




C-TPAT/PIP SECURITY PROCEDURES

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Approved by:	
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Date Reviewed:	

PURPOSE

The purpose of the **C-TPAT/PIP SECURITY PROCEDURE** is to outline KBD Transportation's procedure for creating and maintaining an environment that safeguards against security threats. Security measures aim to ensure the integrity and security of processes relevant to the transportation, handling, and storage of cargo within KBD's supply chain.

SCOPE

This procedure is to be practiced by all KBD employees and Owner/Operators.

PROCEDURES

CARGO

- Cargo is to be PROPERLY MARKED and MANIFESTED, including accurate weight and piece count.

DOCUMENT REVIEW

- Manifests and other documents are to be reviewed in an attempt to RECOGNIZE any SUSPICIOUS CARGO SHIPMENTS such as ones that:
 - Originate from (or are destined to) unusual locations;
 - Request payment by cash or certified cheque rather than invoice;
 - Have unusual routing methods such as staying off of main highways or avoiding certain roads, only traveling in darkness at certain hours, etc.;
 - Exhibit unusual shipping/receiving practices and/or blind shipments and/or not allowing the KBD driver to see what is being loaded; and,
 - Provide vague, generalized or poor information.
- BILLS of LADINGS filed with U.S. Customs and Border Protection (CBP) and with the Canada Border Services Agency (CBSA) should SHOW the FIRST FOREIGN LOCATION where the carrier takes possession of the cargo destined for the USA or Canada.



FAST TRANSPONDER CONTROL

- To protect FAST Transponders against misuse, compromise, theft, tampering, altering and/or duplication:
 - Drivers are expected to:
 - Lock their trucks at all times; and,
 - Report lost or stolen transponders to their Dispatch team immediately;
 - The Dispatch Team are to report lost or stolen transponders to the Safety & Compliance Manager immediately;
- Additional procedures can be located in the FAST TRANSPONDER CONTROL POLICY.

OFFICE/YARD SECURITY

- A witness log requiring sign-in is to be maintained at the:
 - Main Entrance for visitors and supplier deliveries;
 - East Side Entrance for drivers; and
 - Garage window for supplier delivery of LARGE parts.
- Premises are to be monitored by video surveillance cameras;
- The KBD yard is to be secured:
 - Employees are to be issued a unique passcode to access the KBD secured yard:
 - Employees are forbidden to permit others (including KBD employees, family members or friends) to use their passcode to enter KBD premises; and,
 - Upon termination, driver access code is to be removed immediately;
 - Private passenger vehicles parked in the KBD yard are prohibited from parking in close proximity to tractors and trailers that cross the border;
 - Sentinel lights not working are to be reported to the Safety, Compliance & Security Manager so that they can be repaired immediately.

SEALS

- High-security cable seals are to be used to secure trailers:
 - Must be in accordance with ISO PAS 17712;
 - Drivers are required to have seals within their possession at all times. Seals are issued in packs of 10. Drivers are to request a new package from their Dispatch team when their supplies are 3 or less;
- Seals will be numbered and:
 - Kept in the Dispatch Department, where a log of numbered seal assignments is to be maintained;
 - Verified by drivers en-route to be intact and not exhibit signs of tampering;
 - Documented on the Bills of Lading (both the original and any subsequent seal numbers);
 - Verified by driver at Shipper that seal number and location of the seal matches that stated by the Shipper on the shipping documents;
- If a seal is removed in-transit:
 - A second seal is to be placed on the trailer;
 - The seal change is to be documented, noting who broke the seal (i.e., government official) and the new seal number;
 - The seal change is to be communicated to the Dispatch Team immediately; and



- The Dispatch Team is to immediately notify the Shipper and/or the importer and/or load broker of the placement of a second seal.

TRACKING & MONTITORING

- Drivers are to notify their Dispatch Team twice daily of their whereabouts;
- Drivers are to report any unusual or suspicious activity to their Dispatch Team who in turn will report to the SAFETY, COMPLIANCE & SECURITY MANAGER, who reports to:
 - PARTNERS-IN-PROTECTION – Border Watch 888-502-9060 (in Canada);
 - C-TPAT- 800-BE-ALERT or 800-232-5378 (in U.S.A.);
- Trailers are to remain attached to trucks at all times while en-route;
- En-route drivers are expected to make a great effort to stop only in secure areas; and,
- Trailers are not to be dropped in unsecured areas. Secured areas include the KBD yard and customer-secured yards.

TRUCK & TRAILER SECURITY

- Drivers are to look for hidden contraband by following procedures outlined in the *17-Point Checklist* to perform a systematic 17-point inspection on all trailers prior to drop-off at customer and upon pick-up from customer. Inspections must be documented in driver log books;

RESPONSIBILITIES

- KBD drivers and Owner/Operators are committed to:
 - Reviewing manifests and documents for suspicious load activity;
 - Reviewing Bills of Lading to ensure first foreign location is documented;
 - Keeping their trucks locked at all times;
 - Reporting a missing FAST Transponder immediately to their Dispatch team;
 - Not sharing their unique gate passcode with others, including family, friends, and other drivers;
 - Adhering to parking rules outlined within the yard to keep private and commercial vehicles separated;
 - Reporting sentinel light outages to the Safety, Compliance & Security Manager;
 - Adhering to the procedure for cable seals set forth above;
 - Adhering to the tracking & monitoring procedure set forth above;
 - Adhering to the 17-point Checklist outlined in the 17-Point Trailer Inspection Policy; and
 - Reporting all breaches¹ of security immediately to their Dispatcher.
- The Dispatch Team is committed to:
 - Reviewing manifests and documents for suspicious load activity;
 - Reporting a missing FAST Transponder immediately to the Safety, Compliance & Security Manager;
 - Reporting sentinel light outages immediately to the Safety, Compliance & Security Manager;

¹ BREACH: An act of breaking or failing to observe a law, agreement, or code of conduct.



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- Managing the distribution of high-security cable seals;
 - Communicating a broken seal immediately to the relevant shipper, importer, load broker, etc.; and,
 - Managing all breaches of security by taking action as outlined above or reporting it to the Safety, Compliance & Security Manager, or in their absence, the Operations Manager.
- Office & Garage staff are committed to:
 - Ensuring visitors and drivers sign the visitor witness log upon gaining entrance to the KBD facility; and,
 - Reporting any breaches of security immediately to the Safety, Compliance & Security Manager, or in their absence, the Operations Manager.
- The Human Resources Manager is committed to:
 - Educating new employees (upon hire) and re-educating existing employees (as deemed necessary) regarding this Policy;
 - Maintaining the integrity of the employee unique gate passcodes to gain access to the KBD yard;
 - Supporting and coaching employees with the responsibilities outlined above; and
 - Reporting any breaches of security immediately to the Safety, Compliance & Security Manager, or in their absence, the Operations Manager.
- The Safety & Compliance Manager is committed to:
 - Reporting stolen transponders to CBP by e-mail decals@cbp.dhs.gov or by calling 317-298-1245 Monday through Friday, 8 am to 4 pm EST;
 - Ensuring the operational integrity of the video surveillance cameras and maintaining a daily check log;
 - Overseeing the separation of private and commercial vehicles parked within the KBD yard;
 - Arranging for immediate sentinel light replacements;
 - Overseeing the ordering and distribution of high-security cable seals;
 - Overseeing, supporting, and coaching employees with the responsibilities outlined above;
 - Taking the appropriate steps to manage, minimize or prevent any breaches of security; and
 - Responsible for overseeing that all procedures set forth above are followed.
- The Management is committed to:
 - Supporting, encouraging, and providing the structure for a secure environment for all KBD employees and Owner/Operators.