

# CTPAT Audit Report

Provided By



**Facility Name: Calzaturificio Jumbo Spa**

**Facility ID (if applicable): 714001**

**Report No: FS-CP-IT-85729**

**Audit Date: 2024-11-07**

**Audit Type: Initial Audit**

**Audit Announcement: Announced**

**Audit Type: Surveillance**

**Facility Score: 97.1%**

**Facility Risk Level: Low**



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## **Section A: Introduction**

The purpose of this audit is to assess the degree to which the factory's security procedures adhere to the applicable C-TPAT Security Criteria established by the U.S. Customs and Border Protection.

This report details the integrity of its factory's security procedures vis-a-vis the C-TPAT Security Criteria. Through Omega Compliance's Corrective Action Plan, this document also communicates the deadline for the correction of any non-compliance.

Below is a procedural overview of how Omega Compliance conducts C-TPAT audits.

### **1. Opening meeting**

- A short summary of the methods and procedures used during the audit.
- Establish the official communication links between the audit team and the auditee.
- Confirm that all necessary resources and facilities are available to the audit team.

### **2. Document review**

- Review the factory's security policy, procedures and all relevant records.

### **3. Factory tour**

- Evaluate the physical security of the factory.

### **4. Management interview**

- Interviews with representative(s) who oversee(s) Human Resources, Security, Shipping, Warehousing and IT and a review of their corresponding security procedures.

### **5. Employee Interview**

- Interviews with randomly selected employees to ascertain their overall security awareness.

### **6. Closing meeting**

- Present any non-compliance to the facility's senior management ensuring that they clearly understand the results of the audit.

## Section B: Executive Summary

### Facility Profile:

<b>Facility Name:</b>	Calzaturificio Jumbo Spa
<b>Address 1:</b>	6 VIA FENIL NOVO3 7036 SAN MARTINO BUON ALBERGO
<b>Address 2:</b>	N/A
<b>City:</b>	VERONA
<b>State / Province:</b>	N/A
<b>Country:</b>	ITALY
<b>Located in free trade zone?</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Phone:</b>	00 39 348 4105882
<b>Fax:</b>	00 39 045 8797483
<b>Email:</b>	riccardo.grippe@calzaturificiojumbo.it
<b>Website:</b>	www.calzaturificiojumbo.it

### Workforce:

Function	Number of employees	Employed	Contracted	Temporary
Senior Management	2	2	0	0
Security Guard	2	0	2	0
Assembly & Packing	15	15	0	0
Production Workers	66	55	0	11
HR / Administration	1	1	0	0
IT / Security	2	2	0	0
Shipping	2	2	0	0
Loading / Unloading	10	10	0	0
Driver	1	1	0	0
<b>Others (Please specify):</b>	19 (Office Employees)	19	0	0
<b>Total:</b>	120	107	2	11
<b>Number of migrant/overseas workers by nationality:</b>	2			
<b>Religions of workers:</b>	Christian			

## Business Overview:

<b>Type of Industry:</b>	Footwear
<b>Principle Product:</b>	Slippers
<b>General Production Process:</b>	Assembling – Quality Control – Packing – Loading
<b>Years in business at this location:</b>	1981
<b>Has the facility undergone a CTPAT audit for another U.S. importer before?</b>	No
<b>If so, list the name of each importer:</b>	N/A
<b>Has the facility undergone a CTPAT validation by a U.S. Supply Chain Security Specialist?</b>	No
<b>If so, list the date of validation and any security upgrades made:</b>	N/A
<b>Is the facility eligible to join as a CTPAT member administered by U.S. Customs?</b>	No
<b>Has the facility been invited to join as a CTPAT member by U.S. Customs?</b>	No
<b>Does the facility participate in any other security initiatives?</b>	No
<b>If so, please list them:</b>	N/A

## Physical Structure:

Function	Description	Size / Unit	
<b>Production:</b>	1 x 1 story building including assembling, quality control, packing and loading	2,860	M <sup>2</sup>
<b>Warehouse:</b>	1 finished good warehouse	2,114	M <sup>2</sup>
	1 material warehouse	2,000	
<b>Container Yard:</b>	N/A	0	M <sup>2</sup>
<b>Office:</b>	More than 15 offices	1,524	M <sup>2</sup>
<b>Others:</b>	Canteen, Security Guard Room	600	M <sup>2</sup>
<b>Total land area:</b>	N/A	11,000	M <sup>2</sup>

## Shipment:

<b>% of goods exported to the US:</b>	2%
<b>By air:</b>	3%
<b>By sea:</b>	97%
<b>By land:</b>	N/A

## Main Clients (Please list top 5):

<b>Client Name</b>	<b>Percent of Facility Business</b>
adidas	65%
Armani	15%
Alexander Mcqueen	10%
Balenciaga	5%
Brunello Cucinelli	5%

## Certification:

<b>Name of Program</b>	<b>Cert. No, if any</b>	<b>Cert. Body</b>	<b>Issue and Expiry Date, if available</b>
N/A	N/A	N/A	N/A

## Contractor Information:

<b>Contractor's Name</b>	Battistolli Servizi Integrati SRL
<b>Address:</b>	Via Basilio Dalla Scola, 88-36100 Vicenza
<b>Phone:</b>	+39 0444 302128
<b>Fax:</b>	+39 0444 394678
<b>Email:</b>	info.battistolisi@battistoli.it
<b>Service / Function:</b>	Security Guard

**Factory Management's Attitude:**

The factory management was cooperative and positive and granted the auditor full access during the audit. They agreed upon the importance of supply chain security and expressed their commitment to the US Customs C-TPAT Initiative.

**Remediation Issues:**

Non-compliances were found pertaining to the following:

- 4. Cybersecurity
- 5. Conveyance & IIT Security
- 7. Procedural Security
- 8. Agricultural Security

Please refer to the Corrective Action Plan for details.

**Conclusion:**

After considering the factory management's attitude and the findings of the audit, the risk level for this factory is Low.

**Section C: Factory Benchmarking and Improvement Progress****Factory Benchmarking Summary:**

Below is a table demonstrating how the factory's current security set-up compares against the client's specific factory performance targets, and tracks the factory's progress as it implements corrective actions (if any).

	Score
Factory Initial Audit	97.1%
Factory 1 <sup>st</sup> Follow Up (On-site)	N/A
Factory 2 <sup>nd</sup> Follow Up (On-site)	N/A



### Section D: Corrective Action Plan

<b>Facility Name:</b>	Calzaturificio Jumbo Spa
<b>Facility Location:</b>	6 via Fenil Novo 37036 San Martino Buon Albergo ITALY
<b>Telephone No:</b>	00 39 348 4105882
<b>Fax No:</b>	00 39 045 8797483
<b>Facility Representative:</b>	Riccardo Grippo Danieli/Customer Care Executive
<b>Email Address:</b>	riccardo.grippo@calzaturificiojumbo.it
<b>Report No:</b>	FS-CP-IT-85729
<b>Audit Type:</b>	<input checked="" type="checkbox"/> Initial <input type="checkbox"/> 1 <sup>st</sup> Follow-Up
<b>Audit Announcement:</b>	<input checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi-announced <input type="checkbox"/> Unannounced
<b>Facility Percentage Score</b>	97.1%
<b>Facility Risk Level</b>	<input type="checkbox"/> High <input type="checkbox"/> Medium <input checked="" type="checkbox"/> Low
<b>Follow Up Required:</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<b>Audit Date:</b>	2024/11/07
<b>CAP Due Date:</b>	2025/01/07
<b>Monitoring Company:</b>	Omega Compliance Limited
<b>Name of Auditor:</b>	Kaan Toker

### Areas Requiring Corrective Action:

1. Security Vision & Responsibility	<input type="checkbox"/>	7. Procedural Security	<input checked="" type="checkbox"/>
2. Risk Assessment	<input type="checkbox"/>	8. Agricultural Security	<input checked="" type="checkbox"/>
3. Business Partner	<input type="checkbox"/>	9. Physical Security	<input type="checkbox"/>
4. Cybersecurity	<input checked="" type="checkbox"/>	10. Physical Access Security	<input type="checkbox"/>
5. Conveyance & IIT Security	<input checked="" type="checkbox"/>	11. Personnel Security	<input type="checkbox"/>
6. Seal Security	<input type="checkbox"/>	12. Education, Training & Awareness	<input type="checkbox"/>

## Findings and Recommendations:

### 4. Cybersecurity Security

<b>Audit Finding:</b>	<b>1. No inventory check for media that contains sensitive information</b>
<b>CTPAT Requirement:</b>	In accordance with the U.S. Customs and Border Protection CTPAT Security Criteria, all media, hardware, or other IT equipment that contains sensitive information regarding the import/export process must be accounted for through regular inventories.
<b>Finding Details:</b>	It was noted that the facility did not conduct regular inventory checks of its media, hardware and/or other IT equipment that contained sensitive information.
<b>Recommendation:</b>	The facility is advised to conduct regular inventory checks of its media, hardware and/or other IT equipment that contains sensitive information.
<b>Facility Agreed to Take Action?</b>	Yes
<b>Remediation Date:</b>	2025/01/07

### 5. Conveyance & IIT Security Awareness

<b>Audit Finding:</b>	<b>2. 'Last chance' inspections are not conducted for conveyances / IITs prior to arrival at the border crossing</b>
<b>CTPAT Requirement:</b>	In accordance with the U.S. Customs and Border Protection CTPAT Security Criteria, in areas of high risk, and immediately prior to arrival at the border crossing, the company should incorporate a "last chance" verification process for U.S. bound shipments for checking conveyances / Instruments of International Traffic (IIT) for signs of tampering to include visual inspections of conveyances and the VVTT seal verification process. Properly trained individuals should conduct the inspections.
<b>Finding Details:</b>	It was noted that the facility did not conduct 'last chance' inspections of conveyances / IITs prior to arrival at the border crossing.
<b>Recommendation:</b>	The facility is advised to conduct 'last chance' inspections of its conveyance / IITs prior to arrival at the border crossing.
<b>Facility Agreed to Take Action?</b>	Yes
<b>Remediation Date:</b>	2025/01/07

## 7. Procedural Security

<b>Audit Finding:</b>	<b>3. No written procedure for escalating and reporting an incident</b>
<b>CTPAT Requirement:</b>	In accordance with the U.S. Customs and Border Protection CTPAT Security Criteria, written procedures must be in place for reporting an incident, which includes a description of the facility's internal escalation process.
<b>Finding Details:</b>	It was noted that the facility did not have any procedures for escalating and reporting an incident.
<b>Recommendation:</b>	The facility is advised to establish written procedures for reporting an incident, which includes a description of the facility's internal escalation process.
<b>Facility Agreed to Take Action?</b>	Yes
<b>Remediation Date:</b>	2025/01/07

## 8. Agricultural Security

<b>Audit Finding:</b>	<b>4. No regular inspections for pest contamination</b>
<b>CTPAT Requirement:</b>	In accordance with the U.S. Customs and Border Protection CTPAT Security Criteria, cargo staging areas, and the immediate surrounding areas, must be inspected on a regular basis to ensure these areas remain free of visible pest contamination.
<b>Finding Details:</b>	It was noted that the facility conducted regular inspections once every 2 months to ensure its cargo handling and surrounding areas were free from visible pest contamination.
<b>Recommendation:</b>	The facility is advised to conduct regular inspections at least once a month to ensure its cargo staging areas, and the immediate surrounding areas, are free from pest contamination.
<b>Facility Agreed to Take Action?</b>	Yes
<b>Remediation Date:</b>	2025/01/07

**Corrective Action Plan Confirmation**

The factory acknowledges the audit findings and the corrective actions Omega Compliance recommends.

2024/11/07

Riccardo Grippo Danieli / Customer Care

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**Signature & Date – Factory Representative  
Company Chop**

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**Printed Name & Title**

2024/11/07

Kaan Toker / Compliance Auditor

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**Signature & Date – Omega Auditor**

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**Printed Name & Title**

### **Section E: Best Practice Recommendations**

The below are best practices recommendations only, not requirements.

<b>Best Practices</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
1	Does the factory require all employee identification badges to be reviewed on an annual basis and renewed if necessary?	X		
2	Do cameras have pan, zoom, tilt and IR capabilities?		X	
3	Are visitors subject to metal detector/scanner screening?		X	
4	Are visitors subject to X-ray of personal belongings?		X	
5	Does the factory conduct random documented examinations of cartons prior to palletizing?	X		
6	After cartons are examined, are they stamped "EXAMINED" and resealed with tape?	X		
7	Are container/trailer door hinges taped with tamper-proof security tape?		X	
8	Are multiple seals used to seal containers/ trailers at the point of stuffing?		X	
9	Are "smart" seals (such as RFID) used to seal containers or truck cargo holds?		X	
10	Where possible, are transit routes from the facility to the port or next destination location randomly changed to minimize predictability?			X
11	At the time of cargo departing the facility, is there a secondary validation by supervisor or security guard, other than the party who applied the seal? Is 'Tug Twist Turn' testing included?	X		
12	Are CCTV records kept for at least 2 months?		X	
13	Does IT security limit and monitor the downloading of software and access to non-internal websites?	X		
14	Does the facility have a program to recognize an employee when reporting a security incident or recommending improvements?	X		

Please find below a photographic presentation of the good practices.



Security Incident Recognition Policy Posted

### Section F: Factory Security Tour

Please find below a photographic presentation of the facility site.

	
<p>Facility Name</p>	<p>Facility Structure</p>
	
<p>Facility Gate</p>	<p>Facility Guard Room</p>
	
<p>Visitor &amp; Employee Car Park</p>	<p>Facility Car Park</p>





CCTV Monitoring



CCTV Camera



Lighting



Walls and Fences



Raw Material Warehouse



Gluing





Assembling



Quality Control



Packing Area



Finished Goods Warehouse



Loading Docks