

Factory Security Audit Report

Provided By



Facility Name: Rupy Fashions

Facility ID (if applicable): N/A

Report No: FS-CP-IN-84949

Audit Date: 2024-02-14

Audit Type: Initial Audit

Audit Announcement: Announced

Facility Score: 92.4%

Facility Risk Level: Low



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Section A: Introduction

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

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

Below is a procedural overview of how Omega Compliance conducts CTPAT audits.

1. Opening meeting

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

2. Document review

- Reviews the facility's security policy, procedures and all relevant records.

3. Facility tour

- Evaluates the physical security of the facility.

4. Management interview

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

5. Employee Interview

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

6. Closing meeting

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

Section B: Executive Summary

Facility Profile:

Facility Name:	Rupy Fashions
Address 1:	B-139, Okhla Industrial Area,
Address 2:	Phase-I
City:	New Delhi – 110020
State / Province:	Delhi
Country:	India
Located in free trade zone?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Phone:	91 98100 45022
Fax:	N/A
Email:	acrupy@gmail.com
Website:	www.rupyfashions.com

Workforce:

Function	Number of employees	Employed	Contracted	Temporary
Senior Management	4	4	0	0
Security Guard	3	0	3	0
Assembly & Packing	3	3	0	0
Production Workers	15	15	0	0
HR / Administration	10	10	0	0
IT / Security	1	1	0	0
Shipping	1	1	0	0
Loading / Unloading	0	0	0	0
Driver	0	0	0	0
Others (please specify):	5	5	0	0
Total:	42	39	3	0
Number of migrant/overseas workers by nationality:	Nil			
Religions of workers:	Hinduism, Sikhism, Islam			

Business Overview:

Type of Industry:	Home Textiles
Principle Product:	Made Ups & Kitchen items
General Production Process:	Receipt of fabric, cutting, stitching, washing, finishing and packing
Years in business at this location:	18 years (Since 2005)
Has the facility undergone a CTPAT audit for another U.S. importer before?	No
If so, list the name of each importer:	N/A
Has the facility undergone a CTPAT validation by a U.S. Supply Chain Security Specialist?	No
If so, list the date of validation and any security upgrades made:	N/A
Is the facility eligible to join as a CTPAT member administered by U.S. Customs?	No
Has the facility been invited to join as a CTPAT member by U.S. Customs?	No
Does the facility participate in any other security initiatives?	No
If so, please list them:	N/A

Physical Structure:

Function	Description	Size / Unit	
Production:	1 x 5 story buildings for process fabric store, cutting, office, stitching, finishing, packing and washing.	1,672	M ²
Warehouse:	N/A	N/A	M ²
Container Yard:	N/A	N/A	M ²
Office:	N/A	N/A	
Others (please specify):	N/A		
Total land area:	N/A	1,672	M ²

Shipment:

% of goods exported to the US:	95%
By air:	0
By sea:	100%
By land:	N/A

Main Clients (Please list top 5):

Client Name	Percent of Facility Business
Urban Outfitter	50%
Cat Studio	24%
Sur La Table	8%
Great Little	4%
Others	14%

Certification: Nil

Name of Program	Cert. No, if any	Cert. Body	Issue and Expiry Date, if available
Nil			

Contractor Information:

Contractor's Name	Krishna Security and Services
Address:	474/19A. Block-G, Molarband Extn., Badarpur, New Delhi – 44
Phone:	91 98105 94417
Fax:	N/A
Email:	gschauhanarya@gmail.com
Service / Function:	Security guard.

Contractor's Name	Best Roadways Ltd
Address:	118/1, Najafgarh Road, near Main Gate, Swatantra Bharat Mill, New Delhi – 110015
Phone:	91 – 11 – 26812877 / 26811481
Fax:	N/A
Email:	okhla@brl.in
Service / Function:	Truck company sending cargo from facility to the port, etc.

Facility Management's Attitude:

The facility's management was cooperative and positive and granted the auditor full access during the audit. They agreed upon the importance of supply chain security and expressed their commitment to the US Customs CTPAT Initiative.

Remediation Issues:

Non-compliances were found pertaining to the following:

- 3. Business Partner
- 4. Cybersecurity
- 7. Procedural Security
- 9. Physical Security
- 10. Physical Access Controls
- 12. Education, Training & Awareness

Please refer to the Corrective Action Plan for details.

Conclusion:

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

Section C: Corrective Action Plan

Facility Name:	Rupy Fashions
Facility Location:	B-139, Okhla Industrial Area, Phase-I, New Delhi – 110020
Telephone No:	91 98100 45022
Fax No:	N/A
Facility Representative:	Mr. S.P. Chopra, Proprietor
Email Address:	acrupy@gmail.com
Report No:	FS-CP-IN-84949
Audit Type:	<input checked="" type="checkbox"/> Initial <input type="checkbox"/> 1 st Follow-Up
Audit Announcement:	<input checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi-announced <input type="checkbox"/> Unannounced
Facility Percentage Score	92.4%
Facility Risk Level	<input type="checkbox"/> High <input type="checkbox"/> Medium <input checked="" type="checkbox"/> Low
Follow Up Required:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Audit Date:	2024/02/14
CAP Due Date:	2024/06/13
Monitoring Company:	Omega Compliance Limited
Name of Auditor(s):	Bejoy Gupta

Areas Requiring Corrective Action:

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

Findings and Recommendations:

3. Business Partner

Audit Finding:	1. No vetting of business partner on the aspect of force labor
CTPAT Requirement:	In accordance with U.S. Customs and Border Protection CTPAT Security Criteria, a written, risk-based process must be available for screening new business partners and monitoring current partners.
Finding Details:	It was noted that the facility did not conduct a force labor vetting for its new business partners or current partners.
Recommendation:	The facility is advised to conduct a vetting on force labor for prospective new business partners and monitoring force labor performance for current business partners
Facility Agreed to Take Action?	Yes
Remediation Date:	2024/06/13

4. Cybersecurity Security

Audit Finding:	2. No regular tests of IT infrastructure
CTPAT Requirement:	In accordance with the U.S. Customs and Border Protection CTPAT Security Criteria, a company using network systems must regularly test the security of their IT infrastructure.
Finding Details:	It was noted that the facility did not conduct vulnerability scans and penetration tests of its IT infrastructure on a regular basis.
Recommendation:	The facility is advised to conduct vulnerability scans and penetration tests of its IT infrastructure on a regular basis further facility is advised to implement correction action as soon as feasible when vulnerabilities to its IT system are found.
Facility Agreed to Take Action?	Yes
Remediation Date:	2024/06/13


7. Procedural Security

Audit Finding:	3. No pictures are taken at the point of stuffing
CTPAT Requirement:	In accordance with the U.S. Customs and Border Protection CTPAT Security Criteria, as documented evidence of the properly installed seal, digital photographs should be taken at the point of stuffing. To the extent feasible, these images should be electronically forwarded to the destination for verification purposes.
Finding Details:	It was noted that the facility did not take pictures at the point of stuffing as documented evidence of the loading and seal affixing process.
Recommendation:	<p>The facility is advised to take pictures at the point of stuffing. For example:</p> <ul style="list-style-type: none"> • Cargo marking (carton mark/crate mark, etc.) • Loading process - empty, half, 2/3 and finished loading • Closing of the container doors. • Seal affixing and a close up where the seal has been affixed and where seal numbers clearly appear. <p>The facility is recommended to send these pictures electronically to the consignee when feasible.</p>
Facility Agreed to Take Action?	Yes
Remediation Date:	2024/06/13

Audit Finding:	4. No mechanism to report security related issues anonymously
CTPAT Requirement:	In accordance with the U.S. Customs and Border Protection CTPAT Security Criteria, a mechanism should be in place to report security related issues anonymously. When an allegation is received, it should be investigated, and if applicable, corrective actions should be taken.
Finding Details:	It was noted that the facility did not have a mechanism to report security related issues anonymously.
Recommendation:	The facility is advised to develop a mechanism to report security related issues anonymously. When an allegation is received, it should be investigated, and if applicable, corrective actions should be taken. Relevant records shall be maintained.
Facility Agreed to Take Action?	Yes
Remediation Date:	2024/06/13

9. Physical Security

Audit Finding:	5. Insufficient security technology is used to monitor access
CTPAT Requirement:	In accordance with the U.S. Customs and Border Protection CTPAT Security Criteria, security technology should be utilized to monitor the premises and prevent unauthorized access to sensitive areas.
Finding Details:	It was noted that the facility did not have an alarm system to monitor the premises and prevent unauthorized access to sensitive areas.
Recommendation:	The facility is advised to install alarm system to monitor the premises and prevent unauthorized access to sensitive areas.
Facility Agreed to Take Action?	Yes
Remediation Date:	2024/06/13

Audit Finding:	6. Insufficient CCTV records
CTPAT Requirement:	In accordance with the U.S. Customs and Border Protection CTPAT Security Criteria, recordings of the camera footage covering key import/export processes should be maintained on monitored shipments for a sufficient time.
Finding Details:	<p>It was noted that the facility only kept its CCTV records for 43 days after cargo was shipped, currently recordings were available from 02.01.2024.</p> 
Recommendation:	The facility is advised to maintain its CCTV records for at least 45 days.
Facility Agreed to Take Action?	Yes
Remediation Date:	2024/06/13

Audit Finding:	7. No random reviews of camera footage
CTPAT Requirement:	In accordance with the U.S. Customs and Border Protection CTPAT Security Criteria, periodic, random reviews of the camera footage must be conducted (by management, security, or other designated personnel) to verify that cargo security procedures are being properly followed.
Finding Details:	It was noted that the facility did not conduct random reviews of their camera footage.
Recommendation:	The facility is advised to conduct random reviews of their camera footage to verify that cargo security procedures are being properly followed further facility is advised to summarize their camera footage reviews in a written format, and include any corrective actions taken.
Facility Agreed to Take Action?	Yes
Remediation Date:	2024/06/13

10. Physical Access Security

Audit Finding:	8. No advance information from a carrier
CTPAT Requirement:	In accordance with the U.S. Customs and Border Protection CTPAT Security Criteria, prior to arrival, the carrier should notify the facility of the estimated time of arrival for the scheduled pick up, the name of the driver, and truck number.
Finding Details:	It was noted that the facility did not require its carrier to provide the estimated time of arrival, the name of the driver, and truck number before the scheduled pick up.
Recommendation:	The facility is advised to have their carrier provide the estimated time of arrival, the name of the driver, and truck number before a scheduled pick up.
Facility Agreed to Take Action?	Yes
Remediation Date:	2024/06/13

12. Education, Training & Awareness

Audit Finding:	9. No measure on training effectiveness
CTPAT Requirement:	In accordance with the U.S. Customs and Border Protection CTPAT Security Criteria, there should be measures in place to verify that the training provided met all training objectives.
Finding Details:	It was noted that the facility did not measure the effectiveness of its training.
Recommendation:	The facility is advised to have measures in place to verify that the training provided met all training objectives. Exams or quizzes, a simulation exercise/drill, or regular audits of procedures, etc., are some of the measures that may be implemented to determine the effectiveness of the training.
Facility Agreed to Take Action?	Yes
Remediation Date:	2024/06/13

Corrective Action Plan Confirmation

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

2024-02-14**Signature & Date – Facility Representative**Mr. S.P. Chopra, Proprietor**Printed Name & Title
Company Chop**2024-02-14**Signature & Date – Omega Auditor**Bejoy Gupta, Asst. Compliance Manager**Printed Name & Title**

Section D: Best Practices

The below are best practices recommendations only, not requirements.

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

Section E: Facility Security Tour

Please find below a photographic presentation of the facility site.



Factory name and exterior



Packing area



Packed goods warehouse



Loading area



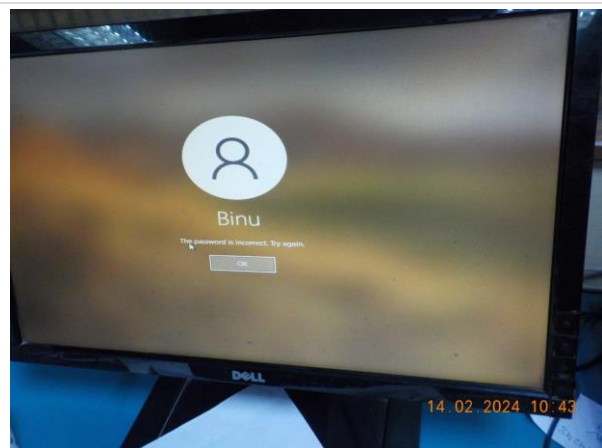
CCTV monitoring by security guards



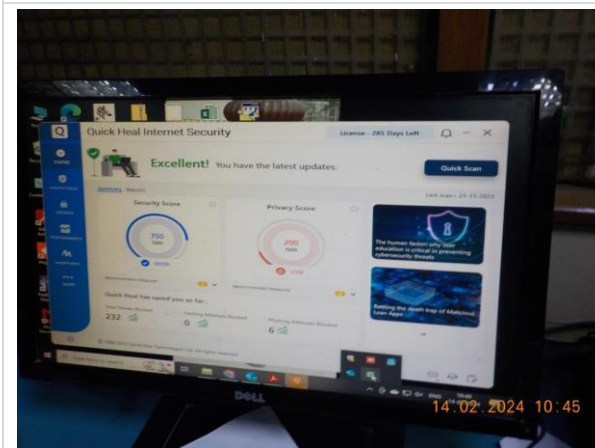
Employees wearing ID badges



CCTV monitoring



Computers are password protected



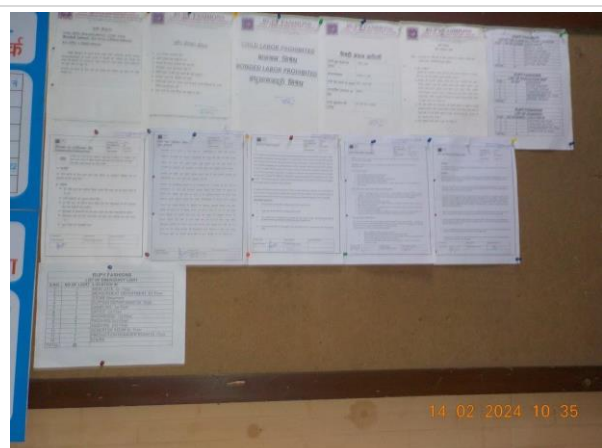
Anti-virus installed



Employee parking



CCTV camera installed in the packed goods warehouse



Security related policies displayed