

Client	Big Lots	QIMA Service No	R-Cloud-1917286
Supplier	U-Brands LLC.	Auditor	Matthew She
Factory	Aiven on Stationery Co.,Ltd.	Audit Date	01-Mar-2019
Industry	Printing & Packaging	Country	China

General Overview of the Audit's Findings						
Clause	Theoretical Max Score	Actual Score				
1. Personal Security	19	15				
2. Physical Security	31	28				
3. Storage & Distribution	16	13				
4. Shipment Information Controls	6	5				
5. Information Access Controls	14	11				
6. Contractor Controls	8	6				
7. Export Logistics	7	6				
8. Records & Documentation	11	10				
9. Facility Photos	/	/				
10. CAP in Chinese & English	/	/				
	112	94				

Overall Score (result)	83.9 = Accepted
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Valid until: 28-Feb-2022



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Important Remarks

- 1. The factory's manufacturing products were folder back clips, and main processes were Metal-making, injection, pickling, spraying, screen printing, assembling and packing.
- 2. The factory had three flat buildings, one 2-storey building, two 3-storey buildings, and one 4-storey building used as workshop and warehouse, one 4-storey building used as Kitchen & canteen and office. No dormitory was provided for employees.

Negative Findings:

- 1. The security dept. did not get the resigned name list.
- 2. Through employee's interview, several employees did not know the security policy and related procedure.
- 3. No guard checked employees ID to monitor access to the restricted areas such as loading/unloading area and raw materials warehouse.
- 4. Visitors were not monitored while accessing restricted areas such as loading/unloading area and raw materials warehouse.
- 5. The factory only maintained 1 day's monitoring records.
- 6. CCTVs were only monitored on normal working time by IT supervisor.
- 7. Facility did not have proper fencings to enclose cargo handling and storage areas to prevent unauthorized access.
- 8. No proper security control was in place to prevent the introduction of foreign materials at point of loading.
- 9. No training on the information requirements for shipments to the United States was provided for this person.
- 10. The login user ID could not be suspended after a certain number of failed access attempts.
- 11. Security logs were not kept for invalid password attempts and file access.
- 12. There is no plan to restore data in the case of a failure.
- 13. Facility did not consider the contractors' financial stability, and corporate history in selecting the contractors used.
- 14. Facility did not consider the carriers' financial stability, and corporate history in selecting the contractors used.
- 15. No evidence showed that the facility security plan is reviewed and updated periodically.



Factory Profile

	General information					
1	Factory Name	Aiven On Stationery Co., Ltd				
	Parent company information	Nil				
	(if applicable) Other Divisions/branches/related	Nil				
	companies list	INII				
	Date of formation	26-Dec-2001				
2	Date of formation	No.16, Jinlong Road, Taoyuan Di	strict Ninghai			
_	Factory address/postal code	Ningbo, Zhejiang, China/315600	· •			
3	GPS location	29.332 N 121.422 E				
4	Contact person name	Mrs. Zheng Jiaona				
5	Tel. / Fax Number	+8657465331900				
6	Email / website	Hr6@aiven.com				
7	Total number of workers	Permanent :449 Temp	orary :0 Migrant :0			
8	Industry	Stationery				
9	Key / Main products	Fold back clip				
10	Main market and country the facility	US and Europe				
	export to					
11	Business license	Certificate No.: 913302267342422366				
		from 26-Dec-2001 to 25-Dec-2023				
12	Type of Business (private/public/joint	Private				
	venture/etc.)	1				
13	Manufacturer Identification Number	N/A				
	(if applicable)					
14		RMB 180,000,000	Trend:			
	Annual turnover for the past 3 years	RMB 200,000,000				
	Tor the past 3 years	RMB 230,000,000				
15	Brief history of the facility	Factory began their business on	this site from			
	(function/business/etc.)	26-Dec-2001				
16	Does the facility participate in any	The facility did not participate in other				
	other security-related compliance programs?	security-related compliance pro	grams.			
17		Based on management interview				
	Annual transportation mode and volume	most of the shipments are sea transportation and the				
	7au transportation mode and volume	annual shipment volume is around 100 cubic feet				
		containers.				
18	How many audits around security	Based on management interview	•			
	the facility conducts on a year basis?	security audits conducted on a year basis.				



F	acility Structure					
19	Facility size (m ²) 55000 m2					
	No. of buildings					
	Workshop	three flat buildings, one 2-storey building, two 3-storey				
		buildings, and one 4-storey building				
	Warehouse	three flat buildings, one 2-storey building, two 3-				
		storey buildings, and one 4-storey building				
	Container yards	40 Fits (12.5*2.3*2.65 m)				
	Others	N/A				
	Trucks owned By Company	0				
	Percent of goods exported to US	60%				
	By air	0%				
	By sea	100%				



Part 1 - Personnel Security

Nr	Checkpoints	Υ	N	NA	Finding/comments
1.1	Is there a procedure in place to screen prospective employees and to periodically check current employees? A process for hiring & interviewing applicants?	\boxtimes			Appropriate procedure was in place to screen prospective employees and to periodically check current employees.
1.2	Application information, such as employment history and references, must be verified prior to employment.	\boxtimes			Employment history and references were verified for all employees.
1.3	Should each applicant fill-in personal data & application form?	\boxtimes			Each applicant filled-in personal data & application form.
1.4	Does the factory keep each employee's ID copy and personal file?	\boxtimes			Facility kept each employee's ID copy and personal file.
1.5	Consistent with national regulations, background checks and investigations should be conducted for prospective employees.	\boxtimes			Background checks and investigations were conducted for prospective employees.
1.6	Periodic checks and reinvestigations for existing employees should be performed based on cause and/or the sensitivity of the employee's position.	\boxtimes			Periodic checks and reinvestigations for existing employees based on cause and/or the sensitivity of the employee's position were conducted.
1.7	Is there a procedure in place to monitor the hand-over of badge, keys/cards, tools and authority of system login-in when the employee resigned? Check the records.				The facility established a procedure to monitor the hand-over of badge, keys/cards, tools and authority of system login-in when the employee resigned, records were provided for review.
1.8	Did the security personnel control adequately the issuance and removal of employees, visitor and vendor ID badges? Did the security dept. get the resigned name list everyday?		\boxtimes		The security guard controls the issuance and removal of employees, visitor and vendor ID badges. The security dept. did not get the resigned name list.
1.9	Did all employees accept the basic safety training, including new employee orientation and periodic training for existing employees? Like security policies and related procedures and standards.				All workers including security guards received security training on 6-Sept-2018. However, through employee's interview, several employees did not know the security policy and related procedure.



1.10	Did special training offer to assist security personnel in maintaining the cargo integrality, identify internal conspiracies, and protecting access control?			Special training was offered to assist security personnel in maintaining the cargo integrality, identify internal conspiracies, and protecting access control once every 6 months. The latest training date was 10-Jan-2019.
1.11	Employees must be made aware of the procedures the company has in place to address a situation and how to report it (e.g. hot-line).	\boxtimes		Employees were aware of the procedure that the company has in place to address a situation and how to report it.
1.12	Are personnel encouraged to report irregularities, suspicious activity and/or security violations? If yes, please indicate by which means:	\boxtimes		The facility had established the C-TPAT report process, and the employees would be given some awards for reporting security violations.
1.13	Are documented security procedures publicized throughout the facility?	\boxtimes		The documented security procedure was publicized throughout the facility.
1.14	Did additional training provide to employees in the shipping and receiving areas, as well as those receiving and opening mail?	\boxtimes		Additional training was provided to employees in the shipping and receiving areas as well as those receiving and opening mail.
1.15	Is a threat awareness program established and maintained by security personnel to recognize and foster awareness of the threat posed by terrorists at each point in the supply chain?			The threat awareness program was established and maintained by security personnel to recognize and foster awareness of the threat posed by terrorists at each point in supply chain.
1.16	Employees should only be given access to those secure areas needed for the performance of their duties. Guard should check employees ID to monitor access to the restricted areas.		\boxtimes	Employees would only be given access to those secure areas needed for the performance of their duties. No guard checked employees ID to monitor access to the restricted areas such as loading/unloading area and raw materials warehouse.

Actual Score	Theoretical Max
15	/ 19



Part 2 - Physical Security

Nr	Checkpoints	Υ	N	NA	Finding/comments
2.1	Do management or security personnel control the issuance of all locks and keys?				All locks and keys were controlled. IT service room was control by Mr. Yu Youwu/ IT Administrator, Production area was controlled by Mr. Shi Xiwen/Security Director. Warehouse area was control by Mr. Yan Shizhong/ Warehouse Supervisor.
2.2	Does the facility have an alarm system and video surveillance cameras? Is there a back-up power source for the alarm system?	\boxtimes			The facility had an alarm system and video surveillance camera. Back-up power source was provided for the alarm system.
2.3	Is there a procedure in place to identify challenge and address unauthorized/unidentified person?				Procedure in place to identify challenge and address unauthorized/unidentified person. Authorized name list with photos were published in all accessing restricted areas.
2.4	Are all buildings in the facility constructed of materials that prevent unlawful entry?	\boxtimes			All offices, workshops and warehouses in the facility constructed of materials that prevent unlawful entry.
2.5	Are all buildings properly inspected, maintained and repaired so that there are no open areas through floors, roof or broken walls? If, yes, check the records.				The facility inspected the buildings (every month) with records, and based on facility tour, no open areas through floors, roof or broken walls were identified during audit.
2.6	Are the perimeter barrier and gates regularly inspected, properly maintained and repaired? If, yes, check the records.				The facility inspected, maintained and repaired the perimeter barrier and gates regularly (every month) with records.
2.7	Is there adequate lighting inside and outside the facility including around entrances and exits, cargo handling and storage areas, fence lines and parking areas?	\boxtimes			There was adequate lighting inside and outside the facility including around entrances and exits, cargo handling and storage areas.
2.8	Does the facility store containers/trailers onsite? If yes, do they store in a secure area with mechanisms in place to prevent unauthorized access?			\boxtimes	No containers and trailers stored onsite



2.9	Are loaded stored containers/trailers sealed with high security seals that meet or exceed ISO/PAS 17712 standard?	\boxtimes		Loaded stored containers/trailers were sealed with high security seals that meet ISO/PAS 17712 standard.
2.10	Does the guard force staff in the facility 24hours a day, 7days a week? If yes, please record the working time and shifts.			Total 6 security guards in the facility, guard force staffs were available in the facility 24 hours a day and 7 days a week. 2 shifts with the work time as below: 6:00 to 18:00 for first shift and 18:00 to 6:00 for second shift.
2.11	Do security guards log incidents and report any security violation incidents to management personnel?	\boxtimes		Security guards logged incident and report all security violation incidents to management personnel.
2.12	Does the facility have proper communication mechanism (e.g. phone, radio) to local law enforcement authorities?	\boxtimes		The security guards communicated to local law enforcement authorities by phone 110.
2.13	Are gates for employees and vehicles entrance/exit guarded and/or monitored during operations and non-operating hours?	\boxtimes		The security guards monitor the gates for employees and vehicles entrance at any time.
2.14	Does access control include the positive identification of all employees, visitors, and vendors at all entry points? Check the records.			All employees wear work cards, the security guard accessed control these employees, visitors, and vendors at entry point and relevant records were provided.
2.15	Does an authorized employee escort visitors and vendors through the buildings?	\boxtimes		Authorized employee escorted visitors and vendors through the buildings.
2.16	Are all visitors monitored while accessing restricted areas (e.g. loading/unloading, IT, Finance)		\boxtimes	Visitors were not monitored while accessing restricted areas such as loading/unloading area and raw materials warehouse.
2.17	Do guards patrol the interior of building in the facility? If yes, check the records.	\boxtimes		Guards regularly patrolled the interior of building in the facility once per hour during day shift and night shift, and accurate patrolling records were provided for review.
2.18	Are closed circuit television cameras (CCTVs) used to monitor activity inside/outside the facility?			The closed-circuit television cameras (CCTVs) were used to monitor activity inside/outside the facility. But the factory only maintained 1 day's monitoring records.
2.19	When are CCTVs monitored? Who monitors the CCTVs? Is access to CCTV monitors controlled?		\boxtimes	Access to CCTV monitors was controlled.

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				CCTVs were only monitored on normal working time by IT supervisor.
2.20	Is there written procedures in place to stipulate how seals are controlled and affixed to loaded containers, including recognizing and reporting compromised seals and /or containers to local customs authorities?	\boxtimes		There is a written procedure in place to stipulate how seals are controlled and affixed to loaded containers, including recognizing and reporting compromised seals and /or containers to local customs authorities.
2.21	In case there is shortage, overages, and other significant discrepancies or anomalies, the facility must make sure such situation be resolved and/or investigated appropriately?	\boxtimes		Appropriate procedure with related records was in place.
2.22	Are vehicles prohibited/prevented from parking near cargo conveyances/perimeter fencing?	\boxtimes		Vehicles parking area was far away from cargo conveyances/perimeter fencing.
2.23	Are parking lots for visitors separated from those for employees? If allowed to enter facility area, are vendor and visitor vehicles inspected?			The security guard provided vendor and visitor vehicles inspected records for review. The parking lots for visitors were separated from those for employees.
2.24	Are there security measures in place to ensure the integrity and security of processes relevant to the transportation, handling and storage of cargo in the supply chain?			Security measures were performed in place to ensure the integrity and security. E.g. CCTV to monitor warehouse and workshop, specialize floor area to store material and finished goods, security guards to prevent foreign goods entry.

Actual Score	Theoretical Max
28	/ 31

Part 3 – Storage & Distribution

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Nr	Checkpoints	Υ	N	NA	Finding/comments
3.1	Does the factory have fencing or other barrier materials to enclose cargo handling and storage areas to prevent unauthorized access?		\boxtimes		Facility did not have proper fencings to enclose cargo handling and storage areas to prevent unauthorized access.
3.2	Are international and domestic cargo segregated and stored separately within a fenced area or secured room?			\boxtimes	No domestic cargo was from the factory.
3.3	Is high value cargo marked, segregated and stored separately within a fenced area or secured room?			\boxtimes	No high value cargo in the facility.
3.4	Is dangerous cargo, including hazardous material and ammunitions and explosives, secured and stored separately and labeled when necessary?			\boxtimes	No hazardous material and ammunitions and explosives in the factory.
3.5	Is the loading and departure of containers/trailers supervised by a security officer or other designated supervisor?				The loading and departure of containers/trailers were supervised by Mr. Shi Xiwen / Production records and records were available.
3.6	Are security controls in place to prevent the introduction of foreign materials at point of loading?		\boxtimes		No proper security control was in place to prevent the introduction of foreign materials at point of loading.
3.7	Are the cargo units identified, labeled, weighted and/or counted before loading?	\boxtimes			The cargo units were identified, labeled, weighted and/or counted before loading.
3.8	Is there a documented procedure in place to ensure that management and/or customs and/or local law enforcement is informed of all anomalies found in shipments?				Documented procedure was in place to ensure that management and/or customs and/or local law enforcement is informed of all anomalies found in shipments.
3.9	Are accurate, legible and complete cargo documents and packing slips prepared?	\boxtimes			Accurate, legible and complete cargo documents and packing slips were prepared.
3.10	Are there documented procedures for tracking goods for shipment? How to track?	\boxtimes			The facility established documented procedures for tracking goods for shipment.



3.11	Are documented procedures in place to verify the integrity of the container structure through inspection of front wall, left side, right side, Floor, ceiling/roof, inside/outside door, outside/undercarriage? Check the records.			Documented procedures and records were in place to verify the integrity of the container structure through inspection of front wall, left side, right side, Floor, ceiling/roof, inside/outside door, outside/undercarriage.
3.12	Is there a documented procedure to affix a high security seal which meets or exceeds ISO/PAS17712 on each container/trailer bound for US?	\boxtimes		Documented procedure to affix a high security seal which meets ISO/PAS17712 on each container/trailers bound for US.
3.13	Please list all seal types used, indicate whether each type is ISO/PAS17712 compliant, and for what percentage of overall shipments the seal type is used.	\boxtimes		The facility used 100% ISO/PAS17712 standard seals and provided ISO/PAS17712 compliant report for review during audit.
3.14	Is there an individual responsible to issuing and tracking seals? Are there documented procedures for affixing, replacing, recording and tracking the seals placed on containers, trailers, trucks?	\boxtimes		An individual (Mr. Yan Shizong/Warehouse supervisor) responsible to issue and track seals, also, documented procedures available in place for affixing, replacing, recording and tracking the seals placed on containers, trailers, trucks.
3.15	Does the facility keep records of seal numbers together with truck license, driver name, time and date of lading or unloading, container/cargo conveyance number? How long the records are kept?	\boxtimes		Facility kept records of seal numbers together with truck license, time and date of loading or unloading, container/cargo conveyance number for 1 year.
3.16	Are seal numbers verified at time of final sealing before departure?			Seal numbers verified by logistic supervisor at time of final sealing before departure.

Actual Score	Theoretical Max
13	/ 16



Part 4 – Shipment Information Control

Nr	Checkpoints	Υ	N	NA	Finding/comments
4.1	Is there a designated company representative responsible for providing accurate information o the facility products to the broker/forwarder and carrier?				A designated company representative (Mrs. Jin Minxia/ Sales) responsible for providing accurate information of the facility products to the broker/forwarder and carrier.
4.2	Has this person been trained on the information requirements for shipments to the United States?				No training on the information requirements for shipments to the United States was provided for the designated person.
4.3	Are records maintained on all shipments?	\boxtimes			All shipments were recorded.
4.4	Are the information requirements automated?	\boxtimes			The information requirements were automated.
4.5	Does the responsible company representative understand the need to provide accurate shipper, forwarder, and consignee information? And the timeframes required for the advance information?				The responsible company representative understood the need to provide accurate shipper, forwarder, and consignee information, and the timeframes required for the advance information.
4.6	Is the information requested in this section related to shipping records documented and verifiable?				The information requested in this section related to shipping records was documented and verifiable.

Actual Score	Theoretical Max
5	/ 6



Part 5 – Information Access Controls

Nr	Checkpoints	Υ	N	NA	Finding/comments
5.1	Does the facility have documented procedures for identifying which employee is allowed access to: electronic information systems? facility documents? Shipping forms? Shipping data? Shipping/cargo movement? High security seals? Is there a name list of access limit?	⊠			Facility had documented procedures for identifying which employee is allowed access to authorized area. There was a name list of access limit. e.g. authorized Mr. Yu youwu/ IT Administrator access to electronic information systems, authorized Mr. Yan Shizong/Warehouse access to high security seals, etc.
5.2	Does the facility have electronic information systems used for operational purposes? Is password protected?	\boxtimes			Facility had electronic information systems used for operational purposes.
5.3	Is access to the server room controlled?	\boxtimes			Access to the server room was controlled.
5.4	Are relevant employees provided with individually assigned IT system accounts?	\boxtimes			All relevant employees provided with individually assigned IT system accounts.
5.5	Are passwords changes required by policy, or enforced in a systematic manner at least every 90days?	\boxtimes			Per management review, computers' passwords were changed every 42 days.
5.6	Is there a designated system administrator who set up the user IDs?	\boxtimes			Mr. Yu youwu/ IT Administrator set up the user IDs.
5.7	Is the login user ID suspended after a certain number of failed access attempts?		\boxtimes		The login user ID could not be suspended after a certain number of failed access attempts.
5.8	Do desktops automatically lock after a designated period of inactivity?	\boxtimes			The desktops would be automatically locked after a designated period of inactivity.
5.9	Are security logs kept and reviewed periodically for invalid password attempts and file access?		\boxtimes		Security logs were not kept for invalid password attempts and file access.
5.10	Has the facility implemented into its network system: firewalls? Intrusion warning system? Virus protection?	\boxtimes			360 antivirus software was used for virus protection and firewalls were installed for network.
5.11	Is all computer information saved on a back-up system? Are backups stored in a fire resistant safe or at an off-site facility?	\boxtimes			All computer information is saved on a back-up system. And backups were stored in a fire resistant safe or at an off-site facility.
5.12	Is there a plan to restore data in the case of a failure?				There is no established plan to restore data in the case of a failure.
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5.13	Is the information requested in this section related to IT security			Conduct procedures and related
	documented and verifiable?	\boxtimes		records were available.

Actual Score	Theoretical Max
11	/ 14



Part 6 - Contractor Controls

Nr	Checkpoints	Υ	N	NA	Finding/comments
6.1	Does the facility select and hire contractor (including other manufacturers, product suppliers, and vendor) to perform services?	⊠			The facility established a process to evaluate the C-TPAT performance of contractors, background checks and other evaluation reports were provided for review during audit.
6.2	In selecting the contractors used by the facility, does the facility consider the contractors' security controls, financial stability, and corporate history?		\boxtimes		Facility did not consider the contractors' financial stability, and corporate history in selecting the contractors used.
6.3	Does the facility have written security standards and documented procedures for its contractors?	\boxtimes			Facility had written security standards and documented procedures for its contractors.
6.4	Do contractor that have access to restricted areas undergo a background investigation?	\boxtimes			Background checks reports of contractor were provided for review.
6.5	Is there a documented procedure for contractors to report security violations to facility management?				Documented procedure was set up for contractors to report security violations to facility management.
6.6	Does the factory require compliance to C-TPAT requirements and procedures in the contract with their suppliers/contractors?	\boxtimes			The facility required C-TPAT enrollment of its contractors and updated every year.
6.7	Is the information requested in this section related to business partners documented and verifiable?				The information requested in this section related to business partners was documented and verifiable.

Actual Score	Theoretical Max
6	/8



Part 7 – Export Logistics

Nr	Checkpoints	Υ	N	NA	Finding/comments
7.1	When selecting carriers, does the facility consider: security controls, financial stability, corporate history?		\boxtimes		Facility did not consider the carriers' financial stability, and corporate history in selecting the contractors used.
7.2	Does the factory require eligible carriers to comply with CTPAT protocols and procedures?	\boxtimes			Facility investigated and evaluated the carriers to demonstrate C-TPAT every year. Related C-TPAT audit report and certification of carriers was provided for review.
7.3	Does the facility use in-country transport services?	\boxtimes			In-country transport services (Such as Ninghai Yuanshun Logistics Co.,Ltd. etc.) were used by the facility.
7.4	Does the facility use in-country carrier services?	\boxtimes			In-country carrier services (Shun Feng Express Delivery Company etc.) were used by the facility.
7.5	Is there a documented procedure for in-country carriers to report security violations to the facility management?	\boxtimes			Documented procedure was set up for in-country carriers to report security violations to facility management.
7.6	Does the facility have written or electronic confirmation of its partners compliance with C-TPAT or C-TPAT equivalent security criteria (e.g. contract language, a letter of commitment signed at the management level or above)	\boxtimes			Facility had written confirmation of its partner's compliance with C-TPAT or C-TPAT equivalent security criteria.
7.7	Is the information requested in this section related to export logistics documented and verifiable?	\boxtimes			The information requested in this section related to export logistics was documented and verifiable.

Actual Score	Theoretical Max
6	/7



Part 8 – Records & Documentation

Nr	Checkpoints	Υ	N	NA	Finding/comments
8.1	Does the facility have a documented policy that requires that all security procedures be documented?	\boxtimes			Facility had a documented policy that requires that all security procedures be documented.
8.2	Does the facility have designated chief/head personnel responsible for overall site security?	\boxtimes			Mr. Shi Xiwen/ Security Director was designated as head personnel responsible.
8.3	Is there a designated security department/team at the facility?				Facility had a designated security team at the facility.
8.4	Is there a facility official responsible for plant security, personnel security, contractor security, conveyance/transport security?				Facility had a senior management responsible for plant security, personnel security, contractor security, conveyance/transport security.
8.5	Is there facility official responsible for security audit or evaluation?				Facility had a senior management (Mr. Shi Xiwen/ Security Director) responsible for security audit or evaluation.
8.6	Has many (internal, second or third party) site security assessment been conducted?	\boxtimes			Facility external security assessment annually by third party. The facility conducted internal security assessment at 19-Mar-2018.
8.7	Is there a documented procedure to conduct periodic security checks to ensure that the security procedures in all sections (Part 1-8) are being performed properly?				A documented procedure was available to conduct periodic security checks to ensure that the security procedures in all sections (Part 1-8) were being performed properly.
8.8	Is there a documented security improvement plan that summarizes or identities vulnerabilities and responsive corrective actions?				The facility had a documented security improvement plan that summarizes or identities vulnerabilities and responsive corrective actions.
8.9	Is the facility security plan reviewed and updated periodically?		\boxtimes		No evidence showed that the facility security plan is reviewed and updated periodically.
8.10	Is the information requested in the section above documented and verifiable?	\boxtimes			The information was requested in the section above documented and verifiable.

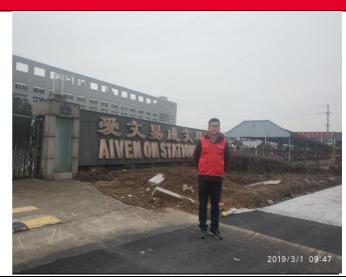


Actual Score	Theoretical Max	
10	/ 11	



Part 9 - Facility Photos





Auditor in front of factory gate



Perimeter Fencing



Facility Building



Employee Parking



Visitor Parking

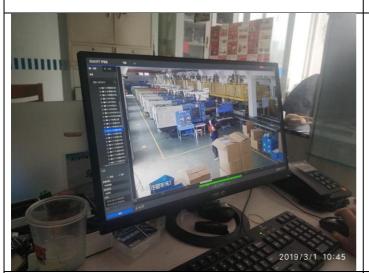




Outside Lighting



Security Room – Communication Equipment



CCTV system and monitor



Packing Area



Loading Area



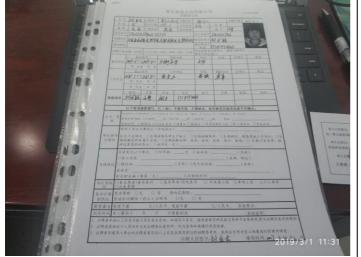
Business License





Facility Security Plan

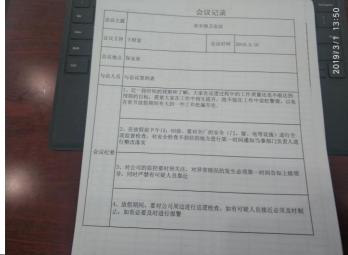
Personnel Security Guideline for Hiring & Termination Procedure

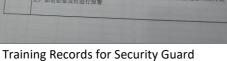




Personal File

ID copy







Job Description of Security Guard

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Suggestion box

Visitor / Vehicle In/out Access Control Record







Records of the distribution of keys, codes, cards

Factory ID Return And Missing Records



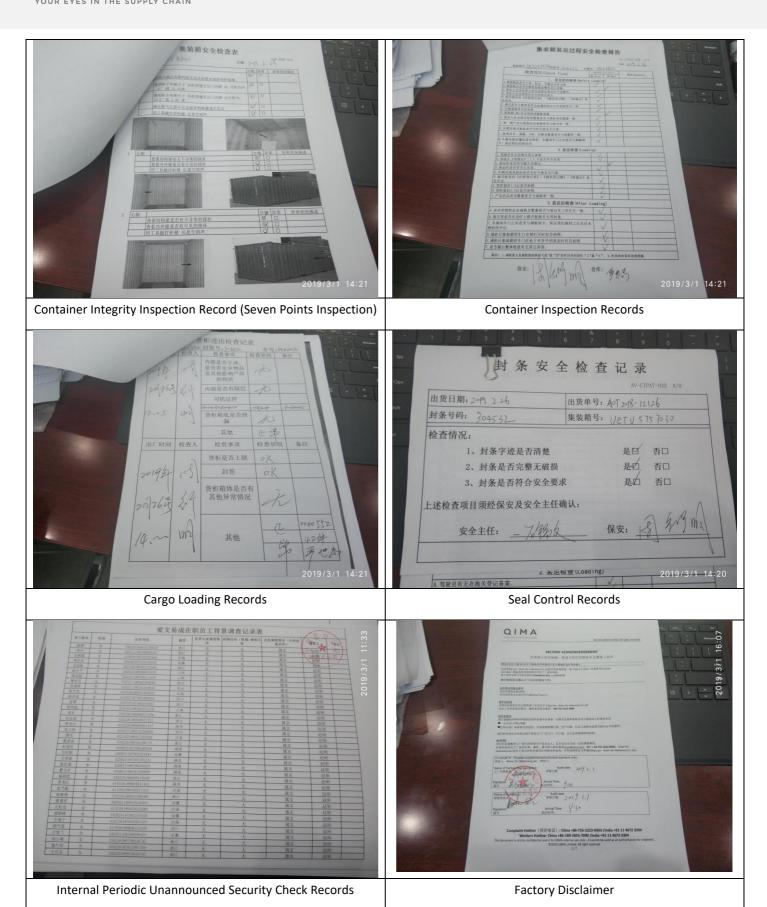
Backup check for new employees



Screen Records of Arriving Package and Mail

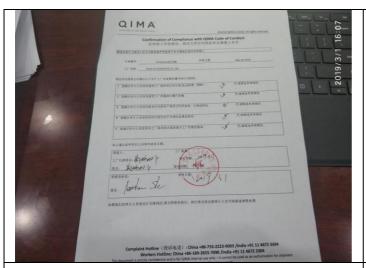
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C-TPAT Audit Report 2019



Part 10 —Corrective Action Plan
到正指施计划

Clased Big Lots
Supplier U-Brands LLC
Factory Alven on Stationery Co., Ltd.
Big Lots
Supplier U-Brands LLC
Factory Alven on Stationery Co., Ltd.
Big Lots
Supplier U-Brands LLC
Factory Alven on Stationery Co., Ltd.
Big Lots
Supplier U-Brands LLC
Factory Alven on Stationery Co., Ltd.
Big Clase
Finding Description
R. Clased Country
China

No. Clased Finding Description
R. Right Ltd.
Big Lots
Supplier U-Brands LLC
Factory Alven on Stationery Co., Ltd.

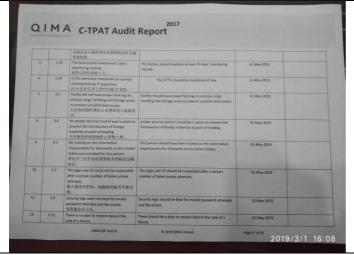
Data Ol. Marz. 2019
Country
China

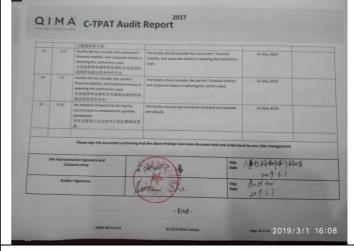
No. Clased Finding Description
R. Right Ltd.
Big Lots
Supplier U-Brands Ltd.
Remarks
R. Right Ltd.
R. Lise Country
China

The factory Should provide registery discussed in a Remarks
R. Right Ltd.
R. Right Right

Confirmation of Compliance with QIMA COC

CAP signed & stamped





CAP signed & stamped

CAP signed & stamped



NC Findings description: The factory only maintained 1 day's monitoring records.



NC Findings description: Facility did not have proper fencings to enclose cargo handling and storage areas to prevent unauthorized access.

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Part 10 - Corrective Action Plan 纠正措施计划

Client **Big Lots** QIMA Service No

R-Cloud-1917286

Supplier

U-Brands LLC.

Printing & Packaging

Auditor(s)

Matthew She 01-Mar-2019

Factory Industry Aiven on Stationery Co.,Ltd.

Date Country

China

Nr. 序号	Clause 条款	Finding Description 发现描述	Corrective Actions agreed/planned 采取的纠正措施	Implementation Date 实施日期	Remarks 备注

			\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\		H 177
1	1.8	The security dept. did not get the resigned name list. 保安部门未获得离职人员名单。	The factory should provide resigned name list to the security department.	31-May-2019	
2	1.9	Through employee's interview, several employees did not know the security policy and related procedure. 访谈中发现有几个员工不了解反恐的相关政策和程序。	All employees should know the security policy and related procedure.	31-May-2019	
3	1.16	No guard checked employees ID to monitor access to the restricted areas such as loading/unloading area and raw materials warehouse. 没有保安或者安全辅助人员在员工进入装卸货区/原材料仓库等限制区域时检查员工的 ID。	Guard should check employees ID to monitor access to the restricted areas.	31-May-2019	

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		Visitors were not monitored while		
4	2.16	accessing restricted areas such as loading/unloading area and raw materials warehouse. 访客在进入装卸货区和原材料仓时未被有效监控。	Visitors should be monitored while accessing restricted areas	31-May-2019
5	2.18	The factory only maintained 1 day's monitoring records. 监控记录仅保留 1 天。	The factory should maintain at least 45 days' monitoring records.	31-May-2019
6	2.19	CCTVs were only monitored on normal working time by IT supervisor. CCTV 仅在正常上班时间被 IT 监控。	The CCTVs should be monitored all day.	31-May-2019
7	3.1	Facility did not have proper fencings to enclose cargo handling and storage areas to prevent unauthorized access. 无有效的围栏来防止未授权进入装卸货区。	Facility should have proper fencings to enclose cargo handling and storage areas to prevent unauthorized access.	31-May-2019
8	3.6	No proper security control was in place to prevent the introduction of foreign materials at point of loading. 无有效的控制措施防止异物入侵。	proper security control should be in place to prevent the introduction of foreign materials at point of loading.	31-May-2019
9	4.2	No training on the information requirements for shipments to the United States was provided for the designated person. 特定员工没有培训美国相关的船运运输知识。	This person should have been trained on the information requirements for shipments to the United States	31-May-2019
10	5.7	The login user ID could not be suspended after a certain number of failed access attempts. 输入错误的密码,电脑使用账号不能自锁。	The login user ID should be suspended after a certain number of failed access attempts.	31-May-2019

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11	5.9	Security logs were not kept for invalid password attempts and file access. 未保留安全日志。	Security logs should be kept for invalid password attended and file access.	empts 31-May-2019
12	5.12	There is no established plan to restore data in the case of a failure. 无数据恢复计划。	There should be a plan to restore data in the case of failure.	a 31-May-2019
13	6.2	Facility did not consider the contractor financial stability, and corporate histor selecting the contractors used. 企业选择承包商和供应商时未考虑任商的财务稳定性和合作历史。	ry in Stability, and corporate history in selecting the contra	
14	7.1	Facility did not consider the carriers' financial stability, and corporate histo selecting the contractors used. 企业选择承运商时未考虑承运商的原稳定性和合作历史。	and corporate history in selecting the carriers used.	bility, 31-May-2019
15	8.10	No evidence showed that the facility security plan is reviewed and updated periodically. 没有证据显示企业安全计划定期修改新。	The facility security plan should be reviewed and upo	dated 31-May-2019
Please sign this document confirming that the above findings have been discussed with and understood by you: (site management)				
Site Representative Signature and Company chop:		gnature and		Title Date
Auditor Signature:				Title Date

- End -

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