



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
Sr. Manager, Global Logistics
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.	<input type="checkbox"/>	<input type="checkbox"/>
2. Does the inspection of the physical integrity of the container examine the following seven-points of the container's structure to ensure they have not been modified to conceal contraband or have been contaminated with agricultural pests? (Please answer questions 3-9)	<input type="checkbox"/>	<input type="checkbox"/>
3. Front wall (to detect any false walls and if applicable the fan housing on refrigerated containers)	<input type="checkbox"/>	<input type="checkbox"/>
4. Left side	<input type="checkbox"/>	<input type="checkbox"/>
5. Right side	<input type="checkbox"/>	<input type="checkbox"/>
6. Floor	<input type="checkbox"/>	<input type="checkbox"/>
7. Ceiling/Roof	<input type="checkbox"/>	<input type="checkbox"/>
8. Inside/outside doors (including the reliability of the locking mechanisms of the doors, handles, rods, hasps, rivets, brackets, and all other parts of a containers locking mechanisms)	<input type="checkbox"/>	<input type="checkbox"/>
9. Outside/undercarriage	<input type="checkbox"/>	<input type="checkbox"/>
10. After the container is stuffed or loaded do you affix a seal to the container?	<input type="checkbox"/>	<input type="checkbox"/>
During the container inspection process, do you use a checklist to show the following: (Please answer questions 11-15)		
11. Container / Trailers # / IIT (Instrument of International Traffic)	<input type="checkbox"/>	<input type="checkbox"/>
12. Date of Inspection	<input type="checkbox"/>	<input type="checkbox"/>
13. Time of Inspection	<input type="checkbox"/>	<input type="checkbox"/>
14. Name of the employee conducting the inspection	<input type="checkbox"/>	<input type="checkbox"/>
15. Specific areas of the IIT that were inspected	<input type="checkbox"/>	<input type="checkbox"/>
16. Does a supervisor sign off on the checklist when the inspection is completed?	<input type="checkbox"/>	<input type="checkbox"/>
17. Does the seal meet or exceed the PAS ISO 17712 standards for high security seals?	<input type="checkbox"/>	<input type="checkbox"/>



18. Who provides the seals to you?		
19. Do you maintain an inventory of seals? If yes, please answer question 20-21, if no please skip to question 22.	<input type="checkbox"/>	<input type="checkbox"/>
20. Do you record the seal numbers in a written record upon receipt of a new shipment?	<input type="checkbox"/>	<input type="checkbox"/>
21. When seals are used, do you record seal numbers with the container numbers on a written log, on the shipping documents, and on your internal records?	<input type="checkbox"/>	<input type="checkbox"/>
22. Do you have written procedures to control access to the seals?	<input type="checkbox"/>	<input type="checkbox"/>
23. Do you have written procedures regarding the correct method to affix the seal to the container?	<input type="checkbox"/>	<input type="checkbox"/>
24. Do you take digital pictures of the properly installed seal at the point of stuffing and share them with the consignee for verification purposes?	<input type="checkbox"/>	<input type="checkbox"/>
25. Do you conduct a periodic audit of the stored seals and reconciliation against seal inventory logs and shipping documents? All audits must be documented.	<input type="checkbox"/>	<input type="checkbox"/>
26. Do you store containers in a secure area to prevent unauthorized access and/or tampering?	<input type="checkbox"/>	<input type="checkbox"/>
27. Do you have written procedures to report unauthorized entry into containers or container storage areas to local law enforcement officials?	<input type="checkbox"/>	<input type="checkbox"/>
Physical Security		
28. Are all buildings constructed of materials that resist unlawful entry and protect against outside intrusion?	<input type="checkbox"/>	<input type="checkbox"/>
29. Are cargo handling and storage facilities enclosed by fencing?	<input type="checkbox"/>	<input type="checkbox"/>
30. Are the gates, through which vehicles enter cargo handling and storage facilities manned and/or monitored at all times when the facility is open?	<input type="checkbox"/>	<input type="checkbox"/>
31. Do you have a policy that notifies individuals that they and their vehicles may be subject to search in accordance with local and labor laws?	<input type="checkbox"/>	<input type="checkbox"/>
32. Are the entrance gates closed and locked when the facility is closed?	<input type="checkbox"/>	<input type="checkbox"/>
33. Do you have written procedures to report unauthorized entry into the facility to local law enforcement officials?	<input type="checkbox"/>	<input type="checkbox"/>
34. Do you use video surveillance cameras to monitor the entrances to the facility and the cargo handling and storage / inspection areas? If yes, please answer question 35. If no, please skip to question 36.	<input type="checkbox"/>	<input type="checkbox"/>
35. Do you store the tapes for a period of time before reusing them? If yes, how long (90-120 days)?	<input type="checkbox"/>	<input type="checkbox"/>

36. Do you have periodic, random reviews of the camera footage to verify that cargo security procedures are being properly followed and maintained for a minimum of 2 years for audit purposes?	<input type="checkbox"/>	<input type="checkbox"/>
37. Is the facility equipped with an alarm system to monitor the entrances to the facility?	<input type="checkbox"/>	<input type="checkbox"/>
38. Is there adequate lighting inside and outside the facility, including parking areas, fence lines, entrances and exits, and cargo handling and storage /inspection areas?	<input type="checkbox"/>	<input type="checkbox"/>
39. Are locking devices used to secure external and internal doors, windows, gates and fences?	<input type="checkbox"/>	<input type="checkbox"/>
40. Do management and/or security personnel control the issuance of keys?	<input type="checkbox"/>	<input type="checkbox"/>
41. Are employee / visitor vehicles prohibited from parking in or adjacent to cargo handling and storage areas?	<input type="checkbox"/>	<input type="checkbox"/>
42. Do you segregate high-value and/or dangerous cargo in a secure area within the warehouse or storage yard?	<input type="checkbox"/>	<input type="checkbox"/>
43. Do you have a communication system to contact internal security personnel and/or local law enforcement authorities?	<input type="checkbox"/>	<input type="checkbox"/>
44. Do you use Security Technology for physical security? If yes, please answer question 45-47, if no please skip to question 48.	<input type="checkbox"/>	<input type="checkbox"/>
45. Do you have written policies and procedures governing the use, maintenance, and protection of security technology? These policies must: a. Limit access to the locations of controls / hardware for security devices; b. Procedures to test / inspect the technology on a regular basis; c. Inspections include verification that equipment is correctly positioned and/or working properly; d. Document the results of the inspections and performance testing; e. If corrective actions are warranted, implement and document the actions taken; f. Documented results must be maintained for a sufficient time for audit purposes.	<input type="checkbox"/>	<input type="checkbox"/>
46. Do you have a written agreement with third-party (off-site) security monitoring resources in place, stipulating critical systems functionality and authentication protocols, such as (but not limited to) security code changes, adding or subtracting authorized personnel, password revision(s), and systems access or denial(s)?	<input type="checkbox"/>	<input type="checkbox"/>
47. Are security technology policies and procedures reviewed at least annually and updated as risk circumstances change?	<input type="checkbox"/>	<input type="checkbox"/>
Access Controls		
48. Do you have an employee identification system which provides for the positive identification of employees before they can enter the facility?	<input type="checkbox"/>	<input type="checkbox"/>
49. Do employees have access only to those areas in which they perform their duties?	<input type="checkbox"/>	<input type="checkbox"/>

50. Do management and/or security personnel control the issuance of employee, visitor and vendor identification badges?	<input type="checkbox"/>	<input type="checkbox"/>
51. Are visitors required to present photo identification upon arrival?	<input type="checkbox"/>	<input type="checkbox"/>
52. Are visitors required to visibly display a temporary identification badge while on the premises?	<input type="checkbox"/>	<input type="checkbox"/>
53. Are visitors escorted at all times by company personnel while on the premises?	<input type="checkbox"/>	<input type="checkbox"/>
54. Are vendors and other delivery personnel required to present photo identification upon arrival?	<input type="checkbox"/>	<input type="checkbox"/>
55. Are arriving packages and mail periodically screened before delivery within the company?	<input type="checkbox"/>	<input type="checkbox"/>
56. Do you have identification procedures for all employees, visitors and vendors at all points of entry?	<input type="checkbox"/>	<input type="checkbox"/>
57. Do you have written policies and procedures for security guards and periodically verify compliance with these work instructions and policies through audits, policy reviews, and simulated exercises?	<input type="checkbox"/>	<input type="checkbox"/>
58. Do you have procedures to challenge unauthorized/unidentified persons and to report problems to local law enforcement officials?	<input type="checkbox"/>	<input type="checkbox"/>
Procedural Security		
59. Do you have a designated security officer to supervise the loading of cargo into containers, trailers and railcars?	<input type="checkbox"/>	<input type="checkbox"/>
60. Do you verify the quantity and identity of goods against the purchase order prior to shipment?	<input type="checkbox"/>	<input type="checkbox"/>
61. Do you have procedures to resolve discrepancies prior to shipment?	<input type="checkbox"/>	<input type="checkbox"/>
62. Do you track the timeliness of incoming and outgoing cargo movements?	<input type="checkbox"/>	<input type="checkbox"/>
63. Do you maintain a written log recording the identity of the driver, positively identifying the driver, and the container number of the cargo picked up?	<input type="checkbox"/>	<input type="checkbox"/>
64. Do you have procedures to ensure that all information related to our orders is protected against loss or the introduction of erroneous information?	<input type="checkbox"/>	<input type="checkbox"/>
65. Do you have procedures to ensure that all shipping documents are legible, complete and accurate?	<input type="checkbox"/>	<input type="checkbox"/>
66. Are your computer systems and the information stored on them protected against unauthorized access?	<input type="checkbox"/>	<input type="checkbox"/>
67. Do you have procedures to notify U.S. Customs and/or local law enforcement officials when anomalies or illegal activities are suspected?	<input type="checkbox"/>	<input type="checkbox"/>

68. Do you have a statement of support to protect your supply chain from criminal activities such as drug trafficking, terrorism, human smuggling and illegal contraband that is signed by a company official and displayed on company bulletin boards?	<input type="checkbox"/>	<input type="checkbox"/>
69. Do you have a Supply Chain Security Program that includes many departments, such as Security, Human Resources, Information Technology and Import/Export offices to create a cross-functional team focused on your company's Supply Chain Security?	<input type="checkbox"/>	<input type="checkbox"/>
70. Do you have a multi-level audit system, in verifiable format, that tests your security programs with checks, balances and accountability in mind to ensure the program operates as planned?	<input type="checkbox"/>	<input type="checkbox"/>
71. Do you have written procedures in place that addresses crisis management, business continuity, security recovery plans and business resumption?	<input type="checkbox"/>	<input type="checkbox"/>
72. Do you have written procedures to separate and secure domestic cargo from International cargo in warehouse or pre-staging areas?	<input type="checkbox"/>	<input type="checkbox"/>
73. Do you inspect cargo staging areas, and the immediate surrounding areas on a regular basis to ensure these areas remain free of visible pest contamination?	<input type="checkbox"/>	<input type="checkbox"/>
74. Do you have written procedures to prevent pest contamination & include Wood Packaging Materials (WPM) regulations under the International Plant Protection Convention's (IPPC) International Standards for Phytosanitary Measures No. 15 (ISPM 15)?	<input type="checkbox"/>	<input type="checkbox"/>
Information Technology Security		
75. Do you use individually assigned accounts for personnel to access your information technology systems based on job requirements?	<input type="checkbox"/>	<input type="checkbox"/>
76. Do you require users to periodically change the passwords used to access your information technology systems?	<input type="checkbox"/>	<input type="checkbox"/>
77. Do you use firewalls to protect your information technology systems from unauthorized access from the internet?	<input type="checkbox"/>	<input type="checkbox"/>
78. Do you have a system to identify the abuse of your information technology systems including the improper access, tampering or altering of business data?	<input type="checkbox"/>	<input type="checkbox"/>
79. If using a network system, do you regularly test the security of your IT infrastructure?	<input type="checkbox"/>	<input type="checkbox"/>
80. Do you have policies and procedures on Cybersecurity, and do they address how information is shared based on cybersecurity threats with the Government and other business partners on an annual basis?	<input type="checkbox"/>	<input type="checkbox"/>
81. Do you allow your personnel to connect remotely to your network via a virtual private network (VPN)? If yes, please answer question 82, if no, skip to question 83.	<input type="checkbox"/>	<input type="checkbox"/>
82. If you use a VPN, do you have procedures designed to secure remote access from unauthorized users?	<input type="checkbox"/>	<input type="checkbox"/>
83. Do you allow employees to use personal devices to conduct company work? if yes, please answer question 84, if no, skip to question 85.	<input type="checkbox"/>	<input type="checkbox"/>
84. If you allow employees to use personal devices to conduct company work, do you have policies and procedures to include regular security updates and a method to securely access the company's network?	<input type="checkbox"/>	<input type="checkbox"/>

85. Do your cybersecurity policies and procedures include measures to prevent the use of counterfeit or improperly licensed technological products?	<input type="checkbox"/>	<input type="checkbox"/>
86. How often is your data backed up and is your data stored in an encrypted format offsite of your facility? _____		
87. Do you regularly account for your IT inventory and is it properly sanitized and/or destroyed in accordance with the National Institute of Standards and Technology (NIST) Guidelines for Media Sanitization or other appropriate industry guidelines?	<input type="checkbox"/>	<input type="checkbox"/>
Personnel Security		
<i>The following personnel security procedures must be followed in accordance with local laws and regulations.</i>		
88. Do you conduct pre-employment screening and background checks on prospective employees?	<input type="checkbox"/>	<input type="checkbox"/>
89. Do you verify the information provided by job applicants, including employment history and references?	<input type="checkbox"/>	<input type="checkbox"/>
90. Do you have procedures to report and manage problems related to personnel security?	<input type="checkbox"/>	<input type="checkbox"/>
91. Do you periodically conduct background checks on current employees based on cause and/or the sensitivity of the employee's position?	<input type="checkbox"/>	<input type="checkbox"/>
92. Do you have procedures to remove identification badges and to deny facility and information systems access for terminated employees?	<input type="checkbox"/>	<input type="checkbox"/>
Employee Education and Awareness		
93. 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?	<input type="checkbox"/>	<input type="checkbox"/>
94. Does the security awareness program encourage and reward employees for active participation in security programs?	<input type="checkbox"/>	<input type="checkbox"/>
95. Do you require personnel who operate and manage security technology systems to have received specialized training on the system's operation and maintenance?	<input type="checkbox"/>	<input type="checkbox"/>
Threat Awareness		
96. 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 money laundering and terrorism financing activities?	<input type="checkbox"/>	<input type="checkbox"/>
Verification		
97. Are the specific procedures identified in this questionnaire response maintained in a verifiable format?	<input type="checkbox"/>	<input type="checkbox"/>
98. Have you obtained a certification in a supply chain security program by a foreign Customs Administration?	<input type="checkbox"/>	<input type="checkbox"/>

If so, please provide your status of participation here and include a copy of your certificate with your response to this questionnaire.

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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)