

## Seal Discrepancies Policy

**1. Purpose:** The purpose of this policy is to ensure the secure transit of shipments handled by our company, focusing on the confidentiality of seal retention and implementing robust procedures for inspection, investigation, and corrective actions in cases of seal discrepancies.

**2. Scope:** This policy applies to all outbound shipments managed by our company, encompassing seal retention, inspection, investigation, and reporting procedures during transit via Inland Container Depot (ICD) and sea ports.

### 3. Procedures:

#### 3.1 Retention of Altered or Tampered Seals:

- **Documentation:** The facility maintains detailed records of all seal placements and changes. Altered or tampered seals are retained securely to aid in investigations.
- **Storage:** Retained seals are stored in a designated secure area with controlled access.

#### 3.2 Seal Discrepancy Inspection:

- **Identification:** Upon discovery of a seal discrepancy (e.g., broken or altered seals), designated personnel promptly conduct a thorough inspection of the shipment.
- **Documentation:** Detailed documentation of the discrepancy, including photographs if possible, is recorded and preserved for investigative purposes.
- **Chain of Custody:** A clear chain of custody is maintained for all examined seals and related evidence.

#### 3.3 Investigation and Corrective Actions:

- **Immediate Response:** The facility initiates an immediate investigation into the cause of the seal discrepancy.
- **Root Cause Analysis:** A root cause analysis is conducted to determine how and when the discrepancy occurred.
- **Corrective Measures:** Based on investigation findings, corrective actions are implemented to prevent future seal discrepancies.
- **Notification:** Internal stakeholders and relevant external parties are informed promptly about the discrepancy and the steps taken to address it.

#### 3.4 Reporting to CBP and Foreign Governments:

- **Protocol:** If a seal discrepancy suggests potential tampering or security breach, the facility reports the incident to U.S. Customs and Border Protection (CBP) and the appropriate foreign government authorities.
- **Collaboration:** The facility cooperates fully with investigating authorities, providing necessary documentation and support as required.

#### **4. Responsibilities:**

- **Management:** Senior management oversees the implementation of this policy and ensures compliance with international shipping standards and regulatory requirements.
- **Training:** Regular training sessions are conducted for personnel involved in handling and monitoring shipments to reinforce seal integrity protocols and procedures.

#### **5. Compliance and Review:**

- **Monitoring:** Compliance with this policy is monitored through regular audits and assessments.
- **Review:** This policy is reviewed annually or as necessary to incorporate any changes in shipping regulations or operational procedures.