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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 Import SOP is written in accordance with US Customs regulatory requirements. Allegion plc is the parent company of Schlage Lock Co., LLC and “Allegion” will be referenced periodically in this SOP.
- II. Purpose:** This purpose of this SOP is to ensure all Schlage Lock Company, LLC suppliers are aware of and adhere to US Customs and other government agency import requirements. All current revisions of Schlage Lock Company, LLC’s Import SOPs can be found on the Allegion Supplier Portal ([www.allegion.com/suppliers](http://www.allegion.com/suppliers)).
- III. Scope:** This policy and procedure provides instructions for shipments to the US for Schlage Lock Company, LLC.
- This SOP does not cover SOMI shipments to the US or Mexico.  
(see “SOMI Import Standard Operating Procedure (SOP)” for instructions on SOMI shipments).
- This SOP does not cover INBOND shipments to Mexico.  
(see “INBOND Standard Operating Procedure (SOP) for Schlage de Mexico” for instructions on INBOND shipments).
- IV. Freight Forwarders:** Allegion has designated freight forwarders depending on the mode of transportation and type of shipment. Please refer to the below guide when shipping product to any Schlage Lock Company, LLC business unit.
- Note: This section only applies to designated freight forwarders and not US Customs brokers.<sup>1</sup>**
- A. VESSEL SHIPMENTS:**
- For all vessel shipments our designated freight forwarder is **Kuehne + Nagel (KN)**. KN will be booking on behalf of Allegion on GSA-endorsed steamship lines.
  - Please refer to Exhibit 2 for contact information by country/city.
- B. AIR SHIPMENTS:**
- Shipments under 45kgs:** Air shipments that weigh less than 45kgs should be forwarded through **UPS Small Package (UPS)**.
  - Shipments greater than 45kgs:** Air shipments that weigh more than 45kgs and destined for **facilities in the US** should be forwarded through **UPS Supply Chain Solutions (UPS-SCS)**.
  - Please refer to Exhibit 2 for contact information by country/city

<sup>1</sup> **Designated US Customs Brokers are provided within:**  
**“At-A-Glance US Imports Shipping Instructions\_2018-02”**

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**C. INBOND SHIPMENTS:**

- Please refer to the separate procedure for INBOND SHIPMENTS. Please find all procedures on the Allegion Supplier Portal (<http://www.allegion.com/suppliers>).

**D. SOMI SHIPMENTS:**

- Please refer to the separate procedure for SOMI SHIPMENTS. Please find all procedures on our Allegion Supplier Portal (<http://www.allegion.com/suppliers>).

**V. 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.

**Procedure for Supplier to obtain ISF Transaction Number:**


1. Obtain bill of lading number from the freight forwarder
2. Complete Importer Security Filing (ISF) template, using template entitled: **"Allegion ISF TEMPLATE – US IMPORTS"**

Note: the Excel version of the ISF template will be distributed with this SOP, but can also be obtained from Trade Compliance.

2. Email completed ISF template and estimated time of vessel departure to the designated filing agent at least 72 hours in advance of sailing.

NOTE: The ISF Filing Agent for US Importations is: [isf@iab-sd.com](mailto:isf@iab-sd.com)  
The ISF contact is Steve Goding.

3. 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.
4. Deliver cargo to freight forwarder, and provide copy of final ISF template (reflecting 'ISF Transaction Number') with shipment documentation.

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## VI. Customs Documentation:

### A. US CUSTOMS DOCUMENTATION REQUIREMENTS:

1. **Documents Required:** the following documents are required for importation into the US.
  - Importer Security Filing for Vessel shipments
  - Commercial Invoice
  - Packing List
  - Express Bill of Lading, Truck Bill or Airway Bill
2. **Shipping and Documentation instructions are reflected in the below attached “Allegion At a Glance- US Imports - Shipping Instructions”, and cover requirements for the following types of import shipments:**
  - A. Ocean Vessel: **KN**
  - B. Small Package: **UPS**
  - C. Air Cargo: **UPS-SCS**

These matrixes provide the instructions for:

- Sold To Party
- Destination / Final Delivery
- Notify Party
- Special Requirements
- ISF filing agent


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a. **Invoice Requirements:** The invoice should contain the following information in English:

- ☐ The date of export
- ☐ The place of export (i.e., origin port);
- ☐ The exporter's name, address, telephone number and name of person with knowledge of the shipment;
- ☐ Place where goods will be imported (Port of Entry);
- ☐ The bill to name and address;
- ☐ The ship to/sold to name and address;
- ☐ Terms of sale (i.e., FOB, CIF, etc....);
- ☐ Invoice number;
- ☐ Invoice date;
- ☐ Buyer's PO and release number should be identified at the top of the invoice;
- ☐ Buyer's part number/item number;
- ☐ Payment terms;
- ☐ Blanket order line item;
- ☐ Detailed description of the merchandise (this includes the grade or quality, the marks, numbers and symbols of the merchandise);
- ☐ Quantities and unit of measure;
- ☐ Unit price of each item; NOTE: this must be the selling price (price to be paid or payable).
- ☐ Total value of each item;
- ☐ Total numeric and written value of shipment (i.e., \$1000 – one thousand US dollars);
- ☐ Associated charges in the currency of purchase (i.e., material surcharges, freight costs, other fees as applicable and not already included in the invoice price per item);
- ☐ The currency of transaction;
- ☐ The country of origin of the goods;
- ☐ US Harmonized Tariff Code (see note below);
  - If you do not have the US Harmonized Tariff Code for a product, please contact the Trade Compliance team prior to export.
- ☐ Packing list number associated with the shipment should be referenced;
- ☐ Page numbers.

b. **Packing List Requirements:** The packing lists should contain the following information in English:

- ☐ Packing list number;
- ☐ Shipping marks (i.e., marks, numbers and symbols of the packages in which the merchandise is packed);
- ☐ Pallet numbers;
- ☐ Carton Numbers;
- ☐ Buyer's part number/item number;
- ☐ Product description;
- ☐ Quantity (quantity per carton and total number of cartons should both be listed);
- ☐ Gross weight and unit of measure;
- ☐ Net Weight and unit of measure.

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#### B. RETURNED/REJECTED GOODS DOCUMENTATION REQUIREMENTS:

- Documentation required for returned or rejected merchandise are the same as those described above.
- Indicate on the commercial invoice the shipment is being returned or rejected and the reason for return (i.e., "Shipment being returned for repairs and re-export" (if applicable).
- The invoice value that appears on the invoice needs to be the actual value of the goods at the time they were purchased.

#### C. DOCUMENTATION DISTRIBUTION

Copies of the following documents should be emailed to the NOTIFY parties instructed in the "**Allegion At a Glance- US Imports - Shipping Instructions**" **attached below**. *The Primary Notify Parties are also included further below for reference.*

1. Importer Security Filing (for Vessel Shipments only)
2. Commercial invoice;
3. Packing list;
4. Express Bill of Lading/Airway Bill/Truck Bill

Each document should be a separately scanned attachment (i.e., for example, all pages of the commercial invoice should be in one attachment, and all pages of the packing list should be in a separate attachment).

#### **For Vessel Shipments:**

Primary Notify Party:

**International Automated Brokers (IAB)**

Steve Goding, James Goding


#### ***Email the following:***

sgoding@iab-sd.com

jamesg@iab-sd.com

Phone: (619) 671-3186

Phone: (619) 671-3185

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**For Air Shipments under 45kgs:**

Primary Notify Party:

**UPS**

Michaela Ehrich

***Email the following:***

michaelaehrich@ups.com

UPSUSAllegion@ups.com

Phone: (502) 485-2600

**For Air Shipments greater than 45kgs:**

Primary Notify Party:

**International Automated Brokers (IAB)**

Steve Goding, James Goding

***Email the following:***

sgoding@iab-sd.com

jamesg@iab-sd.com

Phone: (619) 671-3186

Phone: (619) 671-3185

**\*\*\*Important:** These instructions pertain solely to the distribution of IMPORT DOCUMENTATION for Customs clearance. For payment instructions, the commercial invoices should also be sent to the appropriate entities as instructed on your PURCHASE ORDERS. NOTE: The EXACT SAME invoice must be used for BILLING AND CUSTOMS PURPOSES.

**VII. Customs-Trade Partnership Against Terrorism (C-TPAT):**

As part of US Customs' C-TPAT program (Customs-Trade Partnership Against Terrorism), Allegion requires our foreign suppliers to (A) conduct and document container inspections and (B) apply high security seals to containers.

**All suppliers must comply with C-TPAT requirements A and B listed immediately below:**

**A. Conduct a 9-point Container Inspection prior to loading cargo, as well as:**


- check the reliability of the locking mechanisms of the container doors,
- document the inspection (using the "[Container Inspection Checklist](#)" (attached to this document), and
- assign documentation accountability (someone from your company must be assigned the responsibility for container inspections).

**NOTE:**

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

The required 9-point container inspection process covers:

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

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2. Pallet cleanliness (not filthy; no weeds or seeds)
3. 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)

#### **Container Inspection Checklist**

Complete the Container Inspection Checklist. Suppliers must complete sections I, II, and III for shipments bound for the US, and include the completed form sent on the inside door of the container.

#### **B. Apply a high security Seal to all shipping containers bound for the U.S.**

US law requires all containers bound for the U.S. to be secured with a high security SEAL which meets PAS/ISO 17712:2013 standards, as follows:

(1) 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. An 18MM MINIMUM WIDTH DIAMETER for bolt seals is required.

(2) seals must be clearly and legibly marked with a unique identification number.

(3) The seal is classified as an "H" – High Security Seal

Unused seals must be stored in a secure place and controlled.

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.


**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.

To receive the Container Inspection Checklist via email as a Word document, contact the Trade Compliance group.

U.S. Customs laws require each imported article of foreign origin to be marked with the English name of the country of origin. The country of origin marking must be permanent and conspicuous.



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#### **VIII. Country of Origin Marking:**

The origin marking must be permanent so as to remain on the article (or its container) until it reaches the ultimate purchaser. The size of the marking statement should be readily visible by normal handling of the article.


Suppliers must ensure all Wood Packaging Materials (WPM) comply with US and international phytosanitary standards as follows:

#### **IX. Wood Packaging Materials:**

- All WPM must be properly marked to indicate it has been either heat treated or treated with methyl bromide,
- All WPM must contain the internationally recognized IPPC mark which certifies treatment.
- All WPM must also be free of timber pests
- All WPM must be very clean, and cannot have any signs of weeds or seeds on them (free from organic plant life).

Wood Packaging Material (WPM) is defined as wood or wood products (excluding paper products, such as corrugated paper cartons) used in supporting, protecting or carrying a commodity. Wood packaging materials include:

- pallets,
- crates,
- boxes,
- packing blocks,
- drums,
- cases,
- skids, and
- pieces of wood used to support or brace cargo.

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**X. Freight Plans:**

**OCEAN VESSEL and AIR CARGO Shipments ONLY:**

Supplier must ensure the "Bill To" portion of the Bill of Lading reflects Cass Information Systems, our Third-Party Payment Provider, and the appropriate address below:

**Cass Information Systems**


**c/o Allegion**

**Freight Plan XXXXX** (replace XXXXX with applicable 5-digit number listed below)

**P.O. Box 67**

**St. Louis, MO 63166**

Location	Freight Plan Number	UPS <45kgs	UPS-SCS >45kgs
<b>MEXICO</b>			
Ensenada Plant (ENS Residential) (BC, Mexico)	72386	7267W6	703075465
El Sauzal Plant (ENS Commercial) (BC, Mexico)	72387	957EW0	544978372
Tecate Plant (BC, Mexico)	03398	5738W4	709904460
Tijuana Plant (BC, Mexico)	03362	9W013Y	709904478
Monterrey Distribution Center (NL, Mexico)	51234	306FY1	709904445
<b>USA</b>			
Schlage Distribution Service Center (Olathe, KS)	72394	9W01R3	710618448
Schlage Electronics (formerly known as Locknetics) (Security, CO)	04403	6Y3Y53	710618455
RSI – Schlage (Security, CO)	04401	3E8Y76	710618471
Schlage Xceed ID (Security, CO)	73600	9W02F3	710618489
Security Plant (Security, CO)	72392	9W02E7	710618554
Schlage Kryptonite (Canton, MA)	03320	041738	710618562
LCN (Princeton, IL)	72405	9W01F6	710618570
Von Duprin North (E. 30 <sup>th</sup> St.) (Indianapolis, IN)	72404	9W02A3	710618588
Von Duprin (Tobey Dr.) (Indianapolis, IN)	72404	9W02A3	710618604
Steelcraft (Blue Ash, OH)	97182	9W000Y	710618612
Steelcraft (Chino, CA)	72184	9W01R7	710618620
Brio USA (Rochester, NY)	14623	39V36V	710618661
Republic Doors & Frames (McKenzie, TN)	38201	318494	703133371

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## **XI. Responsibilities:**

### **A. SCHLAGE PLANNER/BUYER (INITIATOR):**

#### **(1) Purchase Orders for New Product – NOTIFY TRADE COMPLIANCE**

The Planner/Buyer is responsible for advising Trade Compliance when new articles will be purchased. The Planner/Buyer will provide the part number, part description, drawings, product literature and specifications as well as the supplier name to the Trade Compliance Analyst. This step will allow the Trade Compliance Analyst to review the new parts in order to assign a US HTS Classification and identify any other government agency requirements.

#### **(2) Quantity Discrepancies**

It is the Planner/Buyer responsibility to research the reasons for any quantity discrepancies and advise the Trade Compliance Manager regarding all discrepancies. The Planner/Buyer will complete the [Receiving Discrepancy Report - Exhibit 3](#). This information is then used to make corrections with US Customs. The US Customs entry quantities must match the quantity that was received. The values on the invoice must also match what the supplier will be paid for the shipment. Failure to report quantity and value discrepancies jeopardizes the company's compliance efforts and places the company at risk of receiving a penalty.

### **B. FOREIGN SUPPLIERS:**

#### **(1) Importer Security Filing**

Suppliers cannot release any vessel cargo to the freight forwarders until they have obtained an ISF transaction number (see ISF instructions under section V of this SOP).

#### **(2) Documentation**

Ensure all documentation is provided to the freight forwarder and US Customs Broker, and complies with this Import SOP:

- Importer Security Filing for vessel shipments
- C-TPAT Container Inspection Checklist (CIC)
- Commercial invoice (with required data, including HTS classification)
- Packing List
- Seaway bill of lading and / or Automated Manifest System (AMS) bill, Truck Bill or Airway Bill (House bill)


#### **(3) Bill of Lading/House bill of Lading Numbers**

Supplier is to send, via email, the master bill of lading number and house bill of lading number to the Schlage Planner/Buyer. This information is used to track the shipment.

#### **(4) Transportation Issues/Delays**

The Logistics Manager along with the Buyer/Planner must be immediately notified in the event of delays, cancellations and or rescheduling of freight to include airline and port delays, mechanical problems, traffic congestion, embargoes, Customs audits and holds, or any other type of transportation delay or failure.

#### **(5) Freight Bill Audit/Payment**

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Any questions surrounding the usage of freight plan numbers, invoice payment cycles or any other freight bill audit and payment issues should be brought to the immediate attention of the Logistics Manager.

### C. FREIGHT FORWARDER:

#### (1) Documentation at Origin

The Freight Forwarder is responsible for ensuring that he/she has copies of documentation at origin. The Freight Forwarder then scans and uploads the documentation into the freight forwarding system, to support recordkeeping efforts.

The Freight Forwarder should NOT allow a shipment to depart origin without the required documentation.

The Freight Forwarder is responsible for ensuring that the arrival notice with the supplier documents are turned over to the designated Broker.

#### (2) Freight Bills (OCEAN VESSEL and AIR CARGO Shipments Only)

Bills of lading and supporting documents for any freight, drayage, terminal fees, etc. must be sent with the freight invoice to Cass, the freight payment service provider, for payment processing. It is extremely important that the freight plan number be included on the Bill of Lading. Allegion will not be responsible for the payment of freight invoices sent to Cass with missing or incorrect freight plan numbers. In addition, it is important that suppliers and freight forwarders note that only freight related charges are billed to Cass. Under no circumstances should Cass be billed for any direct material costs.

It is imperative that the "Bill To" block of the Bill of Lading be filled out to reflect Cass Information Systems, Allegion's Third Party freight payment provider. In addition to the Cass reference a unique freight plan number must also accompany the Cass address. Each Allegion facility has a specific freight plan number as outlined in Section X and the following information is required to be placed in the Bill of Lading "Bill To" block:

#### Cass Information Systems

c/o Allegion

Freight Plan **XXXXX**

*(replace XXXXX with applicable 5 digit number listed on Pg.10)*

P.O. Box 67


St. Louis, MO 63166

### D. US CUSTOMS BROKER:

#### (1) Documentation

The US Customs Broker is responsible for reviewing all supplier import documentation and ensuring it meets the US Customs requirements for entry and compliance purposes. The US Customs Broker is also responsible for reviewing the entry file in accordance with Allegion's "US Customs Broker Guidelines." These Guidelines include Billing requirements.

#### (2) Recordkeeping

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The US Customs Broker is responsible for mailing a CD, of all entry records for the month, to the Trade Compliance Manager.

Copies of the entry packets should be sent with the billing invoice to CASS, the freight payment service provider, for payment processing. The Freight Plans must be included.

### **(3) Missing Data**

The US Customs Broker is responsible for coordinating further with the US Customs Team for any missing data, such as country of origin or classifications.

## **E. ALLEGION TRADE COMPLIANCE:**

### **(1) US HTS Classification**

The Trade Compliance Analyst is responsible for reviewing new parts and the product literature to determine the correct US HTS Classification. The Trade Compliance Analyst will maintain records of supporting documentation used for determination of the US HTS. The classification will be provided to the Buyer Planner within 2 days.

### **(2) Audits**

The Trade Compliance Analyst is responsible for performing periodic entry audits to ensure suppliers, Planner Buyers and Brokers are following this Import SOP and following the compliance requirements of the US Customs and Border Protection agency.

### **(3) Quantity Discrepancies**


The Trade Compliance Manager will review the Receiving Discrepancy Report that the Planner/Buyer sends. The Trade Compliance Manager will communicate the required entry changes with the US Customs Broker. Please refer to Exhibit 3.

## **F. ALLEGION LOGISTICS:**

(1) The Logistics Manager is responsible for providing logistics support, including operational crisis management support when requested by the US plants, factories, and distribution centers. In addition, the Logistics Manager will ensure that the designated freight forwarder/carrier is consistent with the Allegion endorsed transportation base and that logistical movements are conducted in accordance with established contracted rates and service levels established by Allegion.

## **G. ALLEGION RECEIVING:**


The US Receiving Supervisor is to notify the Planner/Buyer when quantity discrepancies are identified at time of receiving. It is **CRITICAL** that quantity discrepancies are reported in order to ensure correct declarations are made to US Customs. Failure to do so may lead to serious penalties against Allegion.

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## XII. Contacts:

For questions, please contact the following:

<b>TRADE COMPLIANCE</b>	Yesenia Gallegos, Trade Compliance Manager	(619) 210-2204
	Stacia Cameron, Trade Compliance Analyst	(619) 210-2207
	George E. Field, Sr. Trade Compliance Analyst	(619) 210-2210
	Kelly Guzman, Trade Compliance Director	(619) 778-4137
<b>GLOBAL LOGISTICS</b>	Sean Miller, Global Distribution and Logistics	(317) 810-3152

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**Exhibit 1**

**Container Inspection Checklist (CIC)**

This example is shown for illustration only; please use the version available on the Allegion Supplier Portal.



**Container/Trailer Inspection Checklist**

**Instructions to Supplier**

Please **complete Sections I, II and III** of this form. Attach completed form with the shipment documentation accompanying the container. Also, please include a copy on the inside door of the container.

**Section I. Shipment Information**

Date:	Supplier Name:
Carrier Name:	Container Number:
Seal Number:	Container Inspector's Name:

**Section II. 9-Point Container Inspection**

Note: Containers must be secure, and not contain any of the following:

- Secret compartments in walls, floors, ceiling, etc.
- Un-manifested goods, packages, etc.
- Signs of tampering (fresh paint, peculiar marks, etc.)

**Check Box after Exam:**

Check <input checked="" type="checkbox"/>	Category	Note any damage or problems with container
<input type="checkbox"/>	1. Container cleanliness (not filthy; no weeds or seeds)	
<input type="checkbox"/>	2. Pallet cleanliness (not filthy; no weeds or seeds)	
<input type="checkbox"/>	3. Underside of Trailer	
<input type="checkbox"/>	4. Left Wall for concealed walls or hidden articles	
<input type="checkbox"/>	5. Right Wall for concealed/false walls or hidden articles	
<input type="checkbox"/>	6. Front Wall for concealed/false walls or hidden articles	
<input type="checkbox"/>	7. Floor for hidden articles or false floor	
<input type="checkbox"/>	8. Ceiling	
<input type="checkbox"/>	9. Inside and Outside Door / Hinges (i.e. Ensure Locking mechanisms are secure)	


**Section III. Supplier's Container Inspector's Signature:** \_\_\_\_\_

**Section IV. For Completion by Allegion Receiving**

Receiving Date:	Seal Number:
Receiving Location:	Receiving Person's Name:

- Does Seal Number match seal shown in Section 1? ☐ Yes ☐ No (report "no" answers to Mgmt)
- Does Container show signs of tampering / anomalies? ☐ Yes ☐ No (report "yes" answers to Mgmt)
- Receiving Inspector's Signature \_\_\_\_\_

\*Instructions to Receiving: Please Save this form for 1 year in a file for C-TPAT audit purposes\*

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## Exhibit 2

### A. OCEAN VESSEL: KUEHNE+ NAGEL (KN)

#### Jiangmen

Jiangmen Branch Office  
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[allegion.support@kuehne-nagel.com](mailto:allegion.support@kuehne-nagel.com)

**Escalation Purposes only. Contact regional contacts above for booking and tracking requests.**

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**B. SMALL PACKAGE: UPS SMALL PACKAGE (UPS)**

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### C. AIR CARGO: UPS SUPPLY CHAIN SOLUTIONS (UPS-SCS):

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**Exhibit 3**

## Receiving Discrepancy Report

Instructions to Planner/Buyer: Please complete Sections I below. Forward the completed checklist to Allegion US Trade Compliance for any quantity discrepancies.

Please note: This report should be sent to the Allegion team within **2 days** of receiving the merchandise so that they may modify the US Customs Entry timely.

### Section I.

**Date**

**Entry Number (if Known)**

**Invoice Number and Invoice Date**

**Supplier Name**

**Container #**

**Bill of Lading Number and House Bill of Lading Number**

**Oracle Part # or Part # (where Oracle is not used)**

**Quantity Declared**

**Quantity Received**

**Full Value that will be paid for the invoice**

**Planner/Buyer Name**

**Name of Person who detected the issue:**