

SEKO Worldwide LLC and SEKO Customs Brokerage Inc. Security Training and Threat Awareness Policy

The company is a Customs-Trade Partnership Against Terrorism ("CTPAT") participant and is responsible for the implementation, annual review, and consistent application of this policy. All training will be documented. Documentation may consist of a written sign-in sheet, a copy of an email showing distribution list of training material, or other practical evidence. Refresher training will be conducted as procedures and security threats change. Training may be formal, or informal in nature, to include stand-up presentations, on-line courses, email reminders, or other means.

All employees will receive training on the following topics:

- The CTPAT program purpose, goals, and the intent of the minimum security criteria
- Mutual Recognition Arrangements and other governmental programs (AEO programs, PIP, etc.)
- Company specific issues as they apply to CTPAT
- Access Controls
 - o Access Device Controls
 - Visitor Procedures
 - o Escort Procedures
- Challenging Persons who appear to be unauthorized
- Cybersecurity
- Reporting Security Incidents/Concerns
- Internal Conspiracies
- Physical Security
 - Parking
 - Fencing
 - Lighting
 - o Building Structure
 - o Gates and Gate Houses
 - o Locking Device and Key Controls / Alarm Systems & Video Monitoring

All Employees will receive training on the above topics as party of the hiring process and continual training as policy changes.

Other employees may receive special training dependent upon their job tasks, e.g.:

- Information Technology procedure for all computer users
- Seal controls and inspection and container/trailer inspection for cargo dock personnel
- Tracking and Monitoring for dispatchers, Managers and other appropriate personnel
- Document preparation, review, and submission
- Suspicious shipment indicators
- Suspicious Packages
- Alarm systems training
- Security screening procedures
- Periodic re-screening
- Conducting risk assessments
- Conducting Business Partner Screening
- How to conduct security verifications during site visits to business partners

As a C-TPAT participant SEKO provides Customs & Border Protection ("CBP") with applicable security information via CBP 2.0 Web Portal

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