



# BISMILLAH TEXTILES LTD.

## 2020 SCAN Security Audit

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Report #	EAC-2020-06-0098-CAPA2-V2
Audit Completed	Jun 8, 2020
Compliance Score	99%
Audit Type	EXTERNAL AUDIT



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

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## LOCATION INFORMATION

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BISMILLAH TEXTILES LTD.

1 KILOMETER JARANWALA ROAD FAISALABAD, KHURRIANWALA

Nil

Nil

KHURRIANWALA, Punjab, Pakistan

37630

+92 321 7864901

SCAN ID: PK5294VS05BI

Point of Contact Name: Mr. Imran Shahzad

Point of Contact Email: [compliance@bismillah.com.pk](mailto:compliance@bismillah.com.pk)

Target Month: 06/04/20

Contact Name	Phone	Email
Imran Shahzad	+92 41 242 888 ext. 281	<a href="mailto:compliance@bismillah.com.pk">compliance@bismillah.com.pk</a>

Location: BISMILLAH TEXTILES LTD.

Primary Location: Yes

Critical Location: No

Assigned Auditor: Bureau Veritas

Schedule Date: 06/03/2020

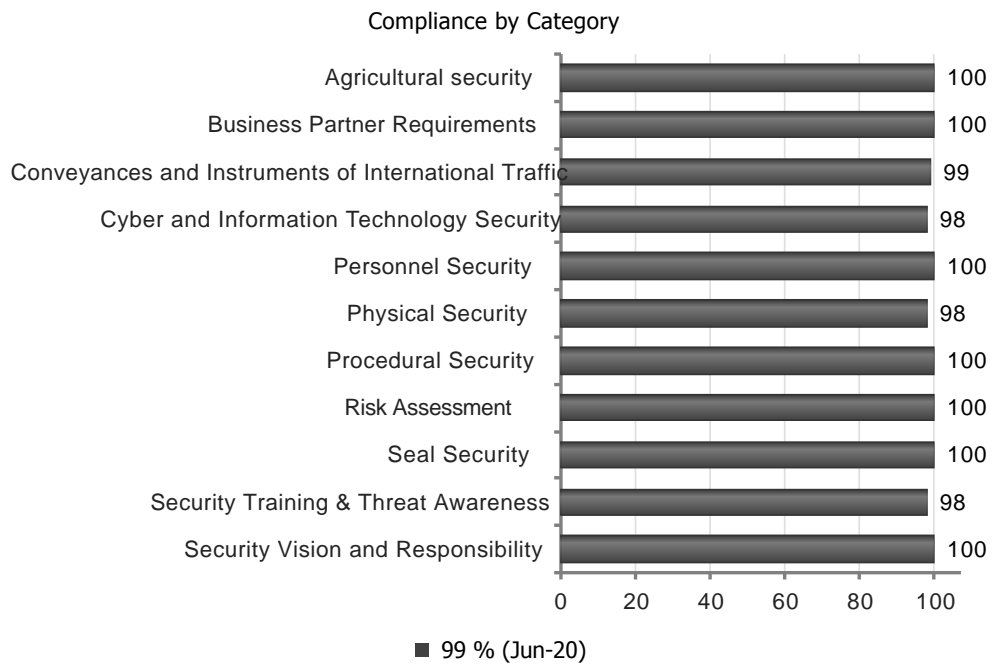
AUDIT SUMMARY

SCAN - 2020 SCAN Security Audit  
Audit completed on June 08, 2020

No assessment round data with custom risk index

Post CAPA scoring – CAPA completed on June 20, 2020

99% Compliance Score



## BUSINESS PROFILE INFORMATION

Profile Question	Response
Does the facility participate in any government, local customs, or World Customs Organization (WCO) accredited facility security program?	No
Do you hold a Government Supply Chain Security Certification?	No
Has the facility been reviewed or audited by this program?	No
Primary Industry of Operations	Pre Treatment, Dyeing, Printing, Finishing, Folding, Cutting, Sticking, Packing and Storage
Product Type / Commodity	Home Textile
Year Established	1989
Grounds Size (Square Meters)	60245
Number of Buildings	8
Facility Size (Square Meters)	38966
Number of access points? (i.e. gates, exterior doors)	1
Hours of Operation	Management staff works in single shift from 9:00 am – 6:00 pm while production and security staff works in 03 shifts (Shift A 6:00 am-2:00pm, Shift-B 2:00pm-10:00pm and Shift-C 10:00pm-6:00am).
Number of Employees	greater than 500
Number of Contract Employees	0
Number of Security Guards	75
Number of Migrant Workers	0
Annual Revenue	10 - 50 Million
Does the facility outsource any manufacturing services?	No
What countries does this facility export to?	USA, UK, Eurpoe, Denmark & Greece
Does this facility have affiliate locations where any work is conducted or	No

product stored?

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*Yes*

Does the facility outsource any transportation services?

Company Name	Contact Name	Contact Email	What % of Time Used?
Malik Kashif Goods Transport Company	Malik Muhammad Asghar	malik.sardar@gmail.com	100

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*No*

Does this facility partner with any sales agent or vendor representatives?

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## AUDIT RESPONSES

Overall Compliance Score: 99 %

Audit Sent: 6/20/2020

Due Date: 6/4/2020

### Security Vision and Responsibility

100%

#### Question

1. Does the Business License match the current location name and address as in the audit sheet? If no, please attach current scanned copy or picture of the facility's Business License.

Actual

- Yes  
 No

*Additional Comments: No comments were provided*

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

Actual

- Yes  
 No POC listed in contacts on factory profile

*Additional Comments: Mr. Imran Shahzad - Manager Compliance*

### Risk Assessment

100%

#### Question

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

Actual

- Yes there is a written risk assessment  
 No risk assessment available

*Additional Comments: No comments were provided*

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

Actual

- Yes the factory risk assessment is shared with business partners  
 No the factory risk assessment is not shared with business partners

*Additional Comments: No comments were provided*

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

CAPA: One of the most vulnerable areas of risk include areas that are out of the control of the company or its management; vulnerabilities involving contractors is a critical consideration. Please provide a timeline to include your risk assessment areas of vulnerability that are controlled by contracted service providers.

Actual

- Yes  
 No

*Additional Comments:* This issue has been addressed and till now risk of vulnerable areas like as construction area are controlled by deployed security guards. Service providers like as Contraction contactor's vehicle checked on main gate. Record of vehicle , drivers, helper and Loaders maintained at main gate. Service provider vehicle assess control has been updated in our security procedure.

Actual

- Yes  
 No

*Additional Comments:* It was noted that risk assessment did not include vulnerabilities specific to contracted service provider like construction service providers.

6. *Must* Is the facility risk assessment updated periodically?

Actual

- No updates noted or last update greater than 24 months ago  
 Last update reflects a date within the past 12 months  
 Last update reflects a date between 12 months and 18 months  
 Last update reflects a date between 18 months and 24 months

*Additional Comments:* Yes, Facility risk assessment was updated on Jan 01, 2020.

7. *Material* Define the facility's cargo mapping process. (Select all that apply)

Use NA only if the arrangement of transportation at origin is strictly managed by the customer or the customer's representative.

Actual

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

*Additional Comments: No comments were provided*

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

*CAPA Sent: 6/8/2020*

*Due Date: 8/7/2020*

CAPA: Please provide a timeline which notates a target date to develop and share your facility crisis plan with all of your business partners. Include in your crisis plan alternative locations to establish operations in the event the facility is unusable for any significant period of time. Please provide a scan of the first page of your plan as evidence.

Actual

- No documented crisis plan available
- Crisis plan includes communication to business partners of crisis related issues
- Crisis plan includes potential alternative locations if facility is rendered unusable
- Documented crisis plan available

[Supplier  
Commitment  
Letters\(1\).zip](#)

*Additional Comments: Facility has communicated the risk plan with our business partners*

Actual

- No documented crisis plan available
- Crisis plan includes communication to business partners of crisis related issues
- Crisis plan includes potential alternative locations if facility is rendered unusable
- Documented crisis plan available

*Additional Comments: It was noted that facility has documented crisis plan but it did not include communication to business partners of crisis related issues.*

**Business Partner Requirements**

**100%**

Question

9. Does the facility contract services such as security, transportation or manufacturing labor?

Actual

- Yes
- No

*Additional Comments: Facility was using Malik Kashif Goods Transport Company as their transport service provider.*

10. *Critical* Does the facility review and provide copies of security criteria to business partners, particularly those that support international supply chain activities?

*CAPA Sent: 6/19/2020*

*Due Date: 7/11/2020*



CAPA: With information provided in regards to local language please select the correct option to increase your score.

Actual

- Yes - Security criteria reviewed and provided in Local language
- Yes - Security criteria is reviewed but not provided to business partners
- No - Security criteria is not reviewed at all
- Yes - Security criteria reviewed and provided in English only.

[Security Policy in Native Language.zip](#)

*Additional Comments:* Facility has develop security guidelines in native language (Urdu) and same will be shared with business partners.

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CAPA Sent: 6/8/2020

Due Date: 8/7/2020

CAPA: Please develop a security procedure that outlines "do's and don'ts" and what actions can and cannot be taken regarding the transportation of goods. Include who to contact when there is an issue or problem. Provide a copy or scan of page one of your "do's and don'ts".

Actual

- Yes - Security criteria reviewed and provided in Local language
- Yes - Security criteria is reviewed but not provided to business partners
- No - Security criteria is not reviewed at all
- Yes - Security criteria reviewed and provided in English only.

[Security Policy in Native Language.zip](#)

*Additional Comments:* Facility has developed its security policy in native language for best understanding of business partner.

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Actual

- Yes - Security criteria reviewed and provided in Local language
- Yes - Security criteria is reviewed but not provided to business partners
- No - Security criteria is not reviewed at all
- Yes - Security criteria reviewed and provided in English only.

[10 \(L37-40\) - Security criteria to business partners.pdf](#)

*Additional Comments:* It was noted that security guidelines and procedures were provided to business partners in English language only but not in native (Urdu) language.

- 
11. **Must** Does the facility have written procedures used in the selection of business partners including: material suppliers, manufacturers, and logistics service providers? (Select all that apply)

CAPA Sent: 6/8/2020

Due Date: 8/7/2020

CAPA: Please develop a written procedure covering the steps utilized in the selection of business partners and provide a scanned copy of the first page of this procedure.

Actual

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

[BTL Supplier  
Commitment Letter  
and Contract Terms  
Conditions CHT  
PAKISTAN  
LIMITED.zip](#)

*Additional Comments:* Facility has been updated the procedure and included screening process of money laundering and terrorism financing

Actual

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

[11 \(L41-45\)  
-Procedure for the  
selection of business  
partners.pdf](#)

*Additional Comments:* As per document review, it was noted that facility has documented procedures used in the selection of business partners but screening process did not include looking for evidence of money laundering and terrorism financing and also for financial stability.

12. *Must* Are the facility's contracted business partners required to conduct and provide an annual security risk assessment of their operation?

Actual

- No
- Yes - Annually
- Yes - Minimally every 2 years
- Yes - At time of contract initiation only

*Additional Comments:* No comments were provided

13. *Must* Does the facility require business partners to provide a statement of compliance or complete a questionnaire highlighting the Minimum Security Requirements and controls that are in place? Is the statement or questionnaire renewed annually? (Select all that apply)

Actual

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

[13\(L50-52\) -  
Statement of  
Compliance of  
Business  
Partners.pdf](#)

*Additional Comments:* No comments were provided

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

Actual

- Yes  
 No

*Additional Comments: No comments were provided*

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Cyber and Information Technology Security

98%

Question

15. *Must* Does the facility have a comprehensive written cyber security policy to protect information technology systems? Is the policy reviewed and updated annually?

NA is applicable only if there are no internet enabled network systems.

Actual

- Yes - Policy is written and was updated within the past 12 months  
 Yes - Policy is written and was updated within the past 12-18 months  
 Yes - Policy is written but last update was greater than 18 months ago  
 No written policy is available  
 NA

[15 \(L55-59\) - Cyber Security Policy.pdf](#)

*Additional Comments: Yes, Facility does have a comprehensive cyber security policy and it was reviewed and updated annually. Last update was November 01, 2019*

- 
16. *Must* Does the facility have firewall and malware software deployed/set up to identify, protect, detect, respond and recover their network? (Select all that apply)

NA is applicable only if there are no internet enabled network systems.

Actual

- Firewall deployed  
 Malware software installed  
 No firewall or malware software deployed  
 NA

*Additional Comments: No comments were provided*

- 
17. *Must* How frequently are updates performed on firewall and malware software?

NA is applicable only if there are no internet enabled network systems.

Actual

- Manual updates installed by on site IT services as needed  
 No updating is performed

- Software updates are automatically deployed from the software providers
- NA

*Additional Comments:* As per Management, firewall and malware softwares are auto updated, As the system prompt with the update request and these softwares are auto updates in the background.

- 
18. *Must* Are test scenarios conducted to identify open ports and IP addresses that create vulnerable access to the internal network?

NA is applicable only if there are no internet enabled network systems.

Actual

- Vulnerability tests are conducted by IT personnel
- No vulnerability tests are conducted
- NA

*Additional Comments:* No comments were provided

- 
19. What actions are taken when problems are identified while testing firewall, malware, and other network vulnerabilities?

*Comments:* As per management Interview, When problems are identified while testing firewalls, malwares then threats and malwares are removed from the User System.

- 
20. *Material* To whom does the facility report Cyber security threats and attempts at unapproved access to network systems?

NA is applicable only if there are no internet enabled network systems.

*CAPA Sent:* 6/8/2020

*Due Date:* 8/7/2020

CAPA: Although this requirement is being phased in, you should be prepared for this to become a future requirement. Please consider establishing a plan to report cyber security threats and unauthorized attempts at accessing your network systems. CTPAT members may want to join the National Cybersecurity and Communications Integration Center at NCCIC (<https://www.us-cert.gov/nccic>)

Actual

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

[Plan for Cyber Security Threat.zip](#)

*Additional Comments:* Facility has develop access attempt plan for effective monitoring of unauthorized access, reporting plan, to find out root causes, corrective action and to prevent in

future as well

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Actual

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

*Additional Comments:* As per management, Whenever there is an unapproved access to our network system so we report to our senior management firstly, that we got cyber security threats to our network system then we resolve the threats in our meeting.

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

NA is applicable only if there are no internet enabled network systems.

Actual

- No
- Yes - Please describe systems
- NA

*Additional Comments:* As per management interview, a system is placed if someone is attempting unauthorized access with the system after 3rd attempt system is blocked and system administrator is prompt with the unauthorized access. Network administrator verifies with the system user and investigate the issue and then the administrator resumes its access on network after verification.

- 
22. **Must** Does management regularly review the employees with network access in order to restrict access to only those applications required to perform current job requirements?

NA is applicable only if there are no internet enabled network systems.

Actual

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

*Additional Comments:* As per Management, Network administrator periodically reviews the employees network accesses and the highlighted issues were discussed with the management in our review meetings.

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

NA is applicable only if there are no internet enabled network systems.

Actual

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

[23 \(L88-91\) - Policy that covers the removal of network access.pdf](#)

*Additional Comments: No comments were provided*

- 
24. *Must* How is computer access managed at the factory? (Select all that apply)

NA is applicable only if there are no internet enabled network systems.

Actual

- Passwords are required
- No passwords are required
- Passwords are required to be changed every 60-90 days
- Passwords must be complex
- NA

*Additional Comments: No comments were provided*

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25. *Must* Are employees/business partners/contractors/consultants permitted to access the company systems remotely?

NA is applicable only if there are no internet enabled network systems.

*CAPA Sent: 6/8/2020*

*Due Date: 8/7/2020*

CAPA: Establish a timeline to control remote access.

Actual

- Yes
- No

*Additional Comments: Facility is not providing access to employees and business partners to access company system remotely*

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Actual

- Yes
- No

*Additional Comments: No comments were provided*

27. *Must* Do all security policies and procedures apply to any personal devices that connect to the network?

NA is applicable only if there are no internet enabled network systems.

Actual

- Facility does not permit personal devices to connect to the network
- Yes - All security policies apply to personal devices
- No - Facility's security policies and procedures do not apply to personal devices
- NA

*Additional Comments:* As per management, they do not allow network access to employees personal devices as they will make security threats to company's network system.

- 
28. *Material* Does IT security limit and monitor the downloading of software and access to non-internal websites?

NA is applicable only if there are no internet enabled network systems.

Actual

- No it does not monitor or limit access
- Yes - IT security monitors and limits access
- NA

*Additional Comments:* No comments were provided

- 
29. *Material* Are network systems backed up?

NA is applicable only if there are no internet enabled network systems.

Actual

- No data back ups are performed
- Yes - Data is backed up daily
- Yes - Data is backed up weekly
- Yes - Data is backed up monthly
- NA

*Additional Comments:* As per Management, network system and system data is backed up on daily basis and it is backed up offsite and the backed up data is in encrypted form.

- 
30. *Material* Is data backed up offsite and encrypted? (Select all that apply)

Actual

- Backed up data is offsite
- Backed up data is encrypted
- Backed up data is not kept offsite nor encrypted

*Additional Comments:* No comments were provided

31. *Must* Is IT related equipment slated for disposal returned to the IT department for elimination of any sensitive business details and documents?

Actual

- Yes
- No

*Additional Comments: No comments were provided*

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Conveyances and Instruments of International Traffic

99%

Question

32. Does the facility load trailers/containers or Instruments of International Traffic?

Actual

- Yes
- No

*Additional Comments: No comments were provided*

33. *Critical* While in the facility's control, are containers stored in a secured manner whether on-site or off site?

Actual

- Yes
- No

*Additional Comments: No comments were provided*

34. *Critical* Is there a written procedure in place to inspect the security integrity of a container or trailer prior to loading? (Select all that apply)

Actual

- Written procedure is in place
- No written procedure in place
- Procedure includes a process to refuse to load damaged or dirty containers

[34 \(L123-125\) Policy that covers how container integrity is determined.pdf](#)

*Additional Comments: No comments were provided*

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

Actual

- Size of container notated
- Name of person performing the inspections included
- Undercarriage checked for damage
- No inspections completed or documented

[35 \(L126-135\) Comprehensive inspection of trailer-container conducted prior to loading of](#)



- Checklist is utilized
- Container number notated
- Date and time of inspection notated
- Floor and roof of container intact no holes or leaks notated
- Outside walls free of damage notated
- Inspection for invasive species (eggs nests, dirt seeds) included

[the container.pdf](#)

*Additional Comments: No comments were provided*

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

Actual

- Photos are captured
- No visual documentation is recorded
- Video is captured

*Additional Comments: No comments were provided*

37. *Critical* 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 measuring tool, pre-measured string or tape measure
- Tap test tool (such as a hammer)
- A broom or some type of blower air hose etc. is used to sweep or clean the inside of the container

*Additional Comments: No comments were provided*

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

*CAPA Sent: 6/8/2020*

*Due Date: 8/7/2020*

CAPA: Establish a process where the trailer/container inspections are supervised and/or captured on CCTV. Please supervise inspections or capture inspections on CCTV

Actual

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

[CCTV cameras monitoring & Container Inspections pictures.zip](#)

*Additional Comments: Our security procedure already developed that the trailer/ container*

inspection will be carried out under CCTV and security supervisor. All CCTV Cameras are in operational condition. These are maintained by MIS and CCTV Cameras are monitored by Security Incharge. Further trailer / container inspection supervised by Manager Security Manager Logistic. Pictorial Evidence is attached

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Actual

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

*Additional Comments:* Yes, empty container inspection was conducted in a secure area in front of the admin & security department and also inspection was carried out under Security supervisor supervision and CCTV Surveillance.

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

Actual

- Yes
- No

*Additional Comments:* No comments were provided

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

Actual

- Yes
- No

*Additional Comments:* No comments were provided

- 
41. *Material* Are container/trailer inspections supervised?

*CAPA Sent:* 6/8/2020

*Due Date:* 8/7/2020

CAPA: This requirement is being phased in, please consider establishment of a plan for management or supervision to perform reviews and/or follow-up inspections of trailer/containers to ensure that the inspections are effective and conducted properly.

Actual

- Some inspections are supervised
- Supervisor signs off on check list for supervised inspections
- Countback audits and/or shipment validation is completed
- Unannounced follow up inspections are conducted and documented

- Some form of "contraband" is hidden in or on containers/trailers to access effectiveness of inspections
- No inspections are documented

*Additional Comments:* It is being ensured by the following personnel i) Manager production ii) Merchandiser iii) Manager Security

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Actual

- Some inspections are supervised
- Supervisor signs off on check list for supervised inspections
- Countback audits and/or shipment validation is completed
- Unannounced follow up inspections are conducted and documented
- Some form of "contraband" is hidden in or on containers/trailers to access effectiveness of inspections
- No inspections are documented

*Additional Comments:* Yes, Container/Trailer inspection was carried out under Security guard/supervisor supervision and 7 Point inspection checklist is utilized for this inspection and this checklist was signed off by the security supervisor.

- 
42. Does the facility directly contract transportation service providers for any of your customers or business partners? This includes the movement to a consolidation location or between multiple production or storage facilities prior to export.

Actual

- Yes
- No

*Additional Comments:* No comments were provided

- 
43. *Material* Does the facility have a written procedure to track, trace and require confirmation of arrival at destination (container yard or freight forwarder's location) for items that you ship?

Actual

- Yes
- No
- NA

*Additional Comments:* No comments were provided

- 
44. *Material* What container or trailer tracking technologies does the facility require to be used by the contracted transportation company? (Select all that apply)

Actual

- Global positioning system carrier controlled
- Global positioning system shipper controlled

- Required cell phone check by carrier dispatch with status update
- Required cell phone confirmation by driver
- No document or report was available to review
- Other please explain

*Additional Comments:* Facility does use the tracking website called "Tracko Interactive System Pvt Ltd" in order to check the GPS location of the container and facility does maintain the record of the container location and Tracko updates the location after every 5 mins.

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

NA is only an available response if there is only one direct route between the factory and the final destination. (i.e. container yard, consolidation location, port of export)

Actual

- Yes
- No
- NA

*Additional Comments:* No comments were provided

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

Actual

- No
- Yes - Drivers are given written instruction to stop only for permitted instances

[46 \(L172-173\) - Written instruction to stop provided to drivers.pdf](#)

*Additional Comments:* No comments were provided

47. *Critical* Does the facility document driver and visitor information including photo ID, tractor ID number and conveyance ID number for arriving and departing material movements? (Select all that apply)

Actual

- Visitor/ driver log is maintained
- Tractor number listed
- Container Number listed
- Photo ID required of drivers and visitors
- No verifiable documentation was available

[47 \(L174-178\) - Driver-Vehicle log book or sheet.pdf](#)

*Additional Comments:* No comments were provided

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

NA is only an available response if no (LCL) movements are done from this facility.

Actual

- Yes
- No
- NA

*Additional Comments:* Not applicable, As no LCL movements are done from this facility.

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50. Does the facility make air shipments?

Actual

- Yes
- No

*Additional Comments:* No air shipment is made from the facility.

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52. Does the facility make any shipments in open top, open sided, ventilated (livestock), soft sided containers?

Actual

- Yes
- No

*Additional Comments:* No such shipment is made from the facility.

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

NA is only an available response if no containers are loaded at this location.

Actual

- Yes
- No
- NA

*Additional Comments:* No comments were provided

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55. *Critical* Does the facility insure that all loaded and stored containers or trailers are closed and secured with a security seal?

NA is only an available response if no containers are loaded at this location.

Actual

- Yes - All loaded and stored containers are closed and sealed
- No - Loaded containers are observed on yard without seals
- NA

*Additional Comments: No comments were provided*

56. *Critical* 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 employee(s)? (Select all that apply)

NA is only an available response if no containers are loaded at this location.

Actual

- Written policy includes keeping seals secured
- Policy designates a facility employee whom is responsible for seal control
- Policy includes that someone, other than the party whom applied the seal, performs the required "TUG TWIST TURN" testing to insure seal is correctly applied. This step is intended as a validation of proper application.
- No written policy is available
- NA

*Additional Comments: No comments were provided*

**Agricultural security**

**100%**

Question

57. *Material* Does the facility run water over or otherwise remove dirt and other debris from the outside of the shipping containers prior to loading and before departure from the facility? (Select all that apply)

*CAPA Sent: 6/8/2020*

*Due Date: 8/7/2020*

CAPA: This requirement is being phased in. Consider establishing a process to "wash or spray water" over a container prior to loading as a means of removing any dirt dust and seeds. Other means of seed and dirt removal are also acceptable. It is important to limit the potential contamination of containers and Instruments of international trade by dirt that may contain pest and seeds and other debris. This wash or shower may use non-potable water or reclaimed rainwater ECT.

Actual

- Outside of container is inspected for dirt and evidence of pests such as egg masses
- Outside of container is run through a water bath/shower to remove dirt and loose debris; identify leaks prior to loading. Other methods of removing dirt or seeds are acceptable please document these methods.
- No washing or inspection for dirt/debris removal is conducted

[Container Inspection.zip](#)

*Additional Comments:* Facility has developed a practice to spray the container for removal of potential contamination of pest and seeds and other debris.

Actual

- Outside of container is inspected for dirt and evidence of pests such as egg masses
- Outside of container is run through a water bath/shower to remove dirt and loose debris; identify leaks prior to loading. Other methods of removing dirt or seeds are acceptable please document these methods.
- No washing or inspection for dirt/debris removal is conducted

*Additional Comments:* As per Management, Facility does inspect and remove the dirt and debris found outside the container with water shower when required otherwise broom is used to clean the container.

58. *Material* Does the facility have a procedure to inspect and review evidence of pest access such as baited traps, periodic extermination, and removal of debris from shipping and storage facilities? (Select all that apply)

*CAPA Sent:* 6/8/2020

*Due Date:* 8/7/2020

CAPA: This requirement is being phased in. Please consider establishing a policy to inspect all containers/trailers, buildings and storage areas for evidence of pests/invasive species. Please note that in the future this will become a critical item where evidence of implementation is required.

Actual

- Bait stations are visible
- Extermination contract is available for review
- Shipping and receiving area appears clean
- No evidence of process or procedure available
- Area outside and around the shipment and container storage are noted to have trash and evidence of bugs, rodents (i.e. droppings, food sources)

[Bait Stations picture 1.zip](#)

*Additional Comments:* Facility have bait satiation's at various points like inventory stores, empty cartons storage areas , packing areas and finished goods storage

Actual

- Bait stations are visible
- Extermination contract is available for review
- Shipping and receiving area appears clean
- No evidence of process or procedure available
- Area outside and around the shipment and container storage are noted to have trash and evidence of bugs, rodents (i.e. droppings, food sources)

*Additional Comments:* Facility has a contract with the PEST control company (Ali Akbar Enterprises), but during site tour bait stations were not visible or positioned in the storage areas.

59. *Must* Is wood packaging material heat treated or fumigated to kill pests and limit the potential for introduction of pests at the container stuffing location? (Select all that apply)

NA is an available answer only if no pallets or wood packaging material are shipped from this

location.

Actual

- Only heat treated or otherwise treated packaging material is utilized at this location
- Origins of all wood used in the manufacturing process is documented and provided to the receiver
- Factory cannot detail how wood packaging material is treated prior to utilization
- NA

*Additional Comments:* Not applicable, As no wood packaging material or pallets were utilized in this facility

60. *Must* Are wood and wood products utilized in the manufacturing process identified by source and species?

NA is only an available and appropriate response if no wood packaging material is utilized in this facility.

Actual

- Yes
- No
- NA

*Additional Comments:* Not applicable, As no wood packaging material or pallets were utilized in this facility.

61. *Must* Are wood pallets used in the shipping process heat treated or fumigated to kill pests and limit the possible introduction of pests at the loading facility? Are pallets stored inside the facility to limit the exposure to seeds, dirt and other forms of contamination? (Select all that apply)

NA is only an available and appropriate answer if no wood pallets are utilized in the international shipment process.

Actual

- Pallets are heat treated or fumigated
- Pallets are marked with a heat treated stamp or a Phytosanitary inspection certificate is issued with each pallet delivery
- Pallets are stored inside the building
- Pallets are observed stored outside and on the ground
- Pallets are not heat treated nor fumigated
- NA

*Additional Comments:* Not applicable, As no wood pallets were utilized in the shipping process.



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

NA only applicable if the seals used are supplied by the Ocean service provider or other transportation service provider and as a used basis.

Actual

- Yes
- No
- NA

*Additional Comments: No comments were provided*

---

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

NA is only an applicable response if the seals are not provided by the factory.

Actual

- Yes
- No
- NA

*Additional Comments: No comments were provided*

---

64. *Must* Is there a procedure in place requiring management level personnel to conduct periodic audits of the seal inventory, seal log, and shipping documents and conveyances to validate that the seal controls are being followed. All steps must be documented. (Select all that apply)

NA is only an available and appropriate response if no containers or trailers are loaded at this facility.

Actual

- A written procedure is available
- Audits are conducted
- Audits are documented
- No written procedure or practices are in place
- NA

*Additional Comments: No comments were provided*

---

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

NA is only an available and appropriate response if no containers or trailers are loaded at this facility.

Actual

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

- Seal numbers are communicated or otherwise transmitted to the consignee
- Facility is advised when seal numbers are changed prior to departure from port of origin
- NA

*Additional Comments: No comments were provided*

Procedural Security

100%

Question

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

Actual

- Yes
- No

*Additional Comments: No comments were provided*

67. *Critical* Is a written procedure in place to report unauthorized access to a container/trailer and/or product storage areas within the facility including whom to notify?

Actual

- Yes
- No

[67 \(L247-248\) - Procedure to report unauthorized access.pdf](#)

*Additional Comments: No comments were provided*

68. *Critical* Is a written procedure in place to monitor and limit access to critical operational areas of the facility, such as warehouse picking, final packing or packaging, shipping and receiving? Access should be limited to only authorized employees.

Actual

- Yes
- No

*Additional Comments: No comments were provided*

69. *Critical* Is a written procedure in place that requires all information used in the shipping documents for merchandise/cargo to be legible, complete, and accurate?

Actual

- Yes
- No

*Additional Comments: No comments were provided*

70. *Critical* Is a written procedure in place to resolve a carton count shortage, overage, or any documentation issue found during container or trailer loading; or after the shipment has departed the facility?

NA is only an available option if no containers are loaded at this location.

Actual

- Yes  
 No  
 NA

*Additional Comments: No comments were provided*

---

71. *Critical* Is an international shipment marked, counted, weighed, and properly reported on the commercial invoice and bill of lading?

NA is only an available option if no containers are loaded at this location.

Actual

- Yes  
 No  
 NA

*Additional Comments: No comments were provided*

---

72. *Critical* Is a written and verifiable procedure in place that restricts access to shipping and receiving documentation?

Actual

- No written procedure is available  
 Yes - Written procedure is available

*Additional Comments: No comments were provided*

---

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

Actual

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

*Additional Comments: No comments were provided*

---

74. *Material* Are shared network printers password protected when used to prepare export documents?

Actual

- Yes - Shared network printers are password protected

- No passwords are utilized for network printers
- No shared network printers are utilized at this facility

*Additional Comments:* Facility does not use shared network printer in order to make export documents in their marketing and logistics departments.

---

75. *Critical* Are commercial document packets sent with the shipment at departure?

Actual

- Document sent in either hard copy or electronically
- No documentation is submitted

*Additional Comments:* No comments were provided

---

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

*CAPA Sent:* 6/8/2020

*Due Date:* 8/7/2020

CAPA: A written policy is required outlining how to, when to and whom to report security issues. Please provide a copy of page one of this policy as evidence.

Actual

- Nothing in place
- Procedure is written
- Local law enforcement notified
- Customer notified
- Origin Customs is notified

[Security Reporting  
issue.zip](#)

*Additional Comments:* Facility has developed plan for reporting of security issue. Further more, plan is also part of contract which is made in between Transportation company & Bismillah Textiles

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Actual

- Nothing in place
- Procedure is written
- Local law enforcement notified
- Customer notified
- Origin Customs is notified

*Additional Comments:* It was noted that facility has documented procedure but it only includes requirement of notifying factory's management only in case of any illegal shipping activity or any abnormality is suspected or detected.

---

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

Actual

- Yes

No

*Additional Comments: No comments were provided*

78. *Critical* Is there a procedure in place to notify Business Partners of security issues such as attempted theft, fraud or internal conspiracies? (Select all that apply)

*CAPA Sent: 6/8/2020*

*Due Date: 8/7/2020*

CAPA: Provide an explanation of when and how business partners are notified of security-related issues, attempts at unauthorized access, theft, and internal conspiracies. Provide a copy of the first page of the policy as evidence.

Actual

- Nothing in place
- Yes Procedure is written
- Local Law enforcement is notified
- Business partners notified
- Origin Customs notified

[Intimation of security issues.pdf new.zip](#)

*Additional Comments: Facility has a procedure to notify the business partner regarding security issue.*

Actual

- Nothing in place
- Yes Procedure is written
- Local Law enforcement is notified
- Business partners notified
- Origin Customs notified

*Additional Comments: Facility does have a procedure to notify their business partners about their theft attempt and fraud via telephone and email.*

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

Actual

- Yes freight is validated prior to loading via manual count
- Freight being loaded is scanned and reviewed against PO/ delivery order prior to departure
- No not validated

*Additional Comments: As per management the shipping department does have the shipment plan with them against the Purchase order. They validate the shipment in warehouse before loading in the container.*

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

Actual

- Nothing in place
- Procedure is written
- Checklist is included in Termination document

*Additional Comments: No comments were provided*

---

81. Do you have dedicated security staff/guards on site?

Actual

- Yes
- No

*Additional Comments: No comments were provided*

---

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

Actual

- Job descriptions are in place
- Job descriptions available for review at time of audit
- No job descriptions exist or were unavailable for review at the time of the audit
- Management review occurs as required
- Electronic or written logs are kept and reviewed regarding duties of security guards such as building/facility tours

*Additional Comments: No comments were provided*

---

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

Actual

- Yes - Patrols are required; documented electronically or via CCTV
- Yes - Patrols are required; documented via paper only
- Yes - Patrols are required; no documentation available
- Patrols are not required nor documented

*Additional Comments: As per management, Security guards does patrolling in the facility as per their security checklist and they do have the documents of patrolling with them in their department.*

---

84. *Must* Does management verify compliance with Security company work instructions and policies? (Select all that apply)

CAPA: Management should verify compliance with the security SOW and requirements. Provide an explanation for how this will be completed and a timeline for implementation. Note that these requirements may in the future be upgraded to a "critical" with evidence of implementation required.

Actual

- No  
 Reviews are conducted  
 Reviews are documented

*Additional Comments:* Facility is being conducting internal audits twice in a year to ensure the implementation of security management system in true spirit and to develop further action planning

Actual

- No  
 Reviews are conducted  
 Reviews are documented

*Additional Comments:* Yes, Management does internal audit of their security management system in order to verify compliance as per their policies and procedures.

## Physical Security

98%

### Question

85. *Critical* Is there a designated employee and visitor vehicle parking area separate 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:* No comments were provided

86. *Material* 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

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

Actual

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

*Additional Comments: No comments were provided*

---

88. *Critical* Are facility gates through which vehicles and/or employees enter and exit guarded or monitored?

NA is only an available and appropriate response for locations such as bulk packaging and shipment facilities such as coal yards, fresh fruit and vegetable locations.

Actual

- Yes gates are secured and monitored
- No gated or other controls in place to limit access
- gates are secured but not monitored
- NA

[88 \(L311-314\) - Entrance gate and front of the facility.pdf](#)

*Additional Comments: No comments were provided*

---

89. *Critical* Are gates locked or otherwise secured when not in use?

NA is only an available and appropriate response for locations such as bulk packaging and shipment facilities such as coal yards, fresh fruit and vegetable locations.

Actual

- Yes
- No
- NA

[89 \(L315-317\) - Entrance gate and front of the facility.pdf](#)

*Additional Comments: No comments were provided*

---

90. *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?

NA is only an available and appropriate response if the location is a bulk packaging facility or a fresh fruit and vegetable packaging facility operated only during daylight hours.

Actual

- Nothing in place
- Interior lighting only
- Exterior lighting only
- Yes - Sufficient exterior and interior lighting
- NA

*Additional Comments: No comments were provided*



---

91. Does the facility incorporate security technology as part of its systems and controls?

Actual

- Other
- CCTV
- Access Control
- Security Alarm

*Additional Comments:* Facility has installed CCTV system only.

---

92. *Must* Do you have written procedures governing the use of the security technology? (Select all that apply)

Actual

- Policy and procedures are written
- Written documentation includes testing and corrective actions
- No written procedures in place

*Additional Comments:* No comments were provided

---

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

Actual

- System was installed by a specialized licensed/certified contractor
- System was installed by factory personnel or an electrical contractor
- Systems were installed in facility by building owners (this is leased space)

*Additional Comments:* As per management, Security equipments were installed by a licensed contractor named " Fire Defence Trading"

---

94. *Material* Do you have maintenance contracts in place for your security systems?

*CAPA Sent:* 6/8/2020

*Due Date:* 8/7/2020

CAPA: You should consider as part of your overall security program, an annual maintenance on your systems.

Actual

- Yes, contracts are annually reviewed
- Yes, contracts are only reviewed when problems are uncovered
- No contract is in place, or readily available for review

*Additional Comments:* Maintenance is being conducted on monthly basis, maintenance program is part of our internal audit.

---

Actual

- Yes, contracts are annually reviewed
- Yes, contracts are only reviewed when problems are uncovered
- No contract is in place, or readily available for review

*Additional Comments:* Facility was carrying out maintenance internally, no maintenance contract is available

- 
95. **Must** Are Critical Security Infrastructure locations secured and authorized access limited to only those whose jobs require access.

NA is only applicable if the facility does not have CCTV or alarm systems.

Actual

- Yes
- No
- NA

*Additional Comments:* No comments were provided

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

NA is only applicable if the facility does not have CCTV or alarm systems.

Actual

- Yes
- No
- NA

*Additional Comments:* No comments were provided

- 
97. **Critical** 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)
- Yes

[97 \(L342-344\) - CCTV Control room and monitor.pdf](#)

*Additional Comments:* No comments were provided

- 
98. **Material** Does your CCTV system have a failure alarm that indicates when the system is off line or no recording is underway? (Select all that apply)

CAPA Sent: 6/8/2020

Due Date: 8/7/2020

CAPA: Consider upgrading your system to include a failure alarm. Provide a timeline for implementation or a purchase order highlighting the intention to implement.

Actual

- System is connected to a back up power system
- CCTV system has a failure alarm
- No failure alarm available

*Additional Comments:* Currently all camera is under watching of MIS and Security if any problem in any camera, it identify immediately, however our MIS department is working to fix alarm system for indication of CCTV failure.

---

Actual

- System is connected to a back up power system
- CCTV system has a failure alarm
- No failure alarm available

*Additional Comments:* It was noted that no failure alarm system was installed in CCTV system, however UPS backup system was provided by the facility.

---

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

Actual

- Yes
- No

*Additional Comments:* No comments were provided

---

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

Actual

- Yes
- No
- PO issued for upgraded system

*Additional Comments:* No comments were provided

---

101. *Must* Does the facility's management team conduct random documented reviews of CCTV footage periodically to ensure security processes and procedures are being followed? If found to be lacking corrective actions are taken. (Select all that apply)

Actual

- Reviews are documented
- Yes - Periodic reviews are conducted
- Corrective actions are taken for gaps identified
- No reviews are conducted

*Additional Comments:* No comments were provided

---

102. *Critical* How many days are CCTV recordings kept?

Actual

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

*Additional Comments:* Facility does have 45 days of CCTV Footage

---

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

Actual

- Yes
- No
- IDs carried but not displayed

[NC- Employee not displaying ID badges.pdf](#)

*Additional Comments:* It was noted that approximately 30 % employees in the Printing, stitching, Checking and packing departments were not wearing the ID badges.

---

104. *Critical* Is a written procedure in place to require an unknown visitor to present photo identification upon arrival? Is their information recorded into a visitor log? (Select all that apply)

Actual

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

[104 \(L365-369\) - Visitor log book.pdf](#)

*Additional Comments:* Yes, Facility does have a procedure in place to acquire photo identification/ CNIC card upon arrival and they register the visitor name and details in the visitor log and factory does maintain the manual register as well as the system / software generated visitor log report.

---

105. *Must* Is a written 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 - Written procedure in place and all bags were inspected
- Yes - Written procedure in place but auditors bag was not inspected or other visitors entering were observed not having bags inspected
- No written process or procedure in place

*Additional Comments:* No comments were provided

---

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

Actual

- Yes
- No

*Additional Comments: No comments were provided*

---

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

Actual

- Yes
- No

*Additional Comments: No comments were provided*

---

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

NA is an available and appropriate response only if all packages and mail are delivered to another location prior to distribution to the factory.

Actual

- Yes
- No
- NA

*Additional Comments: No comments were provided*

---

**Personnel Security**

**100%**

Question

109. *Must* Does the facility have a written procedure in place to validate information provided on an employment application, such as an address, previous employment history, education, personal or professional references, and a certification? (Select all that apply)

NA is an available and appropriate response only if background checks are not permitted by local law.

Actual

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

*Additional Comments: No comments were provided*

110. *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

- Written application required
- Government issued ID required
- No requirements available

*Additional Comments: No comments were provided*

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

NA is an available and appropriate response only if background checks are not permitted by local law.

*CAPA Sent: 6/8/2020*

*Due Date: 8/7/2020*

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

Actual

- Written policy is available
- Criminal background checks
- Credit check completed
- No background checks or policy available for review
- NA

[Background Verification.pdf](#)  
[new.pdf new.zip](#)

*Additional Comments: We have already procedure for background verification of employees prior to hire and periodic check of employees working in sensitive areas.*

Actual

- Written policy is available
- Criminal background checks
- Credit check completed
- No background checks or policy available for review
- NA

*Additional Comments: Facility has documented procedure in place which only includes verification of criminal background checks but credit check is not required or included.*

Security Training & Threat Awareness

98%

Question

112. *Must* Is a security threat awareness training program established and maintained? Is training provided to all new employees and an annual refresher course for current employees?

Actual

- Training provided annually
- Training provided for new hires
- There is no Threat Awareness training in place

*Additional Comments: No comments were provided*

---

113. *Must* Are training classes or meetings conducted to explain the critical reasons why documentation and security is critical in certain departments etc.? (Select all that apply)

Actual

- No training is conducted or documentation of training is unavailable
- Classes are conducted on security related issues
- Training logs are kept to insure required personnel attend the training
- Management personnel randomly reviews documentation

*Additional Comments: No comments were provided*

---

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

*CAPA Sent: 6/8/2020*

*Due Date: 8/7/2020*

CAPA: Consider establishment of an evaluation process regarding training.

Actual

- No evaluations are conducted
- Retraining is required if a successful score is not achieved
- Evaluations of effectiveness of the training classes are conducted

[Weapon security Training \(3\).pdf new.zip](#)

*Additional Comments: This issues has been address and evaluation is being conducting after each training to ensure the effectiveness of training.*

---

Actual

- No evaluations are conducted
- Retraining is required if a successful score is not achieved
- Evaluations of effectiveness of the training classes are conducted

*Additional Comments: Facility was not conducting evaluation of training.*

---

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

NA is only an available and appropriate response if no container or trailers are loaded at this facility.

Actual

- Training is conducted
- Training logs are kept and reviewed
- Refresher training conducted annually
- Training available in local language
- No training conducted or documentation available for review
- NA

*Additional Comments: No comments were provided*

---

116. *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: No comments were provided*

---

117. *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*

---

118. *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

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

*Additional Comments: No comments were provided*

---

119. *Must* Does the training program include criteria critical to security programs such as Threat Awareness, Contraband, Human Smuggling and Terrorism? (Select all that apply)

Actual

- Threat Awareness training is included



- Training includes how to identify and manage contraband found
- Training includes how to identify evidence of human smuggling
- No specific training is conducted

*Additional Comments: No comments were provided*

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

Actual

- Yes - Incentive/recognition program is in place
- No incentive program is available at the facility

*Additional Comments: No comments were provided*

121. *Must* Does the factory have a specific training platform for identifying pest contamination? (Select all that apply)

*CAPA Sent: 6/8/2020*

*Due Date: 8/7/2020*

CAPA: Develop an Agriculture Contamination Training program. There are commercially available training programs. Contact the SCM administrator for details. Provide a timeline to establish this program.

Actual

- No
- Training platform is available
- Documentation of trained personnel is kept and available

[Agriculture Security & Pest Control Training Record.pdf new.zip](#)

*Additional Comments: Facility has been conducted awareness regarding Agriculture Security & Pest Contamination*

Actual

- No
- Training platform is available
- Documentation of trained personnel is kept and available

*Additional Comments: It was noted that facility did not have training program for identifying pest contamination.*

122. *Must* Is there a documented training platform outlining the risks of Cyber security? (Select all that apply)

NA is only an available and appropriate response if the facility has no network connected computer systems or equipment.

Actual

- No

- Documentation of trained personnel is kept
- Training platform is available
- NA

*Additional Comments: No comments were provided*

Misc

NA

Question

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

*Comments:* Front side of the building auditor found Facility under CCTV monitor signage.

[123\(L432-433\)  
Front of the facility  
including signage.pdf](#)

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

*Comments:* Security office found located in front side of the main gate and security guards are working in three different shift.

[124 \(L434-435\) -  
Guard station and  
access gates.pdf](#)

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

*Comments:* Facility has 8 building blocks, the building was found constructed with concrete wall which restrict the unlawful entry. The building includes the department of Pretreatment, Dyeing, Printing, Finishing, Folding, Cutting, Stitching, Inspection, Packing and Dispatch.

[125 \(L436-437\) -  
Building  
structures.pdf](#)

126. Describe the shipping and receiving areas. Please attach a picture.

*Comments:* Shipping and receiving areas are monitored by CCTV and security guards ( 24x7)

[126 \(L438-439\) -  
Shipping and  
receiving area.pdf](#)

127. Describe how the perimeter of the facility is protected from unauthorized access? Please attach pictures

*Comments:* Perimeter of the facility is constructed with the concrete wall, facility has also provided main gates from which access is granted under monitoring.

[127 \(L440-441\) - Perimeter of the facility.pdf](#)

128. Describe the final packaging area. Please attach a picture.

*Comments:* Final packaging area is located in well secured location with CCTV and Security monitoring ( 24X7)

[128 \(L442-43\)- Final packaging area.pdf](#)

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

*Comments:* Facility did store containers, Vehicle parking was provided away from cargo handling and receiving areas.

[129\(L444-445\)- Container & Vehicle Parking area.pdf](#)

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

Actual

- Yes  
 No

[130 \(L446-447\)- Opening meeting letter.pdf](#)

*Additional Comments:* No comments were provided