Colony Brands, Inc.

Supply Chain Security Profile
Customs-Trade Partnership against Terrorism

Supplier Questionnaire

Colony Brands, Inc. (f/k/a The Swiss Colony, Inc.) is a member of the Customs-Trade Partnership against Terrorism (C-TPAT). This program is a key anti-terrorism initiative developed by U.S. Customs and Border Protection (CBP). As a C-TPAT member, Colony Brands must ensure that minimum security procedures are in place throughout our supply chain. For purposes of C-TPAT, CBP defines the supply chain to extend from the point of origin (manufacturer/supplier/vendor) through to our distribution points in the United States.

We are required to have written and verifiable processes for the selection of business partners including manufacturers, product suppliers and vendors. As part of these processes, we must require you to demonstrate that your company's security procedures meet the minimum security requirements established by U.S. Customs and Border Protection. Your responses to this questionnaire will help us meet our obligations as members of C-TPAT. Your responses will also help us obtain the benefits of the C-TPAT program, which include a reduced number of inspections when our goods arrive in the U.S.

Your responses and your compliance with the C-TPAT minimum security criteria are subject to verification by us. We will incorporate the verification into our quality control and social compliance inspections of your facilities. I ask that the questionnaire be completed and returned to me within 30 days.

Please contact me before answering the questionnaire if you have any questions about the minimum security procedures outlined in this questionnaire. The questionnaire is designed to identify those areas where improvements are needed to meet the minimum security requirements. The correct identification of a security weakness will not adversely affect our business relationship, but will enable us to work with you to develop a security improvement plan.

You must complete a questionnaire for each facility or location where you manufacture and ship goods to us. You may photocopy this questionnaire as needed. The questionnaire must be signed by an officer of the company. We require an updated form from every factory on a yearly basis.

Thank you,

AJ Schuchart
Manager, Global Compliance
Colony Brands, Inc. (f/k/a The Swiss Colony, Inc.)
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Name and Address of Facility:

Container Security	Yes	No
1. Do you verify the physical integrity of the container structure prior to stuffing or loading? The inspection of the container is intended to identify the presence of false walls or other tampering with the container designed to facilitate unauthorized access to the container after it leaves your facility.	☐	☐
2. Does the inspection of the physical integrity of the container structure examine the following seven-points of the container's structure:		
a. Front wall (to detect any false walls)	☐	☐
b. Left side	☐	☐
c. Right side	☐	☐
d. Floor	☐	☐
e. Ceiling/Roof	☐	☐
f. Inside/outside doors	☐	☐
g. Outside/undercarriage	☐	☐
3. After the container is stuffed or loaded do you affix a seal to the container?	☐	☐
4. Does the seal meet or exceed the PAS ISO 17712 standards for high security seals?	☐	☐
5. Who provides the seals to you?		
6. Do you maintain an inventory of seals? If yes, please answer question 7-8, if no please skip to question 9.	☐	☐
7. Do you record the seal numbers in a written record upon receipt of a new shipment?	☐	☐
8. Do you record when a seal is used?	☐	☐
9. Do you have written procedures to control access to the seals?	☐	☐
10. Do you have written procedures regarding the correct method to affix the seal to the container?	☐	☐
11. Do you maintain a written log of the seal number and the container number on which it was used?	☐	☐
12. Do you record the seal numbers on the shipping documents and in your internal records?	☐	☐
13. Do you store containers in a secure area to prevent unauthorized access and/or tampering?	☐	☐
14. Do you have written procedures to report unauthorized entry into containers or container storage areas to local law enforcement officials?	☐	☐

Physical Security		
15. Are all buildings constructed of materials that resist unlawful entry and protect against outside intrusion?	☐	☐
16. Are cargo handling and storage facilities enclosed by fencing?	☐	☐
17. Are the gates through which vehicles enter cargo handling and storage facilities manned and/or monitored at all times when the facility is open?	☐	☐
18. Are the entrance gates closed and locked when the facility is closed?	☐	☐
19. Do you have written procedures to report unauthorized entry into the facility to local law enforcement officials?	☐	☐
20. Do you use video surveillance cameras to monitor the entrances to the facility and the cargo handling and storage areas? If yes, please answer question 21. If no, please skip to question 22.	☐	☐
21. Do you store the tapes for a period of time before reusing them? If yes, how long?	☐	☐
22. Is the facility equipped with an alarm system to monitor the entrances to the facility?	☐	☐
23. Is there adequate lighting inside and outside the facility, including parking areas, fence lines, entrances and exits, and cargo handling and storage areas?	☐	☐
24. Are locking devices used to secure external and internal doors, windows, gates and fences?	☐	☐
25. Do management and/or security personnel control the issuance of keys?	☐	☐
26. Are there separate parking areas for employee/visitor vehicles and the shipping/loading dock and cargo areas?	☐	☐
27. Do you segregate high-value and/or dangerous cargo in a secure area within the warehouse or storage yard?	☐	☐
28. Do you have a communication system to contact internal security personnel and/or local law enforcement authorities?	☐	☐
Access Controls		
29. Do you have an employee identification system which provides for the positive identification of employees before they can enter the facility?	☐	☐
30. Do employees have access only to those areas in which they perform their duties?	☐	☐
31. Do management and/or security personnel control the issuance of employee, visitor and vendor identification badges?	☐	☐
32. Are visitors required to present photo identification upon arrival?	☐	☐
33. Are visitors required to visibly display a temporary identification badge while on the premises?	☐	☐
34. Are visitors escorted at all times by company personnel while on the premises?	☐	☐
35. Are vendors and other delivery personnel required to present photo identification upon arrival?	☐	☐
36. Are arriving packages and mail periodically screened before delivery within the company?	☐	☐
37. Do you have identification procedures for all employees, visitors and vendors at all points of entry?	☐	☐
38. Do you have procedures to challenge unauthorized/unidentified persons and to report problems to local law enforcement officials?	☐	☐

Procedural Security		
39. Do you have a designated security officer to supervise the loading of cargo into containers, trailers and railcars?	☐	☐
40. Do you verify the quantity and identity of goods against the purchase order prior to shipment?	☐	☐
41. Do you have procedures to resolve discrepancies prior to shipment?	☐	☐
42. Do you track the timeliness of incoming and outgoing cargo movements?	☐	☐
43. Are drivers receiving cargo positively identified before cargo is released?	☐	☐
44. Do you maintain a written log of the identity of drivers who pick up cargo and the number of the container that was picked up?	☐	☐
45. Do you have procedures to ensure that all information related to our orders is protected against loss or the introduction of erroneous information?	☐	☐
46. Do you have procedures to ensure that all shipping documents are legible, complete and accurate?	☐	☐
47. Are your computer systems and the information stored on them protected against unauthorized access?	☐	☐
48. Do you have procedures to notify U.S. Customs and/or local law enforcement officials when anomalies or illegal activities are suspected?	☐	☐
Information Technology Security		
49. Do you use individually assigned accounts for personnel to access your information technology systems?	☐	☐
50. Do you require users to periodically change the passwords used to access your information technology systems?	☐	☐
51. Do you use firewalls to protect your information technology systems from unauthorized access from the internet?	☐	☐
52. Do you have a system to identify the abuse of your information technology systems including the improper access, tampering or altering of business data?	☐	☐
Personnel Security		
The following personnel security procedures must be followed in accordance with local laws and regulations.		
53. Do you conduct pre-employment screening and background checks on prospective employees?	☐	☐
54. Do you verify the information provided by job applicants, including employment history and references?	☐	☐
55. Do you have procedures to report and manage problems related to personnel security?	☐	☐
56. Do you periodically conduct background checks on current employees based on cause and/or the sensitivity of the employee's position?	☐	☐
57. Do you have procedures to remove identification badges and to deny facility and information systems access for terminated employees?	☐	☐
Employee Education and Awareness		
58. Do you have or plan to have a security awareness program to educate employees to recognize internal conspiracies, maintain cargo integrity and to identify and address security issues?	☐	☐
59. Does the security awareness program encourage and reward employees for active participation in security programs?	☐	☐

Threat Awareness		
60. Do you have or plan to have a threat awareness program established and maintained by security personnel and designed to recognize and foster awareness of the threat posed by terrorists and contraband smugglers?	☐	☐
Verification		
61. Are the specific procedures identified in this questionnaire response maintained in a verifiable format?	☐	☐

Name of Person Completing or Supervising the Completion of the Questionnaire:

_____

Name and Title

_____

Date

_____

Signature

Please email or fax the completed form to:

GlobalCompliance@ColonyBrands.com (Email)

or

800-420-1356 (Fax)