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Guide Name: Supply Chain Security for Imports Standard
Operating Procedure (SOP)

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- I. **Corporate Policy:** It is the policy of Schlage Lock Company, LLC to ensure compliance with all US Customs and other government agency regulations. This Supply Chain Security Import SOP is written in accordance with the security requirements of the US Customs-Trade Partnership against Terrorism (C-TPAT) program.
- II. **Purpose:** The purpose of this SOP is to comply with our C-TPAT obligations, and to protect Schlage’s shipments TO or THRU the United States from infiltration of narcotics, weapons, theft or human trafficking.
- III. **Scope:** The scope of this policy relates to all shipments TO or THRU the United States (‘thru the US’ refers to ‘inbond’ shipments sent thru the US for immediate export to Mexico). The policy is intended to cover shipments to the US where **Schlage Lock Co., LLC** is the Importer of Record.
- IV. **C-TPAT Carriers Only** As required by C-TPAT, this policy requires our business partners (freight forwarders and foreign suppliers) to **ONLY** use C-TPAT certified carriers or freight forwarders, or carriers and freight forwarders who meet the C-TPAT minimum security criteria. All carriers, including rail and land carriers, handling the movement of Schlage shipments, must be C-TPAT compliant. **Failure to do so may result in the carrier’s removal from future Schlage Lock Company, LLC carrier bids.**
- V. **Responsibilities:**
- Foreign Suppliers**
- A. Foreign Suppliers**
1. **Shipping Requirements**
- All cargo should be accurately described, and the weights, labels, marks and piece count indicated and verified against the cargo manifest.
 - 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.
 - Procedures should be established to track the timely movement of incoming and outgoing goods.
2. **Importer Security Filing (ISF)**
- Under US Customs law, an Importer Security Filing (ISF) must be transmitted to US Customs at least 24 hours **prior to loading any vessel bound for the US.**
- Failure to file the ISF will result in \$5K customs penalty per violation.
- For all vessel shipments, Suppliers must obtain an Importer Security Filing transaction number prior to physically turning cargo over to the freight forwarder.

V. Responsibilities:
Foreign Suppliers

Procedure for Supplier to obtain ISF Transaction Number:

- a) Obtain bill of lading number from the freight forwarder.
- b) Complete the Importer Security Filing (ISF) template, using the template applicable to the type of shipment. **All foreign suppliers should have the ISF templates in Excel already, but if not, please contact Yesenia.Gallegos@allegion.com.**

“ISF TEMPLATE – US IMPORTS” ([Exhibit 2](#))

Or

“ISF TEMPLATE – INBONDS TO MEXICO” ([Exhibit 3](#))

- c) Email the completed ISF template to the ISF filing agent at least 72 hours in advance of sailing.

NOTE: the ISF Filing Agent for the US or MX Importations is:

isf@iab-sd.com

The ISF contact is Steve Goding.

- d) Obtain ISF transaction number from filing agent (must be documented on the ISF template). The ISF filing agent is required to return the ISF transaction number within 24 hours.
- e) Deliver cargo to freight forwarder and provide copy of final ISF template (containing ISF transaction number) with the shipment documentation.

3) [Container Security](#)

Container integrity is critical to protect against the introduction into the US of unauthorized material and/or persons.

Foreign suppliers must conduct and document a container inspection.

a. [Container Inspections](#)

Procedures must be in place to verify the physical integrity of the **container structure** prior to stuffing, to include the reliability of the locking mechanisms of the doors. If containers do not meet the 9-point inspection, then they must be rejected in place of a compliant container.

A 9-point inspection process is recommended for all containers:

1. Container cleanliness (must not be filthy; no weeds or seeds allowed)

**V. Responsibilities:
Foreign Suppliers**

2. Pallet cleanliness (must not be filthy; no weeds or seeds allowed)
3. Outside/Underside of Trailer
4. Left Wall
5. Right Wall
6. Front Wall
7. Floor
8. Ceiling
9. Inside and Outside Door / Hinges (i.e. Ensure Locking mechanisms are secure)

b. Container Inspection Checklist (CIC)

- Document the inspection of the container using the “C-TPAT Container Security – Inspection Checklist” (See [Exhibit I](#)).
- Suppliers must complete sections I, II, and III for shipments bound for the US or MX, and include the completed form with paperwork sent with container.
- Suppliers must assign documentation accountability (someone must be assigned responsibility for the container inspections).

4) High Security Seals

a. Foreign suppliers must apply high security seals to containers bound for the U.S.

1. US law requires all containers bound for the U.S. to be secured with a high security SEAL which meets ISO standard-- ISO 17712:2013.

Ensure the following:

- a) Seals must meet or exceed certain standards for strength and durability to prevent accidental breakage, early deterioration (due to weather conditions, chemical action, etc.) or undetectable tampering under normal usage. A 18MM MINIMUM WIDTH DIAMETER for bolt seals is required.
- b) Seals must be clearly and legibly marked with a unique identification number.
- c) The seal is classified as an “H” – High Security Seal
- d) Please comply with key points below:

V. Responsibilities:
Foreign Suppliers

Partners are reminded to be vigilant in their purchase of ISO 17712 compliant seals.

- They should be obtaining independent written certification from a supplier that its product and processes meet or exceed the ISO 17712 standard. Partners should ask their suppliers for copies of conformance certificates for product testing and security related business practices (Normative Annex A).
- The certificates for product testing should come from a lab that is properly accredited according to ISO procedures, such as ISO 17025. The test house must be accredited by an independent third party test laboratory.

Beware of fraudulent documents. Some independent laboratories have adopted digitally signed and certified test reports to ensure content integrity and author authenticity.

- e) Unused seals must be stored in a secure place and controlled.
- f) Less than container loads must use a secured padlock or similar locking device. Only a limited number of individuals should have access to open this padlock.
- g) Once freight is consolidated for shipping to the US, the containers must be sealed with a high security seal.

US Customs Border Protection will assess civil penalties for violations of the container sealing requirement.

For additional information/specifications related to the seal requirement, or for any questions on C-TPAT, please contact the Trade Compliance group. Below are instructions on how to apply the seal.

b. Application of the Seal:

1. Apply a high security seal to the cargo door of the container.
2. The Shipping Coordinator must ensure seals are applied to container doors as shown below.

STEPS:

1. **Seal Placement:** The seal is inserted from top to bottom through the slot on the right-side door handle (see picture).



V. **Responsibilities:**
Foreign Suppliers

2. **Lock Seal:** Insert the plastic piece on the bottom part of the bolt. When the seal has been properly locked, you will hear a “click” sound.



3. **Test Seal:** Pull firmly downwards on the plastic piece to confirm that the seal has been properly locked.



5) **Shipping FCL – Additional Requirements**

Foreign suppliers who ship full container loads (FCL) should ensure the following is sent via email to the US or MX Receiving facility (see contacts in “c” immediately below), prior to destination arrival of the conveyance:

- a) Copy of the “Container Inspection checklist” (CIC) and
- b) Digital photographs showing the condition of the cargo and container/trailer at time of shipping. Include a picture of the

V. Responsibilities:
Foreign Suppliers

placement of the palletized cargo as well as the locked seal to allow viewing of the seal number.

- c) Please send email to the persons identified below, based on plant or site destination:

DSC at Olathe, Kansas USA

John.Perez@allegion.com

Bruce.Webster@allegion.com

Von Duprin at Indiana USA

Dimo.Vckov@allegion.com

Donnie.Miller@allegion.com

LCN at Princeton, Illinois USA

Roger.DeBrock@allegion.com

Daniel.Murray@allegion.com

Chelby.Thompson@allegion.com

Charles.Hundley@allegion.com

SEC at Security, Colorado USA

Eric.Roren@allegion.com

Jeff.Coover@allegion.com

John.Kavanaugh@allegion.com

George.Keith@allegion.com

James.Parker@allegion.com

Shane.Mikus@allegion.com

Schlage de Mexico – Tijuana, MX Plant

Alfonso.Valentin@allegion.com

Schlage de Mexico – Tecate, MX Plant

Luis.Pinto@allegion.com

Jose.Abundez@allegion.com

Schlage de Mexico - Ensenada/SAU, MX Plant

Cesar.Lopez@allegion.com

Raul.Sanchez@allegion.com

Yanira.DeLosReyes@allegion.com

Hector.Perez@allegion.com

Juan.Leon@allegion.com

**For Inbond shipments thru the Port of Los Angeles or
Long Beach, California USA (including SOMI shipments)**

sgoding@iab-sd.com

jortiz@iab-sd.com

V. **Responsibilities:**
Foreign Suppliers

6) **Security Procedures / Annual Survey**

For suppliers not eligible for C-TPAT certification, the foreign manufacturer must require that their business partners 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 (WCO) accredited security program administered by a foreign customs authority; or, by providing a completed foreign manufacturer security questionnaire).

At a minimum, on a yearly basis, or as circumstances dictate such as during periods of heightened alert, security breach or an incident, foreign manufacturers should conduct a comprehensive assessment of their international supply chains based upon the C-TPAT security criteria outlined in the "Minimum-Security Criteria for C-TPAT Foreign Manufacturers." Suppliers are responsible for completing the Annual Survey on Minimum-Security Criteria for C-TPAT Foreign Manufacturers. The Trade Compliance team will issue an annual survey to suppliers by the end of September, and suppliers are required to certify by the end of October. Suppliers who have obtained a certification in a supply chain security program being administered by a foreign Customs Administration must advise Schlage of their status of participation.

7) **Shrink Wrap**

Vendors should ensure all pallets are completely shrink-wrapped to prevent the introduction of contraband without leaving evidence of tampering. Vendors that ship from high-risk areas, such as India and Mexico, should use branded shrink-wrap on shipments or tamper-evident security tape on individual boxes.

8) **REPORT ANOMOLIES and INCIDENTS**

Foreign Suppliers are expected to report any security breaches. Management must decide whether the security breach requires involvement of the local Police. For incidents of terrorism, narcotic smuggling or human trafficking, the Trade Compliance Director for Schlage must be informed.

Trade Compliance Director (619) 778-4137 kelly.guzman@allegion.com

V. Responsibilities:
Freight Forwarders

B. **Freight Forwarders**

1. C-TPAT Carrier

- Freight forwarders who select ocean and air carriers must use only C-TPAT certified carriers, or those meeting the C-TPAT minimum security criteria.
- All carriers handling the movement of Schlage shipments must be C-TPAT compliant.
- Suppliers who have obtained a certification in a supply chain security program being administered by a foreign Customs Administration must advise Schlage of their status of participation.

2. Status Verification Interface

- C-TPAT certification or the Status Verification Interface (SVI) number must be provided to the Trade Compliance team when logistics contracts are renewed.
- If a carrier's C-TPAT status changes, notify the Trade Compliance Director immediately.

3. Importer Security Filing (ISF)

- Freight forwarders handling full container loads must verify, prior to accepting cargo from supplier, that an ISF was filed for the shipment.
- **If the supplier is unable to supply evidence of filing, the Freight Forwarder must not accept the cargo.**
- The Freight Forwarder must only accept the cargo once evidence of an ISF is provided.

4. High Security Seals

- Freight forwarders are responsible for ensuring CTPAT high security seals are applied to all shipping containers bound for the U.S.
- Less than container loads must use a secured padlock or similar locking device.
- Only a limited number of individuals should have access to open this padlock.
- Once freight is consolidated for shipment to the US, the containers must be sealed with a high security seal.

5. Annual Survey

- Freight Forwarders are responsible for completing an annual survey indicating key control requirements/minimum criteria are met for C-TPAT compliance.
- Freight Forwarder must advise if there are any significant changes to the supply chain security process. **See Exhibit 4**

6. REPORT ANOMOLIES, INCIDENTS and Exams

Vessel and Air

Freight Forwarders involved with the carriage of international goods are expected to report any security breach or anomalies to Management. Management must decide whether the security breach requires escalation

to the local Police and/or to the C-TPAT Account Representative handling the account.

For incidents of terrorism, narcotic smuggling or human trafficking, US Customs' advises you should notify the following in this order:

1. Local Police
2. C-TPAT Account Security Specialist
3. Federal Bureau of Investigation (FBI) for US domestic affairs:
(202) 324-3000
4. Central Intelligence Agency (CIA) for foreign affairs:
(703) 482-0623

For any Exams required on Schlage imported merchandise, inform the following:

Trade Compliance Manager Yesenia.Gallegos@allegion.com
Trade Compliance Director Kelly.Guzman@allegion.com

Land Carrier or Drayage Carrier

If security deficiencies are identified in the supply chain, including but not limited to hijacking, internal conspiracies, hidden compartments on trailers, misuse, compromise, theft, tampering, altering or duplication of transponders, etc., then notify the following in this order:

Carrier's Dispatcher; Carrier Dispatcher to notify Immediate Manager

CBP Los Angeles Security Watch (562) 366-5591

C-TPAT Account Security Specialist for Carrier

Trade Compliance Director (619) 778-4137 Kelly Guzman

For any Exams required on Schlage merchandise, inform the following:

Trade Compliance Manager Yesenia.Gallegos@allegion.com
Trade Compliance Director Kelly.Guzman@allegion.com

V. Responsibilities: US CUSTOMS BROKER

C. US Customs Broker (IAB)

1. Importer Security Filing (ISF)

The US Customs Broker is responsible for transmitting and returning the Importer Security Filing transaction number within 24 hours of receiving a completed ISF from the supplier.

Note: If the ISF is transmitted post vessel departure, the US Customs Broker must immediately inform the Trade Compliance Manager.

The US Customs Broker is responsible for working with the Freight Forwarder and or Supplier when there are data mismatches, such as Bill of Lading number mismatches. If a resolution doesn't occur, Filing Agent is to contact the Trade Compliance team.

IAB must send the following Reports to the US Trade Compliance team on a quarterly basis:

1. ISF Internal Log
2. Detailed ISF reports
3. ISF CBP Progress Reports

Dates to Issue reports:

January 2 April 1 July 1 October 1

2. Annual Survey

US Customs Brokers are responsible for completing an annual survey indicating key control requirements/minimum criteria are met for C-TPAT compliance.

US Customs Brokers must advise if there are any significant changes to their security process. See **Exhibit 5**

3. REPORT ANOMOLIES, INCIDENTS and EXAMS

US Customs Brokers are primarily involved with the handling of documentation and are often informed when there is an exam on the cargo. They are also often the first to identify anomalies with invoicing, manifests, packing lists, etc.

US Customs Brokers must report any exams and/or anomalies such as quantity discrepancies or suspicious ISF data to the following:

Trade Compliance Manager	(619) 778-2127	Yesenia Gallegos
Trade Compliance Director	(619) 778-4137	Kelly Guzman

V. Responsibilities:
RECEIVING

D. *Receiving*

1. Container Inspection Checklist (CIC)

The Receiving Team is responsible for completing Section IV of the CIC once the container arrives.

The U.S. Receiving Supervisor will receive a copy of the conveyance inspection report or "Container Inspection checklist" (CIC) prior to the arrival of the conveyance.

2. Digital Photographs validation

The U.S. Receiving Supervisor will receive digital photographs of the condition of the cargo and container/trailer prior to the arrival of the conveyance.

V. Responsibilities:
RECEIVING

Both 1 and 2 will be forwarded electronically to the destination site before cargo arrives. These documents must be available at time of receiving the conveyance.

3. Cargo Discrepancy Log and Analysis

- a. The CIC and the Digital Photographs must be reviewed and compared to actual documents and physical cargo to ensure consistency. Anomalies such as changes in seal numbers without an explanation of an exam, changes in configured layout of cargo, etc., must be reported to the immediate Manager, as well as the Trade Compliance Manager.
- b. Each U.S. receiving distribution center must implement the use of a macro or overview log for inbound trailers. They must document discrepancies and proactively analyze patterns to prevent recurrences. For example, identify wrong addresses, wrong B/L or no B/L for pallet, or mislabeling of commodity.
- c. The receiving distribution center leader must identify patterns such as same day occurrences, same person involved, etc.

4. Seals

Broken or used seals must be completely destroyed at the receiving facility. This task must be done under the Supervisor's direction.

5. REPORT ANOMOLIES and INCIDENTS

The Receiving Supervisor must report any anomalies, including the below listed, to the Plant Manager.

- Un-manifested goods, packages, etc.
- Signs of tampering (fresh paint, peculiar marks, etc.)
- Secret compartments in walls, floors, ceiling, etc.
- Discrepancy between digital photos sent from origin against cargo layout received

The Local Leader will contact the Local Police depending on the severity of the situation.

The Plant Manager is responsible for obtaining a Police Report. He must also inform the following:

Kelly Guzman Director, Trade Compliance (619) 778-4137
Yesenia Gallegos Manager, Trade Compliance (619) 210-2204

V. Responsibilities:
TRADE COMPLIANCE

E. Trade Compliance

The Trade Compliance Director is responsible for reporting all material security issues or anomalies to the Schlage C-TPAT Security Specialist. A full report, including point of origin, conveyance details, dates, times, photographs, police filings, etc., will be included in the report.

1. **High Security Seals**

The Trade Compliance Manager is responsible for obtaining a yearly independent laboratory testing certificate confirming that seals purchased for the MX plants, for use on exports to the US, meet the quality C-TPAT standards. This certificate will be obtained from the seal supplier.

2. **Annual Survey Audit**

The Trade Compliance Manager is responsible for reviewing the results of all annual surveys to ensure key control requirements/minimum criteria are met for C-TPAT compliance. If issues or anomalies are identified, the Trade Compliance Manager will work with the Foreign Suppliers, Freight Forwarders and Brokers to confirm the estimated time to implement controls for compliance.

3. **C-TPAT Company Profile and Security Profile**

The Trade Compliance Manager is responsible for updating the C-TPAT Company Profile and Security Profile for Schlage Lock Company, LLC. Updates will be made yearly on the C-TPAT Portal. The US Customs deadline is 12/1 for Schlage Lock Company, LLC.

4. **Periodic Internal Testing**

The Trade Compliance team will periodically conduct internal testing of documentation for shipments to the US (including from Schlage de MX and from Asia) to ensure C-TPAT requirements are being carried out consistently and effectively. The audit includes a review of the ISF, Container Inspection Checklist, pictures (if provided), etc. Issues will be documented, and elevated for corrective action.

5. **REPORT ANOMOLIES and INCIDENTS**

The Trade Compliance Manager or Trade Compliance Director is responsible for notifying the Schlage C-TPAT Account Security Specialist of any issues related to security breach, including but not limited to those pertaining to theft, narcotics, human trafficking and terrorist activities. US Customs and Border Protection 562-366-3275 (Christina Lin).

VI. CONTACTS

Schlage Lock Co, LLC - Trade Compliance			
Kelly Guzman	Director, Trade Compliance	619-778-4137	Kelly.Guzman@allegion.com
Yesenia Gallegos	Manager, Trade Compliance	619-210-2204	Yesenia.Gallegos@allegion.com
Schlage de México - MX Customs Compliance			
Milton Rangel	Manager, Trade Compliance Mexico	011 52 665 845-2246	Milton.Rangel@allegion.com
Tomas Hernandez	Supervisor, Customs	011 52 646 182-3157	Tomas.Hernandez@allegion.com
Monica Cobian	Supervisor, MX Compliance	011 52 665 103-6188	Monica.Cobian@allegion.com
Schlage Lock Co, LLC - Distribution & Logistics			
Americas Logistics			americas.logistics@allegion.com
Schlage de Mexico - Ensenada / Sauzal			
Raul Sanchez	Supervisor, Receiving	011 52 646 116-2121	Raul.Sanchez@allegion.com
Cecilia Pina	Supervisor, Logistics	011 52 646 185-5772	Cecilia.Pina@allegion.com
Schlage de Mexico - Tecate			
Luis Pinto	Team Leader, Materials	n/a	Luis.Pinto@allegion.com
Cecilia Pina	Supervisor, Logistics	011 52 646 185-5772	Cecilia.Pina@allegion.com
Schlage de Mexico - Tijuana			
Alfonso Valentin	Team Leader, Warehouse	n/a	Alfonso.Valentin@allegion.com
Cecilia Pina	Supervisor, Logistics	011 52 646 185-5772	Cecilia.Pina@allegion.com
U.S. Receiving Location - Everett, WA (AD Systems / Brio)			
Renee Crawford	Demand Planner	425-329-0633	Rene.Crawford@allegion.com
David George	Supply Chain Manager	425-595-6000	David.L.George@allegion.com
U.S. Receiving Location - San Diego, CA (Brokerage and Logistics Solutions)			
Ruben Reyes	Warehouse Manager – Southbound	619-573-2771	rreyes@cd.jdgroup.net
Jorge Jacobo	General Manager	619-755-7930	jjacobo@cd.jdgroup.net
U.S. Receiving Location - Security, Colorado (Schlage)			
John Kavanaugh	Receiving Team Lead	719-390-5071	John.Kavanaugh@allegion.com
Eric Roren	Material Control Manager	719-896-3091	Eric.Roren@allegion.com
U.S. Receiving Location - Olathe, Kansas			
Bruce Webster	Logistics Coordinator	913-991-4344	Bruce.Webster@allegion.com
John Perez	Warehouse Supervisor	913-238-7131	John.Perez@allegion.com
U.S. Receiving Location – Princeton, Illinois (LCN)			
Roger Debrock	Master Scheduler	815 879-1460	Roger.DeBrock@allegion.com
Kasey Considine	Materials Manager	815 760-0261	Kasey.Considine@allegion.com

U.S. Receiving Location – Indianapolis, Indiana (GJ / IVES / Zero)			
Donnie Miller	Warehouse Supervisor	317-429-2447	Donnie.Miller@allegion.com
Dimo Vckov	Material Control Manager	317-515-8763	Dimo.Vckov@allegion.com
U.S. Receiving Location – Indianapolis, Indiana (Von Duprin)			
Dan Arnold	Shipping/Receiving Manager	317-410-8056	Daniel.arnold@allegion.com
Jeff Olson	Purchasing Manager	317-775-5443	Jeff.Olson@allegion.com
U.S. Bonded Warehouse for INBOND shipments to Schlage de Mexico – International Automated Brokers (IAB) Otay Mesa, California			
Steve Goding	VP Operations	619-661-6464 X3111 Cell: 619-921-5824	sgoding@iab-sd.com
Jesus Ortiz	Warehouse Supervisor	619-661-6464 X3130	jortiz@iab-sd.com

Exhibit 1 Container Inspection Checklist (CIC)



Container
Inspection Checklist

Exhibit 2 ISF TEMPLATE – US IMPORTS



ISF Template US
Imports July 2019.xls

Exhibit 3 ISF TEMPLATE – INBONDS TO MEXICO



ISF TEMPLATE –
INBOND to Schlage

Exhibit 4 Annual Survey for Freight Forwarders



Annual Surve
Freight Forwarders.

Exhibit 5 Annual Survey for Brokers



Annual Survey
Brokers.docx

Revision History:

Revision	Date	Description of Change
2	01/13/12	New document release
3	02/9/12	Updated BLS contacts and New ISO standard for seals--ISO 17712:2010
4	10/29/12	Updated Leon Burns email address.
5	05/6/13	Replaced IR logo with Schlage's logo. Replaced reference to Ingersoll Rand to show Schlage Lock Company LLC Updated Titles
6	11/18/13 and 4/28/14	Replaced reference to IR and irco email addresses Updated seal requirements regarding ISO 17712:2013 Section V: Foreign suppliers: Updated contact names and addresses of recipients who will receive the CIC and digital photos (from the foreign suppliers.)
7	1/22/15	Updated Container Inspection Checklist, including a change to a 9 point inspection list from a 7 point inspection list. Embedded the CIC. Updated contact information, as well as other changes
8	03/4/2016	Updated Broker and Freight Forwarder responsibilities to require they inform Trade Compliance Manager and Trade Compliance Director of any EXAMS on cargo. Updated several contact names and email addresses.
9	02/17/2017	Added contacts for the LCN Receiving site and MX Receiving sites Updated contacts for BLS
10	12/28/17	Added contacts for Von Duprin Receiving site and updated Receiving site contacts. Updated the phone number for the CBP Los Angeles Security Watch office.
11	02/02/15	Updated US Imports SOP to reflect Schlage header
12	6/12/18	Updated contact information for Von Duprin
13	03/12/2019	Updated contacts throughout SOP
14	1/9/2020	Updated contacts throughout SOP Updated Annual Survey for Freight Forwarders and Brokers

15	6/9/2020	Updated contacts
16	6/25/2020	Added a Receiving site for IAB related to inbond shipments to Schlage de Mexico. Contacts were added.
17	3/18/2021	Updated contacts and embedded exhibits