

Global Security Verification Report

Facility Name: Shenzhen Colorl Cosmetic Products Co., Ltd.

Country:	China	Assessment Stage:	Annual
Date of Verification:	17-Dec-2021	Report Number:	A4965879
Last Verification Date:	NA	Site ID:	F_IAR_122311
Auditor Primary:	Mr. Steven Lin	Service Provider:	Intertek
Auditor Secondary:	NA	Audit Location:	Onsite

OVERALL FACILITY SCORE

84%



PERFORMANCE INDEX BAR

High Risk Priority
(0-75%)

Medium Risk Priority
(76-85%)

Low Risk Priority
(86-100%)



This Facility 84%

Average Country 81%

Average Global 82%

Industry Average 85%

Participating Facilities: 4407

The C-TPAT Security Criteria and Guidelines indicate that "Must" is a requirement of the program participation. "Should" means that the procedure is considered to be an industry "best practice."

PERFORMANCE SUMMARY

Section Name	Score	Must - High	Must - Low	Should - High	Should - Low
Corporate Security	78%	0	5	0	0
Security Vision and Responsibility	100%	0	0	0	0
Risk Assessment	83%	0	3	0	0
Business Partners	88%	0	1	0	0
Cyber Security	88%	0	1	0	0
Transportation Security	88%	0	1	0	0
Conveyance and Instruments of International Traffic Security	88%	0	1	0	0
Seal Security	100%	0	0	0	0
Procedural Security	100%	0	0	0	0
Agricultural Security	100%	0	0	0	0
People and Physical Security	88%	0	0	3	0
Physical Security	93%	0	0	1	0
Physical Access Controls	93%	0	0	1	0
Personnel Security	100%	0	0	0	0
Education, Training and Awareness	93%	0	0	1	0
Overall	84%	0	6	3	0

Intertek's GSV integrates multiple global supply-chain security initiatives, including C-TPAT (Customs Trade Partnership Against Terrorism), PIP (Partners in Protection) and AEO (Authorized Economic Operators).

A. FACILITY PROFILE

A1. FACILITY INFORMATION

Facility Name:	Shenzhen Colorl Cosmetic Products Co., Ltd.	Contact Name:	Miss ??? Zhang Yue Juan
Facility Legal Name:	Shenzhen Ka Le Er Cosmetic Products Co., Ltd.	Contact Title:	NA
Audit Location:	Floor 1-5, Building E, No.187, Hexi New Village, Guancheng Community, Longhua District, Shenzhen, Guangdong, China	Email:	924194009@qq.com
City:	Shenzhen	Country:	China

A2. EMPLOYEE INFORMATION

NUMBER OF EMPLOYEES

Range	Actual Total	Permanent	Temporary	Foreign	Migrant
51-100	59(100%)	59(100%)	0(0%)	0(0%)	50(85%)

List of Nationalities: NA

A3. BUSINESS OVERVIEW

Industry:	Cosmetics	Warehouse customs bonded:	No
Key/Main Product:	Makeup brush	Free trade zone:	No
Facility land size (in Sqm):	700	Total facility floor size (in Sqm):	3500

Total Nr of Buildings	Distribution	Production	Warehouse	Container Yards	Others
2	0	1	1	0	0

A4. EXPORT LOGISTICS

PERCENTAGE OF GOODS EXPORTED TO US

By Air	By Sea	By Rail	By Truck
0	100	0	0

FACILITY RESPONSIBLE FOR THE RELATIONSHIP WITH THE FOLLOWING TYPE OF LOGISTICS

Air:	Never	Consolidators:	Never
Sea:	Never	Freight Forwarders:	Never
Rail:	Never	NVOCC:	Never
Land Carriers:	Always	Other 3rd party logistics providers:	Never

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The companies used vary routes:	Yes	The companies used Global Positioning Satellite (GPS):	Yes
The companies used employ security guards:	Yes	The companies used truck convoys:	No
The companies used provide vehicle escort:	No		

A5. GENERAL INFORMATION

Brief description of the facility:

The facility was established in 2010 and the land area was about 700 square meters. The facility used one 5-storey building as production workshop, warehouse and offices, part of one 1-storey building as warehouse. There were 59 employees including 20 males and 39 females in the facility. The products manufactured by the facility were makeup brushes. The main export market was Europe and USA.

Brief description of loading process for shipment:

The facility conducted full container loading and used the land carriers selected by itself. Sea carriers were assigned by their clients. No truck or pick-up or partial loaded container was used. Loading process was monitored by designated supervisor and security guards. Physical barrier was used to surround the container loading area. And all containers would be delivered to port directly after loading.

Brief description of sealing process:

Bolt seals used immediately once the inspection and loading were finished. Seal number would be recorded in log. Photo of container and seal would also be recorded.

Brief description of direct shipments to port process:

All containers were delivered to the port directly.

In-country transport services detail:

2 land carrier was used: Jing Cheng transportation company/ 6 years; Jia Hong transportation company/6 years.

Required transit time between audited facility to the port / the next supply chain:

2.5 hours to Yantian port

CCTV details:

There were totally 43 CCTV cameras installed for sensitive areas such as packing department, main gate and loading area, etc. The CCTV monitors were secured in office and monitored by security guard and designated manager. 50 days' CCTV records were available for review.

Security guard force details:

The facility had 2 security guards and manning the facility 24/7 in 2 shifts.

B. RESULT DETAILS

The following section includes all findings noted during the on-site audit.

Risk Assessment					83%
RATING	Must - High	Must - Low	Should - High	Should - Low	Total
NEW NON-COMPLIANCES	0	3	0	0	3

New Non- Compliances

ID #	Finding	Rating
O0103	The facility does not conduct and document its international risk assessment.	Must - Low
% of occurrence at other facilities None		Past occurrences at this facility None
Auditor Comments The facility did not conduct and document its international risk assessment.		
Minimum Security Criteria CTPAT Members must conduct and document the amount of risk in their supply chains. CTPAT Members must conduct an overall risk assessment (RA) to identify where security vulnerabilities may exist. The RA must identify threats, assess risks, and incorporate sustainable measures to mitigate vulnerabilities. The member must take into account CTPAT requirements specific to the member's role in the supply chain.		

New Non- Compliances

ID #	Finding	Rating
O0104	The member does not have a method to assess or differentiate between levels of risk.	Must - Low
% of occurrence at other facilities None		Past occurrences at this facility None
Auditor Comments The facility did not have a method to assess or differentiate between levels of risk.		
Minimum Security Criteria CTPAT Members must conduct and document the amount of risk in their supply chains. CTPAT Members must conduct an overall risk assessment (RA) to identify where security vulnerabilities may exist. The RA must identify threats, assess risks, and incorporate sustainable measures to mitigate vulnerabilities. The member must take into account CTPAT requirements specific to the member's role in the supply chain.		

New Non- Compliances

ID #	Finding	Rating
O0105	The facility does not adopt the "5 Step Risk Assessment Process Guide" in conducting a security risk assessment of their supply chain(s).	Must - Low
% of occurrence at other facilities None		Past occurrences at this facility None
Auditor Comments The facility did not adopt the "5 Step Risk Assessment Process Guide" in conducting a security risk assessment of their supply chain(s).		
Minimum Security Criteria CTPAT Members must conduct and document the amount of risk in their supply chains. CTPAT Members must conduct an overall risk assessment (RA) to identify where security vulnerabilities may exist. The RA must identify threats, assess risks, and incorporate sustainable measures to mitigate vulnerabilities. The member must take into account CTPAT requirements specific to the member's role in the supply chain.		

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Business Partners 88%

RATING	Must - High	Must - Low	Should - High	Should - Low	Total
NEW NON-COMPLIANCES	0	1	0	0	1

New Non-Compliances

ID #	Finding	Rating
O0134	The facility does not require (a) eligible carriers to demonstrate C-TPAT, AEO, PIP certification and/or (b) ineligible carriers to demonstrate compliance with C-TPAT, AEO, PIP equivalent standards.	Must - Low
% of occurrence at other facilities None		Past occurrences at this facility None
Auditor Comments There was one land carrier used by the facility, but this land carrier did not have security certification.		
Minimum Security Criteria Where a CTPAT Member outsources or contracts elements of its supply chain, the Member must exercise due diligence (via visits, questionnaires, etc.) to ensure these business partners have security measures in place that meet or exceed CTPAT's Minimum Security Criteria (MSC).		

Cyber Security 88%

RATING	Must - High	Must - Low	Should - High	Should - Low	Total
NEW NON-COMPLIANCES	0	1	0	0	1

New Non-Compliances

ID #	Finding	Rating
O0185	Account protection and authentication are not controlled with strong passwords and IT safeguards.	Must - Low
% of occurrence at other facilities None		Past occurrences at this facility None
Auditor Comments During facility tour, account protection and authentication were not controlled with strong passwords and IT safeguards.		
Minimum Security Criteria Individuals with access to Information Technology (IT) systems must use individually assigned accounts. Access to IT systems must be protected from infiltration via the use of strong passwords, passphrases, or other forms of authentication and user access to IT systems must be safeguarded. Passwords and/or passphrases must be changed as soon as possible if there is evidence of compromise or reasonable suspicion of a compromise exists.		

Conveyance and Instruments of International Traffic Security 88%

RATING	Must - High	Must - Low	Should - High	Should - Low	Total
NEW NON-COMPLIANCES	0	1	0	0	1

New Non-Compliances

ID #	Finding	Rating
O0237	Conveyance/IIT inspection documentation are not kept for 12 months.	Must - Low

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% of occurrence at other facilities None	Past occurrences at this facility None
Auditor Comments Conveyance/IIT pest contamination inspection records were not provided for review.	
Minimum Security Criteria If visible pest contamination is found during the conveyance/Instruments of International Traffic inspection, washing/vacuuming must be carried out to remove such contamination. Documentation must be retained for one year to demonstrate compliance with these inspection requirements.	

Physical Security 93%

RATING	Must - High	Must - Low	Should - High	Should - Low	Total
NEW NON-COMPLIANCES	0	0	1	0	1

New Non-Compliances

ID #	Finding	Rating
O0381	The company does not have an automatic intrusion detection or alarm system installed in sensitive/controlled access areas.	Should - High

% of occurrence at other facilities None	Past occurrences at this facility None
Auditor Comments The company did not have an automatic intrusion detection or alarm system installed in sensitive/controlled access areas.	
Minimum Security Criteria Security technology should be utilized to monitor premises and prevent unauthorized access to sensitive areas.	

Physical Access Controls 93%

RATING	Must - High	Must - Low	Should - High	Should - Low	Total
NEW NON-COMPLIANCES	0	0	1	0	1

New Non-Compliances

ID #	Finding	Rating
O0449	Advance notice is not required for a pick-up or delivery transport company (driver name, truck number, company, date and time of arrival, purpose of trip).	Should - High

% of occurrence at other facilities None	Past occurrences at this facility None
Auditor Comments Advance notice was not required for all transportation company.	
Minimum Security Criteria Prior to arrival, the carrier should notify the facility of the estimated time of arrival for the scheduled pick up, the name of the driver, and truck number. Where operationally feasible, CTPAT Members should allow deliveries and pickups by appointment only.	

Education, Training and Awareness 93%

RATING	Must - High	Must - Low	Should - High	Should - Low	Total
NEW NON-COMPLIANCES	0	0	1	0	1

New Non-Compliances

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ID #	Finding	Rating
00485	The company does not perform emergency response mock drills.	Should - High
% of occurrence at other facilities None	Past occurrences at this facility None	
Auditor Comments The company did not perform emergency response mock drills.		
Minimum Security Criteria CTPAT Members should have measures in place to verify that the training provided met all training objectives.		

C. BEST PRACTICES AND RECOMMENDED BEST PRACTICES

CBP describes Best Practices as innovative security measures that exceeds the CTPAT criteria and industry standards. For C-TPAT purposes, a best practice must meet all five of the following requirements, all of which are subject to verification: (1. Senior management support; 2. Innovative technology, process or procedures; 3. Documented process; 4. Verifiable evidence; and, 5. A regular system of checks, balances and accountability.)

Existing Best Practices:

1. Business Partners

- Not applicable

2. Cyber Security

- Require computer users to sign an agreement of liability for the use of the company's information systems, and renew these agreements each time a password change is initiated.

3. Conveyance and Instruments of International Traffic Security

- For conveyance entries/exits, logs are maintained with name of the guard.
- Photos of authorized employees are publicized to access the restricted areas posted in the work area to detect any unauthorized entry/access.

4. Seal Security

- Not applicable

5. Procedural Security

- Loaded containers/trailers' final inspection is conducted.

6. Agricultural Security

- Not applicable

7. Physical Security

- Not applicable

8. Physical Access Controls

- Security guards receive specific training in C-TPAT.

9. Personnel Security

- Drug screening checks are conducted if allowed by law.

10. Education, Training and Awareness

- A security awareness assessment is given annually to a random sample of employees to gauge their understanding of the company's general security policy.
- The facility provides online training portal.

Recommended Best Practices:

1. Business Partners

- The facility should conduct periodic table-top exercises to address security breaches within the supply chain and, if one doesn't already exist, create a "quick response team" to investigate suspicious activities discovered during cargo transportation.
- The facility should perform periodic audits of business partners accompanied by a third-party security firm (these audits may be performed without advance notice). The firm should provide a written assessment of business partners' adherence to C-TPAT minimum security criteria. If non-compliance is discovered, it could be sufficient grounds for terminating the business relationship.
- The facility should provide periodic security awareness training to all of the contractors.

2. Cyber Security

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- The facility should equip computers with biometric retina scanners for authentication and identification purposes.
- The facility should install software on employees' laptops that allows management to delete information from hard drives from a remote location.

3. Conveyance and Instruments of International Traffic Security

- The facility should use a dock locking arm to anchor the container chassis to the loading dock.
- The facility should use tamper-indicative security labels bearing an actual photo of the seal and a serial number, attached to the hinges and between the two doors of the vehicles.

4. Seal Security

- In addition to using a bolt seal, attach a cast iron J-bar device to the locking bar that requires a specialized tool for removal.
- The facility uses multiple ISO/PAS 17712 certified high security seals on all shipments bound to the U.S.

5. Procedural Security

- The facility should schedule all deliveries at distribution centers in advance using an online automated tool, and ensure that upon arrival, drivers provide security guards with shipment-linked delivery numbers for verification.
- The facility should use tamper-evident tape with serial numbers to seal cartons, and verify the serial numbers against the packing list when loading and at the final destination.

6. Agricultural Security

- The facility should consider using alternatives to wood packaging material. The following products are not subject to USDA regulation: Plywood or press board; Plastic pallets; Oriented strand board; Hardboard; Parallel strand lumber; Synthetic foam; Metal frames; Inflated dunnage; Masonite veneer

7. Physical Security

- If the facility is located adjacent to a lake or body of water that forms part of its perimeter, it should install an optical fence above and below the water line to detect waterborne intruders.
- The facility should install a double-layered perimeter fence, creating a secure zone between the two fence lines. Ensure that both fences are equipped with electronic monitoring capabilities, and that the outer fence incorporates underground concrete to deter tunneling.
- The facility should maintain multiple alarm systems that include door contacts, heat and vibration sensors, and seismic movement detectors.
- The facility should position security guard that view towers at each corner of the facility perimeter with sightlines that permit views of activity inside and outside the facility. Make sure the towers are manned at all times.
- Vehicles should be prohibited/prevented from parking near perimeter fencing.

8. Physical Access Controls

- The facility should ensure that as employees enter the facility, their photos are displayed on an electronic access system monitor so that the security guard in the area can verify that the individual entering matches the photo displayed on the monitor.
- The facility should ensure that the exterior doors of buildings are equipped with two- person key systems that require a company manager and security guard to unlock the facility.
- The facility should Issue all visitors thermal-activated visitor ID badges featuring expiration marking/coloring that appears after eight hours.

9. Personnel Security

- The facility should conduct exit interviews as a routine part of the employee termination process, with a counselor on hand to evaluate the likelihood that a terminated employee could pose a retaliation threat.
- The facility should have a fingerprinting document of the identity of all new hires, and provide an employee list to national authorities on an annual basis for additional screening.

10. Education, Training and Awareness




- The facility should conduct a semi-annual security awareness training seminar for all U.S. based suppliers, customers, and other business partners.

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- The facility should require new employees to complete a multiple-module security training program. Web-based training should emphasize recognition of internal conspiracies, maintaining cargo security, facility access control, and mail handling procedures. Publish security updates via an intranet.

D. PERFORMANCE TREND ANALYSIS

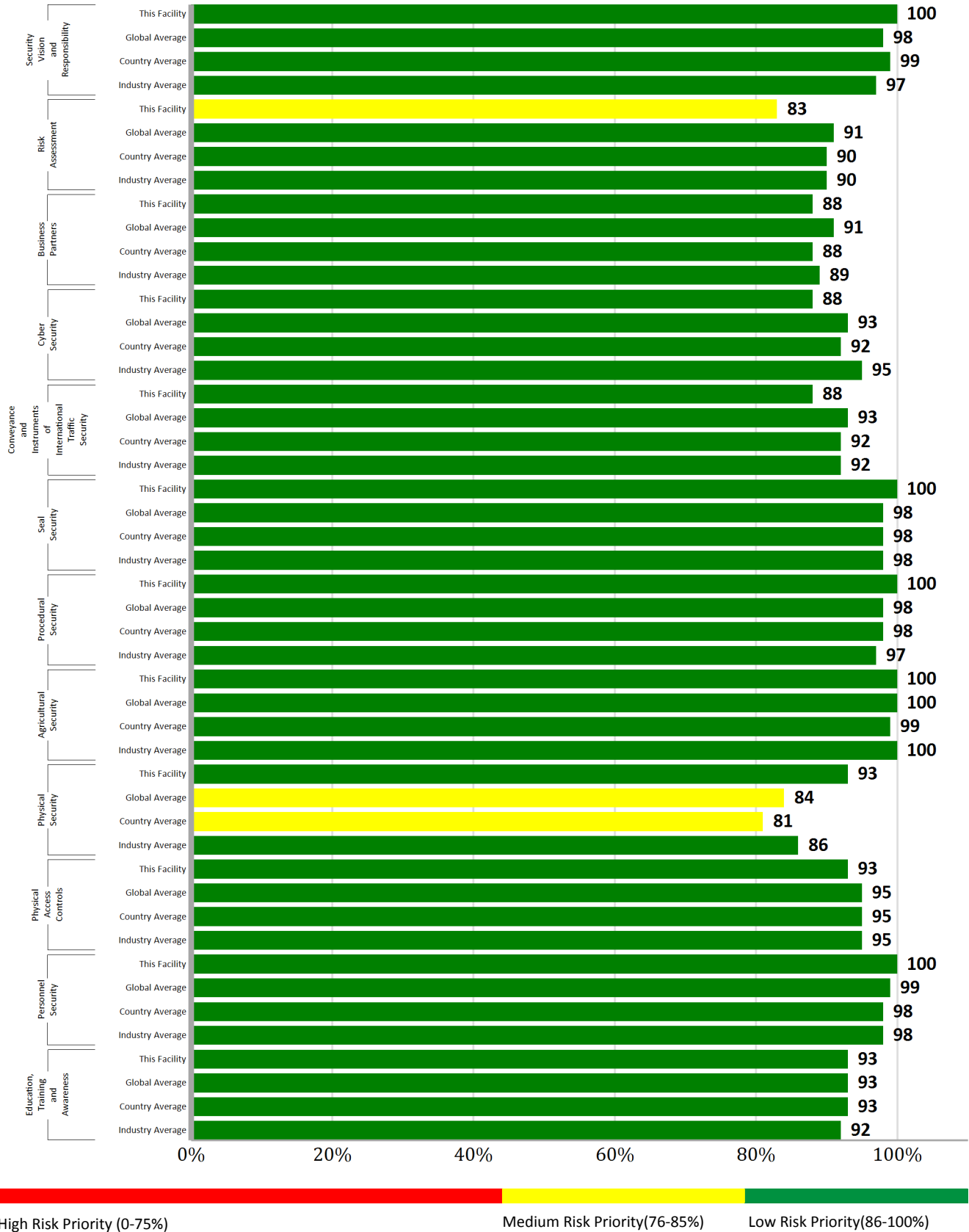
Section Name	Current 17-Dec-2021	Last NA	First NA	Change (Current-Last)	Change (Current-First)
Security Vision and Responsibility	100	NA	NA	NA	NA
Risk Assessment	83	NA	NA	NA	NA
Business Partners	88	NA	NA	NA	NA
Cyber Security	88	NA	NA	NA	NA
Conveyance and Instruments of International Traffic Security	88	NA	NA	NA	NA
Seal Security	100	NA	NA	NA	NA
Procedural Security	100	NA	NA	NA	NA
Agricultural Security	100	NA	NA	NA	NA
Physical Security	93	NA	NA	NA	NA
Physical Access Controls	93	NA	NA	NA	NA
Personnel Security	100	NA	NA	NA	NA
Education, Training and Awareness	93	NA	NA	NA	NA
Overall Score	84	NA	NA	NA	NA

 Advancers
  Constant
  Decliner

E. KEY STRENGTHS AND CHALLENGES

Criteria	Facility Strengths: Facility performance ranks in the top percentile of the population and/or has implemented a best practice process	Global Freq. of Compliance %
Compliant	Where the company makes allowance for the use of personal devices to conduct company work, provisions for the company's cybersecurity policies and procedures are installed and regularly updated in order to engage with the Company Network.	90%
Compliant	Risk assessments are reviewed annually, or more frequently as needed.	90%
Compliant	The company conducts audits of seals that includes periodic inventory of stored seals and reconciliation against seal inventory logs and shipping documents and all audits are documented.	90%
Compliant	Cargo conveyances and Instruments of International Traffic (IIT) are stored in a secure area to prevent unauthorized access.	91%
Compliant	Seal numbers are electronically printed on the bill of lading or other shipping documents.	92%
Compliant	The company (that maintain seal inventories) uses high security seals and maintain document to demonstrate that they use either meet or exceed the most current ISO 17712 standard.	92%
Compliant	Business partner's security assessment is reviewed periodically.	92%
Compliant	If CCTV are installed, periodic, random reviews of the camera footage are conducted (by management, security, or other designated personnel) to verify that cargo security procedures are being properly followed in accordance with law. Results of the reviews are summarized in writing to include any corrective actions taken. The results are maintained for a sufficient time for audit purposes.	93%
Compliant	Digital photographs of the affixed seals on containers or trailers are taken at the point of stuffing. The images are sent electronically to customers and copies properly maintained by the company for verification purposes.	93%
Compliant	All cargo handling and storage facilities, including trailer yards and offices have physical barriers and/or deterrents that prevent unauthorized access.	93%
Criteria	Facility Challenges: Facility performance ranks in the bottom percentile of the population	Global Freq. of Compliance %
Should - High	The company does not have an automatic intrusion detection or alarm system installed in sensitive/controlled access areas.	79%

F. COMPARISON BENCHMARK



FACILITY PHOTOS

Facility Name



Facility Name

Main Gate



Main Gate

Loading Area



Loading Area

Packing Area



Packing Area

Perimeter Fencing

No Image Uploaded

Finished Goods Warehouse



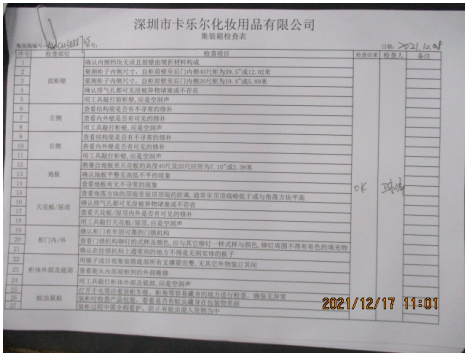
Finished goods warehouse

Container Inspection and Manifest Record



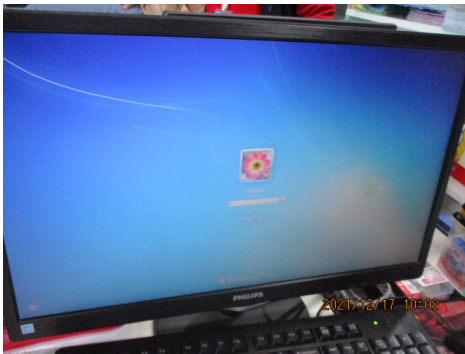
Container Inspection and Manifest Record

Container Inspection Photos/Records



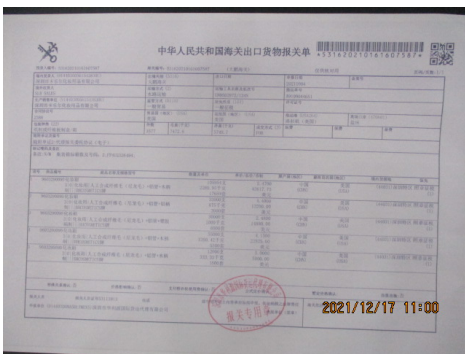
Container inspection photo / records

Computer Security



Computer Security

Shipping Documents



Shipping Documents

Shipping Log

深圳市卡乐尔化妆品有限公司
贵船车运出货记录表

日期	品名	规格	数量	重量	体积	包装	承运人	目的地	备注	操作人员	审核人	日期
2021/12/17	特快	2021/12/17	1000	1000	1000	1000	1000	1000	1000	1000	1000	2021/12/17 11:01
2021/12/17	特快	2021/12/17	1000	1000	1000	1000	1000	1000	1000	1000	1000	2021/12/17 11:01
2021/12/17	特快	2021/12/17	1000	1000	1000	1000	1000	1000	1000	1000	1000	2021/12/17 11:01

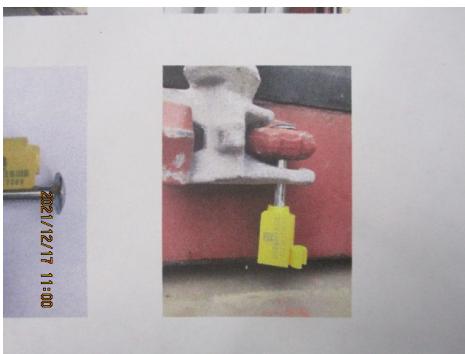
Shipping Log

Shipment Security Seal



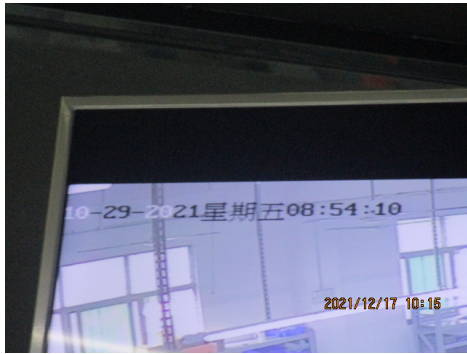
Shipment Security Seal store area

Affixed Seal On Container



Affixed Seal On Container

Oldest CCTV Recording



Oldest CCTV Recording

CCTV



CCTV

CCTV Monitoring



CCTV monitoring

Security Room



Security Room

Vehicle Parking for Employees



Vehicle Parking for Employees

Vehicle Parking for Visitors



Vehicle Parking for Visitors

Intrusion Detection Equipment

No Image Uploaded

Outside Lighting



Outside lighting

Communication Equipment



Communication equipment

Security Guard with Uniform



Security guard with uniform

Employee with ID Badge



Employee with ID badge

Visitor's Card



Visitor's card

Overview



Overview 2



Overview 1

Others



Authorized name list posted



Business License

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