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I. Corporate Policy:

It is the policy of Schlage Lock Company, LLC to ensure compliance with all US and MX Customs and other government agency regulations. This Import Standard Operating Procedure (SOP) is written in accordance with and MX 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:

To explain to all parties, including suppliers and Schlage Lock Company, LLC personnel, the import compliance requirements for direct shipments to the Ensenada port. These requirements are necessary to ensure compliance with Mexico Customs Regulations.

III. Scope:

This procedure applies to direct shipments to the Ensenada port meeting the following criteria:

- Ocean shipments
- Schlage de Mexico shipments
- Raw materials (i.e., parts and components, screws and other fasteners, plastic components, packaging, etc.).

This procedure does not cover SOMI shipments. For SOMI shipments please follow the <u>SOMI Import Standard Operating Procedure (SOP) for direct shipments</u> to the Ensenada port.

This procedure does not cover Air shipments. For Air shipments please follow the SOMI Import/Export Standard Operating Procedure SOMI US SOP.

This procedure does not apply to finished door locks as special legal requirements are applicable to finished door locks sent to Mexico. Finished Locks should not be included in a Direct Shipments to the Port of Ensenada program.

Also NO wood pallets shipped separately (pallets shipped in bulk, without any goods) may be shipped to Mexico due to strict health & agricultural regulations in Mexico. Failure to comply with this rule, will result in an inability to clear customs at the Mexico ports.

IV. Freight Forwarder:

Allegion has designated freight forwarders. In all cases, the designated Freight Forwarder must be used for Allegion 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.

Please refer to the **At-A-Glance Shipping Instructions** for preferred Freight Forwarders. Use of Freight Forwarders <u>NOT DESIGNATED</u> in this SOP will result in delays and increased costs (which may be charged back to the Supplier.)

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V. Supplier Compliance "Checklist":

Prior to approving new suppliers for participation for direct shipments in to the Ensenada port program, **the Schlage Commodity Manager** must ensure the Supplier has met all of the mandatory requirements for participation in the program, as demonstrated by completion of the "SUPPLIER COMPLIANCE CHECKLIST". The checklist is shown in Exhibit 3.

The **Schlage Commodity Manager** must coordinate with the supplier, the customs broker, logistics and the Allegion Trade Compliance group to complete the 'Checklist'. Once completed and signed-off, a supplier can be introduced to the direct shipments to the Ensenada port program.

MANDATORY REQUIREMENT FOR DIRECT SHIPMENTS TO THE PORT OF ENSENADA:

VI. Documentation:

The "SUPPLIER COMPLIANCE CHECKLIST" must be completed before a supplier can be introduced into the Direct shipments to the port of Ensenada program. The Schlage Commodity Manager must ensure this 'checklist' is completed fully and timely. The Supplier Compliance Checklist is contained herein as Exhibit 3.

The Supplier Compliance Checklist will ensure all customs requirements are satisfied to avoid shipments arriving at Port of Ensenada with incorrect documentation. The Schlage Commodity Manager is responsible for ensuring the "Supplier Compliance Checklist" is completed and signed by all named parties before the first shipment.

REQUIREMENTS IN ADVANCE OF 1st DIRECT SHIPMENT TO THE PORT OF ENSENADA FOR EACH STEAM SHIPLINE

- 1. MX Trucking Company will acquire an insurance policy that covers the security deposit for the container retrieval at the Ensenada port.
- 2. MX Trucking Company will name KN as beneficiary of the insurance policy for container retrieval in the Ensenada port. Completed and signed copies of the insurance policy documents must be sent to KN's Tijuana office (info.tijuana@kuehne-nagel.com) with a copy to Jaime Rolon (jaime.rolon@kuehne-nagel.com) and Elsa Escalante (Elsa.Escalante@kuehne-nagel.com) for validation. Also share this document with the Schlage Commodity Manager and Schlage Logistics Manager. Failure to obtain the insurance policy for container retrieval in the Ensenada port will result in a NO SHIP Policy.
- 3. Annual revision of this policy must be done by Schlage Logistics Manager.

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Documentation Required:

The following documents are required at time of entry into Mexico:

- 1. Commercial Invoice See requirements on Exhibit 5
- 2. Packing List A separate Packing Slip is required for each Allegion business unit and Location.
 - Examples: Schlage Ensenada, Schlage El Sauzal, Schlage Tecate, Schlage Tijuana
- 3. Bill of Lading
 - NOTE: SOMI and NON-SOMI shipments CANNOT BE COMBINED on the same House Bill of Lading. SOMI Suppliers must ensure the Freight Forwarder creates a SEPARATE House Bill of Lading for the SOMI shipments.
- 4. C-TPAT Container Inspection Checklist– see Exhibit 1

EVERY document must have a statement that CLEARLY references the Allegion business unit. For example:

- Schlage ENS
- Schlage SAU
- Schlage TEC
- Schlage TIJ

a. Information Required on Documentation:

1. Consignee and Deliver To:

Direct shipments to the Ensenada Port, the Consignee and the Deliver to party will be Schlage de Mexico, S.A. de C.V. plus the Business Unit. Please refer to the "Port Ensenada Imports At-A-Glance".

2. Terms:

The terms for all shipments must be agreed before the first shipment to the Schlage Plants. The Bill of Lading must be clearly marked "COLLECT". Refer to section VIII. Bill To Party and Freight Plans.

3. Notify Party:

The NOTIFY PARTY on all shipping documents for Direct shipments to Ensenada Port must reference the appropriate KN contact and MX Broker (Agencia Aduanal Jorge Diaz S.C.). Please refer to the "Port Ensenada Imports At-A-Glance".

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Send a copy of the express bill of lading to Schlage de Mexico Compliance team to track shipments. Send to tomas.hernandez@allegion.com.

VII. Customs-Trade
Partnership
Against
Terrorism (CTPAT) and
Mexico AEO
program:

As part of US Customs C-TPAT program (Customs-Trade Partnership Against Terrorism) and the AEO program (Authorized Economic Operator from SAFE program in Mexico) our foreign suppliers are required to:

- (A) Conduct and document container inspections and
- (B) Apply high security seals to containers.

Container integrity is critical to protect against the introduction into Mexico of unauthorized material and/or persons. All suppliers <u>must comply</u> with C-TPAT and AEO 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 "<u>Container Inspection Checklist</u>" (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)
- 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
- Inside and Outside Door / Hinges
 (i.e. Ensure Locking mechanisms are secure)

Container Inspection Checklist

- Please complete the Container Inspection Checklist (attached to this SOP as <u>Exhibit 1</u>). Suppliers must complete sections I, II, and III for our shipments bound for Mexico and include the completed form with the paperwork sent with the container.
- B. Apply a high security Seal to all shipping containers bound for Mexico

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It is a mandatory that all containers bound Mexico be secured with a high security SEAL which meets the ISO/PAS 17712 standards.

<u>Seal requirements</u>: All seals must meet or exceed the current PAS ISO 17712 standards for high security seals. A new 18MM MINIMUM WIDTH DIAMETER for bolt seals is required.

- Requires seals 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.
- 2. Requires each seal be clearly and legibly marked with a unique identification number.
- 3. Unused seals must be stored in a secure place and controlled.
- 4. 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 Mexico, the containers must be sealed with a high security seal.

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

VIII. Wood Packing Materials:

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

- 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.

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. Wooden 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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No wood pallets shipped separately (pallets shipped in bulk, without any goods) may be shipped to Mexico due to strict health & agricultural regulations in Mexico. Failure to comply with this rule, will result in an inability to clear customs at the Mexico ports

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:

IX. Freight Plans:

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
MEXICO	
Ensenada Plant (ENS Residential) (BC, Mexico)	72386
El Sauzal Plant (ENS Commercial) (BC, Mexico)	72387
Tecate Plant (BC, Mexico)	03398
Tijuana Plant (BC, Mexico)	03362

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X. Packaging Marking Requirements: All packages must be clearly and visibly marked with their Country of Origin.

The supplier can continue to use the current label with the part number, description and quantity, but the Blanket Purchase Order will not have a Release number.

XI. Responsibilities: 1. Schlage Commodity Manager

The Schlage Commodity Manager has <u>primary</u> responsibility for ensuring the "Supplier Compliance Checklist" is completed <u>PRIOR to introducing a new supplier into the Direct shipments to the port of Ensenada program.</u>

It is critical for the Schlage Commodity Manager to ensure the requirements of this procedure are met by the supplier to avoid the following:

- Delays in customs processing due to the invoice not showing Schlage de Mexico as the consignee or sold to party.
- Delays in customs processing due to the supplier combining SOMI and non-SOMI shipments on the same House Bill of Lading.
- High cost to Allegion for goods sent to storage for inability to clear customs.
- High cost to Allegion for paying pedimento entry.
- High cost to Allegion of lost productivity for all parties involved in resolving customs delays.

The Schlage Commodity Manager liaisons between the supplier and Kuehne + Nagel to ensure all set up requirements are satisfied.

2. Supplier

Ensures all requirements of this procedure are satisfied <u>prior to the first shipment engaging in Direct shipments to the port of Ensenada program,</u> including the following:

- Proves Invoice Compliance with Allegion Customs team.
- Ensures that SOMI and non-SOMI shipments are NOT combined on the same House Bill of Lading.
- Ensures all documentation and packaging requirements are met for EACH shipment, as set forth in this procedure.

3. Freight Forwarder (Kuehne + Nagel)

- Find the best rates and options to ship the goods.
- Serve as liaison between ocean freightliner and Schlage de Mexico.
- Responsible for liaison with logistics and compliance team.

4. Trucking Company (Fletes Esquer)

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- Bond for container retrieval in the Ensenada port.
- Run a checklist of container condition before retrieval from the port.
- Safe return of the container back to the port.

5. Allegion Trade Compliance Team

 Reviews following documents to ensure Supplier Compliance: Invoice Template, Origin Certification, Support HTS Classification requests.

6. Allegion Accounts Payable / Inventory Managers

Allegion Accounts Payable must ensure all invoices and the related subinventory records are saved for 5 years to prove the payments involved goods in the program.

XII. Procedure: These are the requirements that must be met.

1. At Set-up

A. Commodity Manager

- Registration of New Parts in MX Customs System (Complete Southbound forms in coordination with Buyer)
- Agreements w/Contract Number filed
- Agreement with ocean freightliner for container retrieval in the Ensenada port on file
- Follow supplier Check list

B. Supplier

- Fill out and send responsibility template to KN
- Fill out commercial Invoice Compliance Proof
- Declare Value of Goods to Schlage de Mexico
- Provide supplier Tax ID to Schlage de Mexico

C. Global Logistics

• Ensure Cass Set-up for KN charges

2. At Time of Shipment

A. Supplier

- Ensure C-TPAT & AEO compliance (container inspection checklist & high security seal – <u>Exhibit 1</u>)
- Comply with Wood Packing Materials
- Fill out and attach Packing Slip
- Fill out and attach Commercial Invoice (English)
- Bill of Lading, Consignee shown as: Schlage de Mexico
- Follow Freight Plans (2) in BOL
- advise "Notify Party" of Shipment

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B. Allegion Trade Compliance Team

- Create invoice for Importation to Mexico (Spanish)
- File import declaration (Pedimento)

C. Trucking Company

 Agreement with ocean freightliner for container retrieval in the Ensenada port on file

3. Daily Operations

- A. Allegion Planner/Buyer
 - Ensure receipt in Allegion system
- B. Allegion Accounts Payable
 - Pay Supplier
 - Ensure Payables System reflects invoices

4. Ensenada Port Arrival

A. General process flow

- KN notifies arrival notice to Schlage de Mexico and MX Broker.
- MX Broker receives documents (Bill of lading, invoice, packing list, etc) and confirms arrival with KN.
- Allegion compliance team thru MX Broker solicits to the Ensenada Port "Previo" Inspection 24 hours prior to container release.
- Allegion compliance team creates invoice for customs purposes and sends to the MX Broker for Import Declaration (Pedimento Document)
- MX Broker request release ticket from the Port.
- MX Trucking Company enters the Ensenada port and conduct an inspection of the container.
- MX Broker presents to Customs authorities the Import Declaration (Pedimento Document).
 - If inspection by authorities is needed, MX Broker will work with the Ensenada port to facilitate the inspection.
- MX Trucking Company takes goods to Schlage de Mexico facility.
- Schlage de Mexico receives the Materials into their Inventory System.

XIII. Transportation Carrier Contacts:

Once replenishment orders are filled and ready for shipment, suppliers will communicate container booking information and requirements to the local office of Allegion's designated freight forwarder, KN. KN contacts can be found in Exhibit 2. Once received, KN will book ocean container cargo with Allegion's designated Ocean Container Carrier.

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XIV. Contacts:

TRADE	Kolly Cuzmon	
	Kelly Guzman,	
COMPLIANCE	Trade Compliance Director	
	Kelly.Guzman@allegion.com	(619) 778-4137
	Cesar Benitez,	
	MX Trade Compliance Manager	
	Cesar.Benitez@allegion.com	011 52 (665) 103- 6193
	Jesus Adolfo Hernandez,	
	MX Import Supervisor	
	Jesus.Hernandez@allegion.com	011 52 (665) 103- 6268
	Monica Cobian,	
	MX Compliance Supervisor	
	Monica.Cobian@alllegion.com	011 52 (665) 103- 6188
GLOBAL	Sean Miller,	
LOGISTICS	Global Distribution and Logistics	
	Sean.Miller@allegion.com	(317) 810-3152

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C-TPAT Container Inspection Checklist

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



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, ceilling, etc.

- Un-manifested goods, packages, etc.
 Signs of tampering (fresh paint, peculiar marks, etc.)

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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 III. Supplier's Container Inspector's Signature:

For Completion by Allegion Receiving Section IV.

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

- 1. Does Seal Number match seal shown in Section 1? DYes D No (report "no" answers to Mgmt)
- 2. Does Container show signs of tampering / anomalies? □Yes □ No (report "yes" answers to Mgmt)
- 3. 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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OCEAN VESSEL: KUEHNE + NAGEL (KN) ORIGIN CONTACT LIST

Ningbo

Ningbo Branch Office
6F (south) Howard Johnson Office, Building 230,
Liuting Street, Ningbo

Emma Zhang - FCL	
PH: 0086-574-2790 9558	Emma.zhang@kuehne-nagel.com

Vivienne Qin - LCL	
PH: 0086-574-2790 9702	VIVIENNE.QIN@kuehne-nagel.com

Shanghai

Shanghai Branch Office
Life Hub at Daning
Office Tower Block 1, 11-16F
1868 Gong He Xin Road
Zhabei District
200072, Shanghai

Amlica Zhang – Key	Account Manager
PH:0086-21-2602 8251	Amlica.Zhang@kuehne-nagel.com

Anson Wang - FCL	
PH:0086-21-2602 8083	Anson.Wang@kuehne-nagel.com

Chloe Liu - LCL	
PH: 0086-21-2602 8261	chole.liu@kuehne-nagel.com

Hong Kong + Yantian

Hong Kong Branch Office Kuehne + Nagel, Inc. 24/F MassMutual Tower 38 Gloucester Road Wanchai, Hong Kong

Dolphin Law - FCL	
PH:0085-2-2823 7514	Dolphin.Law@kuehne-nagel.com

Jojo Wang - LCL	
PH: 852-28237199	Jojo.wang@kuehne-nagel.com

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Kaohsiung

Kaohsiung Branch Office Kuehne + Nagel, Inc. A-2 6th Floor 8 Min Chuan 2nd Road 806 Kaohsiung – Taiwan R.O.C.

Heidi Lee - FCL	
PH: 00886-7-3391085 ext. 125	Heidi.Lee@kuehne-nagel.com

Allegion.support@kuehne-nagel.com

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

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Supplier Compliance Checklist

Prior to approving new suppliers for participation in the Direct shipments to the Ensenada port program, the COMMODITY MANAGER must ensure all mandatory requirements are satisfied by obtaining sign-off on the "SUPPLIER COMPLIANCE CHECKLIST". The Schlage Commodity Manager must fill out the following fields:

Supplier Name:	
Supplier Contact Name:	
Supplier Contact E-mail:	
Allegion Business Unit:	
Schlage Commodity Manager:	
Schlage Commodity Manager E-mail:	

For each type of transaction below (as applicable), Schlage Commodity Managers and Suppliers must ensure all of the requirements listed below are implemented, understood and completed <u>before any Direct shipments to the Ensenada port are initiated.</u>

Requirements for direct shipments in to the port of Ensenada

PART I:							
Process:	Set-Up	Set-Up	Set-Up	Set-Up	Set-Up	Set-Up	Set-Up
Originator :	СМ	СМ	K+N	Supplier	Supplier	Supplier	Supplier
Document or Procedure:	Agreements w/Contract Number	Letter of Notification of intent	Agreement with ocean freightliner for container retrieval in Ensenada port on file	Responsibility Template (send to KN)	Commercial Invoice Compliance Proof	Declare Value of Goods	Ensure Supplier Contract Executed
Direct Import into Mexico via Ensenada port	Yes	Yes	Yes	Yes	Yes	Yes	Yes
CHECK							

Continuation						
Process:	Set-Up	Set-Up	Set-Up	Set-Up	Set-Up	
Originator :	Supplier	Allegion Compliance team	Transp.& Log. Mgr.	СМ	Buyer/CM	
Document or Procedure:	Supplier Tax ID	HTS # confirmed with Allegion Compliance team	Cass Set-up for KN charges	Supplier Check list	Registration of New Parts in MX Customs System (Complete Southbound forms)	
Direct Import into Mexico via Ensenada port	Yes	Yes	Yes	Yes	Yes	
CHECK						

REMINDERS:

Evidence of Invoice Compliance – Supplier shall submit one sample invoice to demonstrate
a full understanding of invoice requirements for Mexico Ensenada port as destination. Once
submitted, the samples will be reviewed and approved by Allegion Compliance team and
Schlage Commodity Manager. See sample invoice herein as Exhibit 5.

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o Agreement must be signed by Supplier and Commodity Manager.

Supplier Compliance Checklist (continued)

1. To Be Signed By Supplier: < Supplier Name> < Signature Date>
< Supplier Name> <signature date=""></signature>
< Supplier Name> <signature date=""></signature>
< Supplier Signature>
2. To Be Signed By Allegion Compliance Team Representative:
<allegion compliance="" name="" trade=""></allegion> <signature date=""></signature>
<allegion compliance="" signature="" trade=""></allegion>
3. To Be Signed By Schlage Commodity Manager Representative:
<schlage commodity="" manager="" name=""> <signature date=""></signature></schlage>
<schlage commodity="" manager="" signature=""></schlage>
4. To Be Signed By Allegion Logistics and Transportation Manager:
<allegion and="" logistics="" name="" transportation=""></allegion> <signature date=""></signature>
-Allegion Logistics and Transportation Manager Signature >

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Invoice Template – Shipment to MX Facility - EXAMPLE

	INVOICE SAMPLE - FOR	R SHIPMENTS to MX FACIL	ITIES .		Page (s)	
SUPPLIER'S LETTERHEAD Address of Supplier Supplier contact person		including	SUPPLIER: voice requirements apply shipmen Asia, Australia and Europe, desti ont are mandatory and must l	ned for MX facilitie	s. ALL items	
Invoice #	Invoice Date	Exchange rate	Export Date:	Port of Export:	Port of Entry/Import:	
Currency	Packing list #	Payment Terms:	Purchase Order #: PO #		Blanket Order Line Item	
Consignee Schlage de Mexico, S.A. de C.V. Carretera Transpeninsular	<u>Deliver To</u> Schlage de Mexico, S.A. de C.V. Carretera Transpeninsular	Notify Party Jaime Ulises Rolon Alcazar Kuehne + Nagel, S.A. de C.V.	Invoice Comments			
KM 115 4580 Int. 3 Col. Carlos Pacheco C.P. 22890 Ensenada, B.C.	KM 115 4580 Int. 3 Col. Carlos Pacheco C.P. 22890 Ensenada, B.C.	Blvd. Agua Caliente No. 4558-406 Col. Aviación Tijuana B.C. 22420				
Mexico	Mexico	phone: +52 (664) 972-9472 & 70 fax:				
Carrier	Container #	TERMS of Sale: Agreement before t	he first shipment		·	
Shipment Reference number:		Mode	Freight Collect	T&E/Inbo	ond: NO	

QTY	PART #	DESCRIPTION	CLASSIFICATION	Weight (kgs)	Origin	unit price	Total Cost
20		Item Number AUTOMATIC DOOR CLOSERS	8302.60.3000	2	CN	5.00	\$ 100.00
15		Item NUMBER PARTS OF A UTOMATIC DOOR CLOSERS	8302.60.9000	4	MX	10.00	\$ 150.00
			Total Woight	6			

Signature

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Receiving Discrepancy Report

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

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Please note: This report should be sent to the Allegion team within 2 da 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: