| SCHLAGE | | Issue Date: October 2012 | Policy Number: Import/Export Policy - 41 |
|-------------|--|------------------------------------|--|
| Guide Name: | Supply Chain Security for Imports Standard Operating Procedure (SOP) | Last Revision Date: March 26, 2019 | Page 1 of 22 |

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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 Compliant
Carriers required
(Ocean, Air and Truck):

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 <u>prior to loading any</u> <u>vessel bound for the US</u>.

Failure to file the ISF will result in \$5K customs penalty per violation.

For all <u>vessel</u> shipments, Suppliers must obtain an Importer Security
Filing transaction number <u>prior to physically turning cargo over to the freight forwarder</u>.

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 <u>must</u> 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)

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
- 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" (attached below).
- 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.
 - 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. <u>Seal Placement:</u> 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. <u>Test Seal:</u> 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

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 destination:

DSC at Olathe, Kansas USA

John.Perez@allegion.com Bruce.Webster@allegion.com Ben.Neal@allegion.com

Von Duprin at Indiana USA

Dimo.Vckov@allegion.com Kenneth.Hune@allegion.com

LCN at Princeton, Illinois USA

Tom.Burch@Allegion.com Roger.DeBrock@allegion.com Julio.Sanchez@allegion.com Daniel.Murray@allegion.com

SEC at Security, Colorado USA

Eric.Roren@allegion.com
Jeff.Coover@allegion.com
John.Mantelli@allegion.com
Randy.Schulz@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
Fredy.Valderrama@allegion.com
David.Lozano@allegion.com
Yanira.DeLosReyes@allegion.com
Hector.Perez@allegion.com
Juan.Leon@allegion.com

6) Security Procedures / Annual Survey

For suppliers not eligible for C-TPAT certification, the foreign manufacturer must require that <u>their</u> business partners demonstrate that they are meeting

Foreign Suppliers

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.

V. Responsibilities: Freight Forwarders

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 (Schlage/Falcon)

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.

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

RECEIVING

- 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 562-366-3279 (Jorma Rousseau).

VI. CONTACTS

| Schlage de Mexico Plants - Receiving | | | | | | | |
|---|----------------------------------|---------------------------|-------------------------------|--|--|--|--|
| Silvia Cardenas | Business Unit Manager - SAU | 011-52 (646) 182- 3213 | Silvia.Cardenas@allegion.com | | | | |
| Fredy Valderrama | Supervisor, Receiving | 011-52 (646) 117- 3674 | Fredy.Valderrama@allegion.com | | | | |
| Schlage Lock Co, LLC | Schlage Lock Co, LLC - Logistics | | | | | | |
| Sean Miller | Director, Logistics | (317) 319-6432 | Sean.Miller@allegion.com | | | | |
| 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 | | | | | |
|---|---|----------------------|------------------------------|--|--|
| - | <u> </u> | T | , | | |
| Cesar Benitez | Manager, MX Customs and Trade Compliance | 011 52 665 103-6193 | Cesar.Benitez@allegion.com | | |
| Jesus Adolfo | Supervisor, MX Import/Export | 011 52 646 182-3157 | Jesus.Hernandez@allegion.com | | |
| Hernandez | | | | | |
| Monica Cobian | Supervisor, MX Compliance | 011 52 665 103-6188 | Monica.Cobian@allegion.com | | |
| U.S. Receiving Loca | ation - Brokerage and Logistics Solution | ns | | | |
| Jorge Jacobo | General Manager | (619) 671-0276 x 367 | jjacobo@cd.jdgroup.net | | |
| Jose Mancillas | Crossdock Warehouse Manager | (619) 671-0276 x355 | jmancillas@cd.jdgroup.net | | |
| | | | | | |
| U.S. Receiving Loca | ation - DSC Olathe, Kansas | | | | |
| John Perez | Supervisor, DSC Warehouse | (913) 238-7131 | John.Perez@allegion.com | | |
| U.S. Receiving Loca | ation – Von Duprin Indiana | | | | |
| Ernest Maul | Materials Supervisor, OP | (317) 429-2077 | Ernest.Maul@allegion.com | | |
| | Materials | | | | |
| Kenneth Hune | Materials Supervisor, 30 th Street | (317) 429-2243 | Kenneth.Hune@allegion.com | | |
| Dimo Vckov | Materials Control Manager, 30 th Street | (317) 429-2413 | Dimo.Vckov@allegion.com | | |
| U.S. Receiving Loca | ation – LCN Princeton, Illinois | | | | |
| Tom Burch | Materials Manager | (815) 879-1370 | Tom.Burch@allegion.com | | |
| Roger Debrock | Master Scheduler | (815) 879-1460 | Roger.DeBrock@allegion.com | | |
| U.S. Receiving Loca | ation - SEC Security, Colorado | | | | |
| Eric Roren | Manager, Warehouse | (719) 896-3091 | Eric.Roren@allegion.com | | |
| John Mantelli | Materials Control Manager, OP Materials | (719) 896-3806 | John.Mantelli@Allegion.com | | |
| Jeff Coover | Material Specialist II, OP Materials | (719) 896-3190 | Jeff.Coover@allegion.com | | |
| Randy Schulz | Receiving Team Lead | (719) 896-3088 | Randy.Schulz@allegion.com | | |
| George Keith | Team Lead 2, OP materials | (719) 896-3144 | George.Keith@allegion.com | | |

Exhibit I Container Inspection Checklist (CIC)

This example is shown for illustration only; please use the Word version attached within this SOP in Section V. Templates are also available from Yesenia. Gallegos@allegion.com



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:

Section III.

| Check ✓ | Category | Note any damage or problems with container |
|---------|--|---|
| | Container cleanliness (not filthy; no weeds or seeds) | |
| | Pallet cleanliness (not filthy; no weeds or seeds) | |
| | Underside of Trailer | |
| | Left Wall for concealed walls or hidden articles | |
| | Right Wall for concealed/false walls or hidden articles | |
| | Front Wall for concealed/false walls or hidden articles | |
| | Floor for hidden articles or false floor | |
| | 8. Ceiling | |
| | Inside and Outside Door / Hinges (i.e. Ensure Locking mechanisms are secure) | |

Section IV. For Completion by Allegion Receiving

Supplier's Container Inspector's Signature:

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

| 1. | Does Seal Number match seal shown in Section 1? | ☐Yes ☐ No (report "no" answers to Mgmt) |
|----|---|--|
| 2. | Does Container show signs of tampering / anomalies? | DYes □ No (report "ves" answers to Mamt) |

3. Receiving Inspector's Signature_____

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

Exhibit 2 ISF TEMPLATE – US IMPORTS (Page 1)

This example is shown for illustration only; please use Excel version available from <u>Yesenia</u>. <u>Gallegos@allegion.com</u>



U.S. IMPORTATION TEMPLATE FOR THE IMPORTER SECURITY FILING (ISF)

| | SUPPLIER IT | | | | |
|----|------------------|----------------------|--------------------------|------------------------------|-----------------------|
| 1. | House Bill of | Lading | | | |
| | Number(s): | | | | |
| | | | | | |
| | | | | | |
| | Supplier Invo | ice Number(s): | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | ISF Complete | d be: | | | |
| | - | Name: | | | |
| | | | | | |
| | | Phone: | | | |
| | | E-mail: | | | |
| | | Date: | | | |
| | | | | | |
| _ | | | | | |
| 2. | Seller Name a | and Address: | | | |
| | Name: | | | | |
| | Address: | | | | |
| | - | | | | |
| | City: | | | State | e/Provin <u>ce:</u> |
| | Zip Code: | | Country: | | |
| | | | | | |
| | B (*8-14* | T - * D \ W | | | |
| э. | | To" Party) Name | | Schlage Lock Co. LLC | |
| | Please select | t from the drop o | down menu | 11819 North Pennsylvan | ia Street |
| | | | | Carmel, IN 46032 | |
| | | | | | |
| _ | | | | | |
| 4. | Ship-To Part | y Name and Add | ress: | | |
| | Name: | | | | |
| | Address: | | | | |
| | City: | | | State | aJDrasin |
| | - | | | | |
| | Zip Code: _ | | Country: | | |
| | | | | | |
| 5. | Container St | uffing Location: | | | |
| | Name: | , | | | |
| | - | | | | |
| | Address: _ | | | | |
| | City: | | | State | e/Provin |
| | Zip Code: | | Country: | | |
| | | | | | |
| | | | | | |
| 6. | Consolidator | (stuffer) Name a | ind Address: | | |
| | Name: | | | | |
| | Address: | | | | |
| | City: | | | _ | e/Pro r in |
| | - | | | State | arioniii |
| | Zip Code: _ | | Country: | | |
| | | | | | |
| 7 | Importer of Re | ecord / FTZ App | licant | F4 040044655 | |
| | | | e select from the | 54-213941200 | |
| | | | | Schlage Lock Co., LLC | |
| | NOTE to Filer: C | onfirm this Name ag | rees with "Buyer (Sold T | o Party)* Name in Field \$3. | |
| | | _ | | | |
| | | | | | |
| 8. | Consignee No | ımber: | | 54-213941200 | |
| | Please select | t from the drop o | down menu | Schlage Lock Co., LLC | |
| | | | | o Party)* Name in Field \$3. | |
| | | ominim this iyame ad | | | |

Exhibit 2 ISF TEMPLATE – US IMPORTS (Page 2)

This example is shown for illustration only; please use Excel version available from Yesenia.Gallegos@allegion.com

| 7. | Importer of Record / FTZ Applicant Identification Number: NOTE to Filer: Confirm this Name agrees with "Buyer (Sold To Party)" Name in Field #3. | | | | | |
|-----|--|---|-----------------------------------|--|--|--|
| 8. | Consignee Number: Please select from the drop down menu NOTE to Filer: Confirm this Name agrees with "Buyer (Sold To Party)" Name in Field #3. | | | | | |
| | | | | | | |
| | | | | | | |
| | 9. Manufacturer Name | 10. Country of Origin | 11. Commodity HTSUS Number | | | |
| | and Address | (Please select from the drop down menu) | (Please select from the drop down | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| 12. | FILER TO COMPLETE ISF Transaction No.: | | | | | |
| * | House Bill of Lading Number(s): | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |

Exhibit 3 ISF TEMPLATE – INBONDS TO MEXICO

This example is shown for illustration only; please use Excel version available from Yesenia.Gallegos@allegion.com

| | TEMPLATE FOR THE | MPORTER SECURITY FILING | ISF) |
|--|--|---|---------------|
| SUPPLIER TO COMPLE | | | |
| House Bill of Lading Num (F known) | ber(s): | | |
| Supplier Invoic e Number (| ije | | |
| | | | |
| | | | |
| ISF Completed by: Name: | | | |
| Phone: E-mail: | | | |
| Date: | | | |
| 2. Booking Party: | | | |
| Name: Address: | | | |
| City: Zip Code: | Country: | State/Pro- | vince: |
| Foreign Port of Unlading: Please select from the dro Place of Delivery: | p down menu | Mexico: All Other Mexico West Raja Calif | - |
| Please select from the dro | p down menu kddress: | | - |
| Please select from the dro 4. Place of Delivery: 5. Ship-To PartyName and / Please select from the o | ip down menu liddres s: Trop down menu dity HTSUS Number | Baja Calf | "Other", then |
| Please select from the dro 4. Place of Delivery: 5. Ship-To PartyName and / Please select from the o | p down menu luddres s: trop down menu | Roja Cali | "Other", then |
| Please select from the dro 4. Place of Delivery: 5. Ship-To PartyName and / Please select from the o | ip down menu liddres s: Trop down menu dity HTSUS Number | Baja Calf | "Other", then |
| Please select from the dro 4. Place of Delivery: 5. Ship-To PartyName and / Please select from the o | ip down menu liddres s: Trop down menu dity HTSUS Number | Baja Calf | "Other", then |
| Please select from the dro 4. Place of Delivery: 5. Ship-To PartyName and / Please select from the o | ip down menu liddres s: Trop down menu dity HTSUS Number | Baja Calf | "Other", then |
| Please select from the dro 4. Place of Delivery: 5. Ship-To PartyName and / Please select from the o | ip down menu liddres s: Trop down menu dity HTSUS Number | Baja Calf | "Other", then |
| Please select from the dro 4. Place of Delivery: 5. Ship-To PartyName and / Please select from the o | ip down menu liddres s: Trop down menu dity HTSUS Number | Baja Calf | "Other", then |
| Please select from the dro 4. Place of Delivery: 5. Ship-To PartyName and / Please select from the o | ip down menu liddres s: Trop down menu dity HTSUS Number | Baja Calf | "Other", then |
| Please select from the dro 4. Place of Delivery: 5. Ship-To PartyName and / Please select from the o | ip down menu liddres s: Trop down menu dity HTSUS Number | Baja Calf | "Other", then |
| Please select from the dro 4. Place of Delivery: 5. Ship-To PartyName and / Please select from the o | ip down menu liddres s: Trop down menu dity HTSUS Number | Baja Calf | "Other", then |
| Please select from the dro 4. Place of Delivery: 5. Ship-To PartyName and / Please select from the o | ip down menu liddres s: Trop down menu dity HTSUS Number | Baja Calf | "Other", then |

Exhibit 4 Annual Survey for Freight Forwarders

As an active participant of the US Customs-Trade Partnership Against Terrorism (C-TPAT) program, we ask for your support in protecting Schlage's shipments from infiltration of narcotics, weapons, theft or human trafficking. Please complete this Annual Survey and send to the following Schlage Lock Company, LLC Trade Compliance Manager: Yesenia Gallegos at Yesenia.Gallegos@allegion.com

1. Status Verification Interface (SVI) number

Provide your Status Verification Interface (SVI) number related to any transactions associated to Schlage's account. For example, if you have separate C-TPAT certifications for air, vessel and brokerage, include all SVIs below. Also include the name of the company registered per SVI.

a) Have any of your SVIs or C-TPAT status been revoked within the last year? Yes or No

If yes, please provide the SVI number and associated company name.

b) Do you subcontract to NON C-TPAT carriers?

Yes or No

If yes, please provide reasons.

2. Foreign Supply Chain Security Programs

Are you a partner with any other supply chain security program being administered by a foreign Customs Administration? **Yes or No**

If yes, please provide the name of the program, the country Administering the program and year you became a member.

3. Importer Security Filing

Do you have procedures in place to ensure an Importer Security Filing transaction is verified prior to accepting vessel cargo from a Schlage supplier? Yes or No

If not, what controls will you implement to ensure an ISF is filed prior to accepting cargo? Please describe in detail and provide an estimated date of completion.

4. High Security C-TPAT Seals

Do you obtain a yearly independent laboratory certificate, confirming the quality of the C-TPAT seals, from your supplier of high security seals? **Yes or No**

If no, when will you implement?

5. C-TPAT Changes

Have you implemented any significant changes over the last year to address C-TPAT related concerns? If yes, please provide in detail those changes.

6. <u>Comments</u> Please feel free to provide comments/recommendations on any issues you have identified related to Schlage's shipments to support security improvements.

Please add your company name, print your name, sign and date this page.

Exhibit 5 Annual Survey for Brokers

As an active participant of the US Customs-Trade Partnership Against Terrorism (C-TPAT) program, we ask for your support in protecting Schlage's shipments from infiltration of narcotics, weapons, theft or human trafficking.

Please complete this Annual Survey and send to the following Schlage Lock Company, LLC Trade Compliance Manager: Yesenia Gallegos at Yesenia.Gallegos@allegion.com

1. Status Verification Interface (SVI) number

Provide your Status Verification Interface (SVI) number related to your company's Brokerage activity. Also include the name of the company registered for this SVI.

a) Have any of your SVIs or C-TPAT status been revoked within the last year? Yes or No

If yes, please provide the SVI number and associated company name.

2. Please confirm you do not subcontract the Brokerage activity.

In Compliance

Not in Compliance

3. Foreign Supply Chain Security Programs

Are you a partner with any other supply chain security program being administered by a foreign Customs Administration? Yes or No.

If yes, please provide the name of the program, the country Administering the program and year you became a member.

4. Importer Security Filing

Do you have procedures in place to ensure an Importer Security Filing transaction is verified prior to clearing a Schlage vessel shipment? **Yes or No**

If not, what controls will you implement to ensure an ISF is filed prior to fling a US Customs entry? Please describe in detail and provide an estimated date of completion.

5. <u>C-TPAT Changes</u>

Have you implemented any significant changes over the last year to address C-TPAT related concerns? If yes, please provide in detail those changes.

6. Comments

Please feel free to provide comments/recommendations on any issues you have identified related to Schlage's shipments to support security improvements.

Please add your company name, print your name, sign and date this page.

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 sealsISO 17712:2010 |
| 4 10/29/12 Updated Leon Burns ema | | 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 |
| 7 | 1/22/15 | suppliers.) 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. |
| 0 | 02/47/2047 | |
| 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 |