Technology Security**

**95%**

**Question**

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

**Actual**

- ☐ Nothing in place
- ☒ Policy is written
- ☒ Assignment and removal of access controls
- ☐ NA

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

- 
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
- ☒ Individually assigned accounts
- ☒ Periodic password changes
- ☐ NA

**Additional Comments:** Passwords were changed once in 30 days.

- 
80. **Should** Are written procedures and automated back-up capabilities in place to protect against the loss of data?

**CAPA Sent: 5/3/2019**

**Due Date: 7/2/2019**

**CAPA:** This is a "best practice" no further action is required at this time. Implementation of a Critical information backup system shows a high commitment to supply chain security. Putting a system into practice will improve your compliance score well showing a commitment to continuous improvement. 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
- ☐ Procedure is written - Automated back-up
- ☒ Procedure is Written -Manual back-up
- ☐ Procedure is written - No back-ups
- ☐ NA

**Additional Comments:** acknowledged

---

**Actual**

- ☐ Nothing in place
- ☐ Procedure is written - Automated back-up
- ☒ Procedure is Written -Manual back-up
- ☐ Procedure is written - No back-ups
- ☐ NA

**Additional Comments:** No automated back-up was available. The facility made manual back-ups of the system's data. The facility did not have a server. Hence, the facility stated that an automated back-up was not possible to make.

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

**Actual**

- ☒ Yes
- ☐ No
- ☐ NA

**Additional Comments:** An anti-virus program was installed.

- 
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.

**Actual**

- ☐ Nothing in place
- ☒ Employees trained
- ☒ Training documented and retained
- ☒ Training material available
- ☐ NA

**Additional Comments:** Computer security policy training was provided to all employees during the threat awareness program. The last such training was on 14th March 2019.

- 
83. **Should** Is an employee who violates or abuses the information technology policies and procedures subject to disciplinary action?

**Actual**

- ☒ 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**

- ☒ Yes
- ☐ No



[Opening meeting document.jpg](#)

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

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## ATTACHED DOCUMENTATION - PHOTOS

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Container & Trailer Security - Question # 6



Container & Trailer Security - Question # 8



Conveyance Security - Question # 21



STANDARD

**Pointec®**

DAT E=01/04/19

# CONTAINER

Date	Vehicle Number	Container No	DL No	Driver Name Mobile No
01/04/19	TN 301E/6439	CONTAINER	TN 262355 66001924	VELUSAMY 900348381
01/04/19	TN 29/AJ 4322	CALTER	7100900 26702000 1505	Vigneshwara 637977838
03/04/19	MH 437/5738	CALTER	MH 033004 2564	IMRONG 8108124431
03/04/19	MH 02/EP 4761	CNTR	UP 58200 020 4639	NONEISSN 79 00055632
03/04/19	TN 30/4A 4540	CALTER	710034 2091200 9469	MURUGAN 981058880
04/04/19	TN 23/7 8064	CALTER	710037 2091200 1442	RAMAN S 960025402
04/04/19	TN 70/P 0624	CALTER	710034 2600200 0008	KARANJANAND 978944444
04/04/19	TN 70/P 3037	---	710037 2091200 0800371	GENITHILAN 8735436951
05/04/19	TN 40/B 0073	CALTER	TN 24 1943 000284	THANIMAN 974053016
05/04/19	TN 23/AJ 7959	CALTER	710035 1981200 4170	Ganendharan 6369308929

## IN - OUT REGISTER

DATE = 01/04/19

Pollution under control Certificate	Name of Transport	Pass No	In	Out	Driver Signature	Security Signature
YES	ALPHA	01	10-50-00		<i>[Signature]</i>	<i>[Signature]</i>
YES	ALPHA	02	12:00 15:00	15:00	<i>[Signature]</i>	<i>[Signature]</i>
YES	ALPHA	07	09:50 18:30		<i>[Signature]</i>	<i>[Signature]</i>
YES	ALPHA	02	13:00 18:30	18:30	<i>[Signature]</i>	<i>[Signature]</i>
YES	ALPHA	02	14:00 18:30		<i>[Signature]</i>	<i>[Signature]</i>
YES	ALPHA	07	10:00 17:45	18:00	<i>[Signature]</i>	<i>[Signature]</i>
YES	ALPHA	02	10:00 16:30	16:30	<i>[Signature]</i>	<i>[Signature]</i>
YES	ALPHA	03	16:00 19:30	19:30	<i>[Signature]</i>	<i>[Signature]</i>
YES	ALPHA	01	10:55 17:25	17:25	<i>[Signature]</i>	<i>[Signature]</i>
YES	ALPHA	02	13:15 18:15	18:15	<i>[Signature]</i>	<i>[Signature]</i>



- Recordings are stored for minimum of 45 days in a secure location and restricted access.

### Physical Security Equipment Handling and maintenance:

All physical security equipments like, Metal detectors, CCTV camera, locks, emergency lamp battery, generator etc are to be maintained periodically and kept in always ready to use condition.

- Procedure for maintaining generator is to be planned separately and maintained as per that.
- CCTV will be serviced with service providers unless it is not able to solve with the help of in-house engineers
- Locks are periodically reviewed at least once in year
- Metal Detector to be serviced by in-house engineer

### Critical Area:

- As per CTPAT we have container loading, area, Incoming receipt area, packing area, security area at the entrance, control panel room, HR room and shipping documents and tool room are all critical area and we have restricted access for all these area.
- All these area we have CCTV to monitor any unseen activities

### Access Controls

### Facility Access

### Employee Identification:

- Facilities should have a formal system for identifying both permanent and transient trainees (new recruits).
- ID Badges should display the employee's name and picture, (Except in case of New trainees / Candidates wherein two weeks of grace time is allowed) . Till such time, the permanent ID cards are issued; temporary cards may be issued by the Personnel Dept. Permanent ID cards to be issued on surrendering the temporary cards.  
ID cards / Badges should be visible at all times. Employees must be required to show their badges upon entering the facility.
  - Grey color tag :For QA employee

<i>Raghu</i>	<i>C. S.</i>	<i>R</i>
Raghavendra Joshi	Parashivamurthy	Renganathan
Prepared By : AMR	Reviewed By: HR Manager	Approved By: MD

- b. Blue color tag :For other all employees
- c. Red color tag : For Visitors
- d. Purple color tag : For all packing ladies
- e. Lime Yellow Color: Cargo Pass

#### **Renewing Identification Cards:**

1. All badges /ID cards are having unique ID number which is also their PF number. Hence same ID card shall be maintained till their employment. If any damages / lost complaint for the ID card from any employee, then new card will be given on receipt of application. HR also reviews and verify for any ID card damages at least once in year through announced audit.

#### **COLOR-CODING UNIFORMS**

Whenever possible, employees should wear uniforms (for those it has been provided) to help distinguish from possible intruders.

#### **Restricting Access:**

1. Access to packing area: If any other department employee visits the restricted area, then that person shall be challenged for reason of visit to avoid any intrusion.
2. Facilities should limit employee access to specific work areas.
3. All packing employees are not allowed to carry such as lunch box, purse, handbag, knife/any other sharp objects near to the work spot. Facility may provide the suitable location to keep the above said employee's items.
4. Updated list of packing ladies pictures to display in packing area and to be renewed at least once in year.

<i>Raghuveera Joshi</i>	<i>Parashivamurthy</i>	<i>Ranganathan</i>
Prepared By: AMR	Reviewed By: HR Manager	Approved By: MD

## MOVEMENT REGISTER

DATE-09-04-19

WHITE-09-0849

Sl No.	Date	Name	ID No	Name of Company
01	9/11/19	Siddhanta	9131863	9100031505 (Affiliate)
02	9/11/19	Arunath	819252828	9100938416
03	9/11/19	Pratheek	7151850	9100461142
04	9/11/19	Shravan	910013775	9100031505
05	9/11/19	R. Kishan	910013775	9100031505

Whom to meet	Purpose	Pass No	h	Out	Vehicle Sign	Sac Sign
Toshi	Revisor	123	10-35	15:30	Get home	
Spitting	"	4616	11:00	17:10	K. Hara	
John	Offical	67	11:45	12:35	Home	
John	Offical	07	11:35	14:55	Home	
Mrs. Renard Ricketts	"	09, 10	13:35	1-25	End	Gravich

		Date: 10/04/19	
01	10-6-19	HARTER	ARMED
02	10-6-19	CHAMBERS	ARMED
03	10-6-19	WATTS	ARMED
04	10-6-19	WATTS	ARMED
05	10-6-19	WATTS	ARMED
06	10-6-19	WATTS	ARMED
07	10-6-19	WATTS	ARMED
08	10-6-19	WATTS	ARMED
09	10-6-19	WATTS	ARMED
10	10-6-19	WATTS	ARMED
11	10-6-19	WATTS	ARMED
12	10-6-19	WATTS	ARMED
13	10-6-19	WATTS	ARMED
14	10-6-19	WATTS	ARMED
15	10-6-19	WATTS	ARMED
16	10-6-19	WATTS	ARMED
17	10-6-19	WATTS	ARMED
18	10-6-19	WATTS	ARMED
19	10-6-19	WATTS	ARMED
20	10-6-19	WATTS	ARMED
21	10-6-19	WATTS	ARMED
22	10-6-19	WATTS	ARMED
23	10-6-19	WATTS	ARMED
24	10-6-19	WATTS	ARMED
25	10-6-19	WATTS	ARMED
26	10-6-19	WATTS	ARMED
27	10-6-19	WATTS	ARMED
28	10-6-19	WATTS	ARMED
29	10-6-19	WATTS	ARMED
30	10-6-19	WATTS	ARMED
31	10-6-19	WATTS	ARMED

[illegible]



investigates all anomalies found in shipments or accompanying documents.

7. Even same procedure to be followed in case of cargo releasing. If any anomalies found in shipment, inform the same to local law enforcement or customs, as appropriate.

**Restricting Access to Cargo:**

All packed goods are kept in ware house or in limited access area. At the time of container stuffing, the ware house manager, shipping supervisor and security guard are to be present and each have backups when absent. Any attempts to access or actual unauthorized access to containers at the facility to be reported to FM/HR manager/ General manager.

**Verifying Inspection Seal and manifest upon departure:**

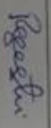


After giving signed gate pass, the container shall be allowed to go after thorough inspection seal intactness by Security.

**Packing:**

1. All the cargos to be loaded into container are properly sealed with gum tape and identified with company stamp (wherever possible). All cartons are to be labeled with barcode sticker as per customer requirement.
2. Random inspections to be carried out to check any anomalies in the consignment being loaded

**Establishing Contractor's Controls:**

1. All outsourcing activities with the out side supplier shall have contract copies with Pointec.
2. The contractor shall be selected on the basis of
  - a. Customer approval / customer approved source

		
Raghavendra Joshi Prepared By: AMR	Parashivamurthy Reviewed By: HR Manager	Rengarathnan Approved By: MD

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<i>Raghu</i>	<i>[Signature]</i>	<i>[Signature]</i>
Raghuveendra Joshi	Parashivamurthy	Rengarathian
Prepared By: AMR	Reviewed By: HR Manager	Approved By: MD



Physical Security - Question # 63



Information Technology Security - Question # 84





Please document below that the audit was conducted and keep a copy for your records.

Audit Company Name	Omega Compliance India Private Limited
Audit Date	2019/04/22
Auditor Name	Muthukumar N
Auditor Signature	<i>Muthukumar N</i>
Facility Representative Name	Raghavendra. Joshi
Factory representative signature	<i>Raghavendra</i>

Contact the SCAN Program Administrator with a question or concern about this audit:

Phone: +1.888.640.6776, extension 2

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Email: [scan@scriskolutions.com](mailto:scan@scriskolutions.com)

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