

Genesco, Inc. | 1415 Murfreesboro Road, Suite 638 | Nashville, TN 37217 | PH: 615-367-7729

#### Dear Genesco, Inc. Business Partner,

Genesco, Inc. (hereafter referred to as "Genesco") is an active participant in the U.S. Customs-Trade Partnership Against Terrorism (hereafter referred to as "C-TPAT") Program. This agreement was made between Genesco and U.S. Customs & Border Protection (hereafter referred to as "Customs").

Genesco is pleased to announce it has partnered with Vandegrift Forwarding Company, Inc. (hereafter referred to as "Vandegrift") to further enhance the joint efforts of Genesco, Importers and Customs to develop a more secure border environment by focusing on the physical security of the production, transportation, and importation elements of the supply chain process. Customs and Importers recognize the need to address these security issues in order to maintain an efficient and compliant import process.

Genesco must conduct a comprehensive assessment of its international supply chain based upon the following C-TPAT security criteria. Where Genesco out-sources or contracts elements of its supply chain, such as a foreign facility, conveyance, domestic warehouse, or other elements, Genesco must work with its business partners to ensure that pertinent security measures are in place and adhered to throughout its supply chain. The supply chain for C-TPAT purposes is defined from the <u>Point of Origin through to the Point of Distribution</u>.

Genesco must have written and verifiable processes for the selection of business partners including manufacturers, product suppliers and vendors.

For business partners not eligible for C-TPAT certification such as foreign manufacturers, suppliers, etc. Genesco must require these 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 World Customs Organization Framework (hereafter referred to as "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.

Genesco must ensure business partners develop security processes and procedures consistent with the C-TPAT security criteria to enhance the integrity of the shipment at point of origin. Periodic reviews of business partners' processes and facilities should be conducted based on risk, and should maintain the security standards required by the importer.

Your company has been identified as a business partner to Genesco. You are required to complete all parts of this questionnaire. The questionnaire should be completed in English and as an acknowledgement that this questionnaire has been completed with true and correct information an authorized officer of your company must sign and date this document upon completion.

The completed questionnaire including your exhibits, attachments, examples, etc. must be returned via email to Genesco within 14 days of receipt of this mailing. Completion and return of this questionnaire document to Genesco is required. Email the scanned copy of the completed, signed questionnaire along with any support documents such as manuals, standard operating procedures, reports, etc. that you wish to include in your submission to Genesco, ATTN: Globalcompliance@genesco.com.





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MANUFACTURER/SHIPPER PROFILE

DATE:

COMPANY/MANUFACTURER:

ADDRESS:

**PRIMARY CONTACT:** 

**TELEPHONE:** 

FAX:

E-MAIL:

SECONDARY CONTACT:

**TELEPHONE:** 

FAX:

E-MAIL:

SERVICE PERFORMED:

PRODUCT/PRODUCTS: (General Description)

\**Please note*: This entire questionnaire must be completed separately for all origin locations shipping to Genesco.



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## INSTRUCTIONS:

The information from this completed questionnaire will be used to assign a level of risk for importing into the U.S. Please answer all questions based on the <u>CURRENT</u> procedures, policies, standards, or measures your company follows **TODAY**. **All written responses must be in English.** 

Many of the questions require a YES or NO response however, whenever possible, please provide a copy of your company's Standard Operating

#### PARTICIPATION/CERTIFICATION IN FOREIGN CUSTOMS ADMINISTRATION SUPPLY CHAIN SECURITY PROGRAMS

Current or prospective business partners who have obtained certification in a supply chain security program being administered by a foreign Customs administration will be required to indicate their status of participation to Genesco.

## 1. Does your company participate in any supply chain security program?

**IF YES:** *First*, explain the supply chain security program with full details of what foreign Customs administration is monitoring the program. *Second*, provide a copy of that certification when returning this questionnaire to Genesco.

## GENERAL SECURITY PROCEDURES: LOADING PROCEDURES

## 2. Are ocean containers loaded at your location/facility?

**For Loose Cargo or Less than Container Loads (LCL)**: Your answers throughout this questionnaire should explain how goods are secured at your facility and then transferred to the ocean consolidator for loading.

3. Does your facility use only enclosed trailers when shipping/delivering products?

If no: Please describe how the product integrity is maintained during transit.





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- 4. Are enclosed trailers locked and sealed after loading is completed?
- 5. How are delivery trucks monitored by the facility during loading and unloading?

6. Identify inland transportation companies (company name, address, phone and contacts) and number of years they have provided service.

7. Identify truck routes typically used to move Genesco merchandise from the factory to the port, airport, railroad, consolidator and/or Customs' facility.

- 8. Provide a copy of your company's written and verifiable procedure for tracking and monitoring exported merchandise to the port, airport, railroad, consolidator and/or Customs' facility.
- 9. Does your company require all 3<sup>rd</sup> party logistics providers to comply with Genesco's CTPAT requirements or country specific security programs?

CONTAINER SECURITY: GENERAL

- 10. Does the factory employ full-time security guards?
- 11. If applicable, do the security guards work 24 hours per day, 7 days per week?





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12. Are there communication systems for security guards?

If yes, please describe the communication systems for security guards.

## CONTAINER SECURITY: INSPECTION

A seven-point inspection process <u>must</u> be carried out for every container loaded. This is for both the protection of the merchandise during shipment as well as to maintain container security that includes the following points:

- 1. Front Wall
- 2. Left Side
- 3. Right Side
- 4. Floor
- 5. Ceiling / Roof
- 6. Inside / Outside Doors
- 7. Outside / Undercarriage of the container

(This inspection process should include verifying the reliability of the locking mechanisms of the doors.)

#### 13. Do you complete a seven-point inspection process for each ocean container?

## If yes, please provide a copy of the procedures that are in place.

## CONTAINER SECURITY: SEALS

Written procedures <u>must</u> stipulate how seals are to be controlled and affixed to a loaded container. Explain how you recognize and report compromised seals and/or containers to the appropriate authorities. Verify that only designated employees distribute container seals for integrity purposes.

- Genesco requires that at the 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 U.S.
  - All seals must meet or exceed the current PAS ISO 17712 standards for high security seals.

# 14. Do the facilities use high security seals that meet or exceed the current PAS ISO 17712 standards for high security seals?

#### 15. Who provides your high security seals?





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- 16. Are the seals controlled by a designated employee?
  - **If yes**, please identify the employee by title.

- 17. Is the facility taking a picture of the sealed container to photo-document the seal?
- 18. Does the facility record and keep records of seal and container numbers?
- 19. Does the facility have procedures for affixing, replacing, recording, tracking and verifying seals on containers, trailers and railcars?

## 2

Records should be kept for at least 60 days. Please attach copies of your procedures and a sample copy of your record.

#### CONTAINER SECURITY: STORAGE

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

- 20. Does your facility have sufficient storage for empty and/or full containers/trailers/railcars to prevent unauthorized access?
- 21. If containers must be stored on the premises, are they stored in a designated secure area?
- 22. Is a practice in place that stored containers are locked or positioned in a way to prevent unauthorized access?
- 23. During a pause or interruption of the loading process before sealing the container, and in the absence of security or other personnel, is the container secured by locking?



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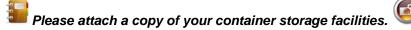
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24. Are written procedures in place for reporting unauthorized entry into containers or storage areas?





#### Physical Access Controls

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

#### PHYSICAL ACCESS CONTROLS: EMPLOYEES

*Employee identification system* <u>must</u> 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.

- 25. Is there an employee identification system in place for positive identification and access control purposes?
- 26. Does the facility inspect employees entering the building and/or do they restrict what they are allowed to bring into the facility?

Please provide details of the process used to control physical access to the building and/or provide a copy of written procedure manual.





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#### PHYSICAL ACCESS CONTROLS: VISITORS

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

- 27. Are visitors screened before entering the facilities i.e., are they required to show photo ID?
  - *If yes, please explain the process and/or provide a copy of written procedure manual.*

28. Does an authorized employee escort visitors (including vendors and contractors) while they are in the facility?

Please provide details of the procedures in place and/or provide a copy of written procedure manual.

#### PHYSICAL ACCESS CONTROLS: DELIVERIES

Proper vendor ID and/or photo identification <u>must</u> be presented for documentation purposes upon arrival by all vendors. Arriving packages and mail should be periodically screened before being disseminated

- 29. Is the identification of vendors and delivery persons verified prior to allowing entry, i.e., are they required to show a photo ID?
- 30. Is unauthorized access to the shipping areas, loading docks and cargo areas prohibited?

<u>If yes,</u> please explain the procedures in place to control access to these areas and/or provide a copy of written procedure manual.



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PHYSICAL ACCESS CONTROLS: CHALLENGING & REMOVING UNAUTHORIZED PERSONS

Procedures <u>must</u> be in place to identify, challenge and address unauthorized/unidentified persons.

31. Is there a process in place to identify, challenge and remove if necessary any unauthorized persons from the facility?

<u>If yes</u>, please provide details of the procedures in use and/or provide a copy of written procedure manual.

## Personnel Security: Business Partner

Genesco requires its business partners to have processes in place to screen prospective employees and to periodically check current employees.

- <u>Pre-Employment Verification</u>: Application information, such as employment history and references must be verified prior to employment.
- <u>Background checks / investigations</u>: Consistent with foreign, federal, state, and local regulations, background checks and investigations should be conducted for prospective employees. Once employed, periodic checks and reinvestigations should be performed based on cause, and/or the sensitivity of the employee's position.
- <u>Personnel Termination Procedures</u>: Companies must have procedures in place to remove identification, facility, and system access for terminated employees.

PERSONNEL SECURITY: PRE-EMPLOYMENT VERIFICATION & BACKGROUND CHECKS/INVESTIGATIONS

- 32. Please provide a copy of the written process for screening and interviewing of employees prior to hiring.
- 33. After employment what is the process for a periodic background check for employees, especially for security guards?





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PERSONNEL SECURITY: PERSONNEL TERMINATION PROCEDURES

34. Does the facility control the issuing of keys, and are keys recovered when employees who have them resign or are terminated?

Explain the process in place for ensuring that keys, key cards and ID badges are collected from terminated employees and/or provide a copy of written procedure manual.

35. Who is the designated person responsible for ensuring that system access is removed for employees that are leaving or have left the company?

Please provide a copy of a written procedure.

36. Are locks changed when employees with keys resign or are terminated, and are the keys recovered, or if an electronic alarm system is used, is the alarm code reset?

Please provide a copy of a written procedure.

Procedural Security: Business Partner

Genesco does require that security measures be addressed herein to be in place to ensure the integrity and security of processes relevant to the transportation, handling, and storage of cargo are in the supply chain.

Documentation Processing

Procedures <u>must</u> 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.

PROCEDURAL SECURITY: DOCUMENTATION PROCESSING

37. Are procedures in place to ensure information on documents is legible, complete, accurate, and disposition of those documents secure?





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38. Are procedures in place to ensure that used/unused forms and other documents that relate to shipped cargo are not lost and/or used?

Please provide details and copies of a written procedure if possible.

Manifesting Procedures

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

PROCEDURAL SECURITY: MANIFEST PROCEDURES

39. Are procedures in place to ensure the manifest is legible, complete, accurate, secure, and verified against purchase orders and/or delivery orders?

**If yes**, please describe the procedures. Provide a copy of the written procedure manual if available.

#### Shipping

The cargo should be accurately described, and the weights, labels, marks and piece count indicated and verified. 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.

#### PROCEDURAL SECURITY: SHIPPING

40. Departing Cargo: Please describe the verification process to ensure that cargo being shipped is accurately reflected on the paperwork in regards to weights, labels, marks and piece counts?



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- 41. Is the driver's photo ID verified prior to loading freight?
- 42. Does the dispatcher provide advanced notice with Driver's ID#, photo, etc.?

Cargo Discrepancies

All shortages, overages, and other significant discrepancies or anomalies **must** be resolved and/or investigated appropriately. Customs and/or other appropriate law enforcement agencies **must** be notified if illegal or suspicious activities are detected - as appropriate.

#### PROCEDURAL SECURITY: CARGO DISCREPANCIES

43. Does facility have procedures to notify Customs/local authority in cases where anomalies or illegal activities are detected or suspected by the company?

If yes, please describe in detail and provide a copy of the written procedure.

#### Security Training and Threat Awareness: Business Partner

Genesco requires a threat awareness program to be established and maintained by security personnel to recognize and foster awareness of the threat posed by terrorists at each point in the supply chain. Employees <u>must</u> 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. These programs should offer incentives for active employee participation.

#### SECURITY TRAINING & THREAT AWARENESS

- 44. Does employee training include introduction to security issues awareness for security workers and associates that participate in loading and unloading trucks?
- 45. If yes, how often is training provided?





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- 46. Do employees who have received the security issues awareness training acknowledge that they have received and participated in the sessions?
  - Please attach a sample of the acknowledgement, log book, journal, etc.

Physical Security: Business Partner

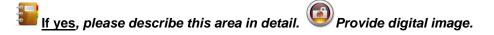
Cargo handling and storage facilities in domestic and foreign locations should have physical barriers and deterrents that guard against unauthorized access. Importers should incorporate the following C-TPAT physical security criteria throughout their supply chains as applicable.

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.

PHYSICAL SECURITY: FENCING

- 47. Is there perimeter fencing around cargo handling and storage areas?
- 48. Does the cargo handling area include interior fencing for segregating domestic, international, high value and hazardous cargo?



49. Is the fencing inspected regularly to ensure that it is without damage?

<sup>I</sup> If yes, please provide a copy of the inspection and maintenance records. 🤎 Provide digital image.



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Gates and Gate Houses

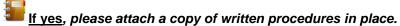
Gates through which vehicles and/or personnel enter or exit <u>must</u> be manned and/or monitored. The number of gates should be kept to the minimum necessary for proper access and safety.

PHYSICAL SECURITY: GATES & GATE HOUSES

50. Are there gates and/or gate houses through which vehicles and/or personnel must enter and exit the facility?

If yes, please attach a copy of the gate and/or gate house entrance and exit procedures.
Provide digital image.

51. If applicable are the gates and/or gate houses manned and/ or monitored?



ce. 🤎 Provide digital image.

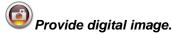
Private passenger vehicles should be prohibited from parking in or adjacent to cargo handling and storage areas.

#### PHYSICAL SECURITY: PARKING

- 52. Is there designated parking for employees and/ or visitors that is separate from delivery trucks and containers?
- 53. If yes, how is this monitored and enforced?



Please attach a copy of the written procedures.





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**Building Structure** 

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

PHYSICAL SECURITY: BUILDING STRUCTURE

- 54. Is the building constructed of materials to resist unlawful entry?
- 55. Please provide details of the construction materials used on the exterior of the building (brick, metal, wood, etc.). Provide digital image.

56. Is the integrity of the structure maintained by periodic inspection and repair?

If yes, please provide details of the inspection and a sample copy of your maintenance records.

Locking Devices and Key Controls

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

PHYSICAL SECURITY: LOCKING DEVICES & KEY CONTROLS

57. Are main entrance(s) secured with locking devices?

58. If yes, Please describe the securing mechanism used?



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59. Does the facility have adequate locking devices on all outside doors?

60. Are the doors and doorframes adequate to prevent unauthorized entry?

61. Are windows and window frames secure and with a locking device installed?

62. Are there procedures in place for controlling the issuance of all locks and keys?

If yes, please explain the process and/ or provide a copy of the written procedures for controlling the issuance of all locks and keys.

## 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.

#### PHYSICAL SECURITY: LIGHTING

63. Does the facility have adequate exterior lighting, specifically at the entrances and exits, along the fence lines, and in the parking areas?







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64. Does the facility have adequate interior lighting, specifically within the cargo handling and storage areas, and at the entrances and exits?

🔚 <u>If yes</u>, please provide details. 🞯 Provide digital image.

Alarms Systems & 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.

PHYSICAL SECURITY: ALARM SYSTEMS & VIDEO SURVEILLANCE CAMERAS

65. Are Closed-circuit televisions (hereafter referred to as "CCTV") or surveillance systems at entrances and exits?

If yes, please describe the monitoring process and provide a copy of the written procedures.

🖉 Provide digital image.

66. Are CCTV or surveillance systems in the parking areas?

It yes, please describe the monitoring process and provide a copy of the written procedures.

Provide digital image.



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67. Are CCTV or surveillance systems in used throughout the facility?

If yes, please describe the monitoring process and provide a copy of the written procedures.
Provide digital image.

- 68. Does the facility have an electronic security alarm system?
- 69. Is the security alarm system monitored by dedicated personnel?
- Please attach a copy of the procedure manual that provides details of the factory security policy.
- 70. Are alarms, video surveillance systems and/or any other electronic security devices tested and inspected regularly to ensure they are in proper working order?

If yes, please provide a copy of the inspection maintenance records.



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#### Information Technology Security: Business Partner

Password Protection

Automated systems <u>must</u> 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

INFORMATION TECHNOLOGY SECURITY: PASSWORD PROTECTION

71. Are procedures in place to verify periodic changes of passwords?

If yes, please provide a copy of the written procedure.

72. Are procedures in place to verify training in IT security standards?

If yes, please provide a copy of the training procedures.

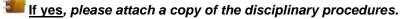
Accountability

A system <u>must</u> 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.

INFORMATION TECHNOLOGY SECURITY: ACCOUNTABILITY

- 73. Are there systems available to identify the abuse of IT improper access, tampering or the altering of business data?
  - *If yes, please attach a copy of the monitoring procedures.*

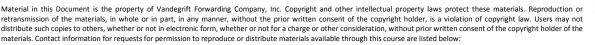
74. Are procedures in place for disciplinary actions for IT abuse?



75. Are procedures in place for terminating access for employees leaving the company?

If yes, please attach a copy of the written procedures for terminating access when employees leave the company.





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I hereby certify that the responses and any added or attached information in this document is accurate, valid, current, and that all requirements have been met.

AUTHORIZED SIGNATURE:

NAME:

TITLE:

Date:

This document must be signed by an elected/authorized officer of your company.

"How to return the completed questionnaire"

Once you have completed this questionnaire, you will need to print a copy, have an authorized person from your company sign the last page, and scan a copy. Email the scanned copy of the completed, signed questionnaire along with any support documents such as manuals, standard operating procedures, reports, etc. that you wish to include in your submission to Genesco **ATTN: Globalcompliance@genesco.com.** 





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