

Compliance with Customs Requirements (Warehouse Companies)

The Guide

The questions listed below serve as a guide from Jordan Customs to help companies/ supply chain companies determine whether they are prepared to carry out self-assessments of their processes. The following questions aim at identifying whether a company/ supply chain company is willing to implement specific and documented procedures to improve its compliance with customs and trade requirements. If a company does not have in place any such procedures, it may indicate in the appropriate columns that it plans to implement procedures in the future and the time it expects to do so.

“Yes/ No” Column

To answer the questions in the lists below, write either “yes” or “no” in the “Yes/No” column as appropriate. A “yes” answer means that the company has in place a specific and documented procedure for the matter in question. A “no” answer means that the company does not have a procedure for the matter in question.

“Plan to implement Procedures” Column

If the answer in the previous column was “yes”, no answer is required in this column. On the other hand, if the answer in the previous column was “no”, the company may state either “yes” or a “no” in this column as appropriate. “yes” means that the company plans to implement appropriate procedures in the future regarding the matter in question, while “no” means that the company does not intend to implement any procedures in the near future. Answering “yes” and indicating the expected time for implementing procedures in the future means that the company is determined and willing to take appropriate procedures, which is a very positive thing and means that the company could be selected to join the Golden List as long as it demonstrates the intention to improve its current situation by implementing new procedures in response to the question. If the answer is “no”, the company is not required to indicate an expected date.

“Expected Date” Column

If the company answers “yes” in the previous column”, it must indicate the appropriate and expected date for implementing the needed procedure in response to the question.

Identifying Responsibilities

This part includes the professional responsibilities and the integrity of procedures of customs warehouse companies. Does your company (the owner or manager of the customs warehouses) have controls in place to carry out its business and other responsibilities in the best possible manner?

Note: customs warehouses mean all warehouses both public and private.

No.	Compliance with Customs Requirements Guide	Yes / No	Plan to implement procedure Yes/ No	Expected Date
A-1	Is the warehouse (owned or managed by your company) duly licensed as per articles (108/b), (116) and (117) of the Customs Law?			
A-2	Is your warehouse licensed by all other relevant entities?			
A-3	<input type="checkbox"/> Does your warehouse have qualified staff in warehouse and customs work? <input type="checkbox"/> Do these employees have training certifications in the fields of warehouses and customs work?			
B-4	Are all procedures applied at the warehouse duly assessed for compliance with the Customs Law and all other related laws, regulations and instructions?			
B-5	<input type="checkbox"/> Do you conclude contracts with all clients who store goods with you? <input type="checkbox"/> Do these contracts identify the responsibilities of each side in terms of conditions for storage and warehouse uses? <input type="checkbox"/> Do you verify (new) clients' registration documents with official entities? <input type="checkbox"/> Do you verify the nature of goods that new clients what to store with you?			
B-6	<input type="checkbox"/> Do you have a code of conduct that requires protecting all your clients' confidential information? <input type="checkbox"/> Do you train your employees from time to time on maintaining the private information of clients?			

	<input type="checkbox"/> Does each employee sign to acknowledge compliance with the code of conduct with regard to maintaining the information of clients?			
B-7	If you have a code of conduct, does it include a specific policy on bribes and accepting them?			
B-8	<input type="checkbox"/> If you have a code of conduct, does it include specific instructions on avoiding fraud and misrepresentation with the government or government institutions? <input type="checkbox"/> Does the code of conduct include a mechanism for informing the concerned party of any fraud or misrepresentation?			
B-9	If you have a code of conduct, does it require each employee to notify about any fraud, misrepresentation or crime against the security officer or manager of the warehouse or any other party?			
B-10	<input type="checkbox"/> Do you have a specific system for storing files and protecting the files and transactions of clients? <input type="checkbox"/> Does the system include specific procedures to prevent access of unauthorized persons to clients' files and information?			
B-11	Do you have an insurance policy that covers your interests, property as well as goods that you store for other companies?			
B-12	Do you have a copy of the Customs Law and all relevant instructions and decisions related to the import, export and storage of goods in warehouses?			
B-13	Do you have a specific procedure for ensuring that you are updated of any amendment to the Jordanian Customs law and any related decisions or instructions, as well as any amendments to customs laws of other countries that concern your work? Do you obtain and review the Official Gazette?			
B-14	Do you provide continuous training to your staff to ensure their adherence to responsibilities of work in warehouses?			

Internal Expertise

If you rely on your own staff only to conduct work, do you implement the following measures?

No.	Compliance with Customs Requirements Guide	Yes/ No	Plan to implement procedure Yes/ No	Expected Date
B-1	<input type="checkbox"/> Does your company (warehouse) have an employee who specializes in the imports to the Kingdom under the Jordanian Customs Law? <input type="checkbox"/> Have you taken measures to verify the experience of the employee (training certifications from the Customs Department's training institute, international certifications, etc.,) <input type="checkbox"/> Do you have an employee who specializes in issues and conditions of exports to the US as per the requirements of the US customs department?			
B-2	Do you have a copy of the Jordan Customs Tariff system and the tariffs of other countries that you work in?			
B-3	Do you offer training to your staff from time to time on import, export and storing issues?			

In addition to the three items above, refer back to the customs compliance system for importers, exporters and clearance companies.

Internal Reviews

Do you have an internal audit system?

No.	Compliance with Customs Requirements Guide	Yes / No	Plan to implement procedure Yes/ No	Expected Date
A-1	Do you have an internal audit system that ensures your compliance with the Jordan Customs Law, regulations, instructions and decisions and other relevant Jordanian laws and regulations?			
A-2	Do you have a specific procedure to notify the Customs Department of any errors detected during audits and take corrective actions?			

Compliance with Jordan Customs Law

Warehouse management companies are advised to refer to customs compliance system for importers and exporters as they help in providing better storing services to them.

No.	Compliance with Customs Requirements Guide	Yes/ No	Plan to implement procedure Yes/ No	Expected Date
A-1	Do you have access to and sufficient knowledge of laws related to warehouse work and instructions issued in this regard?			
A-2	Do you duly apply and adhere to legal provisions and instructions pertinent to warehouses?			

Risk Management

In providing storing services to clients, storage and warehouse management companies are subject to a certain degree of risk due to its responsibility towards clients, the Customs Department and official entities. The following section addresses these risks and how they are managed.

No.	Compliance with Customs Requirements Guide	Yes / No	Plan to implement procedure Yes/ No	Expected Date
B-1	General principles and goal of risk management: <ul style="list-style-type: none"><input type="checkbox"/> Do you carry out audits to check for non-compliance with the customs law, instructions and decisions and investigate the number of violations or non-compliance?<input type="checkbox"/> Do you measure the above mentioned non-compliance throughout consecutive months and years?<input type="checkbox"/> Are monthly and annual non-compliance incidents decreasing?<input type="checkbox"/> Do you share the information mentioned in the above three items with the Customs Department?<input type="checkbox"/> Do you set new procedures to enhance compliance levels based on the results of the above mentioned audits?			

	<p><input type="checkbox"/> Do you have measures to control compliance with custom requirements at all levels:</p> <ul style="list-style-type: none"> ▪ Board of directors ▪ Management ▪ Warehouse staff ▪ Accounting department ▪ Personnel department ▪ General staff <p><input type="checkbox"/> Do you have a specific procedure to validate your compliance with all customs requirements in cooperation with the Customs Department?</p> <p><input type="checkbox"/> Do you have a specific procedure to inspect all client documents to ensure compliance with customs requirements?</p> <p><input type="checkbox"/> Do you have a procedure to inform your staff of the potential risks related to goods or their means of transport on your warehouse?</p> <p><input type="checkbox"/> Do you implement any risk-management procedures in cooperation with the Risk Management Directorate at the Customs Department?</p>			
B-2	<p>Risk Types and Factors</p> <p>Do you have a customs compliance system that considers various types of risk in terms of:</p> <p><u>Type and nature of goods</u></p> <ul style="list-style-type: none"> <input type="checkbox"/> Do you check which types of goods have the most smuggling and illegal entry potential? <input type="checkbox"/> Do you check if any goods are illegally withdrawn (without Custom Department's approval) <input type="checkbox"/> Is the time between the arrival of goods and the referral of goods to customs authorities recorded? <input type="checkbox"/> Do you check how customs declarations are filled out? <input type="checkbox"/> Do you verify the accuracy of information in the customs declaration (description of goods, quantity, etc.,) <input type="checkbox"/> Do you require your clients to mention the names and quantities of goods in detail? <input type="checkbox"/> Do you check if the importation or entry of goods is prohibited? <input type="checkbox"/> Do you have a specific procedure to ensure fast handling of perishable goods? <input type="checkbox"/> Do you have a specific procedure for goods that require extra processes, such as lab tests, certification from the Standards and Metrology Organization, etc., 			

	<ul style="list-style-type: none"> ❑ Do you have a specific procedure for guarantees submitted to ensure payment of customs duties? ❑ Do you record the commercial volume of various clients throughout the year? ❑ Do you have a specific procedure for counterfeited products or products that constitute an infringement of intellectual property rights? ❑ Do you have a specific procedure for goods that have entry permission for specific purposes only? ❑ Do you have a specific procedure for expensive goods from well-known US or European brand names (such as luxury watches, fragrances, and some types of apparel and footwear)? ❑ Do you have a specific procedure for spare parts of cars, airplanes and other similar capital goods? ❑ Do you have a specific procedure for medicines and chemicals? ❑ Do you have a specific procedure for audio and visual recording devices? ❑ Do you have a specific procedure for publications, books, etc.,? ❑ Do you have a specific procedure for designs and models that are copyright protected? ❑ Do you have a specific procedure for verifying labels and writings printed on the packages? ❑ Do you have a specific procedure for knowing whether the labels and prints on packages conform to the requirements of Jordanian official entities? ❑ Do you have a specific procedure for handing packages that contain varying items (e.g., watches and fragrances)? ❑ Do you have a specific procedure for small consignments, especially those which do not carry the name of the sender? ❑ Do you have a specific procedure for transporting and storing nuclear and radioactive materials? ❑ Do you have a specific procedure for complying with UN instructions on the transporting and storing nuclear and radioactive materials? ❑ Do you have a specific procedure for exporting hazardous waste and substances? 			
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	<p><input type="checkbox"/> Do you have a specific procedure for re-exporting dual-use items?</p> <p><u>Classification (number) of goods as per the customs tariffs system:</u></p> <p><input type="checkbox"/> Do you verify if the goods are from a preferential origin?</p> <p><input type="checkbox"/> Do you verify if the classification of goods is correct as per the customs tariffs system?</p> <p><input type="checkbox"/> Do you verify the accuracy of guarantees to ensure payment of customs duties as per the correct classification of goods?</p> <p><input type="checkbox"/> Do you have a specific procedure for re-exported goods such as machines sent for maintenance outside the Kingdom?</p> <p><input type="checkbox"/> Do you have a specific procedure for misclassified goods and how to report that?</p> <p><input type="checkbox"/> Do you have a specific procedure for goods that enter the country under “temporary entry” and eligible for full or partial exemption from custom duties?</p> <p><input type="checkbox"/> Do you have a specific procedure for goods that enter the country under “other” in the customs declaration?</p> <p><u>Country of Origin (goods of preferential origin)</u></p> <p><input type="checkbox"/> Do you have a list of the countries that receive preferential customs treatment for their goods?</p> <p><u>The Sending Country (Source country)</u></p> <p><input type="checkbox"/> Do you have a list of some of the countries from which consignments are considered high-risk, such as Afghanistan?</p> <p><input type="checkbox"/> Do you have a specific procedure for consignments from neighboring countries which are subject to dumping fees for the same product?</p> <p><input type="checkbox"/> Do you have a specific procedure for checking with the Customs Department about consignments from high-risk countries?</p> <p><u>Destination Country (receiving country)</u></p> <p><input type="checkbox"/> Do you have a specific procedure for identifying the actual destination country for the goods?</p>			
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	<p><u>Customs Value</u></p> <ul style="list-style-type: none"> □ Do you verify the validity of customs declarations and business documents of goods, such as: <ul style="list-style-type: none"> ▪ Invoices ▪ Sale/purchase contract ▪ Customs documents issued by other countries ▪ All documents that enable the Customs Department to determine the value of the goods as per article 28 of the Customs Law. ▪ Do you verify the declared value of goods stated in the customs declarations and attached documents? ▪ Do you check if the goods are subject to fixed customs tariffs (goods for which the real value is suspected to be higher than what is declared)? <p><u>Risks associated with members of the trade process:</u></p> <ul style="list-style-type: none"> □ Do you check if the merchant/ importer is new (is following customs procedures for the first time)? □ Do you check if the country of origin is not consistent with the nature of goods? □ When a merchant/importer is dealing with goods that they do not normally deal with, do you verify the type goods and the related papers? □ Do you have a specific procedure for verifying partially or completely unclear or illegible documents? □ Do you verify the validity of stamps on the documents, especially when they the documents are not clear? □ If there appears to be tampering or alteration of the seals on containers, do you check with the client to know the reason? 			
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	<input type="checkbox"/> Do you give the highest priority to transportation and transit documents due to their importance? <u>Documents attached to Customs Declarations</u> <u>The Used means of transportation</u> <u>Route of goods</u>			
B-3	Risk Management and Assessment <input type="checkbox"/> Do you collect statistics on non-compliance with customs declarations or any violations of the law? <input type="checkbox"/> Does the customs compliance system take into account the types of risk mentioned in item (2) above? <input type="checkbox"/> Is statistical data (on noncompliance and errors, violations, etc.,) published annually? <input type="checkbox"/> Are does the customs compliance system measure improvement in compliance levels? <input type="checkbox"/> Does the customs compliance system take into account the types of risks set out by the Customs Department? <input type="checkbox"/> Do you modify the compliance system from time to time as the applicable types of risks change?			

Verifying Supply Chain Security

The following section is based on US C-TPAT program and the World Customs Organization's program for enhancing supply chain security, facilitating trade and transmitting information on world's cargo.

The below procedures are not mandatory for joining the US C-TPAT program, but help in joining this program.

Goals:

Develop and implement a specific plan for improving supply chain security procedures. Your company must take all appropriate measures throughout cargo transport and storage processes that are not directly supervised by your company to encourage other elements of the supply chain to take all needed measures to enhance security levels. All or part of the following procedures could be implemented based on the volume of your business.

Procedure Security

Documenting and auditing all procedures related to cargo throughout the supply chain until its safe arrival to the owner in the specified place.

No.	Compliance with Customs Requirements Guide	Yes/ No	Plan to implement procedure Yes/ No	Expected Date
A-1	<p>Do you have a specific procedure that requires you to have in place a supply chain security system that covers the following:</p> <ul style="list-style-type: none"> ❑ Procedures or systems must be in place to ensure that all information used in the clearing of cargo is legible, complete, accurate, and protected against the exchange, loss or introduction of erroneous information. ❑ Procedures must be in place to safeguard computer access and information. ❑ To help ensure the integrity of cargo, procedures must be in place to ensure that information received from business partners is accurate and timely. ❑ Arriving cargo should be reconciled against information on the cargo manifest. ❑ The cargo should be accurately described, and the weights, labels, marks and piece count indicated and verified. ❑ Departing cargo should be verified against purchase or delivery orders. ❑ Drivers delivering cargo must be positively identified before cargo is received. ❑ The receipt or release of cargo should be documented and audited. ❑ Procedures should be in place to ensure that all shortages, overages, and other significant discrepancies or anomalies are resolved and investigated appropriately. ❑ Seals on containers and trucks should be verified. 			
A-2	Do you have a specific and documented procedure to notify the Customs Department and other concerned authorities (e.g., police stations) if illegal or suspicious activities are detected?			
B-3	Do you have specific and documented procedures to provide and ensure adherence to instructions on security procedures to the management in your facilities?			

B-4	Do you have specific and documented procedures to perform random security audits to assess security levels at your company?			
A-5	Do you have specific and documented procedures for the complete processing of documentations related to incoming and outgoing consignments			
C-6	Do you have an automated system for connecting your company to supply chain companies, such as clearance, shipping, transportation companies, etc.,?			

Security of Buildings

Security of buildings means that a high level of security is maintained inside the buildings and facilities of the company including the area surrounding these buildings. These security procedures include mail delivery services, locking devices and key controls, fencing and the alarm systems.

The following procedures are related to the company's size and nature of business and used as needed:

No.	Compliance with Customs Requirements Guide	Yes / No	Plan to implement procedure Yes/ No	Expected Date
A-1	<p>Are buildings constructed in a manner that ensures integrity as follows:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Buildings are constructed of materials that prevent unlawful entry <input type="checkbox"/> A specific procedure is in place to ensure periodic inspection and maintenance of all buildings (facilities, fences, cameras, locks, etc.) 			
B-2	<p>Do buildings and offices have a sufficient level of security including:</p> <p><u>Fencing:</u></p> <ul style="list-style-type: none"> <input type="checkbox"/> Perimeter fencing should enclose the areas around cargo handling and storage facilities. <input type="checkbox"/> Interior fencing within a cargo handling structure should be used to segregate regular, high value, and hazardous cargo as well as domestic and international cargo. <p><u>Gates and Gate Houses</u></p> <ul style="list-style-type: none"> <input type="checkbox"/> There must be appropriate gates and gate houses at each gate. <input type="checkbox"/> Gates through which vehicles and/or personnel enter or exit must be manned and/or monitored. <input type="checkbox"/> The number of gates should be kept to the minimum necessary for proper access and safety. 			

	<p><u>Locking Devices and Key Controls</u></p> <ul style="list-style-type: none"> □ All external and internal windows, gates and fences must be secured with locking devices. □ Management or security personnel must control the issuance of all locks and keys. <p><u>Lighting</u></p> <ul style="list-style-type: none"> □ Is there an emergency lighting system in case of a power outage? □ Adequate lighting must be provided inside and outside the facility including the following areas: entrances and exits, cargo handling and storage areas, fence lines and parking areas. <p><u>Alarms Systems & Video Surveillance</u></p> <p><u>Cameras</u></p> <ul style="list-style-type: none"> □ Alarm systems and video surveillance cameras should be utilized to monitor premises and prevent unauthorized access to cargo handling and storage areas. <p><u>Parking</u></p> <p>Private passenger vehicles should be prohibited from parking in or adjacent to cargo handling and storage areas</p>			
B-3	Appropriate warning signs or guidelines are displayed concerning health and safety matters and no-entry locations.			
B-4	Do you have a designated employee responsible for developing and implementing the company's security plans?			
B-5	Does the above mentioned security officer have the authority to determine and raise security alert levels in response to a prospective hazard?			
B-6	Does the above mentioned security officer have the authority to perform security audits from time to time and amend the applicable security plans in response to audit findings?			
C-7	Is access to personnel parking areas controlled?			

C-8	Are personnel parking areas segregated from the parking areas for private visitor vehicle?			
C-9	There may be a need to outsource a specialized security company to perform security functions of your company.			

Access Control:

Access controls prevent unauthorized entry to buildings, facilities, vehicles, storage and handling areas, especially cargo locations.

No.	Compliance with Customs Requirements Guide	Yes/No	Plan to implement procedure Yes/ No	Expected Date
B-1	<p>Do you have specific procedures to prevent unauthorized access to company facilities in terms of:</p> <p><u>Employee</u></p> <ul style="list-style-type: none"> <input type="checkbox"/> An employee identification system must be in place for positive identification and access control purposes. <input type="checkbox"/> Employees should only be given access to those secure areas needed for the performance of their duties. <input type="checkbox"/> Company management or security personnel must adequately control the issuance and removal of employee, visitor and vendor identification badges. <input type="checkbox"/> Procedures must be in place for the issuance, removal and changing of access devices (e.g. keys, key cards, etc.). <p><u>Visitors</u></p> <ul style="list-style-type: none"> <input type="checkbox"/> Identity of all visitors must be verified and documented upon arrival <input type="checkbox"/> All visitors should be escorted. <input type="checkbox"/> All visitors must visibly display temporary identification. <p><u>Deliveries (including mail)</u></p> <ul style="list-style-type: none"> <input type="checkbox"/> Proper personal ID must be presented for documentation purposes upon arrival by all vendors or distributors. <input type="checkbox"/> Arriving packages and mail should be periodically screened before being disseminated. 			

A-2	Do you have a specific procedure for identifying, challenging, and addressing unauthorized or unidentified persons?			
B-3	Do you have a specific procedure for supervising parking areas and their use by personnel and visitors?			
B-4	Do you have a specific procedure for controlling and determining the times where entry to facilities, cargo storage areas, etc., is permitted?			
B-5	Access to cargo and file storage areas is controlled			
A-6	Do you have a specific system for issuing and verifying entry permits to individuals and private vehicles, especially with regard to the transport of goods?			

Personnel Security

Personnel security involves all appropriate procedures that ensure the security of employees, especially new employees, to prevent violations from entities that plan to carry out illegal activities (such as smuggling).

No.	Compliance with Customs Requirements Guide	Yes / No	Plan to implement procedure Yes/ No	Expected Date
B-1	<p>Do you have specific procedures in place to screen prospective employees and to periodically check current employees:</p> <p><u>Pre-Employment Verification</u> Application information, such as employment history and references must be verified prior to employment.</p> <p><u>Background Checks</u></p> <ul style="list-style-type: none"> <input type="checkbox"/> Consistent with foreign regulations, background checks should be conducted for prospective employees. <input type="checkbox"/> Once employed, periodic checks and reinvestigations should be performed based on cause, and/or the sensitivity of the employee's position. <p><u>Personnel Termination Procedures</u></p> <ul style="list-style-type: none"> <input type="checkbox"/> Procedures must be in place to remove identification, facility, and system access for terminated employees. 			

B-2	Do you require prospective employees to present a certificate of good conduct?			
B-3	Do you have a specific procedure to ensure that security guards and personnel wear a special uniform that distinguishes them from other employees?			
C-4	Do you have a specific and documented procedure to ensure that the skills of prospective employees match the required skills for the job?			
C-5	Do you have a specific procedure to perform background checks on service providers, such as maintenance, mail delivery, cleaning services companies, etc.?			

Awareness, Education and Training

Enhancing security in any company requires a collaborated effort of all its personnel. Therefore, training and raising awareness of employees in implementing and adhering to security measures at all times is essential to ensure the success of any company and enhance its security levels.

No.	Compliance with Customs Requirements Guide	Yes / No	Plan to implement procedure Yes/ No	Expected Date
A-1	<p>Do you have a specific procedure to enhance the security of the company in terms of:</p> <ul style="list-style-type: none"> <input type="checkbox"/> A threat awareness program should be established and maintained by security or quality assurance personnel to recognize and foster awareness of the threat posed by terrorists at each point in the supply chain. <input type="checkbox"/> Employees must be made aware of the procedures the company has in place to address a situation and how to report it. <input type="checkbox"/> Additional training should be provided to employees in the shipping and receiving areas, as well as those receiving mail. <input type="checkbox"/> Specific training should be offered to assist employees in maintaining cargo integrity, recognizing internal conspiracies, and protecting access controls. 			

B-2	Do these approved security programs offer incentives for active employee compliance and participation in security procedures?			
B-3	Do your awareness programs provide trainings on how to identify strange objects that may exist in the packing and loading/off-loading of goods?			
C-4	Do you participate in any activities organized by the Customs Administration or the Container Terminal for improving supply chain security procedures?			
C-5	Do you have a system for researching and accessing new international security procedures that could be used by your company (through libraries or the internet)?			

Cargo Security

Cargo security guarantees appropriate protection for goods against the introduction of persons or other materials, especially during the shipping process from one point to another throughout the supply chain.

No.	Compliance with Customs Requirements Guide	Yes / No	Plan to implement procedure Yes/ No	Expected Date
A-1	Do you have a specific procedure for ensuring the security of your cargo transport system and prevent intrusion by persons or materials of cargo shipped from the company's sites?			
A-2	Do you have specific procedures and/or agreements with your suppliers, carriers and shipping agencies that ensure that they implement appropriate measures to prevent the introduction of any unauthorized materials or goods to your cargo?			
A-3	Do you have specific and documented procedure that requires you to inspect cargos before they enter your facilities?			
B-4	Do you have specific and documented procedure to ensure that a person is designated to supervise the entry and exit of cargo?			
B-5	Do you have a specific procedure for ensuring that the integrity of containers and trailers is maintained to protect against the introduction of unauthorized materials/persons, including:			

	<p><u>Container inspection</u></p> <ul style="list-style-type: none"> □ Procedures must be in place to verify the physical integrity of the <u>container</u> structure before stuffing to include the reliability of the locking mechanisms of the doors A seven-point inspection process is recommended for all containers (front side, left side, right side, floor, ceiling/roof, inner/ outer doors, outside/ under carriage). <p><u>Trailer inspection</u></p> <ul style="list-style-type: none"> □ Procedures must be in place to verify the physical integrity of the <u>trailer</u> structure, before stuffing to include the reliability of the locking mechanisms of the doors. A ten-point inspection process is recommended for all trailers (fifth wheel area – physical inspection of trailer / ramp, outer/sides – front side, back doors, front wall, left side, right side, floor, ceiling, roof, inner doors, outer doors, outside/undercarriage). <p><u>Container and Trailer Seals</u></p> <ul style="list-style-type: none"> □ A high security seal must be affixed to all loaded containers and trailers bound for the US. All seals must meet international standards. □ Written procedures must be in place to stipulate how seals are to be controlled and affixed to loaded containers and trailers - to include procedures for recognizing and reporting compromised seals and/or containers to Customs Department or concerned authorities. □ Only designated employees should distribute seals to ensure proper use of seals. <p><u>Container/ Trailer Storage</u></p> <ul style="list-style-type: none"> □ Containers must be stored in a secure area to prevent unauthorized access and/or manipulation. □ Procedures must be in place for reporting and preventing unauthorized entry into containers/ trailers or container/ trailer storage areas. 			
C-6	Do you have an automated system for tracking all goods received or sent by your company?			
C-7	Do you utilize advanced technology to track containers or trucks used in transporting goods?			

Business Partners Security

General security of the international supply chain cannot be achieved unless each company takes appropriate measures to achieve the required security levels. Therefore, the security of any company includes also the security of its business partners:

No.	Compliance with Customs Requirements Guide	Yes / No	Plan to implement procedure Yes/ No	Expected Date
A-1	Do you have written and verifiable regulations for selecting business partners including carriers, producers, suppliers, and vendors (suppliers of spare parts and raw materials, etc.)?			
B-2	Do you have documentation that demonstrates whether your business partners are C-TPAT certified?			
B-3	Do you require your non- C-TPAT business partners to demonstrate that they are meeting security criteria via written/electronic confirmation?			
B-4	Do you check whether your business partners develop security systems and mechanisms that are consistent with C-TPAT to enhance cargo security?			
B-5	Have current or prospective business partners (approved by a supply chain Security program managed by a foreign customs administration) expressed their position on participation in the program?			
B-6	Do you check if all transport service providers (primary providers and subcontractors) are C-TPAT compliant?			
A-7	Do you check if the carrier has effective security systems, especially at handling sites?			
B-8	Do you continuously share information on security matters with service providers?			
C-9	Do you share security training and awareness with service providers?			

Record Keeping System

No.	Compliance with Customs Requirements Guide	Yes / No	Plan to implement procedure Yes/ No	Expected Date
A-1	Do you have a safe and secure place for retaining declarations?			
A-2	Do you have a specific procedure for ensuring that customs declarations, records, documents, accounting and trade records are retained for the durations prescribed in the law?			
B-3	Have you ever paid fines for failure to retain declarations for the durations required by law?			
A-4	Do you have a specific and documented procedure that requires all employees to retain the following documentations: <ul style="list-style-type: none"> <input type="checkbox"/> Air waybill <input type="checkbox"/> Manifest <input type="checkbox"/> Carrier certificate <input type="checkbox"/> Entry declaration <input type="checkbox"/> Any authorizations <input type="checkbox"/> Statement of goods / invoice <input type="checkbox"/> Guarantee information <input type="checkbox"/> Sea or land bill of lading <input type="checkbox"/> Country of origin certificate <input type="checkbox"/> Any other documents related to specific types of goods. 			

Documentation and Data Security

Documentation of all procedures and data security are necessary to maintain the safety of goods relevant to such information.

No.	Compliance with Customs Requirements Guide	Yes / No	Plan to implement procedure Yes/ No	Expected Date
A-1	Do you have a specific procedure to prevent unauthorized access to the company's computers and information?			
A-2	Do you have a specific and documented procedure to ensure that the company has there is a backup of the company's data base?			
A-3	Do you have specific and documented procedures for protecting the manual or computer data base?			

B-4	Do automated systems at your company use individually assigned accounts that require passwords to be changed periodically?			
B-5	Do you have in place policies, procedures and standards for data security that are provided to employees in the form of training			
A-6	Do you have a system for identifying abuse of information technology, such as improper access or tampering of business data?			
B-7	Are system violators subject to appropriate disciplinary actions for abuse?			
B-8	Do you have specific and documented procedure for documenting the entry and exist time of individual suppliers and transporters of goods?			
C-9	Do you have a specific and documented procedure to ensure that all cargos handling details (e.g., time of affixing seals to containers, inspection of consignment, vehicle's entry to the store, off-loading time, etc.,) are documented?			
C-10	Do you have a specific and documented procedure for recording any delays in processes and the justifications for them?			
C-11	Do you have a specific and documented procedure to ensure that all procedures are electronically recorded through computer software?			

Sharing information electronically in the future and other procedures (desired procedures)

No.	Compliance with Customs Requirements Guide	Yes/ No	Plan to implement procedure Yes/ No	Expected Date
C-1	Set up a system in the future for sharing customs information electronically based on the data system developed by World Trade Organization and regulations on the unified number of cargos.			
C-2	Electronic bill of lading filing system			
C-3	Electronic data filing system			
C-4	Risk management system			
C-5	Electronic authorizations, permission			
C-6	Joint cooperation with all entities concerning customs matters			

Financial and Accounting Controls:

No.	Compliance with Customs Requirements Guide	Yes / No	Plan to implement procedure Yes/ No	Expected Date
A-1	Do you have an identified and documented procedure to obtain, access and maintain all accounting laws and regulations and follow up on any amendments thereto?			
A-2	Do you retain all procedures, audit findings and reconciliations, especially audits on purchases, payments and stores?			
A-3	Are the financial and accounting controls in your company ensure compliance with all financial, accounting and audit standards required by Jordanian laws?			
B-4	<input type="checkbox"/> Do you have a specific and documented procedure for ensuring that the company conducts periodic inspections and assessments of its processes? Are there regular reviews of high-risk processes and procedures (high margin of error)? <input type="checkbox"/> Do you have a specific and documented procedure for maintaining and storing findings of periodic inspection?			
B-5	Do you have a specific and documented procedure to ensure that regular meetings among departments of the company are held to discuss any amendments to the applicable financial and accounting system, especially after the above mentioned periodic inspections?			
B-6	Do you have a staff member who is authorized and responsible for disclosing financial and accounting matters of the company?			

Are you willing to present to the Customs Department all procedures, including financial and accounting procedures as well as procedures concerning the import of goods for review at a place suitable for both sides?

Notes:

- ❖ **Questions in the above checklists are classified into three categories of requirements:**
- ❖ **Basic:** must be met by the company and does not call for developing a compliance improvement plan. The code for this category is (A) and shall be added next to the question number.
- ❖ **Important:** must also be met by the company and calls for developing a compliance improvement plan if the compliance of the company is partial or weak. The code for this category is (B) and shall be added next to the question number.
- ❖ **Desired:** this category is not mandatory for inclusion on the golden list and does not call for developing a compliance improvement plan, but the fulfilment of which helps to distinguish the company from other companies on the list. The code for this category is (C) and should be added next to the question.

- ❖ **Questions irrelevant to the company's nature of business do not require an answer.**
- ❖ **For more information, contact the Risk Management Directorate, Jordan Customs.**