BEALL’s, INC.

C-TPAT
Expectations for Agents, Vendors & Manufacturers

For Distribution to all new and existing Beall’s import related Business Partners

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Introduction

In the wake of 9/11 the Bureau of Customs and Border Protection ("CBP") immediately tightened security at U.S. borders and cautioned the importing community of the susceptibility of the supply chain to breaches in cargo security. It also prompted CBP to institute a voluntary security program known as the Customs-Trade Partnership Against Terrorism (C-TPAT). This joint initiative between CBP and the global business community will not only strengthen the supply chain but it will also give visible benefits to those companies choosing to join. In exchange for implementing improved security practices and communicating security requirements to their business partners, importers can expect to have reduced inspections and quicker clearance of imported freight. By participating in the C-TPAT program, Beall’s hopes to increase vigilance amongst its employees and partners, and establish a more secure and efficient supply chain. By setting a precedent for our foreign counterparts, Beall’s will prove itself to be a leader in supply chain security.

We at Beall’s understand that if our supply chain were disturbed by an act of terror, it could have a significant impact on our business and business relationships. Beall’s has taken steps internally to protect its supply chain against security breaches and acts of terrorism. Likewise, we are asking our business partners to enhance their safety and security procedures in the following areas:

1. Business Partner Security
2. Container Security
3. Physical Access Controls
4. Personnel Security
5. Procedural security
6. Security & Awareness Training
7. Physical security
8. Information Security

Beall’s has developed a list of requirements for each of these specific areas of focus noted above. We recognize that some of the requirements may be based on U.S. standards and may not be possible to implement in other countries. We also recognize that certain requirements may not be appropriate for some vendors due to the factory’s size and structure.
However, it is important for each business partner (vendor and manufacturer) to ensure and acknowledge that security regulations are formulated and implemented to protect the Company, its employees and the security of Beall’s supply chain.

It is imperative that all employees observe the facility’s security policies and report any suspicious or improper actions to management and/or the proper authorities.

Beall’s reserves the right to conduct background investigations on manufacturers before doing business with them. In particular, Beall’s is interested in investigating the company for financial solvency, and the principles for criminal activity.
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SECTION I
Business Partner Security

1.1 Business Partner Security Overview

C-TPAT membership is primarily comprised of companies operating in the United States. However, today’s world embraces a global economy that requires companies to import and outsource in order to remain competitive.

As a member of the C-TPAT program, Beall’s is required to ensure that all of its business partners adopt security-minded strategies and procedures that meet the C-TPAT requirements. Thus, Beall’s goal is to continue to partner with its vendors, suppliers, and manufacturers in order to protect the security and integrity of the Company’s supply chain.

Beall’s, like many C-TPAT companies, is now contractually requiring businesses to improve security in order to meet C-TPAT guidelines. As a result, C-TPAT extends its reach well beyond U.S. borders and impacts the security of companies both here and overseas. Examples of how Beall’s leverages foreign suppliers to tighten security in the supply chain include:

- Beall’s conducts regular audits of our foreign import vendors to ensure compliance with C-TPAT security guidelines.
- Beall’s is conditioning contractual business relationships with our service providers and vendors based on C-TPAT participation and/or adherence to C-TPAT security guidelines.
- Beall’s is leveraging existing internal inspection teams. We require C-TPAT cargo security training for quality assurance personnel or non-security related business representatives who visit foreign vendors and factories on a regular basis.

To better secure and facilitate the supply chain security and flow of goods entering the United States, Beall’s is committed to ensuring that all of the Company’s preferred existing and new
trading partners fulfill their commitments by verifying that agreed security measures have been implemented.

As a participant of the C-TPAT program, Beall’s not only reinforces its Company’s belief in corporate good citizenry, Beall’s believes that assessing its supply chain security procedures and practices improves business efficiency. Perhaps the greatest success of C-TPAT is that although participant companies join voluntarily, members have made participation and/or compliance with C–TPAT security standards by their business partners a requirement for doing business. Ultimately, these partnerships will help CBP create a true green lane that speeds low risk shipments across all our borders and through our ports of entry and preserve global trade in this time of global terrorism.

1.2 Beall’s C-TPAT Business Partner Security Expectations

Beall’s has developed a thorough vendor vetting process for all import related vendors and business partners (both foreign and domestic). Beall’s requires all import related business partners to demonstrate that they are meeting C-TPAT security criteria via written/electronic confirmation (e.g., contractual obligations; via a letter from a senior business partner officer attesting to compliance; a written statement from the business partner demonstrating their compliance with C-TPAT security criteria or an equivalent WCO accredited security program administered by a foreign customs authority; or, by providing a completed importer security questionnaire). Based upon a documented risk assessment process, non-C-TPAT eligible business partners must be subject to verification of compliance with C-TPAT security criteria by the importer.

Beall’s vendors are required to meet and/or exceed the following requirements.

1.2.1 Business Partner Selection Requirement

☑ All Beall’s import related vendors, business partners and foreign manufacturers must have written and verifiable processes for the selection of business partners including, carriers, other manufacturers, product suppliers and vendors (parts and raw material suppliers, etc).

☑ Beall’s reserves the right to request copies of vendor’s written processes for the selection of business partners for verification that C-TPAT requirements are being met.

☑ Beall’s reserves the right to periodically inspect vendor’s business facilities to ensure compliance with Beall’s and U.S. Customs C-TPAT requirements.
1.2.2 Security Procedures –

All Beall’s business partners are required to submit a completed Import Vendor Acknowledgement Form and Import Vendor Security Self-Assessment Form to Beall’s C-TPAT Coordinator’s office at: CTPATCompliance@beallsinc.com.

(Note: Self-Assessment forms are to be submitted on an annual basis)

✔ For Beall’s business partners who are C-TPAT members, (i.e. foreign manufacturers, carriers, ports, terminals, brokers, consolidators, etc.) Beall’s requires documentation verifying business partner’s C-TPAT status. The following are acceptable forms of documentation:

- copy of C-TPAT certificate and SVI number

AND

- a completed “Beall’s C-TPAT Vendor Self-Assessment Form.”

Note. Beall’s requires written notification from its C-TPAT certified business partners if there is a change in the partner’s C-TPAT status. All vendors are required to submit a completed “Beall’s C-TPAT Vendor Self-Assessment Form” on an annual basis. Beall’s reserves the right to terminate business relations with business partners who fail to submit annual self-assessments of their security practices.

✔ For Beall’s business partners who are eligible for but not C-TPAT certified (foreign manufacturers, carriers, ports, terminals, brokers, consolidators, etc.) Beall’s requires business partners who are eligible for but not C-TPAT certified to demonstrate that they are meeting C-TPAT security criteria via written/electronic confirmation. Accepted forms of business partner written/electronic confirmation are:

- contractual obligations
- a letter from a senior business partner or officer attesting to compliance
- a written statement from the business partner demonstrating their compliance with C-TPAT security criteria or an equivalent WCO accredited security program administered by a foreign customs authority

AND

- a completed “Beall’s C-TPAT Vendor Self-Assessment Form.”

Note. All vendors are required to submit a completed “Beall’s C-TPAT Vendor Self-Assessment Form” on an annual basis. Vendor’s failure to do so could result in Beall’s termination of business relations with non-compliant vendor. Based upon a documented risk assessment process, eligible but non-C-TPAT certified business partners are subject to verification of compliance with C-TPAT security criteria by Beall’s.
For those business partners not eligible for C-TPAT certification,
Beall’s requires business partners who are not eligible for C-TPAT certification to demonstrate that they are meeting C-TPAT security criteria via written/electronic confirmation. Accepted forms of business partner written/electronic confirmation are:
- contractual obligations
- a letter from a senior business partner officer attesting to compliance
- a written statement from the business partner demonstrating their compliance with C-TPAT security criteria or an equivalent WCO accredited security program administered by a foreign customs authority

**AND**
- a completed “Beall’s C-TPAT Vendor Self-Assessment Form.”

Note. All vendors are required to submit a completed “Beall’s C-TPAT Vendor Self-Assessment Form” on an annual basis. Vendor’s failure to do so could result in Beall’s termination of business relations with non-compliant vendor. Based upon a documented risk assessment process, Beall’s business partners ineligible for C-TPAT certification are subject to verification of compliance with C-TPAT security requirements by Beall’s and/or U.S. Customs.

1.2.3 Point of Origin –

Beall’s requires all business partners to ensure the development and implementation of security processes and procedures consistent with the C-TPAT security criteria to enhance the integrity of all Beall’s shipments at point of origin.

1.2.4 Participation / Certification in Foreign Customs Administrations Supply Chain Security Programs

Current or prospective business partners who have obtained a certification in a supply chain security program being administered by foreign Customs Administration are required to indicate their status of participation to Beall’s.

1.2.5 Other Internal criteria for selection

Internal requirements, such as financial soundness, capability of meeting contractual security requirements, and the ability to identify and correct security deficiencies as needed, are also addressed by Beall’s. Internal requirements are assessed against a risk-based process as determined by an internal management team.
2 Container and Trailer Security Overview

Container and trailer integrity must be maintained to protect against the introduction of unauthorized material and/or persons. At the point-of-stuffing, procedures must be in place to properly seal and maintain the integrity of the shipping containers and trailers. A high security seal must be affixed to all loaded containers and trailers bound for the U.S. All seals must meet or exceed the current PAS ISO 17712 standard for high security seals.

In those geographic areas where risk assessments warrant checking containers or trailers for human concealment or smuggling, such procedures should be designed to address this risk at the manufacturing facility or point-of-stuffing.

2.1 Container Inspection – 7 point inspection form

Procedures must be in place to verify the physical integrity of the container structure prior to stuffing, to include the reliability of the locking mechanisms of the doors. A seven-point inspection process is required for all factory loaded containers. Seven container points to be inspected are:

- Front wall
- Left side
- Right side
- Floor
- Ceiling/Roof
- Inside/outside doors
- Outside/Undercarriage
2.2 Trailer Inspection

Procedures must be in place to verify the physical integrity of the trailer structure prior to stuffing, to include the reliability of the locking mechanisms of the doors. The following ten-point inspection process is recommended for all trailers:

- Fifth wheel area – check natural compartment/skid plate
- Exterior – front/sides
- Rear – bumper/doors
- Front wall
- Left side
- Right side
- Floor
- Ceiling/Roof
- Inside/outside doors
- Outside/Undercarriage

2.3 Container and Trailer Seals

The sealing of trailers and containers, to include continuous seal integrity, are crucial elements of a secure supply chain, and remains a critical part of a foreign manufacturers’ commitment to C-TPAT. The foreign manufacturer must affix a high security seal to all loaded trailers and containers bound for the U.S. All seals must meet or exceed the current PAS ISO 17712 standards for high security seals.

Written procedures must stipulate how seals are to be controlled and affixed to loaded containers and trailers, to include procedures for recognizing and reporting compromised seals and/or containers/trailers to US Customs and Border Protection or the appropriate foreign authority. Only designated employees should distribute seals for integrity purposes.

2.4 Container and Trailer Storage

Containers and trailers under foreign manufacturer control or located in a facility of the foreign manufacturer must be stored in a secure area to prevent unauthorized access and/or manipulation. Procedures must be in place for reporting and neutralizing unauthorized entry into containers/trailers or container/trailer storage areas.
2.5 Container Seals

Written procedures must stipulate how seals are to be controlled and affixed to loaded containers – to include procedures for recognizing and reporting compromised seals and/or containers to US Customs and Border Protection or the appropriate foreign authority. Only designated employees should distribute container seals for integrity purposes.

2.6 Container Storage

Containers must be stored in a secure area to prevent unauthorized access and/or manipulation. Procedures must be in place for reporting and neutralizing unauthorized entry into containers or container storage areas.

Beall’s requires all business partners to have procedures in place that adhere to the following security criterion.

2.7 For Vendors shipping Factory Loaded Containers to Beall’s:

☑ A 7-Point inspection form (see attachment) is to be completed for each container and submitted to Beall’s at time of booking request.

☑ Original copies of completed 7-Point container inspection forms are required for payment approval. Originals are to be included in the document packet submitted to Beall’s Import Accounting & Compliance Dept. for Direct Wire Transfer Payments or to the LC issuing bank for LC payments. Copies are to be included in the documents presented to the Beall’s approved freight forwarder for Customs entry purposes.

☑ Beall’s will conduct periodic reviews of all business partners’ processes and facilities based on risk to ensure that C–TPAT security standards are being met.
3 Physical Access Controls Overview

Access controls prevent unauthorized entry to facilities, maintain control of employees and visitors, and protect company assets. Access controls must include the positive identification of all employees, visitors, and vendors at all points of entry.

3.1 Employees

An employee identification system must be in place for positive identification and access control purposes. Employees should only be given access to those secure areas needed for the performance of their duties. Company management or security personnel must adequately control the issuance and removal of employee, visitor and vendor identification badges. Procedures for the issuance, removal and changing of access devices (e.g. keys, key cards, etc.) must be documented.

3.2 Visitors

Visitors must present photo identification for documentation purposes upon arrival. All visitors should be escorted and should visibly display temporary identification.

3.3 Deliveries (including mail)

Proper vendor ID and/or photo identification must be presented for documentation purposes upon arrival by all vendors. Arriving packages and mail should be periodically screened before being disseminated.
3.4 Challenging and Removing Unauthorized Persons

Procedures must be in place to identify, challenge and address unauthorized and/or unidentified persons.
4 Personnel Security Overview

Implementing personnel security measures is an important step in securing the supply chain. The focus of a personnel security program is to investigate the background of prospective employees to ensure that they pose no risk to Beall’s operations. Please note that the requirements provided below are based on U.S. standards and may not be possible to fulfill in other countries. However, Beall’s expects all business partners to take as many steps as possible to avoid hiring someone whom may pose a threat to Beall’s or its supply chain.

4.1 Pre-Employment Verification

☐ Prospective employees must undergo pre-screening prior to commencement of employment. This applies to prospective permanent, temporary, and contract employees.

☐ Application information, such as employment history and references must be verified prior to employment.

4.2 Background checks / investigations

Beall’s expects all business partners to conduct a background check of all prospective and/or current employees that are consistent with foreign, federal, state, and local regulations. Once employed, periodic checks and reinvestigations should be performed based on cause, and/or the sensitivity of the employee’s position.

Background checks should include the following.

☐ Criminal convictions –
   All felony and misdemeanor convictions involving workplace violence, burglary/robbery, theft, assault, identity theft, murder, kidnapping, rape, terrorist threats, or other crimes.
4.3 Personnel Termination Procedures

Beall's expects all business partners to have procedures in place to remove identification, facility, and system access for terminated employees.
SECTION V
Procedural Security

5 Procedural Security Overview

Security measures must be in place to ensure the integrity and security of processes relevant to the transportation, handling, and storage of cargo in the supply chain. Procedural security measures regulate incoming and outgoing goods and are designed to prevent the introduction of unmanifested materials into the supply chain, or the loss or exchange of Beall’s merchandise. Each business partner and/or factory should have a designated employee supervising the introduction and removal of cargo. All merchandise must be properly marked, weighed, counted, and documented. Procedures must be in place to govern the detection and recording of shortages and overages.

5.1 Documentation Processing

Procedures must be in place to ensure that all information used in the clearing of merchandise/cargo, is legible, complete, accurate, and protected against the exchange, loss or introduction of erroneous information. Documentation control must include safeguarding computer access and information.

5.2 Manifesting Procedures

To help ensure the integrity of cargo, procedures must be in place to ensure that information received from business partners is reported accurately and timely.

5.3 Shipping and Receiving

☑ All vendors and factories shipping factory loaded containers destined for Beall’s must conduct a 7-point container inspection of the container and submit a completed 7-point container inspection form with the payment and entry documents. (See attached 7 point inspection form).
Departing cargo being shipped should be reconciled against information on the cargo manifest.

The cargo should be accurately described, and the weights, labels, marks and piece count indicated and verified. All merchandise must be properly marked, weighed, counted, and documented.

Departing cargo should be verified against purchase or delivery orders.

Drivers delivering or receiving cargo must be positively identified before cargo is received or released.

Procedures should also be established to track the timely movement of incoming and outgoing goods.

5.4 Cargo Discrepancies

All shortages, overages, and other significant discrepancies or anomalies must be resolved and/or investigated appropriately. Procedures must be in place to govern the detection and recording of shortages and overages.

Customs and/or other appropriate law enforcement agencies must be notified if anomalies, illegal or suspicious activities are detected - as appropriate.

Each factory should have a designated employee supervising the introduction and removal of cargo.

Containers, trailers, and/or railcars left at the facility overnight must be secured.

Containers that are full of cargo must be locked and sealed with industry-approved seals and said seal numbers must be recorded. The seals should be uniquely numbered and require destruction to be removed.

All containers or trailer entering or leaving the facility must be recorded, along with the name of the driver who took custody of the Beall’s merchandise.

The factory should have a procedure for inspecting and verifying seals.

Cargo discrepancies must immediately be reported to management and/or security personnel.
Beall’s requires all vendors and manufacturers to complete self-assessments of their security procedures each year. Copies of the self-assessment must be forwarded to the C-TPAT Coordinator located at Beall’s Headquarters in Bradenton, FL.

Beall’s verifies the accuracy of self-assessments submitted by vendors and manufacturers.

Beall’s reserves the right to request on-site access to business partner’s facilities to ensure that the C-TPAT requirements are being met.
6 Security Training and Threat Awareness Overview

Beall’s requires all vendors, manufacturers and service providers to establish and maintain a threat awareness program by security personnel to recognize and foster awareness of the threat posed by terrorists and contraband smugglers at each point in the supply chain.

☑ Employees must be made aware of the procedures the company has in place to address a situation and how to report it.

☑ Additional training should be provided to employees in the shipping and receiving areas, as well as those receiving and opening mail.

☑ Additionally, specific training should be offered to assist employees in maintaining cargo integrity, recognizing internal conspiracies, and protecting access controls.
7 Physical Security Overview

Cargo handling and storage facilities in international locations must have physical barriers and deterrents that guard against unauthorized access. Foreign manufacturers should incorporate the following C-TPAT physical security criteria throughout their supply chains as applicable. Vendors and manufacturers from which Beall's sources should have the following characteristics.

7.1 Fencing

☑️ Perimeter fencing should enclose the areas around cargo handling and storage facilities.

☑️ Interior fencing within a cargo handling structure should be used to segregate domestic, international, high value, and hazardous cargo.

☑️ All fencing must be regularly inspected for integrity and damage.

7.2 Gates and Gate Houses

☑️ A guard or receptionist to monitor office entrances.

☑️ There must be a formal registration process for documenting visitors to the operations.

☑️ Gates through which vehicles and/or personnel enter or exit must be manned and/or monitored.

☑️ The number of gates should be kept to the minimum necessary for proper access and safety.
7.3 Parking

- Private passenger vehicles should be prohibited from parking in or adjacent to cargo handling and storage areas.
- Parking for employees must be separate from the dock and cargo operations.

7.4 Building Structure

- Buildings must be constructed of materials that resist unlawful entry.
- The integrity of structures must be maintained by periodic inspection and repair.

7.5 Locking Devices and Key Controls

- All external and internal windows, gates and fences must be secured with locking devices.
- Management or security personnel must control the issuance of all locks and keys.

7.6 Lighting

- Adequate lighting must be provided inside and outside the facility including the following areas: entrances and exits, cargo handling and storage areas, fence lines and parking areas.
- Adequate lighting inside and outside of facility.
- All corners of parking lots must be illuminated at night.
- Inside lighting should be bright enough to eliminate dark spots or corners.
- Flood lighting on loading and unloading areas.
- Dock doors should be illuminated at night.

7.7 Alarms Systems and Video Surveillance Cameras

Alarm systems and video surveillance cameras should be utilized to monitor premises and prevent unauthorized access to cargo handling and storage areas.
7.8 Beall’s expects all vendors, manufacturers and business partners to adhere to the physical security requirements below:

- Clear zones must be maintained internally and externally to monitor the security of the facility. Brush and growth should be cleared at least 35 feet from perimeter barrier.

- All containers and trailers that remain at the warehouse overnight should be secured. Trailers loaded with cargo should also be sealed, with the seal number recorded and verified.

- Seal numbers must be verified before the container, trailer or truck is released.

- Employees should be familiar with the trucking vendors. The identification of the driver should be checked before cargo is released to his/her custody.

- Truck drivers should never be allowed to randomly enter the factory and pick up a trailer without supervision.

- All visitors and persons not employed by the company should be escorted by an employee at all times.

- Each facility should also have a communication system in place to contact internal security personnel or local law enforcement police in the event of an emergency.
8 Information Technology Security Overview

Beall’s requires all vendors, manufacturers and business partners to ensure the integrity and security of all information technology data. All vendors and manufacturers must adhere to the following information security requirements:

8.1 Restricted Access and Password Protection

✓ **Access should be restricted to authorized company personnel’s use only.**

Automated systems must use individually assigned accounts that require a periodic change of password. IT security policies, procedures and standards must be in place and provided to employees in the form of training.

8.2 Use of firewalls, anti-virus, encryption software

✓ Vendors and manufacturers must have systems in place that are supported by the use of firewalls, anti-virus protection and encryption software to prevent against outside intrusion.

8.3 Data backup and storage systems (must be offsite)

✓ All vendors, manufacturers and business partners should have a data backup plan.
✓ System backup data should be stored at an off-site location for safekeeping.

8.4 Accountability

✓ A system must be in place to identify the abuse of IT including improper access, tampering or the altering of business data. All system violators must be subject to appropriate disciplinary actions for abuse.
Beall’s C-TPAT Expectations
Import Vendor Acknowledgement Form

Business Partner Name

Date

Business Partner Address


Respondent Name

Respondent Title
(Principal/Owner, Partner,
Security Manager etc)

Respondent Email

Respondent Tel

I, , a duly authorized representative of above-named company, do hereby acknowledge and confirm the following:

☒ I have received and reviewed a copy of Beall’s C-TPAT Expectations for Vendors & Manufacturers.

☒ I clearly understand my Company’s responsibilities as a Beall’s Business Partner in ensuring the security and integrity of Beall’s Supply Chain.

☒ I attest that my Company can meet and/or exceed all of Beall’s C-TPAT Supply Chain Expectations for Vendors and Manufacturers.

☒ I understand that Beall’s will hold my Company liable for the C-TPAT security compliance of all subcontractors used by my company in the production and transportation of Beall’s merchandise in the supply chain.

☒ I understand that Beall’s may request written and verifiable proof of my Company’s ability to meet all of Beall’s C-TPAT Expectations.

☒ I understand that Beall’s reserves the right to provide recommendations for the improvement of my Company’s Supply Chain Security as per Beall’s risk assessment of my Company’s security profile responses.

☒ I understand that Beall’s and/or U.S. Customs reserves the right to physically inspect my Company’s facilities.

☒ I understand that Beall’s reserves the right to cease doing business with my Company should we fail to adhere to U.S. Customs C-TPAT Supply Chain Security requirements and Beall’s C-TPAT Expectations for Vendors & Manufacturers.

_________________________________________________ ______________________
Authorized Signature Date

_______________________________________
Company Stamp/Seal
Beall’s C-TPAT Expectations - Import Vendor Security Self-Assessment Form

Insert Vendor Name Here

Read the attached *Beall’s C-TPAT Expectations for Vendors & Manufacturers* and C-TPAT security recommendations from U.S. Customs then describe your company’s security procedures related to export/import shipments to Beall’s, Inc. and its subsidiaries: *Beall’s Imports, Inc.* and/or *Beall’s Outlet Stores, Inc.* in the U.S. by checking (V) the appropriate blocks below.

Please print, sign and forward completed forms to Attn: Beall’s C-TPAT Coordinator’s Office at CTPATCompliance@beallsinc.com

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**Business Partner Name**

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**Business Partner Address**

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**Respondent Name**

---

**Respondent Title**

(Principal/Owner, Partner, Security Manager etc)

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**Respondent Email**

---

**Respondent Tel**

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1. Select (V) the category that best describes your business with Beall’s entities in the U. S. *(Check all that apply)*

- [ ] Vendor
- [ ] Manufacturer
- [ ] Agent
- [ ] Customs Broker
- [ ] Consolidator
- [ ] Freight Forwarder
- [ ] Ocean Carrier
- [ ] Inland Transportation Provider
- [ ] Warehouse
- [ ] Other _______________

2. Years in business ____

3. Years doing business with Beall’s, Inc. and its subsidiaries ____

4. Number of employees: ____

5. What Beall’s, Inc. subsidiary / location(s) in the United States does your company most frequently ship to?

- [ ] Beall’s Imports, Inc.
- [ ] Beall’s Outlet Stores, Inc.
- [ ] Both

6. Does your company have written security procedures at non-U.S. facilities doing business with Beall’s, Inc. and its subsidiaries and conduct periodic reviews of internal controls to ensure security compliance?

- [ ] Yes
- [ ] No
7. Does your company affix seals to loaded containers for shipments to Beall’s Inc. and its subsidiaries in the U.S.?
   *Note: All seals must meet or exceed the current PAS ISO 17712 standard for high security seals.*

   - [ ] Yes
   - [ ] No
   Specify Type: [ ]

8. Does your company store containers at its facilities?

   - [ ] Yes
   - [ ] No

9. If yes to above question, are containers stored in a secure area to prevent unauthorized access or manipulation?

   - [ ] Yes
   - [ ] No

10. Does your company ship full container loads (CY/CY) or mostly LCL shipments to Beall’s, Inc. and its subsidiaries? *(Please indicate your best estimate by volume percentage)*

   - [ ] CY/CY Loads Only
   - [ ] CFS / LCL Loads Only
   - [ ] Both ___ % CY/CY ___ % CFS / LCL

   - [ ] Mostly CY/CY Loads ___ %
   - [ ] Mostly CFS / LCL Loads ___ %

11. Does your company have procedures in place to verify the physical integrity of the container structure prior to stuffing, and do they address ensuring the reliability of the locking mechanisms of the doors? *(See the following link for items to be addressed during a container inspection: [http://www.customs.gov/xp/cgov/trade/cargo_security/ctpat/security_criteria/sec_criteria_foreign_mfc/](http://www.customs.gov/xp/cgov/trade/cargo_security/ctpat/security_criteria/sec_criteria_foreign_mfc/))*

   - [ ] Yes
   - [ ] No

12. Does your company conduct 7-point inspections on all import containers scheduled to convey Beall’s merchandise?

   - [ ] Yes
   - [ ] No

13. Does your company have physical access controls to prevent unauthorized entry to facilities, maintain control of employees and visitors, and protect company assets?

   - [ ] Yes
   - [ ] No

14. Have you developed and communicated a process to report shipment overages/shortages, losses or abnormalities, whether suspected or confirmed, to Beall’s, Inc. management?

   - [ ] Yes
   - [ ] No

15. Is your company a member of any of the following U.S. Customs programs: C-TPAT, ISA, the Business Anti-Smuggling Coalition (BASC), or any other internationally-recognized security initiatives?

   - [ ] Yes, C-TPAT *(Please specify SVI# and include copy of C-TPAT Certificate)*
   - [ ] SVI# [ ]
   - [ ] Yes, specify other [ ]
   - [ ] No

16. If a member of the C-TPAT program, has your company been certified and validated? If yes, please state your company’s Tier in the C-TPAT program.

   - [ ] Yes, C-TPAT certified and validated
   - [ ] C-TPAT Tier [ ]
   - [ ] Yes, certified, not validated
   - [ ] N/A
17. Does your company have a Security & Threat Awareness Training program for its employees?
   - Yes  - No

18. If yes, how often is Security & Threat Awareness training provided for employees?
   - Annually  - Quarterly  - Monthly  - Weekly  - As needed

19. Is training documented and records kept on file?
   - Yes  - No

20. Does your company have an incentive program to encourage employees to report security anomalies and incidents?
   - Yes  - No

21. Does your company have written procedures for reporting security anomalies and incidents to local law enforcement and/or U.S. Customs?
   - Yes  - No

22. Do your company’s computer systems have limited access that is reserved for authorized company personnel use only?
   - Yes  - No

23. Are your company’s computer systems password protected to prevent unauthorized access?
   - Yes  - No

24. Does your company use firewalls, encryption software and anti-virus protection to guard from outside intrusion?
   - Yes  - No

25. Does your company have a data backup plan?
   - Yes  - No

26. Is system mainframe back-up data stored at an off-site location for safekeeping?
   - Yes  - No

27. Identify the individual within your company to whom questions about the security of Beall’s, Inc. and its subsidiaries shipments may be directed:

   - Contact Name: _____
   - Contact Title: _____
   - Company Name: _____
Beall’s C-TPAT Expectations - Import Vendor Security Self-Assessment Form

Name: _______                                      Title: _______

Signature: ________________________                      Date: __________________

Company Stamp/Seal: _______________________

Insert Company Name Here acknowledges Beall’s, Inc. and its subsidiaries emphasis on supply chain security and recognizes the expectation that Beall’s business partners share that commitment. I understand that Beall’s, Inc. and its subsidiaries may refer security inquiries from U. S. Customs to me.
Beall's Import Vendor Container 7-Point Inspection Form

To be completed by business partner/factory where the container is physically stuffed and inspected.

Applicable for vendors shipping full container loads ONLY!

**Date:** □ □ □ □  |  **Load Type:** □ CY/CY  □ LC / WT# □ □ □ □
**Container#** □ □ □ □  |  **Seal#** □ □ □ □  |  **Total Cartons** □ □ □ □

<table>
<thead>
<tr>
<th>Vendor / Actual Manufacturer (Full Name &amp; Address)</th>
<th>Container Stuffing Location (Full name &amp; Address)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Consigned To:**

- □ Beall's Imports, Inc.
- □ Beall's Outlet Stores, Inc.

1806 38th Avenue East  
Bradenton, FL 34208

2100 47th Terrace East  
Bradenton, FL 34203

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### Import Vendor Container 7-Point Inspection Report

<table>
<thead>
<tr>
<th>1</th>
<th>2</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Outside / Undercarriage</strong></td>
<td><strong>Inside / Outside Doors</strong></td>
</tr>
<tr>
<td>□ Check for structural damage (dents, holes, repairs)</td>
<td>□ Ensure locks are secure and reliable</td>
</tr>
<tr>
<td>□ Support beams are visible</td>
<td>□ Check for loose bolts</td>
</tr>
<tr>
<td>□ Ensure no foreign objects are mounted on container</td>
<td>□ Ensure hinges are secure and reliable</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>3</th>
<th>4</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Right Side</strong></td>
<td><strong>Left Side</strong></td>
</tr>
<tr>
<td>□ Look for unusual repairs to structural beams</td>
<td>□ Look for unusual repairs to structural beams</td>
</tr>
<tr>
<td>□ Repairs to the inside wall must be visible on the outside too and vice versa</td>
<td>□ Repairs to the inside wall must be visible on the outside too and vice versa</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>5</th>
<th>6</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Front Wall</strong></td>
<td><strong>Ceiling / Roof</strong></td>
</tr>
<tr>
<td>□ Front wall should be made of corrugated material</td>
<td>□ Ensure support beams are visible</td>
</tr>
<tr>
<td>□ Interior blocks are visible and not false. Absent or cardboard blocks are not normal</td>
<td>□ Ensure ventilation holes are visible. They should not be covered or absent</td>
</tr>
<tr>
<td>□ Ensure vents are visible.</td>
<td>□ Ensure no foreign objects are mounted to the container</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>7</th>
<th>8</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Floor</strong></td>
<td><strong>Seal Verification</strong></td>
</tr>
<tr>
<td>□ Ensure floor of container is flat.</td>
<td>□ Seal properly affixed</td>
</tr>
<tr>
<td>□ Ensure floor is of uniform height.</td>
<td>□ Seal meets or exceeds PAS ISO 17712</td>
</tr>
<tr>
<td>□ Look for unusual repairs to the floor</td>
<td>□ Ensure seal is not broken/damaged</td>
</tr>
</tbody>
</table>

I have visually inspected and verified, to the best of my ability, the condition of the container noted above. I confirm that the container is structurally sound, weather tight, has no false compartments, and the locking mechanisms are in good order and show no visible signs of being tampered with.

<table>
<thead>
<tr>
<th>Inspected By:</th>
<th>Date</th>
<th>Company Stamp/Seal:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Seal affixed and verified by:</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Beall's C-TPAT Contact Information

Please direct C-TPAT inquiries to:

Attn: Marlyn Vaughn
C-TPAT Coordinator
Beall's, Inc.
700 13th Avenue East – 4th Floor
Bradenton, FL 34208

Tel: 941-747-2355

Email: CTPATCompliance@beallsinc.com