

## Factory Requirements

### Container Security

#### 1. Container Inspection

The physical integrity of the container structure must be verified prior to stuffing, to include the reliability of the locking mechanisms of the doors. A 7-point inspection process is required for all containers:

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

#### 2. Container Security

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

High security seals are constructed and manufactured of material such as metal or metal cable with the intent to delay intrusion and generally must be removed with quality bolt cutters or cable cutters. They require inspection to indicate whether tampering has occurred or entry has been attempted.

High security seals include:

- High Security Bolt Seals – A bolt seal consisting of a metal rod, threaded or unthreaded, flexible or rigid, with a formed head, secured with a separate locking mechanism.
- High Security Cable Seals – A cable seal consisting of a cable and a locking mechanism on a one piece seal, the locking or seizing mechanism is permanently attached to one end of the cable. A two-piece cable seal has a separate locking mechanism which slips onto the cable or prefabricated cable end.
- High Security Padlock/Handcuff Seals- A padlock/handcuff seal consisting of a locking body with a bail attached. Examples of this type of seal are wire shackle padlock and keyless padlock seals.

#### 3. Container Seal Acquisition and Control

- The manufacturer (depending on who seals the container) is responsible for the sealed container until the carrier assumes control.
- If sealed by the factory, the seals must be provided by the freight forwarder.
- Seals must be identified by permanent unique marks and numbers that are readily legible.
- Seal Control procedures must include:
  - Inventory

- Seals must be stored in a secure location (locked cabinet, safe, etc.) until issued for use.
- Access to secure locations must be restricted to those parties responsible for the inventory and affixing of seals.
- Access to seals must be strictly controlled by a designated responsible party.
- Seals must be issued at random to avoid seals being affixed in sequential order.
- A log must be maintained to account for all seals under the control of the manufacturer or freight forwarder.
- Accountability
  - Tracking of individual seal use. Information concerning the use of every seal must be recorded and readily retrievable for audit purposes.
  - Seal numbers must be indicated on manifests and/or bills of lading to facilitate seal verification.
  - Affixing Seals to Containers
  - High security seals must be affixed to all loaded containers bound for the United States. All seals must meet or exceed the current PAS ISO 17712 standards for high security seals.
  - Seals are to be affixed at manufacturer point of origin (loading) point
  - Seals must be affixed by a responsible, designated representative of the company. This is an employee who maintains a position of trust (i.e. security personnel) within the business and has received appropriate instruction/training in the use of high security seals.
  - Compromised Seal Reporting
  - Immediately report compromised/tampered seals to the security office at the facility. Security staff must review the container contents to verify integrity and protect against the introduction of unauthorized material and/or persons. Report any compromised/tampered seals to Kohl's Director of International Transportation for further instructions. Notify local police and/or appropriate government agencies and Kohl's Director of International Transportation if illegal or suspicious activities are detected, as appropriate.

#### **4. Storage**

Containers must be stored in a secure area to prevent unauthorized access and/or manipulation. Immediately report unauthorized entry into containers or container storage areas and/or evidence of unauthorized entry to the security office at the facility. The facility security staff must neutralize unauthorized entry. Report any unauthorized container entry to Kohl's Director of International Transportation for further instructions. Notify local police and/or U.S. Customs and Kohl's Director of International Transportation if illegal or suspicious activities are detected, as appropriate. Examples of illegal or suspicious activities include: the presence of contraband or stowaways, significant theft, introduction of materials /items after point of stuffing., and other activities which may indicate criminal actions.