

**Due Diligence Model for Risk Management:
Six Customs Due Diligence Models**

Final Report

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Abstract

This report describes the objectives, methodology and rationale as to how the six Jordan Customs Department due diligence models were developed. The six models have been developed in association with the Jordan Customs Department and validated with several Jordan companies. The models were provided to several Jordan trade associations. The report includes the due diligence models for export, import, customs clearance agents, warehouse operators, transport operators and Qualified Industrial Zone companies.

The six customs due diligence models provide Jordan companies wishing to become members of the Jordan Customs Department Golden List to undertake a voluntary internal compliance self assessment in preparation for a customs compliance audit.

Abbreviations and Acronyms

ADC	Aqaba Development Corporation
ADR	International Carriage of Dangerous Goods by Road (1957)
AETR	Work of Crews of Vehicles Engaged in International Road Transport (1970)
AIDC	Automatic Identification and Data Collection
AIS	Automatic Information System
AMIR	Achievement of Market-Friendly Initiatives and Results Program
APHIS	Animal and Plant Health Inspection Service
AWB	Air Way Bill
AZEM	Aqaba Zone Economic Mobilization
ASEZA	Aqaba Special Economic Zone
ATS	Automated Targeting System
BASC	Business Anti-Smuggling Coalition
CAT	Customs Assessment Team
CBP	Customs and Border Protection
CCTV	Closed Circuit Television
CE	Consumer Electronic mark and certification
CIP	Carrier Initiative Program
CN	Combined Nomenclature
CSI	Container Security Initiative
CITES	Convention International Trade in Endangered Species
CMR	Convention on the Contract for the International Carriage of Goods (1956)
CSR	Continuous Synopsis Record
C-TPAT	Customs-Trade Partnership Against Terror
CTU	Closed Transport Unit
DHS	Department of Homeland Security
EDI	Electronic Data Interchange
EDP	Electronic Data Processing
EEC	European Economic Commission
EFTA	European Free Trade Association
EICC	European Information Correspondence Centre
EJADA	Euro-Jordan action for the development of enterprise
EJEP	Euro Jordan Export Programme
EU	European Union
FCDD	Full Circle Due Diligence
FDA	Food and Drugs Administration
FIATA	The International Federation of Freight Forwarders
FTA	Free Trade Area
JABA	The American Chamber of Commerce in Jordan
JCD	Jordan Customs Department
JFTA	Jordan-US Free Trade Agreement
JIEC	Jordan Industrial Estates Corporation
JISM	Jordan Institute for Standards and Metrology
GAFTA	Greater Arab Free Trade Area
GISIS	Global Integrated Shipping Information System
GLDD	Golden List Due Diligence
GRN	Goods Receipt Note

Customs Due Diligence Models for Risk Management

<u>GSP</u>	<u>General System of Preferences</u>
<u>GVS</u>	<u>Global Village Strategies</u>
<u>HACCP</u>	<u>Hazard Analysis Critical Control Point</u>
<u>HTS</u>	<u>Harmonized Tariff System</u>
<u>IATA</u>	<u>International Air Transport Association</u>
<u>I.D.</u>	<u>Identification</u>
<u>ILO</u>	<u>International Labor Organization</u>
<u>IMDG</u>	<u>International Maritime Dangerous Goods Code</u>
<u>IMO</u>	<u>International Maritime Organization</u>
<u>INCOTERMS</u>	<u>International Commercial Terms</u>
<u>IRU</u>	<u>International Road Union</u>
<u>ISPS</u>	<u>International Ship and Port Facility Security Guide</u>
<u>ISSC</u>	<u>International Ship Security Certificate</u>
<u>ITPWG</u>	<u>United Nations International Trade Procedures Working Group</u>
<u>JEAA</u>	<u>Jordan – European Association Agreement</u>
<u>JABA</u>	<u>Jordan American Business Association</u>
<u>LRIT</u>	<u>Long Range Identification and Tracking</u>
<u>MIT</u>	<u>Ministry of Industry and Trade</u>
<u>NAFTA</u>	<u>North American Free Trade Agreement</u>
<u>NTR</u>	<u>Normal Trade Relations</u>
<u>OACI</u>	<u>International Civil Aviation Organization (ICAO)</u>
<u>OPS</u>	<u>Operation Port Shield</u>
<u>OSC</u>	<u>Operation Safe Commerce</u>
<u>PFRA</u>	<u>Port Facility Risk Assessment</u>
<u>PFSP</u>	<u>Port Facility Security Plan</u>
<u>PNSI</u>	<u>Prior Notice System Interface</u>
<u>PPQ</u>	<u>Plant Protection and Quarantine</u>
<u>PRA</u>	<u>Port Risk Assessment</u>
<u>PSA</u>	<u>Port Security Assessment</u>
<u>PSP</u>	<u>Port Security Plan</u>
<u>RFID</u>	<u>Radio Frequency Identification</u>
<u>QIZ</u>	<u>Qualified Industrial Zone</u>
<u>SCM</u>	<u>Supply Chain Management</u>
<u>SCIP</u>	<u>Super Carrier Initiative Program</u>
<u>SED</u>	<u>Standard Export Document</u>
<u>SOLAS</u>	<u>International Convention for the Safety of Life at Sea</u>
<u>SPI</u>	<u>Special Program Indicator</u>
<u>SSAS</u>	<u>Ship Security Alert System</u>
<u>SST</u>	<u>Smart and Secure Trade lanes</u>
<u>TIR</u>	<u>Transport International Routiers</u>
<u>TRIPS</u>	<u>Trade Related aspects of Intellectual Property</u>
<u>UCR</u>	<u>Unique Consignment Reference</u>
<u>US AID</u>	<u>United States Agency for International Development</u>
<u>VAT</u>	<u>Value Added Tax</u>
<u>WCO</u>	<u>World Customs Organization</u>
<u>WTO</u>	<u>World Trade Organization</u>
<u>XML</u>	<u>Extensible Markup Language</u>

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Executive Summary

The objective of the six customs due diligence models is to provide Jordan companies that choose to volunteer in the Jordan Customs Department's Golden List Program an opportunity to undertake a voluntary internal compliance self assessment. When the volunteer companies have decided that they have complied with most of a model(s) they can choose to invite Jordan Customs Department Risk Management Directorate to undertake a customs compliance audit.

The methodology that was used to develop the six models includes the business issues that must be complied with to ensure the lawful operation of the company, compliance with the Jordan Customs Law, Jordan Customs Department Regulations and other relevant Jordan laws and regulations regarding export and import. The customs due diligence model for QIZ exporters includes for example a section on the Jordan-US Free Trade Agreement. The methodology includes a detailed supply chain security section. The supply chain security section incorporates the U.S. Customs and Border Protection Customs-Trade Partnership Against Terrorism (C-TPAT), and some of the relevant recommendations and requirements of the International Maritime Organization ISPS Code, the World Customs Organization instruments for Container Security and the United Nations ITPWG draft version 4 International Shippers and Freight Forwarders Security Code.

Each of the six due diligence models has been verified by Jordan companies. For example, the export model has been validated by companies in different industry sectors: manufacturing, garment, chemical, pharmaceutical, olive oil, and transportation intermediaries. The import model has been validated by an engineering and construction equipment supplier, pharmaceutical supplier, several garment factories and customs clearance agents. The customs clearance agent model has been validated by three agents whilst the transport operator model has been validated by an agent and one of the world's largest sea carriers.

Each due diligence model has been developed "fit for purpose": for example the transport operator model has separate sections for truck companies, ocean transportation intermediaries, sea carriers and the port operator.

The supply chain security sub-section includes a checklist for procedural security, physical security, access security, personnel security, education and training awareness, conveyance security, trading and transportation operator security, internal company record keeping system, and documentation and information processing security.

The rationale in developing the six customs due diligence models for Jordan Customs Department (JCD) and for Jordan export and import companies and the transportation intermediaries is to enhance the trading capacity for Jordan in an increasing competitive global market.

Key Recommendations

Prevention is better than cure. The customs due diligence models are part of a wider holistic approach to lessen unauthorized access, inhibit illegal intrusion, deter tampering with facilities and merchandise for import and export and ensure compliant internal controls and documentation with secure supply chain procedures.

Good objectives and excellent intentions are useless unless they are sensitively and effectively implemented. Customs due diligent models need to be implemented and up dated. This requires willingness and commitment and a transparent and mutually agreed path for its implementation, monitoring and up dating.

1. Need for enhanced and continuing JCD and trade community due diligence that involves shared responsibility, informed and voluntary compliance, partnership and the building of relationships and building of a new sense of trust between Jordan Customs Department and Jordan industry and transportation intermediaries;
2. Need for enhanced border security through voluntary agreed supply chain security guidelines certified by JCD and US Customs and Border Protection;
3. Need for an integrated supply chain: communications with all parties, common security management policies, common security education and training and a supply chain security / trade route review and monitoring;
4. Need for intelligent transportation systems to enhance supply chain security and to increase and facilitate the flow of trade. For example, satellite tracking plus RFID, etc;
5. Need for data systems to target high risk shipments for inspection and facilitate trade;
6. Need to build systematic risk management capacity necessary to allow customs to target scarce resources;
7. Need for a secure trade route between Jordan and USA. A model for a secure trade route does exist;
8. The Jordan-US Customs Mutual Administrative Assistance can include Port Aqaba and C-TPAT and Operation Port Shield on the agenda;
9. JCD needs to assign the trained compliance audit specialists to the Compliance Unit within the Risk Management Directorate in order that the audit specialists can undertake customs compliance audits as part of the Golden List initiative with Jordan companies;
10. JCD needs to approve very quickly the customs due diligence models;
11. Need for a direct shipping line from Port Aqaba to the US. This is a commercial decision that only a sea carrier can make. However, one sea carrier reported that it had 90% of its total monthly container traffic booked and scheduled for Port Aqaba prior to the congestion;
12. Jordan enters into a Smart and Secure Trade Lane initiative with assistance from the Strategic Council on Security Technology, supply chain industry Smart and Secure Trade Lanes.
13. Port Aqaba to seek C-TPAT accreditation;
14. Jordan Customs Department should consider contacting US Customs with the objective of inviting US Customs regarding C-TPAT, CSI and Operation Port Shield cooperative efforts.

I. Six Customs Due Diligence Models for Risk Management

A. Introduction

Jordan Customs Department has announced a new challenge to implement a “Golden List” of compliant Jordan companies. This is a challenge, as there has to be a partnership, willingness, commitment and shared responsibility between the JCD and Jordan industry to develop and implement informed compliance.

Shared responsibility means that Jordan importers and JCD have a mutual responsibility to ensure informed compliance with international trade and with the Jordan Customs Law and Regulations. The objective of informed compliance is to maximize voluntary compliance.

The importer is legally responsible for declaring the customs value, classification, and rate of duty applicable to entered goods and customs administrations expect that importers use reasonable care to provide customs with accurate and timely data. Customs retains the responsibility to establish the value, classification and rate of duty. Customs must clearly and regularly inform importers of their responsibilities if they except compliance.

Jordan Customs Department is committed to providing the importer with all the information needed to comply with the Jordan Customs Law and Jordan Customs Regulations. To fulfill this commitment, JCD will make available on its Web Site a package of documents known as the compliance information forms. The provision of the documents to Jordan companies is so that they can prepare for a compliance assessment and conduct internal assessments of the company’s own customs regulatory related systems.

The six customs due diligence models provide Jordan export, import, transportation intermediaries, warehouse operators, customs clearance agents and QIZ companies with the opportunity to conduct a voluntary internal customs self assessment.

B. Methodology

The check list format is based upon the US Customs and Border Protection Compliance Assessment Team Kit, applied Customs Due Diligence Models in other countries and upon the USCBP C-TPAT requirements.

The content of each due diligence model has three main characteristics:

1. Compliance with the commercial laws and regulations;
2. Compliance with the Jordan Customs Law, Jordan Customs Regulations and bilateral trade agreements;
3. Supply chain security.

The customs due diligence model for QIZ exporters includes for example a section on the Jordan-US Free Trade Agreement. The methodology includes a detailed supply chain security section. The supply chain security section incorporates some of the relevant recommendations and requirements from:

- the U.S. Customs and Border Protection Customs-Trade Partnership Against Terrorism (C-TPAT) program,
- the International Maritime Organization ISPS Code,
- the World Customs Organization instruments for Container Security,

- and the United Nations Centre for Trade Facilitation and Electronic Business (UN/CEFACT) ITPWG draft revised version 4 International Shippers and Freight Forwarders Security Code (Security-management Systems for the supply chain).

Each due diligence model is “fit for purpose”, although a model cannot include every single requirement and cannot cover every circumstance. In practice, the due diligence models are intended as living documents that are continuously open to modification and improvement. Each customs due diligence model is in the process of validation by Jordan companies engaged in the business segment covered by the models. All the customs due diligence models were submitted to Jordan Customs Department for review in the English text.

C. Objectives of Customs Due Diligence

The main objective of a customs due diligence process is to enable the JCD to use limited resources and limited manpower for the best return of the invested budget. Due diligence is one of the main characteristics of a modern risk management system.

Informed compliance can benefit Jordan companies as well as the JCD. JCD reduces labor-intensive, redundant examinations or entry reviews through voluntary compliance. The international trader’s cargo will be dependably compliant to legal requirements. Under a shared responsibility concept, the primary focus is on self-assessment and a Customs regulatory audit is not intended to punish errors but to maximize future compliance. The JCD is forbidden to increase their work force. Consequently, a Golden List Program will enable Jordan Customs Department to target scarce work force and financial resources in high-risk areas.

Trained officers led by an auditor in charge and several auditors that should include an international trade specialist should conduct the JCD compliance audit. The JCD compliance audit / compliance assessment team will use traditional audit techniques of a financial audit, as well as the systems audit and will usually cover a company’s recent completed fiscal year.

A voluntary company internal compliance self-assessment and a JCD customs audit test the import, export, and financial transactions to determine whether:

1. The entries of the importer and exporter meet an acceptable level of compliance with the Jordan Customs Law and Jordan Customs Regulations and trade agreements during the period under review, and
2. Whether the importer and exporter has documented customs internal controls.

The results of the compliance assessment can be used to recommend a compliance risk category for the company. If, the compliance assessment / audit by JCD determines that the compliance is at an acceptable level in all areas tested the audit process will end and JCD will ascertain eligibility for membership for the “Golden List” Program. The JCD and the company will discuss the preferences that may be granted to the company. As an example, the company may be permitted to file periodic declarations rather than single entry declarations.

II. The objectives for a Customs Due Diligence in Jordan

The Jordan-US Free Trade Agreement does not include the issue of security examinations on goods arriving in the USA from Jordan. However, Jordan is located in a region that comprises several countries that are perceived to constitute a supply chain security threat. Transshipment through Jordan is also associated with higher risk.

The six customs due diligence models introduce a comprehensive compliance checklist for all participants in the supply chain that is located in Jordan. Once implemented, the due diligence models can provide an important tool with which to demonstrate to other customs services that there is an acceptable level of supply chain security and customs compliance in Jordan. The six due diligence models are comparable to compliance checklists in other countries. As a result the due diligence models will provide documented technical compliance and evidence of internal customs controls.

A. Benefits

Jordan is a trading nation. To increase its competitive advantage, Jordan companies must have an enhanced supply chain that is secure against threats and facilitates the flow of trade. Each of the six customs due diligence models includes supply chain security and compliance with the Jordan Customs Law, Jordan Customs Regulations, with the U.S.A., EU Free Trade Agreements and bilateral trade agreements.

Textile and Apparel Quotas in the US end in January 2005. Reports in the media speculate that consequently China and India will gain an increased market share of the US apparel market. Although Jordan garment factories will continue to enjoy a 17% customs duty exemption after the elimination of the textile quotas, Jordan garment factories may experience an impact as US buyers streamline the number of suppliers. The six customs due diligence models can act as part of a marketing tool to maintain, if not increase market share. The export model includes a section on exporting to the USA. Increased future customs and supply chain security compliance by Jordan companies that is certified by Jordan Customs Department should lead to less delay at the US port of entry as a result of examinations and import documentation examination by US Customs and Border Protection. Implemented, informed compliance should provide US buyers and logistics operators with added confidence that Jordan Customs in partnership with Jordan companies address supply chain security, customs and transshipment compliance. The benefits of documented compliance will also support the acceptance of Jordan exports to other importing countries.

The method for external acceptance of the reduced risk for Golden List compliant Jordanian companies is two-fold. First, the JCD can identify through customs-to-customs communications the processes applied for compliance verifications by JCD. Secondly, US companies participating in the US C-TPAT program will incorporate in their internal documentation the steps taken by their suppliers from Jordan to meet border compliance mandates, including supply chain security processes. The rationale in developing the six customs due diligence models for JCD and for Jordan export and import companies and the transportation intermediaries is to enhance the trading capacity for Jordan in an increasing competitive global market. For the JCD compliance audit provides several benefits:

1. Help with the identification of compliance issues;
2. Identify the cause of non compliance;
3. Identifies solutions and actions to amend and enhance internal controls.

For the trade companies in Jordan compliance audit provides several benefits:

1. Provides protection from unfair penalties;

2. Establishes professional capability;
3. Increases business potential;
4. Provides a basis for better and privileged treatment by JCD;

The application of the Golden List program by the JCD should include:

1. Customs should provide consultation, guidance, and training as requested (for compliance assistance, risk assessments, internal assessments, Customs audit trails and data analysis support, etc);
2. The Jordan company should have access to a hotline to JCD to contact key JCD officials;
3. In the event of customs penalties the company participation in the Golden List should be considered during the disposition of the case;
4. Companies can correct customs errors when they occur as a result of administrative errors, through prior disclosure or customs post-entry procedures, without fear of unexpected penalties.

Ideally, a full circle due diligence process (FCDD) needs to be developed and implemented. The FCDD is where each participant in the cross border transaction is exercising due diligence. The FCDD process provides a high level of confidence to customs administrations. It provides high confidence that a particular shipment crossing a border is compliant with the customs law and customs regulations, with international free and bilateral trade agreements, includes requirements of international supply chain security, and that it therefore does not require inspection resulting in delays.

B. Golden List Preferences and Privileges

The WCO Customs Co-operation Council High Level Guidelines For Co-operative Arrangements Between Members and Private Industry To Increase Supply Chain Security and Facilitate The Flow of International Trade (TF0004E3, Brussels, 13 May 2003) describing customs administration responsibilities for enforcing national and international laws and relating the enforcement role in the context of supply chain security includes in Section 1 paragraph (c) the following:

“A system whereby trader co-operation is recognized, and where appropriate, a mechanism for rewarding such co-operation is established.”

Jordan Customs Department has described several preferences and privileges that it is considering providing to compliant members of the Golden List:

1. 30 day deferment of customs duties;
2. Less examinations;
3. Less inspection of the import documentation and support documentation;
4. Less post entry audits;
5. A fast lane / track for Golden List members at all Jordan Customs Centers;
6. Future account management.

III. Customs Due Diligence and Jordan Company Participation

Participation by Jordan traders and transportation intermediaries means that they maintain a system of business records, have reliable written procedures and implement supply chain security that demonstrate the accuracy of customs transactions and the security of the supply chain. The characteristics include:

- Establish, document, and implement internal controls;
- Perform periodic testing of the system based on risk;
- Maintain results of testing for three years and make test information available to JCD on request;
- Make appropriate adjustments to internal controls; and
- Maintain an audit trail from financial records to Customs Declarations.

Jordan companies that become members of the Golden List should be encouraged by Jordan Customs Department to exchange information, meet and discuss with the objective to evaluate the process in order to improve the system for the benefit of JCD and Jordan companies.

A. Import Model

The import model (See Appendix 1) includes the following sections: External Expert, Internal Company Customs Expert, Internal Controls, Compliance with the Jordan Customs Law, Jordan-US Free Trade Agreement and Supply Chain Security Validation Process Guidelines. The criteria include: Merchandise Description and Tariff Classification, Country of Origin, Customs Value, Customs Declaration, Inspection of Goods, Inward Processing, Temporary Entry, Exemptions, etc.

B. Export Model

The export model (See Appendix 2) includes the following sections: External Expert, Internal Company Customs Expert, Internal Reviews, Licensing and Certification, Compliance with the Jordan Customs Law, Export to the USA (Jordan-US Free Trade Agreement), Export to the EU (Jordan-EU Free Trade Association Agreement), and Supply Chain Security Validation Process Guideline.

C. Warehouse Operators Model

The model (See Appendix 3) includes commercial and operation aspects. The model provides a checklist so that a Jordan company that operates a warehouse can check if it has adequate and reliable accountability and control procedures in place.

The warehouse model is for bonded and non bonded warehouse operators. The model includes the following sections: Defined Responsibilities, Internal Expert, Internal Reviews, Physical Security, Risk Management, Compliance with the Jordan Customs Law, C-TPAT Warehouse Security Recommendations.

D. Customs Clearance Agent Model

The customs clearance agent or broker model (See Appendix 4) includes the following sections: Licensing and Certification, Legal, Technical Specialization, Process Oversight,

Information Exchange Coordination, Internal Reviews, Internal Records and Documentation, and Supply Chain Validation Process Guidelines.

E. Transport Operators Model

The transport operators model is intended for multimodal transport(See Appendix 5). Included in this model are sections on: Transport Operators and Road Transport Facility Operators Defined Responsibilities, Internal Export, Internal Reviews, Internal Records and Documentation, Physical Security, Sea Carrier and Ocean Transportation Intermediary (24 Hour Advanced Manifest Rule, CSI, C-TPAT, ISPS Code, WCO Instruments for Container Security, United Nations International Shippers and Freight Forwarders Security Code Draft), Defined Responsibility During Transit (Smart Box Initiative, SSAS, ATS, 96 Hour Advance Notice of Arrival to US Coast Guard, Operation Port Shield), Sea Port Operator Defined Responsibilities that includes the Code of Practice on Security in Ports. See the following sections on more specific details for various modes of transport.

Transport Operators and Road Transport Facility Operators Defined Responsibilities

The model allows road transport companies to check if they have sufficient safeguards in place to ensure that every haulage is compliant with the JCD, other government agency requirements:

- Across an international border;
- From a clients premises to a border crossing point;
- To a seaport.

Further, the model identifies the requirements of an ocean transportation intermediary and Port of Aqaba for the exportation and importation of the commodities.

Note: There are over 11,000 owner-drivers in Jordan and although there are initiatives to improve the reliability, quality and safety of the trucks, Jordan companies that are engaged in international trade must check the identification of the driver and check if the driver is the bone fide owner of the vehicle. Because of the current policies at the Port of Aqaba on the use of “next in line” truck rather than free market selection of the transporter, this segment of the transport industry will be hard to apply in the selected models.

Sea Port Operator Defined Responsibilities

Note: Relative to Aqaba other security requirements are already implemented. Each contracting Government to the International Marine organization (IMO) has to ensure completion of a Port Facility Security Assessment. The Port Facility Security Assessment is a risk analysis of all aspects of a ports facility’s operation in order to determine which parts of it are more susceptible, and / or more likely, to be the subject of attack.

Upon completion of such an analysis, it is possible to produce an overall assessment of the level of risk and produce the Port Facility Security Plan (PFSP). This plan indicates the operational and physical security measures the port facility has taken to ensure that it always operates at security level 1. The plan also indicates the additional, or intensified, security measures the port facility can take to move to and operate at security level 2 when instructed to do so. It also indicates the possible preparatory actions the port facility takes to allow prompt response to the instructions that may be issued at security level 3.

Ships using port facilities may be subject to port control inspections and additional control measures. The Jordan authorities may request the provision of information regarding the ship, its cargo, passengers and crew prior to the ship’s entry into port. The port may deny the entry of a ship to the port in certain circumstances.

An approved Port Facility Security Plan governs Port of Aqaba. The Port Security Committee administers the PFSP.

APM Terminals contracted for the operation and management of Port of Aqaba Container Terminal for two years. APM Terminals is a business subsidiary of Maersk whose parent is A.P. Moller – Maersk Group registered in Denmark. APM Terminals comply with the ISPS Code. Global Village Strategies (GVS) is the contractor to APM Terminals for security. GVS has regional experience implementing port facility security related to the ISPS Code. From this perspective we recommend that the Port of Aqaba is included in the JNC Golden List Program and relative to security issues working with both APM Terminals and GVS will give the JNC compliance audit team a good working partner.

F. QIZ Model

The qualified industrial zone model (See Appendix 6) included sections are: QIZ Compliance Assessment, Compliance with the Jordan Customs Law, Export to the USA and Supply Chain Security Validation Process Guidelines. The model includes a sub-section entitled Accounting and Electronic Data Processing (EDP) Systems as JCD and US Customs may wish to audit invoices with the supporting transaction documentation to verify any transshipment.

Note on QIZs

The U.S. Customs and Border Protection Department requires that U.S. importers develop and implement a sound plan to enhance security procedures throughout their supply chain. Sea carriers accredited by US Customs and Border Protection for the C-TAP also must implement this requirement. In the case of a US importer that does not control a facility, conveyance or process subject to the recommendations contained in the QIZ model, the exporter should agree to make every reasonable effort to secure compliance. Some US importers have visited Jordan garment factories and during the normal factory, health and safety inspection have examined supply chain security measures and reviewed procedures. Furthermore, some US importers have their suppliers complete a supply chain security acknowledgement form. Access control is particularly important during stuffing and packing of containers. To gain competitive advantage to access the US market and to lower supply chain delays QIZ exporters may wish to undertake this part of the due diligence model as a very high priority whether wishing to enter the Jordan Customs Golden List program or not.

G. Completing the Customs Due Diligence Model Check Lists

Each Customs Due Diligence Model described above has a series of checklists. Each Customs Due Diligence Model has an explanatory note as to how to complete the checklist. The checklist has three columns that the company will complete. The three columns are:

1. Yes or No the company is compliant;
2. The company plans to implement or improve;
3. The internal target date for compliance.

The explanatory note consists of a guide, how to complete the column entitled “Response Yes or No” and how to complete the column in case the answer is a “No”. The explanatory note includes how to complete the column entitled “Target date”.

Guide

The questions in the checklist are a guide to allow JCD and Golden List candidate companies to determine if the applicant is ready to assume the responsibilities of self-assessment. The check list questions are designed to determine if the Jordan company has made a commitment to implement specific actions (internal procedures and controls) that will enhance compliance.

Customs Due Diligence Models for Risk Management

A Jordan company that does not have procedures and controls in place may answer that it plans to develop and implement procedures and controls and specify a target date for implementation.

Response Yes or No

A respond yes or no in this column indicates whether a Jordan company has implemented procedures and controls response to the question. If, a Jordan company has adequate procedures and controls that it believes document that the company is ready to assume the responsibility of self-assessment, the Jordan company can answer yes to the question. If, the Jordan company does not have adequate procedures and controls, whether they are generally adequate or need significant improvement, the Jordan company can answer no under this column and indicate in the next column that it plans to implement procedures that will be adequate for the company to assume responsibility of self-assessment.

If No, Plan to implement or improve (yes or no)

If, the Jordan company indicated “no” under the previous column, the Jordan company can respond yes or no in this column to indicate whether it plans to implement or improve procedures and controls. Whether the Jordan company procedures and controls are generally adequate but need small improvements, or need significant improvements, we recommend the JCD accept the company into the Golden List under certain conditions. The company must commit to making the necessary improvements and demonstrates that the steps are in process. If, the Jordan Company agrees to make needed improvements the company should respond yes in this column. The JCD must periodically monitor the improvement process. Failure to follow through would then result in removal from the Golden List. If, the Jordan company does not have or plan to have these procedures and controls Jordan Customs Risk Management Directorate will need to consult with the company to ascertain their readiness to assume responsibility of self assessment. Shipments associated with non-participants in the Golden List Program will be subject to other risk assessment factors.

Target date

If, the Jordan company indicates that it is going to implement procedures and controls under this column, it should provide the target date to have the procedures and controls implemented and working in this column by the target date.

IV. Supply Chain Security

Each customs due diligence model includes a comprehensive assessment of the supply chain security management, facility, record keeping and operation activities. The supply chain security section is an amalgamation of the C-TPAT, IMO ISPS Code, WCO and United Nations supply chain security requirements and recommendations. The recommendations are not mandatory for C-TPAT participation, but they may be helpful in the self-assessment and customs assessment audit. In supply chain security the fundamental process begins at the point the container is first stuffed – the secure point of origin. Certified containers need to enter a smart and secure trade lane. However, Jordan does not currently participate in a Smart and Secure Trade Lane initiative.

The objectives of the supply chain security section check list is to enable Jordan companies to develop and implement a sound plan to enhance security procedures throughout their part of the supply chain. Where a Jordan company that is, for example, an importer and it does not control a facility, conveyance or process subject to these recommendations, the importer agrees to make every reasonable effort to secure compliance by the responsible party. The checklist items are general recommendations that should be followed on a case-by-case basis depending on the company's size and structure and may not be applicable to all.

The criteria are as follows: procedural security, physical security, access security, personnel security, education and training awareness, conveyance security, trading and transportation operator security and internal company record keeping system information security.

In addition to the criteria listed below, each security section includes a sub-section on Service Provider Requirements (operative sub-contractors) and Internal Finance and Accountancy Controls.

Jordan companies must check all new traders to establish if the client has recently registered as a business and check the authenticity of the charter board of directors, etc. This will eliminate the risk of bad debts but it will also serve to provide supply chain security. One off shipments could be a risk. Furthermore, the Internal Finance and Accountancy Controls sub-section provides confidence and compliance in order that Jordan Customs Department and US Customs can check invoices against the transaction documents in cases of transshipment verification.

Case Study: Jordanian Company – Petra Engineering Industries, Co.

Some companies in Jordan are more advanced than others in awareness of the global requirements for supply chain security. One example is Petra Engineering Industries. Identifying companies that could be potential beta test partners for the Jordan due diligence models identified that this company is aware of the US C-TPAT program and had applied to join the program. Unfortunately, the US C-TPAT program is not open at this time to Jordan Manufacturers. C-TPAT is not currently available for countries other than Mexico. The following is a company comparison of the US C-TPAT provisions the company is prepared to demonstrate.

Security provision comparison with C-TPAT and Petra Engineering Industries Co, Amman

No	Security provision	C-TAP recommendation	Petra
1	Physical Security	Yes	✓
2	Access Controls	Yes	✓
3	Personnel Security	Yes	✓
4	Education and Training Awareness	Yes	✓
5	Conveyance Security	Yes	✓
6	Trading and Transportation Security	Yes	✓
7	Internal Company Record Keeping System	Yes	✓
8	Documentation and Information Processing System	Yes	✓

The following are examples of what would fall under a complete security program.

Procedural Security

Procedural security assures recorded and verifiable location of goods in the supply chain. Procedures should provide for the security of goods throughout the supply chain. Contingent procedures should be included within the scope of procedural security.

Physical Security

Physical security includes security measures that monitor and control the facility’s exterior and interior perimeters. This will include Mail Service Security, Lock and Key Control, and Perimeter and Interior Alarms.

Access Controls

Access controls prohibit unauthorized access to facilities, vehicles, loading and unloading equipment, vessels, aircraft, shipping, loading docks, break bulk areas and cargo areas. If, access control is not possible increased precautions in other security aspects is needed.

Personnel Security

Personnel security is concerned with the screening of employees and prospective employees, as appropriate and as allowed for by law.

Education and Training Awareness

Education, training and awareness encompass education and training of personnel regarding security policies, encouraging alertness for deviations from those policies and knowing what actions to take in response to security lapses.

Conveyance Security

Conveyance security provides protection against the introduction of unauthorized personnel and material into the supply chain, including the areas between the links of the supply chain.

Trading and Transportation Operator Security

Trading partner security extends supply chain security to your suppliers and customers. Communication, assessment, training and improvement are key components.

Internal Company Record Keeping System

The company needs an established internal record keeping system, a Quality Management System (QMS), and or a compliance guidebook that ensures that all documents related to export and import transactions and processing documents are correct and stored (3 years).

Jordan Customs Department requires hard copies¹ of all documents in order to match transaction entries in the accounts ledger with the procurement, and transportation documentation. Therefore, the company must have all hard copies and even if they hold some documents on a computer software system, such as SAP, or as part of a company private exchange system such as Cisco's e Hub, etc.

Documentation and Information Processing Security

Documentation processing security, both electronic and manual, assures that information is legible and protected against the loss of data or introduction of erroneous information.

Identifying perceived weaknesses in security and compliance will not necessarily prohibit participation in the Jordan Customs "Golden List" program. Jordan Customs is committed to working with the trade community to identify effective corrections and adjustments to a company process that will result in a more secure supply chain operation. Meeting the objectives can be helped by the Jordan company implementing responsibility of self assessment and a Jordan Customs Department compliance audit.

¹ This is and antiquated process that we have previously recommended must change.

Storyline

Jordan commits to guiding principles for co-operation on security and facilitation in the international trade supply chain.

On 26 June 2004 on the occasion of the 103rd/104th WCO Council sessions, Jordan signed to the Johannesburg Convention in Brussels. This convention gives a basis for international cooperation between customs administrations for validation of the global supply chain security. His Excellency Mr. Mahmoud Quteishat has been elected as a regional representative of the WCO for the coming period that will last for two years. The election of the Jordan Customs Department for the third time was at consensus of all Arab members of the WCO and was internationally welcomed. This came as a result of the role which is being played by Jordan Customs Department as well as the distinguished status it occupies.

The WCO Task Force on Security and Facilitation of the International Trade Supply Chain endorsed the following guiding principles, which form a solid basis for the development of co-operative agreements between Customs and trade in this area:

1. The Authorized Trader concept within the supply chain, including an international system of mutual recognition;
2. The use of the Unique Consignment Reference (UCR);
3. Security should be provided for the entire supply chain, including authorized trader premises;
4. Expansion of information and intelligence sources and capabilities, including the earlier collection and provision of information and intelligence, using all possible sources of data and intelligence involved in the international trade transaction;
5. The approach should be based on voluntary co-operation with the international business community and should include mutual recognition of the secure assurance procedures in other countries. However, mandatory options and the creation of legislation should remain an option;
6. Building on the existing national initiatives such as BASC and the C-TPAT.

A. Validation

The consulting team² interviewed fifteen Jordan companies involved in the drafting and checking of the six customs due diligence models. Each model incorporates the comments, professional and expert input from Jordan volunteer companies in order to ensure that each model is relevant for the situation in Jordan and that each model meets the requirements and demands of the global supply chain players and international organizations.

Companies in different industry sectors including manufacturing, garment, chemical, pharmaceutical, olive oil, transportation intermediaries validated the export model. An engineering and construction equipment supplier, a pharmaceutical supplier, a manufacturer and several garment factories validated the import model. Three clearing agents validated customs clearance agent model whilst an agent and one of the world's largest sea carrier have validated the transport operator model.

² In addition to this direct consultancy working on the development of the due diligence models, AMIR grantee International Research Corporation (IRC) is also substantially participating in partnership in this process.

B. Voluntary Self-Assessment

Each volunteer company has expressed the desire to enter the Jordan Customs Department Golden List of compliant companies. Consequently, each volunteer company is committed to undertake an internal voluntary customs self-assessment. Based upon the results of the voluntary internal self-assessment the company may require and decide to enhance some of its internal controls. The “how to complete the check list” guide for a voluntary self-assessment is included with each model. After a Jordan company has completed its voluntary compliance self-assessment and made any necessary adjustments to its internal controls it can arrange with Jordan Customs Department for a customs compliance audit.

Note: As of the writing of this report, the Director General of the JCD has approved a new unit to be part of the Risk Management Directorate specifically tasked with performing voluntary compliance audits. AMIR consultants trained JCD staff in the procedures to conduct the audits, including a practice audit with a volunteer Jordanian company. The JCD has not formally assigned the trained staff into the Compliance Audit Unit. The Director General of the JCD must commit the staff to complete this critical step of assigning competent personnel to the Compliance Audit Unit at the earliest date.

C. Partnership

The existing WCO Memorandum of Understanding (MOU) approach of customs to private sector partnership agreements will cover specific security and facilitation objectives of the Golden List program. For each sector of the supply chain, as a minimum, partnership agreements should address basic security standards and potential business benefits. Conditions and /or Undertakings that may be required as essential elements of such agreements taking into account existing tariff, non-tariff and security initiatives and programs.

The compliance risks confronting JCD are reduced if JCD can rely upon its partners in the Golden List. Therefore, Jordan companies that demonstrate a verifiable willingness to enhance customs compliance and supply chain security should benefit. Minimizing risk in this way helps JCD in performing their security functions, and in facilitation legitimate trade.

V. Jordan Customs Compliance Audit

The Jordan Customs Department will conduct the customs compliance audit.

Using the US Customs and Border Protection model the audit process stages can include the following:

1. Planning and preparation for compliance assessment;
2. Advance conference;
3. Mutually acceptable timetable;
4. Engagement letter;
5. Commencement meeting;
6. The audit;
7. Reporting the results of the audit;
8. Coordination with the company and Jordan Customs officials;
9. End of audit meeting;
10. Issuance of the compliance assessment report;
11. Follow-up

The AMIR Program provided compliance audit training for the Jordan Customs Department. Consequently, there are trained auditors in the JCD. The purpose of an audit is to provide an effective balance between trade facilitation and control. It is an effective post-entry strategy for ensuring that Jordan companies meet their obligations and that JCD provides the information to enable the company to be more compliant in the future. The purpose of the Jordan Customs compliance audit is not to “catch” companies for errors made in the past but to increase future compliance. In the process of developing the models, the consultant gave this message to all of the volunteer companies and to the Jordan Risk Management Directorate. JCD is duty bound to provide a description in the compliance audit report of the evaluation of any errors. The purpose of the evaluation is to determine if the errors were systematic and or recurring. If, errors are systematic then JCD needs to recommend and agree a corrective program to correct the errors. If, the errors are recurring then there is a need to project the effect.

Because of the JCD compliance audit systematic errors found JCD should not preclude membership of the Golden List. Membership of the Golden List should be extended to companies that agree with JCD that the systematic errors will be corrected and that future company internal controls will eliminate the repetition of the errors. JCD must agree with the company on a program together with an agreed schedule as to when the corrective action will commence and when the new or amended internal controls are in place. JCD must be informed as to who will undertake the corrective action. The company will provide a copy of the authorized company document signed by a charter member of the company board of directors describing the new or amended internal control plan.

Each volunteer company needs to ascertain and agree with JCD the list of preferences that they may receive because of a successful compliance audit. As a result of a favorable audit report JCD should include the company to the “Golden List” of compliant companies.

A. Customs Due Diligence Self Assessment Processing Time

The completion of a Customs Due Diligence Models and a JCD compliance audit are part of a new process. Consequently, it is not possible to ascertain at this stage how long it will take any

one Jordan company to become a member of the JCD Golden List. We believe the volunteer companies will be the first Golden List applicants and as a result will be helping JCD to ascertain the application process and the audit duration.

B. Competitiveness

Jordan companies that import, manufacture and export need to enhance and update competitiveness in order to gain increased market access into the USA, EU and regional markets. Other countries are striving to improve their competitiveness and Jordan cannot afford to lag behind its competitors. The models provide an important series of checklists that provide a means to assess compliance with customs laws and regulations, free trade agreements, with bilateral trade agreements and with the new supply chain security requirements and recommendations.

Jordan companies require scheduled, reliable and efficiently operated supply chain facilities that provide cost effective services. The quality of the supply chain facility services in Jordan need to be comparative to those services provided by competitive facilities in other countries. A constraint and a risk for the implementation of the Golden List identified by several exporters during interviews are the current congestion and delays in Port Aqaba. The companies identified that the Golden List is desirable and they will apply, however the Port of Aqaba could still cancel out the benefits of the Golden List. Input from some volunteer companies describe delays and longer than necessary supply chain durations from Jordan to the US as a result of congestion and out of service handling equipment. Further interviews with volunteer companies describe that the situation is being addressed and that solutions are being implemented that should result in measurable improvements in the quality of service and a reduction in the time taken to reach the US from Jordan. As a side note, Egypt is reportedly planning to implement QIZ's so it is urgent that Jordan companies in QIZ's have a competitive and secure supply chain to maintain a market advantage.

Storyline

Textile and Apparel Quotas eliminated in January 2005

1. The WTO estimate that because of the elimination of the Textile and Apparel Quotas China and India will gain increased US and global market share;
2. "China does not compete just on price: it is not the lowest-cost producer of some clothing items. Its biggest advantages are its industry's rapid response, reliability, business-like attitude and keen understanding of customer demand. "It is very easy to do business there," states Ms. Jones of the US Importer's Association;
3. US garment buyers may source from 5 or 6 countries by 2007, down from about 50 today, states the "Financial Times" p.9, 19 July 2004;
4. Wal-Mart may reduce its number of suppliers.

C. Test Shipment: door-to-door Jordan to the USA.

During the winter of 2004 and early 2005 a test shipment is proposed that includes tracking a container from a Jordan supplier through the supply chain to the US importer / buyer. A supply chain security checklist has been produced to identify where and what type of security controls exist along the trade route from Jordan to the USA in Jordan, in transit and upon port of entry USA.

Customs Due Diligence Models for Risk Management

The potential parties to the test shipment from the Jordan side may come from voluntary participants in the development of the due diligence models.

On 24 August 2004 the consultant gave a PowerPoint presentation to USAID on this proposal. The presentation described the reasons, objectives and the parties that can be involved in the shipment. The presentation indicated that some of the participating parties in the test shipment supply chain are either C-TPAT accredited or that have many of the supply chain security characteristics that are recommended by C-TPAT or required by international organizations. The following identifies the door-to door concept.

Complete Supply Chain Security

Supply Chain Flow: Jordan to the U.S.A.	Supply Chain Security Check List								
	GLDD	C-TPAT	ISPS	24hour	CSI	SSAS	ATS	96hour	OPS
Supplier located in Jordan	✓	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
Road Transport	✓	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
Port Aqaba Container Terminal	✓	✓ *	✓	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
Sea Carrier	✓ *	✓	✓	✓	✓	✓	✓	✓	N.A.
U.S. port of entry	N.A.	✓	✓	✓	✓	✓	✓	✓	✓
U.S. importer	N.A.	✓	N.A.	N.A.	✓	N.A.	N.A.	N.A.	N.A.

* Future

N/A = Not applicable

VI. Key Recommendations

Prevention is better than cure.

The customs due diligence models are part of a wider holistic approach to lessen unauthorized access, inhibit illegal intrusion, deter tampering with facilities or merchandise in the import and export process that ensure compliant internal controls and documentation.

Good objectives and excellent intentions are useless unless they are sensibly and effectively implemented.

Customs due diligent models need to be implemented and up dated. This requires willingness and commitment and a transparent and mutually agreed path for its implementation, monitoring and up dating. This includes the need for:

1. Enhanced and continuing JCD and trade community due diligence that involves shared responsibility, informed and voluntary compliance, partnership and the building of relationships and building of a new sense of trust between Jordan Customs Department and Jordan industry and transportation intermediaries;
2. Enhanced border security through voluntary agreed supply chain security guidelines certified by JCD and US Customs and Border Protection;
3. An integrated supply chain through communications with all parties, common security management policies, common security education and training and a supply chain security / trade route review and monitoring;
4. Intelligent transportation systems to enhance supply chain security and to increase and facilitate the flow of trade. (For example, satellite tracking plus RFID, etc);
5. Data systems to target high risk shipments for inspection and facilitate trade;
6. Need to build systematic risk management capacity necessary to allow customs to target scarce resources;
7. Need for a secure trade route between Jordan and the USA. A model for a secure trade route does exist;
8. The Jordan-US Customs mutual administrative assistance can include Port Aqaba and C-TPAT and Operation Port Shield on the agenda;
9. JCD needs to assign the trained audit specialists in order that the audit specialists can undertake customs compliance audits as part of the Golden List initiative with Jordan companies;
10. JCD needs to approve (very quickly) the customs due diligence models;
11. A direct shipping line from Port Aqaba to the US. (This is a commercial decision that only a sea carrier can make. However, one sea carrier reported that it had 90% of its total monthly container traffic booked and scheduled for Port Aqaba prior to the congestion);
12. Jordan enters into a Smart and Secure Trade Lane initiative with assistance from the Strategic Council on Security Technology, supply chain industry Smart and Secure Trade Lanes;
13. Port Aqaba to seek C-TPAT accreditation.

Case Study

A Secure Global Supply Chain

Introduction

“The US has been working bilaterally and multilaterally to keep the arteries of commerce clear while strengthening security surrounding the world’s transportation infrastructure.

The US Customs Service is, through its Container Security Initiative, partnering with key ports to introduce pre-screening and risk analysis of cargo containers based on advance information.” The White House, News Release 26 October 2002

STAR-BEST model

The Secure Trade in the APEC Region is a program to advance the efficient and secure movement of people and goods across borders. The STAR initiative includes the Bangkok/Laem Chabang port Efficient and Secure Trade program.

STAR-BEST implemented an end-to-end supply chain solution using radio frequency identification (RFID) technology and electronic seals to track secure containers from point of origin in Thailand to distribution centers in Seattle, Wash. A cost-benefit analysis was completed.

Laem Chabang port is now accredited with the C-TPAT.

Benefits

1. Enhanced global supply chain security, logistical efficiency;
2. Net financial benefits for supply chain participants;
3. Further developments of global security standards and protocols;
4. Support for efforts by Thailand and the United States to implement the Container Security Initiative;
5. Potential application by other APEC economies in the future.

For shippers, STAR-BEST demonstrated that a system to secure, track and manage the supply chain could lower expenses by reducing logistics and inventory costs and increase revenue by improving service rates. For importers, the project showed that a secure system offers the financial benefits of shorter transit times and reduced inventory safety stocks.

Demonstration

Laem Chabang and Seattle served as the origin and destination points. The project affixed RFID sensor seals, also known as e-seals, to conventional bolt locks on standard 40-foot containers at the point of origin. The containers were then transported by truck (and rail) to the port and loaded on ships destined for the US. The containers were tracked throughout their route, including other ports along the supply chain, using a real time, Web-enabled software application developed by Savi Technology (Note: Savi Technology is a speaker during the WCO meeting in Amman 8-10 September 2004), the projects prime contractor.

After arriving at the Port of Seattle terminals, the containers were discharged from the ships and the e-seals checked before the containers left the premises. Next, they were sent to their final destination point where operators with hand held computers verified the container’s origin and contents. Once verified, receivers used the hand held computers to unlock the seals so that the container contents could be removed.

30 containers were tracked.

“We think ‘smart container’ technologies can improve homeland security while enhancing the efficiency of global trade” states M.R. Dinsmore, Port of Seattle Chief Executive Officer, 14 February 2004.

“Trade is the engine of growth for countries around the world. In today’s world, countries also must protect their supply chains to prevent them from becoming tools of terrorism. The STAR-BEST project is an outstanding example of how we can meet important trade facilitation and security goals simultaneously.” Thelma J. Askey, Director, US Trade and Development Agency.

Appendix 1: Import

Guide

The questions in the checklist are a guide to allow JCD and Golden List candidate companies to determine if the applicant is ready to assume the responsibilities of self-assessment. The check list questions are designed to determine if the Jordan company has made a commitment to implement specific actions (internal procedures and controls) that will enhance compliance. A Jordan company that does not have procedures and controls in place may answer that it plans to develop and implement procedures and controls and specify a target date for implementation.

Response Yes or No

A respond yes or no in this column indicates whether a Jordan company has implemented procedures and controls response to the question. If, a Jordan company has adequate procedures and controls that it believes document that the company is ready to assume the responsibility of self-assessment, the Jordan company can answer yes to the question. If, the Jordan company does not have adequate procedures and controls, whether they are generally adequate or need significant improvement, the Jordan company can answer no under this column and indicate in the next column that it plans to implement procedures that will be adequate for the company to assume responsibility of self-assessment.

If No, Plan to implement or improve (yes or no)

If, the Jordan company indicated “no” under the previous column, the Jordan company can respond yes or no in this column to indicate whether it plans to implement or improve procedures and controls. Whether the Jordan company procedures and controls are generally adequate but need small improvements, or need significant improvements, we recommend the JCD accept the company into the Golden List under certain conditions. The company must commit to making the necessary improvements and demonstrates that the steps are in process. If, the Jordan company agrees to make needed improvements the company should respond yes in this column. The JCD must periodically monitor the improvement process. Failure to follow through would then result in removal from the Golden List. If, the Jordan company does not have or plan to have these procedures and controls Jordan Customs Risk Management Directorate will need to consult with the company to ascertain their readiness to assume responsibility of self assessment. Shipments associated with non-participants in the Golden List Program will be subject to other risk assessment factors.

Target date

If, the Jordan company indicates that it is going to implement procedures and controls under this column, it should provide the target date to have the procedures and controls implemented and working in this column by the target date.

External Expert

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Have you contracted in accordance to the Articles, described in several laws that govern contracts with a licensed clearing agent in the Hashemite Kingdom of Jordan to ensure that your company is in compliance with the Jordan Customs Law and Customs Regulations?			
2	Have you contracted with a legal company or other customs expertise in order to undertake customs due diligence in Jordan and as a result of the expert advice establish a customs procedure for the import / export of your commodities, materials, equipment and spare parts, etc?			
3	<p>What steps have you taken to ensure the quality of your licensed clearing agent?</p> <p>A) Checked the clearing agent’s license, obtained from the Jordan Customs, for validity?</p> <p>B) Checked additional certification verification: business registration, etc?</p> <p>C) Quality Management System, i.e., ISO 9000, registration?</p> <p>D) Checked if you have a valid Letter of Delegation (Power of Authority) for the clearing agent; signed by the authorized company representative as per the notarized company Charter and Registration documents?</p> <p>E) Checked the clearing agent internal quality system and procedures?</p> <p>F) Checked the professional qualifications of the personnel employed by the clearing agent; does the agent have personnel that will ensure that your imports and / or exports comply with the requirements of the customs law of Jordan?</p> <p>G) Checked if your clearing agent is a current member of a shipping / clearing agent association in Jordan?</p> <p>H) Checked if the licensed clearing agent is included in a list of agents, kept by Jordan Customs Department, that have been penalized as a result of an infringement of the Jordan Customs Law³?</p> <p>I) Checked that your licensed clearing agent keeps complete and accurate records of all of your temporary imports, in order that the annual renewal process is undertaken by the broker in a</p>			

³ *Fines and penalties*

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	<p>timely and accurate manner? J) Checked if the clearing agent has a license for the customs border entry via which your imports enter the territory of Jordan?</p>			
4	<p>Do you have a person in your company that is knowledgeable of the customs law and customs procedures and who is assigned to review and check the documentation and customs clearance process by your clearing agent to ensure that it is full, complete and accurate?</p>			
5	<p>If your documentation was prepared outside your own organization, do you have a reliable system, or check list, in place to insure that you receive copies of the information as submitted to Customs; that it is reviewed for accuracy, missing documents and pages, license(s), technical passport, compliance certificates, banking documents, etc., and that originals are in the packet of documents where these are required in place of photo copies, etc., and in the event of mistakes and or missing documents that you disclose to Customs in a timely manner the need for corrections (<i>No disclosure system and provisions exist in Jordan. There is a need for an enabling law and regulations to permit disclosure</i>)?</p>			
6	<p>If you use a clearing agent to assist your company to comply with the provisions of the customs law and with the provisions under existing Investment Promotion Laws for local investor and foreign investor import customs privileges, foreign exchange, Withholding Tax, VAT and temporary import, etc., have you discussed your import privileges in advance with that person and as a result do you have an accurate written procedure, description of responsibilities and a flow chart (process map that illustrates the paperwork flow and required documents) about the import transactions?</p>			

INTERNAL COMPANY CUSTOMS EXPERT

If you are not contracted with and using a licensed customs broker or external customs expert, have you taken the following steps?

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p>Does your company have an internal customs and international transport expert?</p> <ul style="list-style-type: none"> • What steps have you taken to verify the training, technical expertise and tested knowledge of ASYCUDA, Investment Promotion Laws, and security of trade and facilities requirements, etc., with your customs person: a certificate as a customs issues specialist issued by a customs brokers school or who has qualified by virtue of passing out of the Jordan Customs Training School? • Is the training certificate renewed annually after a recognized and attested training course, and is the certificate issued if the person has incorporated changes to customs laws and regulations? • Are the training certificates filed in the Personnel files as per the Labor Law for Jordan? 			
2	<p>Do you have on file a complete and current copy of the Customs Law and Regulations (For example, Directive No1, 1999: Documents to be submitted with a Customs Declaration) and all relevant Customs Regulations pertaining to the commodity, materials, equipment and or spare parts that your company is importing or exporting (Article 9), for example: -</p> <ul style="list-style-type: none"> • Copy of the Income Tax and Sales Tax Law for Jordan? • Copy of the Instructions that provide the details as to how to implement the price identification Articles described in the Customs Law • Customs Decision regarding prohibited goods? • Convention International Transport of Endangered Species (CITES)? • Regulations on hazardous and dangerous goods? • Regulations and permit instructions from the Jordan Nuclear Agency on the import of radioactive material and isotopes? 			

<ul style="list-style-type: none"> • Freight Transport Law for Jordan? • FIATA Regulations? • Harmonized System Convention? • Investment Promotion Law and Regulations? • Notarized contract with the Government as a Foreign Investor? • Vehicle axle weight laws and regulations? • Railway Regulations, Tariffs and dimensions for large loads? • Preferential customs duties (Article 11 and 12): copies of Regional Trade Agreements: Jordan-European Union Association Agreement; Jordan European Free Trade Association Agreement (EFTA); Greater Arab Free Trade Area? • Preferential customs duties (Article 11-12): Copies of the Jordan-Singapore Free Trade Agreement? • Preferential customs duties (Articles 11 and 12): Copies of Bi Lateral Trade Agreements: Jordan-US Free Trade Agreement; Egypt; Algeria; Libya; Syria, Kuwait, Bahrain, Turkey; Iran; Pakistan; Sri Lanka; Brunei; Azerbaijan; Taiwan; Nepal; Japan; India; China? • Copies of Bilateral Commercial Agreements: Canada, Mexico, Cuba, Brazil, Uruguay, Chile, Morocco, Tunisia, Sudan, Ethiopia, Cameroon, Botswana, South Africa, Mauritania, Sierra Leone, Somalia, Nigeria, Djibouti, Ivory Coast, Palestinian National Authority, Israel, Lebanon, Yemen, Oman, Iraq (Oil for Food), United Arab Emirates, Saudi Arabia, Qatar, Australia, Indonesia, Philippines, Malaysia, North Korea, Singapore, Armenia, South Korea, Afghanistan, Thailand, Uzbekistan, Vietnam, Cyprus, Moldavia, Bosnia, Yugoslavia, Poland, Romania, Bulgaria, Malta, Slovak Republic, Ukraine, Russia, Hungary, Czech Republic and Croatia. • <i>Copies of ratified international conventions: TIR, AETR, Container, Multi Modal, Passenger Vehicles, and ADR?</i> • Copy of the TIR Guidebook? • Copy of the European Union and Jordan Free Trade Association rules of origin, EUR1 and standards? • Copy of the Import and Export Law published by the Jordan Ministry of Industry and Trade that provides the list of import goods that require an import license and permits? • Copy of the Law On Company published by Jordan Ministry of Industry and Trade; • Copy of the Law Metrology Standards and 		
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	<p>Technical Standards Regulation that provides the list of goods for product dual language labeling and marking?</p> <ul style="list-style-type: none"> • Copy of the Phyto Sanitary Regulations administered by the Ministry of Agriculture, Ministry of Health and JISM? • Regulations for the import and export and transit of scrap metal? • Copies of current import and transit protection measures? • Copies of the anti dumping regulations? • Copy of the Central Bank Law and Central Bank Regulations of Jordan? • Copy of the Jordan Intellectual Property Rights Laws and instructions and the TRIPS Agreement (ref parallel trade and counterfeit goods)? • Copy of the Jordan Institute for Standards and Meteorology (JISM) and the list of product technical standards? • Instructions for the allowance rates for a physical person for goods into the territory of Jordan? • Instructions for the transfer of goods by individuals across the border of Jordan under simplified and privileged procedures; • Instructions governing the export and import of heating, asphalt, fuels and raw materials from the Ministry of Power? • Instructions and permission rules for the import of frozen chicken? • Tariff Schedule and instructions determined by the Committee for the procedure for the assessment of customs duties and refunds of customs duties”? • Copy of the instructions Jordan Customs Regulation concerning and defining customs clearance procedure using the ASYCUDA systems? • Copy of the Jordan Customs Instructions providing for the licensing, operations, equipment and procedures of a Bonded storage warehouse? • Copy of the Jordan Customs Instructions for WHO, Red Crescent, US AID, Iraq Crisis Committee, Palestinian Committee, etc., regarding the import of humanitarian aid? 			
4	Do you have a copy of the current Tariff Schedule for Jordan and the countries that you operate in (Article 10)?			
5	Do you have a method for ensuring that you obtain the latest customs tariffs, countervailing duties and import quotas that are made by the Customs Tariff			

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	Council and that are published in the Official Gazette? (Articles 14 and 15)			
6	Do you have a procedure in place to verify that you are current and up to date on all applicable changes in the Customs Laws and Regulations?			
7	Do you subscribe to professional journals that include information and news concerning new and amended customs, tax and accountancy laws and regulations? <ul style="list-style-type: none"> Do you have a system to disseminate copies of changes to customs legislation to all company personnel that are involved with the import transaction? 			
8	Do you have a procedure for the payment of customs duties on goods deposited in a warehouse in which payment of customs duties are due upon the expiry of the grace period date of expiry? (Article 18 Section A)			
7	Do you have a procedure to avoid illegal removal from a warehouse in order to avoid illegal removal and the payment of tariff duties at the highest level? (Article 18 Section B)			
8	Do you have a system to submit to the Customs Department all statements for goods to enjoy suspended duty? Does the system include a fail safe check to avoid the event of the statements not being submitted to the Customs Department? (Article 19)			
9	Do you have a procedure to identify smuggling? (Article 20)			
10	Do you have a procedure to process the payment of tariff duties as a result of an amicable settlement? (Article 20)			
11	Do you have a procedure to identify damage to the goods by force majeure or by an unforeseen event and present the damage report / findings to the Customs Department in order to obtain a Minister's decision? (Articles 22 and 80)			

(Note: If you are not using an external expert we strongly recommend that you review the Due Diligence model for Freight Forwarders / Clearing and Shipping Agents and apply the check list as part of your internal company procedure.)

Internal Control Reviews

The criteria listed below are the recommended best practices for all importers whether using an external expert or not. In many cases meeting the criteria for the following procedures will be covered by contractual agreement with your external expert. However, internal compliance steps are also recommended.

Merchandise Description & Tariff Classification

Do you know or have you established a reliable procurement and supply chain management procedure or program to ensure that you know what you ordered, where an item was made and what it is made of?

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Have you provided or established reliable procedures to ensure you provide a complete and accurate description of your merchandise to Customs in accordance with the Customs Law? • Do you have a copy of the Tariff Book?			
2	Have you provided or established reliable procedures to ensure you provide a correct tariff classification for your merchandise to Customs in accordance with the Customs Tariffs? • Have you checked the original JISM Certificate and if required a Customs Laboratory Test Certificate?			
3	Have you consulted the tariff schedules, Customs Regulations, court cases, World Customs Organization Harmonized System rulings and Jordanian Customs rulings to assist you in describing and classifying the merchandise? • Checked other country rulings? • Checked if you have difficulties identifying a tariff schedule, in which case you consult with your licensed customs broker?			
4	Have you consulted with your licensed customs broker or with a customs expert such as a lawyer, accountant, or customs consultant to assist you with the correct description and/or classification of the merchandise?			
5	If, you are claiming a conditionally free or special			

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	<p>tariff classification/provision for your merchandise, have you verified that the merchandise qualifies for such status?</p> <ul style="list-style-type: none"> • Have you obtained or developed reliable procedures to obtain any required or necessary documentation to support the claim? 			
6	<p>Do you have merchandise that requires a laboratory analysis or other specialized procedure to assist in the correct description and classification?</p> <ul style="list-style-type: none"> • Do you have a company quality certification system in place? • A certification system based on JISM? • Certification from an independent laboratory in Jordan? • Certification from another country? 			
7	<p>Do you have a reliable program or procedure in your company to maintain and produce all compliant Customs declaration documentation and supporting information?</p>			

Tariff, Anti Dumping and Miscellaneous Questions

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p>Do you have a checklist and reliable step-by-step procedures to ensure that your goods are subject to a dumping or countervailing duty investigation or determination?</p> <ul style="list-style-type: none"> • and if so, have you complied or developed a reliable check list and procedures to ensure compliance with Customs reporting requirements upon entry? 			
2	<p>Is your merchandise subject to quota/visa requirements, and if so, have you provided or developed a reliable procedure to provide a correct visa for the goods upon entry?</p>			
3	<p>Have you taken reliable steps and measures to ensure and verify that you are filing the correct Customs entry procedure? i.e., release of goods for free circulation, temporary importation, customs warehouse, transit of goods, etc.,: -</p> <ul style="list-style-type: none"> • Checked if your company has the right to make customs entries under the Customs Law and Regulations / Customs Code? • Checked the warehouse entries? • Checked the customs clearance process? 			
4	<p>Do you have an internal company instruction / policy manual for self regulated checking between your shipping department, warehousing department, accounting department import and export departments to insure that discrepancies between actual goods shipped or received correspond to declared counts to Customs? –</p> <ul style="list-style-type: none"> • Checked the Good Received Note (GRN)? • Checked the Warehouse Inventory List? • Checked the Warehouse Inventory valuation with the Accounts valuation as per tax submission? • Checked if your company accounts values as held in the company accounts software system (SAP, Platinum, etc) corresponds with the values on the customs documents and warehouse inventory system? 			

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	<ul style="list-style-type: none"> Checked if the original customs documents and values correspond with the temporary import renewal documents? 			
5	<p>Do you have internal audits to insure that values declared to Customs actually correspond to payments?</p> <ul style="list-style-type: none"> Copy of the Head Office audit? Copy of the Regional Office audits? Annual obligatory tax audit by an independent professional audit company as per the law in Jordan? 			
6	Do you routinely and on a scheduled basis conduct internal audits for compliance with Customs legal requirements?			
7	Do you have a policy for making voluntary disclosures to Customs when errors or omissions are discovered?			
8	<p>Do you have a written internal company Code of Conduct for employees regarding the requirements for safeguarding the confidential client information contained in your files?</p> <p>Do you conduct routine training on the obligations for the safeguarding of confidential information?</p> <p>Does each employee sign an acknowledgement that they have read and understood your internal Code of Conduct requirements and is that record maintained in your personnel files?</p>			
9	If you have a company Code of Conduct does it contain a policy statement on offering bribes and responding to solicitation of bribes?			
10	If you have a company Code of Conduct does it include a provision for non-participation in any attempts to commit a fraud against the Government and an obligatory requirement to report frauds or attempted frauds to the proper authorities?			
11	What steps have you taken to ensure that the other participants in the move of your goods, such as a freight forwarder, transporter, warehouse operator are exercising due diligence relative to customs matters?			

Licensing & Certification

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p>Have you taken measures or developed reliable procedures to ensure that your merchandise complies with other agency requirements prior to or upon entry, including the procurement of any necessary licenses or permits: -</p> <ul style="list-style-type: none"> • Obtained and checked the original copy of the JISM Standard Certificate, and payment of 10JD per declaration; for example by applying to the Ministry of Health, VERITAS for agricultural equipment? • Obtained original Jordan JISM Standard Certificates even though the goods and or equipment has a foreign Standards Certificate and analysis report? • Obtained and checked, where necessary the original copy of the Customs Laboratory Certificate? • Obtained and checked the original copy of the import license? • Obtained and checked, where applicable an original copy of a maritime agency inspection and certificate? • Obtained and checked, where applicable an original copy of the relevant inspection and certification from an authorized agency in Jordan? • Checked in case the independent inspection and or customs will require samples, in order to ascertain the harmonized code, duty level and value, during the unloading of the goods in the customs control zone? 			

COMPLIANCE WITH JORDAN CUSTOMS LAW

Chapter Two: Country of Origin

Have you taken reliable measures to ascertain the correct country of origin for the imported merchandise?

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p>Article 24: Have you established reliable procedures to ensure that you report the correct country of origin on Customs entry documents?</p> <ul style="list-style-type: none"> • Checked the Certificate of Origin from the country of production? • Checked the applicability of items (a) to (j) with your merchandise 			
2	<p>Article 25:</p> <p>Section A: Have you established reliable procedures to check that where in the case of the origin of goods produced in more than one country shall be the country of the last manufacturing stage, provided that this manufacturing has been carried out in a purpose built project set up for the manufacture of a new product? What is the definition by Jordan Customs of a “purpose built project”</p> <p>Section B:</p> <p>Have you a reliable procedure and check system for goods imported from a source other than the country of origin and which are put for domestic consumption to ensure that the correct level of tariff is paid: goods from the source or goods from the origin?</p> <p>Section C: Have you a reliable procedure and check system to ensure that the correct level of tariff is paid for goods that undergo additional manufacturing in other than the country of origin.</p> <p>Apply tariff either to the goods from the country of origin or the tariff applicable to the country of manufacturing, and;</p> <p>Check the extent of additional manufacturing and the criteria in Section A above.</p>			
3	<p>Article 26:</p> <p>Section A: Have you a reliable program to check the country of origin certificate to ensure it’s authenticity?</p> <ul style="list-style-type: none"> • Describe your company procedure. 			

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	Section B: Do you have a process to obtain additional evidence concerning to prove the authenticity of the certificate of origin in case the Customs Department has reason to doubt the authenticity of the certificate of origin?			
4	Have you established reliable procedures to verify or ensure that the merchandise is properly marked upon entry with the correct country of origin (if required) and any other applicable special marking requirement?			
5	Have you undertaken due diligence (customs advise) and taken reliable and adequate measures to communicate the requirements of Jordan Customs for country of origin (or other marking requirements) to your foreign supplier prior to the departure from the place of manufacture and or assembly and importation of your merchandise?			
6	Have you developed reliable procedures to ensure that you have ascertained the correct country of origin and assured yourself that no illegal transshipment or false or fraudulent practices were involved? <ul style="list-style-type: none"> • Checked directly with the manufacturer and received verification? 			
7	Have you consulted with a Customs "expert" (e.g., lawyer, accountant, Customs broker, Customs consultant) regarding the correct country of origin (proper marking) of your merchandise?			
8	Have you obtained a Customs "preliminary decision" regarding the proper country of origin of the merchandise, and if so, have you established reliable procedures to ensure that you followed the ruling and brought it to Customs attention? <ul style="list-style-type: none"> • Checked the manufacturing documentation to ascertain the correct country of origin; • Checked the certificates of origin in cases of partial production or sub-assembly in several countries as per the requirement in Article 25 Section A, B and C of the Customs Law of Jordan? 			
9	If you are claiming a change in the origin of the merchandise or claiming that the goods are of origin from the country of importation, how have you taken the required measures to substantiate your claim?			
10	Do you know how and who makes your goods from			

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	raw materials to finished goods, and where? <ul style="list-style-type: none"> • Checked with the supplier and received a written assurance? 			
11	If your merchandise is subject to import licensing have you taken reliable measures to ensure that you have obtained the correct import licenses?			
12	Have you checked with Customs and developed a reliable procedure or system to ensure that the quota category is correct? (not applicable at this time)			
13	Have you checked or developed reliable procedures to check the Status Report on Current Import Quotas (Restraint Levels) issued by Customs to determine if your goods are subject to a quota category which has “part” categories?			
14	Preferential Origin Article 27: Have you established reliable procedures to check the rules in the treaties between Jordan and other countries that identify preferential treatment?			

Section 2: Customs Value

Basic question: Are you taking reasonable steps to insure that the value you declare to Customs is the correct value under the Customs Law?

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p>Article 28: Do you know or have you established reliable procedures to know the transaction value: actually paid or payable for your merchandise?</p> <ul style="list-style-type: none"> • Do you know the terms of sale; whether there will be rebates, tie-ins, indirect costs, additional payments; whether “assists” were provided, commissions or royalties paid; and are there documents to prove this? • Are amounts actual or estimated? <p>Section 1, 2, 3 and 4: do you have a reliable procedure to check the conditions to the transaction value?</p> <p>Section B and items 1 to 8: do you have a reliable procedure to the provisions of the Customs Law regarding related parties?</p> <p>If you purchased the merchandise from a "related" seller, have you established procedures to ensure that you have reported that fact (received proof of submission) upon entry and taken measures to establish a reliable procedure to ensure that the value reported to Customs meets one of the "related party" tests?</p> <p>Do you check if your bank keeps all transaction documents in case the documents are required for an independent inspection or by customs officers in the course of their duties to undertake audits and inspections?</p> <p>Section C: do you have a reliable procedure to ensure that there is no bias as a result of the related parties relationship?</p> <p>If you are declaring a value based on a transaction in which you were/are not the buyer, have you substantiated that the transaction is a bona fide sale at arm’s length and that the merchandise was clearly</p>			

	<p>destined to the country of importation at the time of sale?</p> <p>Section D: do you have a reliable procedure to prove that the transaction value closely approximates one of the test standards before or after 90 days from the date of importation as described in sub paragraph 1 and 2 to Section D and Section E Article 28 of the Customs Law?</p> <p>Section F: do you together with your supplier(s) have a procedure to indicate all the costs that make up the transaction value as per items 1 to 8?</p> <p>Do you have an established and reliable procedure to ensure that all of the legally required costs or payments associated with the imported merchandise have been reported to Customs: transportation, insurance, cargo handling, assists, all commissions, indirect payments or rebates and royalties, etc.?</p> <p>Section G: do you have a reliable check list and procedure to produce objective and quantifiable data for customs to determine the transaction value and that will consequently avoid an indeterminable value for your merchandise? For example:</p> <ul style="list-style-type: none"> • a contract that proves the purchase-sale or a lease contract (not a rental agreement) and the banking documents: original • a stamped and signed certificate of origin form from a Chamber of Commerce: original • a certificate of conformity: original • a cargo declaration: original • shipping documents: bills of lading, airway bill (AWB): original • original stamped commercial invoices • Registration Card of an entity involved with import and export: copy <p>Section H: do you have a reliable procedure to obtain further correct and authentic documents to prove the transaction value in cases where Customs doubt the authenticity of the produced documents, and have you established by agreement with Customs the definition of “reasonable opportunity to respond”?</p>			
2	<p>Articles 29 and 30:</p> <p>Do you have a reliable procedure to ensure that in cases that Customs deem the customs value to be indeterminable that the consecutive steps as provided for by Article 30 Section A, B, C1, C2 and D1, D2 and D3 that refer to:</p> <ul style="list-style-type: none"> • Transaction value of identical goods; 			

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	<ul style="list-style-type: none"> • Transaction value of similar goods; • Deductive method; • Compound method; <p>are complied with?</p>			
3	<p>Article 31: Do you have a reliable checklist and procedure that ensures that all the correct documents required by Section C are collected for presentation and ensures that “any entity recognized by the Department and attesting to the authenticity of the prices and the origin” has been defined?</p> <p>Do you have a reliable procedure to obtain all copies of the Minister and Director instructions that are published in the Official Gazette?</p> <p>Are copies of the instructions entered into the operation procedure manual for each person involved with import transactions?</p> <p>Section G: do you have a reliable procedure to obtain in some cases when Customs requests the submission of “documentary credit”?</p>			
4	<p>Have you consulted the Customs valuation laws and regulations, Customs Regulations, court cases and World Trade Organization or Jordan Customs rulings and instructions decisions to assist you in valuing your company merchandise?</p>			
5	<p>Have you consulted with a licensed customs broker or with a customs expert such as a lawyer, accountant and customs consultant to assist you with the valuation of the merchandise?</p>			
6	<p>If you are claiming a conditionally free or special tariff classification/provision for your merchandise, have you established a reliable system or program to ensure that you reported the required value information and obtained any required or necessary documentation to support the claim?</p>			

Section 3: Class of Goods

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Article 33: Section A and Section B: do you have a procedure to obtain the Official Gazette in order that you have a complete and up to date record of: <ul style="list-style-type: none">• Assimilation and classification of goods that are not mentioned in the Customs Tariff Schedules;• Supplementary tariff commentaries and application guides that are within the instructions.			

Title Four

Entry and Exit of Goods

Chapter one

Presenting Goods to the Customs Authority

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Article 34: Do you have a reliable procedure that ensures the correct manifest of the goods is presented to Jordan Customs? Do you have a reliable procedure for presenting without delay the goods to Jordan Customs?			

Chapter Two

Prohibition and Restriction

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p>Article 39:</p> <p>Section A: Do you have a reliable procedure that can produce the license for prohibited goods before their arrival in Jordan?</p> <p>Section B: Do you have a reliable procedure and a record system to ensure that prohibited goods are returned outside the Kingdom?</p> <p>Section C: Do you have a reliable procedure to ensure that all licenses, permits, certificates and other documents are obtained so that customs formalities can start without delay upon the arrival of the goods in Jordan?</p>			
2	<p>Article 40:</p> <p>Do you have a reliable procedure to ensure that foreign goods do not arrive in Jordan with any marks, names or signs which suggest that the goods were produced locally?</p>			

Intellectual Property

Have you developed or established a reliable procedure to permit you to determine whether your merchandise or its packaging bear or use any trademarks or copyrighted matter or are patented and, if so, that you have a legal right to import those items into, and/or use those items in your country of importation?

- What are the steps in the checklist?
- What is the procedure?
- How do you implement the procedure?

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p>Article 41:</p> <p>Do you have a reliable procedure and a training and awareness system for your personnel dealing with imports regarding the requirements for intellectual property rights as defined by the Jordan Customs Law?</p> <p>Do you have a reliable procedure and a training and awareness system for your personnel dealing with</p>			

	<p>imports regarding the requirements for intellectual property rights in Jordan as provided under the provisions of any intellectual property conventions signed to and ratified by Jordan?</p> <p>Section A-1: Do you have a reliable procedure as to how to apply to the court regarding stopping the release of goods that are in violation of intellectual property rights?</p> <p>Section A-2: Do you have a reliable procedure that can obtain copies of intellectual property rights court decisions, and deal with an appeal, and that complies with the time durations as specified in the Jordan Customs Law?</p> <p>Section B: Do you have a reliable procedure that informs you of what you consider to be infringements of your intellectual property rights imports in order that you can inform the Jordan Customs Department within eight days as allowed for in the Jordan Customs Law?</p> <p>Section C: Do you have a procedure and a information sheet informing your personnel about your companies intellectual property rights and that the Jordan Court has the right to order the applicant to pay compensation to the importer of the goods, etc?</p> <p>Section D-1: Do you have a reliable procedure so that you can notify the Jordan Customs Manager regarding violations of trade mark and author's rights?</p> <p>Section D-2: Do you have a reliable procedure that will undertake the procedure as provided for in Article 41 Section D-1 above that the Jordan Customs Department must be notified within eight days?</p> <p>Section E: Do you have a reliable procedure to examine goods seized by Customs in order to prove that the goods are counterfeit and in violation of the intellectual property rights?</p>			
2	<p>Do you have copies of the Law on Copyright and Related Rights, Act on Trade Marks, Service Marks, and Names of Places of Goods Origin, Law on Patent and the Regulations that implement these Laws?</p>			
3	<p>If you are importing goods or packaging bearing a trademark registered in the country of importation, have you checked or established a reliable procedure to ensure that it is genuine and not</p>			

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	restricted from importation, or that you have permission from the trademark holder to import such merchandise?			
4	Have you registered on behalf of your company a trademark certificate?			
5	If you are importing goods or packaging, which consist of, or contain registered copyrighted material, have you checked or established a reliable procedure to ensure that it is authorized and genuine? If you are importing sound recordings of live performances, were the recordings authorized?			
5	Have you checked or developed a reliable procedure to see if your merchandise is subject to an exemption order? <ul style="list-style-type: none"> • Checked as to how to file an exemption order under the provisions of the Customs Law? 			
6	Do you have an established a reliable procedure, i.e., a step by step record keeping system, to ensure that you maintain and can produce any required declaration documentation and supporting information? <ul style="list-style-type: none"> • Checked how to request customs to stop the import of “grey market goods”? • Checked the export declaration? • Checked if the company keeps all records for 5 years in compliance with the law in Jordan: original documents? • Checked the companies record keeping system for all import and or export secondary documents? 			
	Do you have an established and reliable procedure that ensures that you have copies of TRIPS Agreement, as ratified by Jordan, with all those personnel who are involved with the import transaction and process?			

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No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Article 42: Do you have a reliable procedure to obtain and find the latest Jordan Customs information and decision regarding special rules for the packing of certain goods for the purpose of simplifying inspection procedures?			

Chapter Three

Sea Transport

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p>Article 43:</p> <p>Section A: Do you have a reliable procedure to comply with the Jordan Customs Law on the import of goods by sea in particular the registration of all goods in the cargo manifest?</p> <p>Section B: Do you have a reliable procedure to prepare correctly the cargo manifest with the required information?</p> <p>Section C: Do you have a reliable procedure that enables the original cargo manifest to be endorsed and delivered to Jordan Customs?</p> <p>Section D: Do you have a reliable procedure that ensures that the ships captain delivers the correct documents to the Jordan Customs?</p> <p>Section E: Do you have a reliable procedure to ensure that all the documents are presented to Jordan Customs within 36 hours of the ships arrival in port?</p> <p>Section F: Do you have a reliable procedure to ensure that the correct number of copies and the form of the manifest are complaint with the decision of Jordan Customs?</p>			
2	<p>Article 44:</p> <p>Do you have a reliable procedure to endorse the cargo manifest of ships that do not frequently visit Jordanian ports?</p>			
3	<p>Article 45:</p> <p>Section A: Do you have a reliable procedure and instruction that ensures cargoes of ships are unloaded only in the confines of ports with a customs center and furthermore, that transfer of cargo is only permitted by written approval of the customs center and in the presence of customs officials?</p> <p>Section B: Do you have a reliable procedure and instruction that ensures that cargo is only transferred during office hours and within the conditions laid down by Jordan Customs Department?</p>			

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4	Article 46: Do you have a reliable procedure to obtain and disseminate the Jordan Customs regulations and instructions regarding shortage in the number of parts, packages or contents or in the quantity of unbound, loose or bagged goods?			
5	Article 47: Do you have a reliable procedure that ensures that the captain prepares and submits documentation as evidence justifying the shortages of the goods unloaded compared to the contents of the cargo manifest within six months from the delivery report? Do you have a reliable procedure to obtain and disseminate the Jordan Customs instructions as to how reports of delivery shall be drawn from the Official Gazette?			

Chapter Four

Land Transport

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p>Article 48: Do you have a reliable procedure and written instructions for all vehicle drivers that they must drive from the border to the nearest customs center?</p> <p>Do you have a reliable procedure and a written instruction to all vehicle drivers that they must not bypass the customs center without permission, and to deposit the goods in the customs center buildings?</p>			
2	<p>Article 49: Section A: Do you have a reliable procedure and a written instruction to all vehicle drivers that they must present upon arrival in the customs center a bill of lading or a document that substitutes for the cargo manifest signed by the driver and the representative of the transport company in compliance with the provisions of Article 43 of the Jordan Customs Law?</p> <p>Do you have a reliable procedure and a written instruction to ensure that you obtain any Jordan Customs Department exceptions from this rule?</p> <p>Section B: Do you have a reliable procedure and a written instruction to ensure that the bill of lading or the document is accompanied by documents confirming its contents in accordance with the terms that are specified by the Director of the Jordan Customs Department?</p>			

Chapter Five

Air Freight

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p>Article 51: Do you have a reliable procedure and a written instruction to ensure that the goods arriving by aircraft are recorded in a cargo manifest in compliance with Article 43 of the Jordan Customs Law?</p>			
2	<p>Article 52: Do you have a reliable procedure and a written instruction to ensure that the cargo manifest, other documents and translated copies are presented to the Jordan Customs immediately upon arrival?</p>			
3	<p>Article 54: Do you have a reliable procedure and a written instruction to ensure that the provisions of the Jordan Customs Law Articles 45, 46 and 47 are complied with:</p> <p>Article 45: Section A: Do you have a reliable procedure and instruction that ensures cargoes of ships are unloaded only in the confines of ports with a customs center and furthermore, that transfer of cargo is only permitted by written approval of the customs center and in the presence of customs officials?</p> <p>Section B: Do you have a reliable procedure and instruction that ensures that cargo is only transferred during office hours and within the conditions laid down by Jordan Customs Department?</p> <p>Article 46: Do you have a reliable procedure to obtain and disseminate the Jordan Customs regulations and instructions regarding shortage in the number of parts, packages or contents or in the quantity of unbound, loose or bagged goods?</p> <p>Article 47: Do you have a reliable procedure that ensures that the captain prepares and submits documentation as evidence justifying the shortages of the goods unloaded compared to the contents of the cargo manifest within six months from the delivery report?</p>			

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	Do have a reliable procedure to obtain and disseminate the Jordan Customs instructions as to how reports of delivery shall be drawn from the Official Gazette?			
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Chapter Eight

Common Provisions

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p>Article 60:</p> <p>Section A: Do you have a reliable procedure and written instruction that ensures that several sealed parcels are not put together in any way?</p> <p>Do you have a reliable procedure and written instruction that you obtain the Jordan Customs instructions regarding containers, pallets and trailers?</p> <p>Section B: Do you have a reliable procedure and written instruction that ensures that authorization is obtained to permit single consignments to be divided as long as no loss occurs to the Jordan Treasury?</p> <p>Do you have a reliable procedure and written instruction that ensures you obtain the Director of Jordan Customs directives to this effect?</p>			

Title Five

Customs Clearance Stages

Chapter One

Customs Declarations

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p>Article 61: Do you have a reliable procedure and written instruction that ensures you present to Jordan Customs a customs declaration?</p> <p>Do you have a reliable procedure and written instruction that ensures you present to Jordan Customs a customs declaration in compliance with the provisions as described in the Jordan Customs Law?</p> <p>Section A: Do you have a reliable procedure and written instruction that ensures you present to Jordan Customs a customs declaration in writing?</p> <p>Section B: Do you have a reliable procedure and written instruction that ensures you present to Jordan Customs a customs declaration in electronic form?</p> <p>Have you a procedure that complies with the provisions of the Law on Electronic Information?</p> <p>Section B-2: Do you have a reliable procedure and written instruction that ensures you present to Jordan Customs a customs declaration in compliance with the specifications for the forms of declarations and the means for their submission, in addition to the number of copies, prices, the information that they must contain, the documents that must be attached to the declaration as well as the information that must be contained in the supplementary documents?</p>			
2	<p>Article 62: Do you have a reliable procedure and written instruction that ensures you present to Jordan Customs a declaration that describe the goods listed in a single manifest, except in those cases determined by the Director of Jordan Customs?</p>			
3	<p>Article 63: Do you have a reliable procedure and written instruction that ensures that the declaration you submit does not mention any sealed packages or packages assembled in any way that look as if they form a whole unit?</p>			

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	Do you have a reliable procedure and written instruction that you obtain the Jordan Customs instructions regarding containers, pallets and trailers?			
4	<p>Article 64: Do you have a reliable procedure and written instruction that ensures that you correctly amend one or more of the items in the declaration after it has been accepted by Customs and where the following Customs formalities have not yet been carried out:</p> <ul style="list-style-type: none"> • Announcement by Customs to examine the goods, or; • Decision that the items or details are incorrect; • Releasing the goods. 			
5	<p>Article 65: Do you have a reliable procedure and written instruction that ensures that the goods admitted to the Kingdom are admitted under one of the following customs regime:</p> <ol style="list-style-type: none"> 1. Free circulation; 2. Transit; 3. Warehousing; 4. Deposit in a Free Zone; 5. Temporary entry; 6. Entry for processing purposes. <p>Do you have a reliable procedure and written instruction that ensures that you correctly complete all the necessary forms and documents for:</p> <p>Free circulation:</p> <ul style="list-style-type: none"> • Packing List; • Certificate Of Origin; • Commercial Invoice(s); • Bank documents confirming payment of the invoice: for specific verification of customs value and / or for analyzing risk assessment; • Company Registration document: card and income tax identification number, for import relief circumstances; • Transport documentation; • Certificates: depending upon the commodity; • Letter of Delegation (Power of Attorney) for the completion of the customs formalities verified by a Bank (Verify signature); • Permit: as needed; • An import license (if required); • Import card; • Contract: if required to prove the customs value; • Pro Forma Invoices; • Export declaration; • Cost of Transport; 			

<ul style="list-style-type: none"> • AWB; • Bill of Lading; • A tax certificate and Customs Announcement confirming the offsetting or postponement of Tax and VAT (if allowed); <p>Do you have a reliable procedure and written instruction that ensures that you correctly complete all the necessary forms and documents for the:</p> <p>Transit regime:</p> <ul style="list-style-type: none"> • Packing List; • Certificate of Origin; • TIR Carnet; • Commercial Invoice(s); • Neighbor country Customs documents; • Bill of Lading by sea; • AWB by air; • Applicable Certificates for health, agricultures and CITES, etc; • Brokers documents from the consignee proving responsibility; • Road charges instruction (new). <p>Arab Transit regime:</p> <ul style="list-style-type: none"> • Arab transit manifest. <p>Do you have a reliable procedure and written instruction that ensures that you correctly complete all the necessary forms and documents for the:</p> <p>Warehousing regime:</p> <ul style="list-style-type: none"> • Packing List; • Certificate Of Origin • Commercial Invoice(s) • Bank documents in case of a need to prove customs value; • Company Registration document: card and income tax identification number; • Transport documentation; • Certificates: depending upon the commodity; • Letter of Delegation (Power of Attorney) for the completion of the customs formalities verified by a Bank (Verify signature); • Permit: as needed; • An import license (if required;) • Import card; <hr/> <p>Do you have a reliable procedure and written instruction that ensures that you correctly complete all the necessary forms and documents for the:</p>			
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	<p>Deposit in free zone regime?</p> <ul style="list-style-type: none"> • Packing List; • Certificate Of Origin • Commercial Invoice(s) • Bank documents in case of a need to prove customs value; • Company Registration document: card and income tax identification number; • Transport documentation; • Certificates: depending upon the commodity; • Letter of Delegation (Power of Attorney) for the completion of the customs formalities verified by a Bank (Verify signature); • Permit: as needed; • An import license (if required); • Import card; <p>Do you have a reliable procedure and written instruction that ensures that you correctly complete all the necessary forms and documents for the:</p> <p>Temporary entry regime</p> <ul style="list-style-type: none"> • Letter from Customs confirming the temporary admission; • Packing List; • Certificate Of Origin • Commercial Invoice(s) • Bank documents in case of a need to prove customs value; • Company Registration document: card and income tax identification number; • Transport documentation; • Certificates: depending upon the commodity; • Letter of Delegation (Power of Attorney) for the completion of the customs formalities verified by a Bank (Verify signature); • Permit: as needed; • Certificate of compliance from the manufacturer for new equipment and vehicles; • JISM Standard certification; • Technical Passport for certain commodities; • Transportation documentation; • Card of an entity involved with foreign economic activity; • Import license from the Ministry of Industry and Trade as per the Law on Import and Export; • Import card; 			
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<p>Do you have a reliable procedure and written instruction that ensures that you correctly complete all the necessary forms and documents for the:</p> <p>Import for processing and export</p> <ul style="list-style-type: none"> • Letter from Customs confirming the temporary admission; • Packing List; • Certificate Of Origin • Commercial Invoice(s) • Bank documents in case of a need to prove customs value; • Company Registration document: card and income tax identification number; • Transport documentation; • Certificates: depending upon the commodity; • Letter of Delegation (Power of Attorney) for the completion of the customs formalities verified by a Bank (Verify signature); • Permit: as needed; • Import card; <p><u>Export of Goods Outside Jordan</u></p> <ul style="list-style-type: none"> • Registration Card; • Export Form stamped by Ministry of Industry and Trade; • Permission if applicable; • EUR 1 for exports to a member state of the European Union; • Invoice; • Certificates from the relevant Ministry; • Export license (if required); • Power of Attorney for the completion of the required customs procedures from a broker; • Proof of Duty payment for wheat flour if exporting biscuits and bread products; <p><u>Re-export of Previously Imported Goods</u></p> <ul style="list-style-type: none"> • Copies of invoices; • Copy of Import Declaration; • Packing List; • Certificate of Origin • Letter to Customs regarding re-export for calibration or repair and that the part / item will re-enter Jordan as an import. <p><u>Placing goods in a Bonded Warehouse</u></p> <ul style="list-style-type: none"> • Declaration for the postponement of duties for the foreign component plus copy of the formula; • Registration Card; • Transportation documentation; 			
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	<ul style="list-style-type: none"> • Invoices; • Certificates; • Power of Attorney for the completion of the required customs procedures. <p>Do you have a reliable procedure and written instruction that ensures that you correctly complete all the necessary forms and documents for the entry for other import regimes for example:</p> <ul style="list-style-type: none"> • Processing of goods within the customs territory; • Processing of goods outside the customs territory; • Temporary export of goods; • Qualified Industrial Zone; • Bonded Warehouse; • Destruction of Goods; • Relinquishing of goods for the benefit of the state; • Re-import; • DDuty Free Shop. <p>Section B: Do you have a reliable procedure and written instruction that ensures that you correctly transform from one customs regime to another and that this is undertaken only with the approval of the Jordan Customs Department and with the procedures that are determined by the Director of Jordan Customs?</p>			
6	<p>Article 66:</p> <p>Section A: Do you have a reliable procedure and written instruction that ensures that you avoid having the customs declaration cancelled after the elapse of 15 days owing to reasons connected with the person that submitted the declaration?</p> <p>Section B: Do you have a reliable procedure and written instruction that ensures that you can cancel the declaration upon request to the Jordan Customs as long as duties and taxes have not been paid?</p> <p>Section C: Do you have a reliable procedure and written instruction that ensures that you are present during the inspection of the goods as a result of receiving written notice of the date of the inspection from Jordan Customs?</p>			
7	<p>Article 67:</p> <p>Do you have a reliable procedure and written instruction that ensures that you or your clients representative can examine the goods before presenting the declaration?</p> <p>Do you have a reliable procedure and written instruction that ensures that enables you to take samples of the goods and only after receiving the per mission of Jordan</p>			

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	Customs and that the samples are taken under direct supervision of Jordan Customs? Do you have a reliable procedure and written instruction that ensures that you pay duties and taxes for the samples?			
8	Article 68: Do you have a reliable procedure, written instruction and security measures and security facilities that stop people other than the goods owners and their representatives access to examine the customs declaration, with the exception of competent judicial and official authorities?			

Chapter Two

Inspection of Goods

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p>Article 69: Do you have a reliable procedure and written instruction that permits the inspection of the goods after the declaration has been submitted?</p> <p>Do you have a reliable procedure and written instruction that obtains and disseminate to all personnel concerned the inspection instructions of the Director of Jordan Customs?</p>			
2	<p>Article 70: Section A: Do you have a reliable procedure and written instruction that enables the customs inspection to be conducted at the customs zone and outside the customs zone?</p> <p>Do you have a reliable procedure and written instruction that enables the request for a customs inspection to be carried outside a customs zone and in accordance with the rules set by the Director of Jordan Customs?</p> <p>Section B: Do you have a reliable procedure and written instruction that ensures the cost / fee for the transfer of goods to the inspection post, their unpacking and re-packing and all other steps to be paid for by the person / party that presented the customs declaration?</p> <p>Section C: Do you have a reliable procedure and written instruction that ensures the goods in store or in other places set for inspection are not transferred without the prior approval of the Jordan Customs Department?</p> <p>Section D: Do you have a reliable procedure and written instruction that ensures the persons involved in the transfer of goods and who present them for inspection are acceptable to the Jordan Customs Department?</p> <p>Section E: Do you have a reliable procedure and written instruction plus security measures and physical security to stop the access of unauthorized persons entering the stores, warehouses, depots, shelters and yards where goods are stored, deposited</p>			

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	for inspection and that no one enters these areas and facilities without the prior approval of the Jordan Customs Department?			
3	<p>Article 71: Do you have a reliable procedure and written instruction to ensure that an inspection shall be carried out only in the presence of the person who presented the declaration or his representative in order that if a shortage is detected the responsibility can be defined?</p> <p>Section A: Do you have a reliable goods received / goods inwards procedure and written goods received note (GRN) to ensure that all goods and packages are received in a sound condition in order that shortages can be said to have occurred in the country of origin and as a result prosecution for the shortage is avoided?</p> <p>This requires a goods received record system that includes the GRN.</p> <p>Section B: Do you have a reliable goods received / goods inwards procedure that includes a written goods received record system and materials handling systems to enable goods and packages that are brought into the warehouse are checked for their condition and that in the event that goods and packages are received in an unsound condition you and the customs department and the transport operator shall record the condition in the delivery report, check the weight, contents and number?</p> <p>Do you have a reliable goods received / goods inwards procedure that includes a written goods received record system, materials storage system and facilities to secure the goods and packages preservation?</p> <p>Do you have a reliable materials storage system and facilities so that goods and packages that are received in an unsound condition do not contaminate other goods?</p> <p>Section C: Do you have a reliable goods received / goods inwards procedure that includes a written goods received record system, materials storage system and facilities to ensure that goods and packages received in a sound condition become suspect after entering the stores and warehouse are identified and that shortages and or replacement is recorded in the warehouse inventory record system, and that the shortage is confirmed with Jordan Customs?</p>			
4	Article 72:			

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	<p>Do you have a reliable goods inwards procedure that includes a written goods received record system and materials storage system and facilities to ensure that the Jordan Customs Department can open packages for inspection if Jordan Customs suspect the existence of prohibited goods or goods which contravene the contents of the customs documents?</p> <p>Do you have a reliable goods inwards procedure and written instruction that ensures that you or your representative receives notification of a customs inspection in order that you or your representative are present during the customs inspection?</p> <p>Do you have a reliable customs inspection procedure and written instruction that ensures that the customs inspection is undertaken by a committee and that a written report on the result of the inspection is received?</p>			
5	<p>Article 73: Do you have a reliable procedure and written instruction that ensures that you have a record of the authorized laboratories and analysts, used by Jordan Customs, that can check the kind of specification of the goods and their compliance with the legislation in force?</p>			
6	<p>Article 74: Do you have a reliable procedure and written instruction as to how you can appeal against the result of the analysis before a special committee as allowed under Article 80 of the Jordan Customs Law?</p>			
7	<p>Article 75: Section A: Do you have a reliable procedure and written instruction that ensures that you have a record of the legal provisions, special terms and specifications of goods that require an analysis or inspection, and a do you have a reliable procedure and written instruction that ensures that the analysis is undertaken?</p> <p>Section B: Do you have a reliable procedure and written instruction that ensures that you can release the goods prior to the appearance of the analysis result when the objective of the analysis is to determine the customs tariff and that the goods owner has paid the customs duties based on the highest tariff rate in trust until the appearance of the result?</p> <p>Section C: Do you have a reliable goods records procedure that includes a written goods record system that will provide written records of either the destruction of the goods in cases where the director of Jordan Custom decides that the analysis has</p>			

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	<p>proved the goods to be harmful or are not in conformity with the accepted specifications or to record the re-export of the goods and record the cost of destruction?</p> <p>Do you have a reliable goods records procedure that includes a written goods record system that will record (file) the written report of any destruction of goods?</p>			
8	<p>Article 76: Do you have a reliable records procedure that includes a written system that will ensure that duties are applied “ad valorem” on packaging of goods?</p> <p>Do you have a reliable procedure that includes a written system that will ensure that you obtain the director of Jordan Customs decision on the definition of fees and duties imposed on packaging with the provisions of the tariffs, reduced duties and exemptions?</p>			
9	<p>Article 77: Do you have a reliable procedure that includes a written system that will ensure that you produce any additional documents to corroborate the accuracy of the contents of the manifest and present them to Jordan Customs?</p>			
10	<p>Article 78: Do you have a reliable procedure that includes a written system that will ensure that you pay the fees and duties on the basis of the result of an analysis and to pay the fines imposed by Jordan Customs?</p>			
11	<p>Article 79: Do you have a reliable procedure that includes a written system that will ensure that the owner and customs can re-inspect the goods in accordance with the provisions of Articles 69-78 of the Jordan Customs Law?</p>			

Chapter Three

Disputes

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p>Article 80:</p> <p>Section A: Do you have a reliable procedure that includes a written system to ensure that you can manage, prepare documentation and conduct meetings with a special committee appointed by the Director of Jordan Customs for the purposes of examining disputes relating to the customs value, origin, characteristics or tariff classification of the goods?</p> <p>Section B: Do you have a reliable procedure that includes a written system to ensure that your personnel and your client is notified of a dispute with Jordan Customs and that the special committee may consult with experts and technicians?</p> <p>Section C: Do you have a reliable procedure that includes a written system to ensure that you receive the decision of the Director of Jordan Customs and that the decision is filed in your record system and that all your personnel, and your client is formally informed by you, of the decision?</p> <p>Section D: Do you have a reliable procedure that includes a written system to ensure that in cases when you decide to appeal that you lodge the appeal with the Jordan Customs Court within 15 days of the notification?</p> <p>Section E: Do you have a reliable procedure that includes a written system to ensure that the goods are released and delivered prior to the settlement of the dispute according to the conditions, procedures and guarantees specified by the director of Jordan Customs?</p> <p>Do you have a reliable procedure that includes a written system to ensure that the samples of the goods are kept with the Jordan Customs Department?</p> <p>Section F: Do you have a reliable procedure that includes a written system to ensure that the customs duties, other fees and taxes are paid for the goods under dispute as a deposit or a bank guarantee until the settling of the dispute?</p>			

Chapter Five

Payment of Duties and Taxes and Withdrawal of Goods

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p>Article 82:</p> <p>Section A: Do you have a reliable procedure that includes a written system to ensure that the goods are not released until after the completion of customs formalities and payment of duties and taxes?</p> <p>Section B: Do you have a reliable procedure that includes a written system to ensure that you pay the customs duties, other fees and taxes?</p> <p>Section C: Do you have a reliable procedure that includes a written system to ensure that the goods are withdrawn as per the provisions of the instructions issued by the Minister?</p>			
2	<p>Article 83:</p> <p>Do you have a reliable procedure that includes a written system to ensure that taxable persons may withdraw their goods before the final assessment of due duties and taxes against a bank or a cash guarantee and under the conditions and rules supplied by the director?</p>			
3	<p>Article 84:</p> <p>Section A: Do you have a reliable procedure that includes a written system to ensure that you manage and facilitate on your premises a customs examination of the commercial documents and data relating to the import of goods up to three months after the release of goods?</p> <p>Section B: Do you have a reliable procedure that includes a written system to ensure that you manage and facilitate the correction of the situation where there are cases of revising the declaration as a result of incorrect or incomplete information?</p>			
4	<p>Article 86:</p> <p>Do you have a reliable procedure that includes a written system to ensure that you obtain and retain in your record system a copy of the receipt for the payment of duties and taxes?</p>			

Chapter Five

Inward Processing

(Entry for Processing and Export)

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Article 133 Section A to D: Do you have a reliable procedure that includes a written system to ensure that the declaration and other documentation your goods are processed in accordance with the provisions according to the instructions issued by the Director for Jordan Customs?			
2	Article 134 Section A to B: Do you have a reliable procedure that includes a written system to ensure that when imported goods and those goods produced from the imported materials enter free circulation all legal conditions in force are observed?			

Chapter Six

Temporary Entry

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p>Article 135: Section A to C: Do you have a reliable procedure that includes a written system to ensure that goods entering under the temporary import regime are allowed for by the provisions of this Chapter of the Jordan Customs Law?</p> <p>Do you have a reliable procedure that includes a written system to ensure that temporary entry goods are placed in a Free Zone or are exported after the expiry of the delay period for their stay in Jordan: within three months?</p> <p>Note: Do you have copies of the Regulation for Temporary Entry for all personnel that are involved with the import transaction and process?</p>			
2	<p>Article 136: Do you have a reliable procedure that includes a written system to ensure cars are imported correctly for the users that are listed in this Article and in accordance with the terms determined by the Director for Jordan Customs?</p>			
3	<p>Article 143: Do you have a reliable procedure that includes a written system to ensure that you obtain the latest terms for the temporary import of cars as determined by the Director for Jordan Customs?</p>			

Chapter Five

Returned Goods

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Article 157 Section A to D: Do you have a reliable procedure that includes a written system to ensure that your goods can be exempted from customs duties, fees and taxes, and that you have the correct documentation to prove their origin and temporary export? Section E: Do you have a reliable procedure that includes a written system to ensure that you obtain the latest instructions regarding returned good that are determined by the Director for Jordan Customs?			

Chapter Six

Various Exemptions

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Article 158 Section A to I: Do you have a reliable procedure that includes a written system to ensure that the list of articles exempted from customs duties, fees and taxes are known by your personnel and by the personnel of your clients?			

Title Twelve

Chapter One: Customs Territory

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Article 176: Do you have a reliable procedure that includes a written system to ensure that specified prohibited goods, goods subject to Sumptuary duties and other goods determined by the Minister through a decision published in the Official Gazette shall be subject to the provisions of the customs territory even if the goods are outside the customs territory?			
2	Article 177 Section A to C: Do you have a reliable procedure that includes a written system to ensure that goods subject to Article 176 of the Jordan Customs Law are transferred and recorded according to the conditions determined by the Director of Jordan Customs?			
3	Article 178: Do you have a reliable procedure that includes a written system to ensure that you do not possess or transfer goods in breach of the provisions of the Article?			

Jordan-US Free Trade Agreement

Imports from the U.S.

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Do you have a reliable procedure that includes a written system to ensure that you calculate the correct level of customs duties: <ul style="list-style-type: none"> • Level between 17% and a maximum of 30% • 10% for raw materials? • Other taxes: 7% to 45% 			
2	Do you have a reliable procedure that includes a written system to ensure that you check: <ul style="list-style-type: none"> • Substantial transformation; • Local content provisions; • Direct shipment? 			
3	Do you have a reliable procedure that includes a written system to ensure you check the			

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	registration/filing of the export declaration (SED)?			
4	Do you have a reliable procedure that includes a written system to ensure you check the: <ul style="list-style-type: none"> • Invoice(s); • Certificate of Origin; • Bill of Lading; • AWB; • Packing List; • Other documents including relevant permits, etc. 			
5	Do you have a reliable procedure that includes a written system to ensure you check the Rules of Origin that are provided for in the FTA? Please see: www.usaembassy-amman.org.jo/fta/fta.html			
6	Do you have a reliable procedure that includes a written system to ensure you check what information is required in support of a GSP?			

Supply Chain Security validation process guidelines

Based upon C-TPAT and World Customs Organisation (WCO) Supply Chain Security and Facilitation and the Advance Cargo Information Guidelines.

The recommendations are not mandatory for C-TPAT participation, but they may be helpful in the self assessment and customs assessment inspection.

Objectives

Develop and implement a sound plan to enhance security procedures throughout your supply chain. Where your company as an importer does not control a facility, conveyance or process subject to these recommendations, the importer agrees to make every reasonable effort to secure compliance by the responsible party. The following are general recommendations that should be followed on a case-by-case basis depending on the company's size and structure and may not be applicable to all.

Procedural Security

Procedural security assures recorded and verifiable location of goods in the supply chain. Procedures should provide for the security of goods throughout the supply chain. Contingent procedures should be included within the scope of procedural security.

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Does your company have reliable procedures and a written system in place to protect against non manifested material being introduced into the supply chain?			
2	Does your company have reliable procedures and a written system to ensure your supply chain has			

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	<p>security controls that include:</p> <ul style="list-style-type: none"> • the recorded and verified introduction/removal of cargo that is supervised by a designated company official and / or authorized representative: broker, transport operator, clearance agent? • the proper marking, • weighing, • counting and documenting of cargo/cargo equipment verified against manifest documents, • the detecting/reporting of shortages/overages, and • the detecting of irregularity or illegal activities, • procedures for verifying seals on containers, trailers, and railcars? 			
3	Does your company have reliable procedures and a written system to ensure that the incoming and outgoing of goods is supervised and monitored?			
4	Does your company have reliable procedures and a written system to ensure that random, unannounced security assessments of areas in your company's control within the supply chain are conducted?			
5	Does your company have reliable procedures and a written system to ensure that the procedures for notifying Customs and other law enforcement agencies in cases where anomalies or illegal activities are detected, or suspected, by the company are in place?			
6	Does your company have reliable procedures and a written system to ensure that your company Facility/Terminal operators have written and verifiable security procedures in place with regards to areas under your company control?			
7	Does your company have an integrated computer information exchange system (Connectivity and share) with your suppliers, freight forwarder (Supply chain participants) and your company sections and divisions that are involved with your import transaction and physical movement of your goods and consignments?			
8	Does your company computer system allow the connectivity to exchange sufficient quality information that has the required detail to record in-transit visibility and exception reporting and product identification for each consignment / container in real time (Tracking using spreadsheets and faxes are not sufficient)?			
9	Does your company have a real time computer information collection and connection system that engages with your supply chain partners who have different technical capabilities, and data message integrity that can offset human errors and foster product identification?			

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10	Is your company computer system sophisticated enough to record container opening, tampering and other dock to dock tracking visibility?			
11	Is your company computer system sophisticated enough to inform you where a shipment is supposed to be and if delivery is ahead or behind schedule, wrong direction, radiation, seawater or chemical problem, temperature change beyond tolerance levels, as well as other client specific information and consequently produces an exception report (Your transportation agent or freight forwarder may have this type of system capability)?			
12	Does your computer system or the computer system of your transportation operator / agent and freight forwarder have the capability to produce a complete audit trail of where the container has traveled and when and where exceptions have been generated, detection capture, communication of breeches in real time and that exceptions generate real time notification to you via e-mail, pager or XML/EDI transactions?			
13	Does your company transportation operator and or freight forwarder use detection devices that are attached in such a way that a thief cannot breach the container without generating an exception, even if the container door is removed completely?			
14	Does your company have reliable procedures and a written system to ensure that your company properly stores empty and full containers to prevent unauthorized access, including the use of tamper-proof / non-counterfeitable seals?			
15	Does your company have reliable procedures and a written system to ensure that your company checks empty containers received for storage or loading to ensure its structure has not been modified?			
16	Does your company have reliable procedures and a written system to ensure that affixing, recording, tracking, and verifying tamper-proof / non-counterfeitable seals on containers, trailers and railcars?			
17	Does your company have reliable procedures and a written system to ensure that seals are not used in strict numeric sequence and that seals are not registered and controlled by a single person?			
18	Does your company have reliable procedures and a written system to ensure that your company verifies the identity and authority of the carrier requesting delivery of cargo prior to cargo release?			
19	Does your company have reliable procedures and a written system to ensure that your company employees notify Jordan Customs and other law enforcement agencies of suspected illegal activities?			
20	Does your company have reliable procedures and a			

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	written system to ensure that your company carries out random and unannounced security assessments?			
21	Does your company have reliable procedures and a written system to ensure that your company employees inspect persons and packages?			
22	Does your company have reliable procedures and a written system to ensure that your company has and carries out additional security procedures for high value and high risk goods?			

Physical Security:

Physical security includes security measures that monitor and control the facility’s exterior and interior perimeters. This will include Mail Service Security, Lock and Key Control, and Perimeter and Interior Alarms.

Recommended features to be installed as appropriate:

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Are all of your company buildings and rail yards constructed of materials that resist unlawful entry and have protection from outside intrusion?			
2	Do your company buildings and offices have physical security that includes: <ul style="list-style-type: none"> • perimeter fences, locking devices (International standard) on reinforced external and internal doors; • windows with mesh, metal bars; • International standard locking devices on external and internal doors, windows, gates and fences. Exterior doors and windows must be equipped with alarms; • perimeter fences and interior fencing, • gates and gatehouses; • adequate lighting inside and lighting outside the facility that includes CCTV; • electronic security systems that include theft alarm systems and alarmed access control systems; • have the segregation and marking of international, domestic, high-value, and dangerous goods cargo within the warehouse by a safe, caged or otherwise fenced-in area; • Large dual language signage: that display and instruct direction, health and safety and restricted areas? 			
3	Does your company plan and implement a			

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	maintenance program that comprises regular scheduled inspections to keep fencing, gates, lights and cameras in good condition and working order (maintain the integrity of security measures)?			
4	Does your company have a reliable procedure and a written system that ensures your company has implemented controls to stop the theft of goods, vehicles and company documents?			
5	Does your company have a reliable procedure to undertake random inspections and “walk throughs” to inspect and check all physical security measures and facilities?			
6	Does your company have emergency lighting / power systems for key operational areas and high value cargo areas?			

Recommended procedures to be implemented as appropriate:

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Depending upon the company size a security company may be required to undertake some of the physical security duties and measures?			
2	Gates or doors through which vehicles and personnel enter or exit should be manned or under observation by management or security personnel			
3	Access to employee vehicle parking must be controlled			
4	Employee vehicle parking must be in a separate area from visitor parking			
5	Private passenger vehicles must be prohibited from parking in cargo areas or immediately adjacent to cargo storage and office buildings			
6	Lock and key control including signing in and out of high risk areas			
7	Restrict access to document and cargo storage areas			

Access Controls:

Access controls prohibit unauthorized access to facilities, vehicles, loading and unloading equipment, vessels, aircraft, shipping, loading docks, break bulk areas and cargo areas. If, access control is not possible increased precautions in other security aspects is needed.

Recommended procedures to be conducted as appropriate:

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No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Do you have reliable procedures and physical facilities that stops non-authorized persons access to company facilities and conveyances, and that positively identifies, records and tracks all employees, contractors, visitors and suppliers?			
2	Do you have procedures and physical access controls that include positive identification of all employees, visitors, and vendors, that includes check in and check outs and labeling?			
3	Do you have procedures and physical access controls that trigger an alarm when visitors attempt to enter an unauthorized area?			
4	Do you have procedures and written instructions for all employees which results in your employees and guards safely challenging unauthorized/unidentified persons and removing unauthorized/unidentified persons?			
5	<p>Does your company control and monitor the parking of all vehicles around the companies offices and port/terminal buildings that include segregation and restricted areas access?</p> <p>Does your company vehicle parking procedure and control system include the authorization by an adequate gate/pass and/or decal system?</p> <p>Does your company have a procedure that ensures vehicle parking for office employees, terminal/warehouse (facility) workers and visitors are physically segregated and restricted to designated areas?</p>			
6	Do you have procedures, written instructions and trained personnel that ensures vehicles are inspected before they enter operation facilities?			
7	Do you have procedures, written instructions and trained personnel that ensures you control the time individuals have access to facilities?			
8	Do you have procedures, written instructions that ensures you display large dual language maps of restricted areas within the view of all employees and visitors?			

Personnel Security:

Personnel security is concerned with the screening of employees and prospective employees, as appropriate and as allowed for by law.

Recommended procedures to be conducted as appropriate:

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Do you have a written procedure that ensures you conduct employment screening and interviewing of prospective employees?			
2	Do you have a written procedure that ensures you conduct periodic background checks and resume / application verifications?			
3	Do you a written procedure that ensures your verify job application information?			
4	Do you have a written procedure that ensures you contact references?			
5	Do you have a written procedure that ensures you review the skill requirements for key positions?			
6	Do you have a written procedure that ensures you align job skill requirements with individual skills?			
7	Do you have a written procedure that ensures you check the background and corporate structure of independent contractors?			
8	Do you have a written procedure that ensures you conduct drug testing (as allowed for by law): <ul style="list-style-type: none"> • Before hiring; • Random periodic testing; • At times of reasonable suspicion? 			
9	Do you have a written procedure that ensures you implement different color ID cards to employees that designate access privileges?			
10	Do you have a written procedure that ensures you implement gate passes to vehicle drivers and other carriers to control and identify those authorized to enter the facility?			
11	Do you have a written procedure that ensures you issue to employees different color uniforms for each sensitive area?			
12	Do you have a written procedure that ensures you issue different color uniforms for your security staff?			
13	Does your company have an authorized and responsible senior company manager and or director that is responsible for company security plans and for the implementation of security measures and procedures?			
14	Does your senior company manager and or director			

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	responsible for security have the authority to announce a security threat level on the company property and to company employees?			
15	Does the company person responsible for security have the authority to undertake a Security Assessment (Risk analysis) and as a result of the Security Assessment implement a Security Plan that includes various controls and compliance measures?			
16	Does the company have an Internal Code of Conduct that is a part of the employees contract of employment?			
17	Does your company Internal Code of Conduct include a written system and procedure for the reporting / disclosure to management of any problems and issues that relate to personnel security and to the security of facilities, goods and documents?			

Education and Training Awareness:

Education, training and awareness encompass education and training of personnel regarding security policies, encouraging alertness for deviations from those policies and knowing what actions to take in response to security lapses.

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Do you have a written procedure that ensures you communicate security policies and standards to employees, including consequences of noncompliance?			
2	Do you conduct a security awareness program for all employees that includes the recognition of internal conspiracies, maintaining cargo integrity, and determining and addressing (solving) unauthorized access?			
3	Does your security awareness programs provide for incentives for active employee participation in security controls? The security education and training awareness programs must encourage active employee participation in security controls.			
4	Does your security awareness program includes the use of press releases, e-mail distribution lists and bulletin boards?			
5	Does your company have a reliable process by which you search for and obtain new supply chain security information?			

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	<p>For example: World Customs Organization (WCO) initiatives and programs: Convention and commentary on Mutual Administrative Assistance in Customs Matters, WCO Data Model and the list of essential data elements required for the identification of high risk consignments, International Customs guidelines on advance cargo information, etc.</p>			
6	<p>Does your company partake in Jordan Customs and Port plans and programs to introduce and implement or enhance the Port Facility Security Plan (PFSP)?</p>			
7	<p>Does your company have a copy of the International Ship and Port Facility Security Code (ISPS) and copies of other security measures adopted by the International Maritime Organization (IMO)?</p> <p>Does your company have a reliable procedure to obtain new measures to the ISPS Code?</p> <p>Does your company have a reliable procedure that obtains the new measures to the ISPS Code in order that it is aware of the repercussions that ships might face after 1 July 2004 if they are found not to be in compliance with the requirements of that regulation and Section A/9.81 of the ISPS Code?</p> <p>The repercussions to ports should also be assessed. Requirements for port facilities include:</p> <ul style="list-style-type: none"> • Monitoring and controlling access; • Monitoring the activities of people and cargo; • Ensuring security communications are readily available. 			
8	<p>Does your company have a copy of the International Labor Organization (ILO) and IMO Code of Practice on Security in Ports?</p> <p>Does your company have a reliable procedure to obtain and circulate to all your relevant company new measures to enhance maritime security to the ISPS Code?</p>			
9	<p>Does your company have a copy of the Safety of Life at Sea Convention (SOLAS), with attention to SOLAS regulation X1-2/9 on “Control and compliance measures”?</p> <p>Does your company have a reliable procedure to obtain and circulate to all your relevant company personnel a copy of the new SOLAS measures (New Chapter X1-2) that enter into force on 1 July</p>			

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	2004?			
10	Does the company education and awareness training include hands on training for all company employees to recognize and address potentially dangerous items during packing, loading and unloading process?			

Conveyance Security:

Conveyance security provides protection against the introduction of unauthorized personnel and material into the supply chain, including the areas between the links of the supply chain.

Recommended procedures to be conducted as appropriate:

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Does your company have a reliable procedure and written system that ensures there is protection in your transportation system that protects it from the introduction of unauthorized personnel and material?			
2	Does your company have a reliable procedure and written system that ensures that the security procedure includes the physical search of all: <ul style="list-style-type: none"> • readily accessible areas, the securing of internal/external compartments and panels, and • procedures for reporting cases in which unauthorized personnel, non manifested materials, or signs of tampering, are discovered. 			
3	Does your company have reliable procedures and a written system that is implemented and consequently it physically controls and monitors all cargo transfer operations within your company facilities / terminal?			
4	Does your company have a reliable procedure and a written agreement with suppliers and transportation and freight forwarders to ensure that they establish and implement procedures to guard against the packing and loading of goods of unknown articles and materials? <ul style="list-style-type: none"> • Supervised loading and unloading of all goods; • Proper sealing, marking, and counting of goods and packages and boxes loaded into containers; • The correct documentation for the goods that are loaded into the container must be sent in advance to Jordan; 			

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	<ul style="list-style-type: none"> Approved procedures for affixing, recording, tracking and verifying seals on containers and trailers are in place. 			
5	Does your company have a reliable procedure and a written system that ensures your company uses where necessary C-TPAT High Security Compliant Bolt Seals and C-TPAT compliant Heavy Duty Bolt Locks on containers?			
6	Use tamper-proof / non-counterfeitable seals or electronic seals to secure conveyance.			
7	If cost effective, use transponders to facilitate continual tracking of conveyances.			
8	Use automatic electronic transmittal of “smart-card” data to Customs if available.			
9	Use “smart-card” technology containing vehicle, consignment and driver information where automated border crossings are in place.			
10	Consider cost and future standardization issues related to the use of smart cards, electronic seals and transponders.			
11	Stay informed regarding development of standards and requirements regarding smart cards, electronic seals and transponders by World Customs Organization, International Maritime Organization and International Standards Organization, etc.			

Service Provider Requirements: forwarders and operative sub contractors

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Does your company have reliable procedures and a written system that is implemented to ensure that plant, equipment and vehicles brought by suppliers and sub-contractor plant and equipment into your company facilities and buildings and onto your company property is assessed and physically inspected for security?			
2	Does your company have reliable procedures and a written system that is implemented to ensure quality control records and procedures on production processes maintain system integrity?			
3	Does your company have reliable procedures and a written system that is implemented to ensure that financial assessments are implemented to determine the service providers fiscal soundness and ability to deliver goods and services within contract obligations?			
4	Does your company have reliable procedures and a written system that is implemented to ensure internal controls are implemented for the selection			

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	of service providers?			
5	Does your company have reliable procedures and a written system that is implemented to ensure profiles of your main suppliers who are receiving and packing finished commodities and equipment are maintained and available for review?			
6	Does your company have reliable procedures and a written system that is implemented to ensure those service providers with whom your company is contracted are participants in: <ul style="list-style-type: none"> • Jordan Golden List; • Customs Trade Partnership Against Terrorism (C TPAT); • Jordan Customs Industry Partnership programs, and; • Jordan Anti Smuggling program;Etc. 			

Trading and Transportation Operator Security

Trading partner security extends supply chain security to your suppliers and customers. Communication, assessment, training and improvement are key components.

Recommended procedures to be conducted as appropriate:

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Do you check the integrity of your international transport operator?			
2	Do you have a procedure and a methodology to check your international transportation operator? For example, is your transportation operator compliant with the Container Security Initiative (CSI) and with the Customs-Trade Partnership Against Terrorism (C-TPAT) Guidelines, etc?			
3	Do you check if your transport operator is in full compliance with the laws and regulations of Jordan? <ul style="list-style-type: none"> • Business documents: registration, license, driver licenses, qualifications, Tax and Sales Tax certificates, etc; • TIR Carnet; • Certificate of vehicle compliance? 			
4	Do you encourage your trading partners and suppliers and contractors to assess and enhance, if required, their supply chain security?			
5	Do you request written security agreements with trading partners/suppliers/contractors to include controls such as:			

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	<ul style="list-style-type: none"> • Tamper-proof/non-counterfeitable seals; • Signatures; • Time controls; • Agreed means of communication? 			
6	Do you document mutual supply chain security policies?			
7	Do you have extensive exchange of information between trading partners/suppliers/contractors?			
8	Do you advise Customs and foreign authorities of security agreements with trading partners?			
9	Do you have or receive education, training and awareness of security aspects of the supply chain from trading partners?			
10	Do you if possible include equivalent security provisions as a condition of contract for contractors/suppliers providing services?			

Internal Company Record Keeping System

Does your company have an established internal record keeping system, a Quality Management System, and or a compliance guidebook, that ensures that all documents related to your import transaction and import processing documents are correct and stored (3 years)?

Customs require hard copies of all documents. Therefore, does your company have all hard copies or does it hold some documents on a computer software system, such as SAP, or as part of a company private exchange system such as Cisco's e Hub, etc?

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p>Does your company Quality Management System have an internal record keeping system to meet the following criteria?</p> <p>The term "records" means any information made or normally kept in the ordinary course of business which pertains to the following activities:</p> <ul style="list-style-type: none"> • Accounts: Record of Reconciliation, receipts, payment documents, VAT payments, etc • Warehouse documents: delivery notes, goods received notes, inventory lists, record of deliveries, etc • any importation, declaration or entry; • the transportation or storage of merchandise carried or held under guarantee into or from the customs territory of your country and the other countries that you operate in; • the filing of a drawback claim (re-export), etc; • the collection and payment of fees, duties and taxes to Customs; • any other activity required to be undertaken 			

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	<p>pursuant to laws or regulations administered by Customs, such as transfer pricing and expert independent inspection, etc;</p> <p>The term “records” includes any information required for the entry of merchandise and other information pertaining to or from which is derived, any information element set forth in a collection of information required by the Customs Law in connection with an activity described above. The term includes, but is not limited to:</p> <ul style="list-style-type: none"> • statements, declarations, documents; • electronically generated or machine readable data; • electronically stored or transmitted information or data; • books, papers, correspondence; • accounts, financial accounting data • technical data; • computer programs necessary to retrieve information in a usable form; • file of drawback claims; • transport or warehouse / store merchandise documents held in bond. <p>Or, documents that are required by law to be stored.</p>			
2	Do you have a lockable secure storage place for your records?			
3	Are your records indexed in a retrievable fashion?			
4	Have you established a reliable destruction cycle to prevent the premature destruction of required records; and do you have the right documentation that allows you to dispose of and proves that you have disposed of documents that are more than 3 years old?			
5	Do you have a responsible person assigned as your custodian of records; Chief Accountant or an Inventory Accountant, etc?			
6	Do you have a compliance improvement plan framework?			
7	Do you have a reliable procedure and a written system that ensures all of your company section / division personnel retain and store original and or electronic documents for each import transaction?			
8	Does your company have a record of paying penalties for not keeping documents for the prescribed minimum of three years in Jordan?			
9	Does your company have a procedure and a written			

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	<p>requirement as an instruction to all company personnel, and a document archive facility to keep and store the following list of documents:</p> <ul style="list-style-type: none"> • Air way bill; • Bill of lading; • Carries certificate; • Declaration of entry; • Power of Attorney; • Consolidated shipments authority: if this procedure is used; • Packing list; • Bond information; • Vessel, vehicle or air manifest; • Certificates of Origin; <p>There are other documents that are relevant for specific commodities and transport modes, etc., that need to be retained.</p>			
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Documentation and Information Processing Security

Documentation processing security, both electronic and manual, assures that information is legible and protected against the loss of data or introduction of erroneous information.

Recommended procedures to be conducted as appropriate:

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Do you have a written procedure that ensures you safeguard computer access and information?			
2	Do you have a written procedure that ensures you control access to information systems, both by level of job responsibility?			
3	Do you have physical security in computer areas?			
4	Do you have written procedures that ensure you monitor employee use of data systems?			
5	Do you have written procedures that you have processes to backup computer system data?			
6	Do you have a written procedure that ensures you record the amount of cargo by packing unit type, packing conditions, and security seal stamps. Furthermore, you your procedures that discrepancies are recorded with a note, photograph and scale weight records?			
7	Do you have a written procedure that ensures you obtain signatures for all process checkpoints (e.g., document preparation, when seals are applied/broken, vehicle inspection, opening the vault, cargo delivery, cargo receipt, counting			

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	unshipped pieces, etc.)?)			
8	Do you have a written procedure that ensures you fix times for the preparation of documents, and for the shipping and unshipping of cargoes?			
9	Do you have a written procedure that ensures you use special control procedures to prepare emergency / last minute shipments and if necessary notify authorities regarding such shipments?			
10	Do you have a written procedure that ensures your software system registers transactions and supports operations, and if possible make a follow up of the activities that it handles?			
11	Do you have a written procedure that ensures you record the entrance and exit time of people receiving and delivering goods?			
12	Do you have a written procedure that ensures you document significant process delays?			
13	Manifest security: Do you have a written procedure that ensures your manifests are complete, legible, accurate, and submitted within the prescribed time period in compliance with the Jordan Customs Law?			
14	Does your company have reliable procedures and a written system that ensures the security of all electronic assets, including advising employees of the need to protect passwords and computer access?			
15	Does your company have reliable procedures and a written system that ensures measures are taken to secure sensitive information in order to prevent the loss or unauthorized use of such information?			

Future automated data exchange and authorized supply chain related procedures:

1	Establish electronic customs reporting systems based upon World Customs Organization Customs Data Model and the Unique Consignment Reference (UCR)?			
2	Establish advance manifest reporting systems?			
3	Advance lodgement of data			
4	The single window system			
5	Risk Management			
6	Authorization			
7	Customs mutual assistance arrangements			

Internal finance and accountancy controls

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Does your company have a reliable procedure and a written system that ensures you obtain and maintain a record of all new finance and accountancy laws, regulations and guidelines a copy of which is each provided to each member of your staff that is involved with transactions and record keeping?			
2	Do you maintain an original document and electronic document audit trail from procurement, accountancy, goods received, warehousing and to payments in your company?			
3	<p>Are the financial and accountancy control systems in your company consistent with and compliant with the Financial Audit and Certified Public Accountancy that are legally enforced in Jordan?</p> <p>Do the audit measures cover:</p> <ul style="list-style-type: none"> • Control environment; • Risk assessment; • Control activities; • Information and communication, and; • Monitoring? 			
4	Does your company have a written system that ensures that you implement reliable control procedures in the company sections and or divisions and subsidiaries that participate or effect the importation of goods?			
5	Has your company identified financial and accountancy risks that are related to your import operations and procedures?			
6	Does your company have a reliable procedure and a written system that ensures you correct compliance deficiencies?			
7	<p>Does your company have a reliable procedure and a written system that ensures you plan and perform periodic testing and assessment in the company operations and divisions that have an effect on imported goods?</p> <p>Does the procedure include a minimum annual review of the significant risk areas?</p>			
8	Does your company have a reliable procedure and a written system that ensures you hold interdepartmental meetings to discuss and coordinate changes to your financial and accountancy internal control systems when the tests and assessments or other information show a need for compliance improvement?			

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9	Does your company have an authorized and responsible person that can initiate appropriate disclosure of financial and accountancy?			
10	Does your company have a reliable procedure and a written system that ensures you have an internal control process that document and retain all the tests and assessments?			
11	Does your company have a reliable procedure and a written system that ensures you retain and store for three years all the test and assessment documents?			

Can all the specific procedures and written systems be made available to Jordan Customs in a verifiable format at an identified location?

Identifying perceived weaknesses in security and compliance will not necessarily prohibit participation in the Jordan Customs “Golden List” program. Jordan Customs is committed to working with the trade community to identify effective corrections and adjustments to a company process that will result in a more secure supply chain operation. Meeting the objectives can be helped by your company implementing responsibility of self assessment and a Jordan Customs Risk Management Department assessment.

Appendix 2: Export

Guide

The questions in the checklist are a guide to allow JCD and Golden List candidate companies to determine if the applicant is ready to assume the responsibilities of self-assessment. The check list questions are designed to determine if the Jordan company has made a commitment to implement specific actions (internal procedures and controls) that will enhance compliance. A Jordan company that does not have procedures and controls in place may answer that it plans to develop and implement procedures and controls and specify a target date for implementation.

Response Yes or No

A respond yes or no in this column indicates whether a Jordan company has implemented procedures and controls response to the question. If, a Jordan company has adequate procedures and controls that it believes document that the company is ready to assume the responsibility of self-assessment, the Jordan company can answer yes to the question. If, the Jordan company does not have adequate procedures and controls, whether they are generally adequate or need significant improvement, the Jordan company can answer no under this column and indicate in the next column that it plans to implement procedures that will be adequate for the company to assume responsibility of self-assessment.

If No, Plan to implement or improve (yes or no)

If, the Jordan company indicated “no” under the previous column, the Jordan company can respond yes or no in this column to indicate whether it plans to implement or improve procedures and controls. Whether the Jordan company procedures and controls are generally adequate but need small improvements, or need significant improvements, we recommend the JCD accept the company into the Golden List under certain conditions. The company must commit to making the necessary improvements and demonstrates that the steps are in process. If, the Jordan company agrees to make needed improvements the company should respond yes in this column. The JCD must periodically monitor the improvement process. Failure to follow through would then result in removal from the Golden List. If, the Jordan company does not have or plan to have these procedures and controls Jordan Customs Risk Management Directorate will need to consult with the company to ascertain their readiness to assume responsibility of self assessment. Shipments associated with non-participants in the Golden List Program will be subject to other risk assessment factors.

Target date

If, the Jordan company indicates that it is going to implement procedures and controls under this column, it should provide the target date to have the procedures and controls implemented and working in this column by the target date.

EXTERNAL EXPERT

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Have you contracted in accordance to the Articles, described in several laws that govern contracts with a licensed clearing agent in the Hashemite Kingdom of Jordan to ensure that your company is in compliance with the Jordan Customs Law, Customs Regulations and with the Law on Import and Export?			
2	Have you contracted with a legal company or other customs expertise in order to undertake customs due diligence in Jordan and as a result of the expert advice establish a customs procedure for the export of your commodities, materials, equipment and spare parts, etc?			
3	<p>What steps have you taken to ensure the quality of your licensed freight forwarder?</p> <ul style="list-style-type: none"> • Checked the freight forwarder registration for validity? • Quality Management System, i.e., ISO 9000, registration? • Checked if you have a valid Letter of Delegation (Power of Authority) for the freight forwarder; signed by the authorized company representative as per the notarized company Charter and Registration documents? • Checked the freight forwarder internal quality system and procedures? • Checked the professional qualifications of the personnel employed by the freight forwarder; does the forwarder have personnel that will ensure that your exports comply with the requirements of the Customs Law and with the Import and Export Law of Jordan? • Checked if your freight forwarder is a current member of the Jordan Shipping Association? • Checked if the freight forwarder is included in a list of forwarders, kept by Jordan Customs Department, that have been penalized as a result of an infringement of the Jordan Customs Law⁴? 			
4	Do you have a person in your company that is knowledgeable of the customs law and customs export procedures and who is assigned to review and check the documentation and customs export			

⁴ *Fines and penalties*

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	process by your freight forwarder to ensure that it is full, complete and accurate?			
5	If your documentation was prepared outside your own organization, do you have a reliable system, or check list, in place to insure that you receive copies of the information as submitted to Customs and your clients; that it is reviewed for accuracy, missing documents and pages, and that originals are in the packet of documents where these are required in place of photo copies, etc., and in the event of mistakes and or missing documents that you disclose to Customs in a timely manner the need for corrections (<i>No disclosure system and provisions exist in Jordan. There is a need for an enabling law and regulations to permit disclosure</i>)?			

Internal Company Customs Expert

If you are not contracted with and using a freight forwarder have you taken the following steps?

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p>Does your company have an internal export / customs and international transport expert (Shipping Manager)?</p> <ul style="list-style-type: none"> • What steps have you taken to verify the training, technical expertise and security of trade and facilities requirements, etc., with your customs person: a certificate as an export expert issued by a customs brokers school or who has qualified by virtue of passing out of the Jordan Customs Training School? • Is the training certificate renewed annually after a recognized and attested training course, and is the certificate issued if the person has incorporated changes to customs laws and regulations? • Are the training certificates filed in the Personnel files as per the Labor Law for Jordan? 			
2	<ul style="list-style-type: none"> • Do you have on file a complete and current copy of the Customs Law and Regulations and all relevant Customs Regulations pertaining to the commodity, materials, equipment and or spare parts that your company is exporting (Article 9), for example: - • Copy of the Law on Import and Export? • Copy of the Income Tax and • Sales Tax Law for Jordan? • Customs Decision regarding prohibited goods? 			

	<ul style="list-style-type: none"> • Convention International Transport of Endangered Species (CITES)? • Regulations on hazardous and dangerous goods and ADR? • Freight Transport Law for Jordan? • FIATA Regulations? • Harmonized System Convention? • Investment Promotion Law and Regulations? • Notarized contract with the Government as a Foreign Investor? • Vehicle axle weight laws and regulations? • Railway Regulations, Tariffs and dimensions for large loads? • Preferential customs duties (Jordan Customs Law Article 11 and 12): copies of Regional Trade Agreements: Jordan-European Union Association Agreement; Jordan European Free Trade Association Agreement (EFTA); Greater Arab Free Trade Area? • Preferential customs duties (Article 11-12): Copies of the Jordan-Singapore Free Trade Agreement? • Preferential customs duties (Articles 11 and 12): Copies of Bi Lateral Trade Agreements: Jordan-US Free Trade Agreement; Egypt; Algeria; Libya; Syria, Kuwait, Bahrain, Turkey; Iran; Pakistan; Sri Lanka; Brunei; Azerbaijan; Taiwan; Nepal; Japan; India; China? • Copies of Bilateral Commercial Agreements: Canada, Mexico, Cuba, Brazil, Uruguay, Chile, Morocco, Tunisia, Sudan, Ethiopia, Cameroon, Botswana, South Africa, Mauritania, Sierra Leone, Somalia, Nigeria, Djibouti, Ivory Coast, Palestinian National Authority, Israel, Lebanon, Yemen, Oman, Iraq (Oil for Food), United Arab Emirates, Saudi Arabia, Qatar, Australia, Indonesia, Philippines, Malaysia, North Korea, Singapore, Armenia, South Korea, Afghanistan, Thailand, Uzbekistan, Vietnam, Cyprus, Moldavia, Bosnia, Yugoslavia, Poland, Romania, Bulgaria, Malta, Slovak Republic, Ukraine, Russia, Hungary, Czech Republic and Croatia • Copies of ratified international conventions: TIR, AETR, Container, Multi Modal, Passenger Vehicles, and ADR • Copy of the TIR Guidebook? • Copy of the European Union and Jordan Free Trade Association Rules of Origin, and EUR1? • Copy of the Import and Export Law published by the Jordan Ministry of Industry and Trade? • Copy of the Law On Company published by Jordan Ministry of Industry and Trade; 			
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	<ul style="list-style-type: none"> • Copy of the Phyto Sanitary Regulations administered by the Ministry of Agriculture, Ministry of Health and JISM? • Regulations for the import and export and transit of scrap metal? • Copies of current transit protection measures? • Copy of the Central Bank Law and Central Bank Regulations of Jordan? • Copy of the Jordan Intellectual Property Rights Laws and instructions and the TRIPS Agreement (ref parallel trade and counterfeit goods)? • Instructions governing the export and import of heating, asphalt, fuels and raw materials from the Ministry of Power? • Instructions and permission rules for the import of frozen chicken? • Copy of the Jordan Customs Instructions providing for the licensing, operations, equipment and procedures of a Bonded storage warehouse? 			
3	Do you have a procedure in place to verify that you are current and up to date on all applicable changes in the Customs Laws and Regulations?			
4	<p>Do you subscribe to professional journals that include information and news concerning new and amended customs, tax and accountancy laws and regulations?</p> <ul style="list-style-type: none"> • Do you have a system to disseminate copies of changes to export legislation to all company personnel that are involved with the export transaction? 			
5	Do you have a procedure to identify smuggling? (Article 20)			

(Note: If you are not using an external expert we strongly recommend that you review the Due Diligence model for Freight Forwarders and Transportation Operator and apply the check list as part of your internal company procedure and as an extension of your supply chain security)

Internal Reviews

The criteria listed below are the recommended best practices for all exporters whether using an external expert or not. In many cases meeting the criteria for the following procedures will be covered by contractual agreement with your external expert. However, internal compliance steps are also recommended.

Merchandise Description

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Do you have a reliable procurement and supply chain management procedure or program to ensure that you know what you have produced and that your manufactured item is composed of parts that you can substantiate the origin?			

Licensing & Certification

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Have you taken measures or developed reliable procedures to ensure that your merchandise complies with other agency requirements prior to export <ul style="list-style-type: none">• Obtained original Jordan JISM Standard Certificates even though the goods and or equipment has a foreign Standards Certificate and analysis report?• Obtained and checked, where applicable an original copy of the relevant inspection and certification from an authorized agency in Jordan?			

COMPLIANCE WITH THE JORDAN CUSTOMS LAW

Chapter Two: Country of Origin

Have you taken reliable measures to ascertain the correct country of origin for the export of merchandise?

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Article 24: Have you established reliable procedures to ensure that you obtain the correct country of origin certificate from the issuing authority? • Checked the applicability of items (a) to (d) with your merchandise?			
2	Article 25: Section A: Have you established reliable procedures to check that where in the case of the origin of goods produced in more than one country shall be the country of the last manufacturing stage, provided that this manufacturing has been carried out in a purpose built project set up for the manufacture of a new product? What is the definition by Jordan Customs of a “purpose built project”; Check the extent of additional manufacturing and the criteria in Section A-1 above.			
3	Have you undertaken due diligence (customs advise) and taken reliable and adequate measures to communicate the requirements of Jordan Customs for country of origin (or other marking requirements) to your foreign supplier prior to the departure from the place of manufacture and or assembly and importation of your merchandise?			

Chapter Seven

Export and Re-Export

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Article 56: Do you have a reliable procedure that ensures the correct manifest of the goods is presented to Jordan Customs before the goods leave Jordan?			
2	Article 57: Do you have a reliable procedure that ensures the goods and the detailed declaration are presented to Jordan Customs Center?			

Chapter Eight

Common Provisions

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p>Article 60:</p> <p>Section A: Do you have a reliable procedure and written instruction that ensures that several sealed parcels are not put together in any way?</p> <p>Do you have a reliable procedure and written instruction that you obtain the Jordan Customs instructions regarding containers, pallets and trailers?</p> <p>Section B: Do you have a reliable procedure and written instruction that ensures that authorization is obtained to permit single consignments to be divided as long as no loss occurs to the Jordan Treasury?</p> <p>Do you have a reliable procedure and written instruction that ensures you obtain the Director of Jordan Customs directives to this effect?</p>			

Chapter Two

Inspection of Goods

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p>Article 69: Do you have a reliable procedure and written instruction that permits the inspection of the goods?</p> <p>Do you have a reliable procedure and written instruction that obtains and disseminate to all personnel concerned the inspection instructions of the Director of Jordan Customs?</p>			
2	<p>Article 70: Section A: Do you have a reliable procedure and written instruction that enables the customs inspection to be conducted at the customs zone and outside the customs zone?</p> <p>Do you have a reliable procedure and written instruction that enables the request for a customs inspection to be carried outside a customs zone and in accordance with the rules set by the Director of Jordan Customs?</p> <p>Section B: Do you have a reliable procedure and written instruction that ensures the cost / fee for the transfer of goods to the inspection post, their unpacking and re-packing and all other steps to be paid for by the person / party that presented the customs declaration?</p> <p>Section C: Do you have a reliable procedure and written instruction that ensures the goods in store or in other places set for inspection are not transferred without the prior approval of the Jordan Customs Department?</p> <p>Section D: Do you have a reliable procedure and written instruction that ensures the persons involved in the transfer of goods and who present them for inspection are acceptable to the Jordan Customs Department?</p> <p>Section E: Do you have a reliable procedure and written instruction plus security measures and physical security to stop the access of unauthorized persons entering the stores, warehouses, depots, shelters and yards where goods are stored,</p>			

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	deposited for inspection and that no one enters these areas and facilities without the prior approval of the Jordan Customs Department?			
3	<p>Article 71: Do you have a reliable procedure and written instruction to ensure that an inspection shall be carried out only in the presence of the person who presented the declaration or his representative in order that if a shortage is detected the responsibility can be defined?</p>			
4	<p>Article 72: Do you have a reliable goods inwards procedure that includes a written goods received record system and materials storage system and facilities to ensure that the Jordan Customs Department can open packages for inspection if Jordan Customs suspect the existence of prohibited goods or goods which contravene the contents of the customs documents?</p> <p>Do you have a reliable goods inwards procedure and written instruction that ensures that you or your representative receive notification of a customs inspection in order that you or your representative are present during the customs inspection?</p> <p>Do you have a reliable customs inspection procedure and written instruction that ensures that the customs inspection is undertaken by a committee and that a written report on the result of the inspection is received?</p>			
5	<p>Article 77: Do you have a reliable procedure that includes a written system that will ensure that you produce any additional documents to corroborate the accuracy of the contents of the manifest and present them to Jordan Customs?</p>			
6	<p>Article 79: Do you have a reliable procedure that includes a written system that will ensure that the owner and customs can re-inspect the goods in accordance with the provisions of Articles 69-78 of the Jordan Customs Law?</p>			

EXPORTS TO THE USA

The Jordan-US Free Trade Agreement

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p>Do you have a reliable procedure that includes a written system to ensure that you are informed and can correctly implement the provisions of the Jordan-US Trade Agreements: specifically that companies can export to the US under three different programs/agreements that either allow for duty free entry or customs duty reductions:</p> <ul style="list-style-type: none"> • Generalized System of Preferences: GSP; • Free Trade Agreement: FTA; • Qualified Industrial Zone: QIZ 			
2	<p>Do you have a reliable procedure that includes a written system to ensure that you can identify the Harmonized Tariff system (HTS) code of the product you plan to export to check its eligibility under the above three program/agreements?</p> <p>For example, the HTS numbers are available from the Data Web for the U.S. International Trade Commission, www.dataweb.usitc.gov</p> <p>The web site has a link that gives tariff reductions under the Jordan-US Free Trade Agreement by product for the years 2001-2010.</p>			
3	<p>Do you have a reliable procedure that includes a written system to ensure that you can identify the eligibility for:</p> <ul style="list-style-type: none"> • GSP system followed by • Customs duties under Normal Trade Relations (NTR); • Customs duties under FTA. 			
4	<p>Do you have a reliable procedure that includes a written system to ensure that you are informed and can correctly interpret the local content requirement for local product?</p>			
5	<p>Do you have a reliable procedure that includes a written system to ensure that you are informed and can interpret correctly for QIZ products duty free access after fulfilling the 11.7% Jordanian content requirement, the 8% Israeli content requirement and the overall 35% content and substantial transformation?</p>			
6	<p>Do you have a reliable procedure that includes a written system to ensure that you undertake to optimize duty free access by case by case, which can</p>			

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	vary according to product from 3.9% to 32%?			
7	<p>Do you have a reliable procedure that includes a written system to ensure that you have an informed export compliance system that includes the importer in the US and the forwarder?</p> <p>As a result of the “informed compliance” does your US importer claim preferential tariff treatment for originating Jordanian products by indicating the program or the agreement he wants to be treated under in the Special Program Indicator (SPI) Box on the import documentation.</p> <p>The symbol used for the agreements/programs are as follows:</p> <ul style="list-style-type: none"> • FTA: symbol “JO” is placed as a prefix to the subheading of the HTS of the exported product; • GSP: symbol “A” is placed as a prefix to the subheading of the HTS of the exported product; • QIZ: symbol “N” is placed as a prefix to the subheading of the HTS of the exported product. 			
8	<p>Do you have a reliable procedure that includes a written system to ensure that you as the exporter and the importer have an informed export compliance system that includes internal control questions:</p> <ol style="list-style-type: none"> 1. Are the GSP claimed products from an eligible country listed in General Note 4 of the Harmonized Tariff Schedules of the US? 2. Assure the importer that the articles are in fact the growth, product or manufacture of the Beneficiary Developing Country? 3. Ensure that the value information to support the GSP claim is complete and accurate? 4. Provide proof of eligibility and all the required declarations at time of purchase; 5. Have a knowledgeable staff or forwarder that is familiar with the Customs requirements for handling the GSP export? 6. Does your US importer have a broker who is familiar and sufficiently knowledgeable to review the accuracy of GSP importations? 7. Have you provided him with all the necessary information? Do you have a system of record keeping that addresses the aspect of whether the importations qualify for GSP? 8. Does the importer in the US know anything about you to assure him that your products meet the requirements for GSP? 9. Have you or the importer ever addressed the issue of verification of GSP claims? Will you make your records available? 			

<p>9</p>	<p>Do you have a reliable procedure that includes a written system to ensure that you correctly apply the JFTA General Origin Rules?</p> <p>Section 102 of the JFTA (Public Law 107-43, 115 Stat. 243; 19 U.S.C. 2112 Note) provides for the rules of origin to determine whether a good qualifies for preferential tariff treatment under the JFTA. Under the agreement, a good qualifies for preferential tariff treatment as a "Product of Jordan," only if:</p> <ul style="list-style-type: none"> (a) It is imported directly from Jordan into the U.S. and is wholly the growth, product, or manufacture of Jordan; or (b) It is imported directly from Jordan into the U.S. and is a new or different article of commerce that has been grown, produced, or manufactured in Jordan; and (c) The sum of: (1) the cost or value of the materials produced in Jordan, plus (2) the direct costs of processing operations performed in Jordan is not less than 35% of the appraised value of the article at the time it is entered into the territory of the U.S. (d) If the cost or value of materials produced in the customs territory of the United States is included for purposes of determining whether an article meets the requirement of containing 35% domestic content, no more than 15 percent of that article's appraised value that is attributable to the United States cost or value at the time it is entered may be applied toward determining the 35%. <p>Simple combining or packaging operations or mere dilution with water or another substance is not sufficient to confer origin for purposes of this agreement.</p> <p>There is no exception from paying the merchandise processing fees provided for in the agreement. These fees must be paid on entries of merchandise for which a preferential-tariff treatment claim is made under the JFTA.</p> <p>The JFTA does not affect merchandise entered from a Qualified Industrial Zone (QIZ). (See General Note 3[a][v], HTS, for a definition of QIZs.) Because duty reductions will be staged for certain products, it may be advantageous for importers to continue to enter merchandise manufactured in a Jordanian QIZ under General Note 3 (a)(v), rather than under the JFTA.</p>			
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<p>10</p>	<p>Do you have a reliable procedure that includes a written system to ensure that you correctly apply the JFTA Textile and Apparel Articles Origin Rules?</p> <p>Pursuant to the provisions set forth under the JFTA Act, a textile or apparel article imported directly from Jordan into the customs territory of the United States will be eligible for preferential tariff treatment only if the following conditions are met:</p> <ul style="list-style-type: none"> • The article is wholly obtained or produced in Jordan; • The article is a yarn, thread, twine, cordage, rope, cable or braiding, and <ul style="list-style-type: none"> A. the constituent staple fibers are spun in Jordan, or B. the continuous filament is extruded in Jordan; • The article is a fabric, including a fabric classified in chapter 59 of the HTS, and the constituent fibers, filaments or yarns are woven, knitted, needled, tufted, felted, entangled or transformed by any other fabric-making process in Jordan; or • The article is any other textile or apparel article that is wholly assembled in Jordan from its component pieces. <p>Textile and apparel articles not wholly obtained or produced in Jordan must comply with the above conditions and the value requirements described above under “General Origin Rules.”</p> <p>There are special rules for certain textile and apparel articles like knit-to-shape goods, linens, and certain fabrics and goods subjected to dyeing, printing, and two or more finishing operations (please see General Note 18 HTS).</p> <p>An article is “wholly obtained or produced in Jordan” if it is wholly the growth, product, or manufacture of Jordan. For more details or clarification of this provision, please consult the General Origin Rules and the relevant HTS headings.</p> <p>Eligible Articles</p> <p>Pursuant to Annex II of Presidential Proclamation 7512, a list of the HTS item numbers that are eligible for immediate duty-free treatment with respect to Jordanian goods that are either entered or withdrawn from warehouse for consumption, on or after December 17,</p>				
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	<p>2001, may be found in the <i>Federal Register</i> (66 FR 64497-64734) dated December 13, 2001. This edition of the <i>Federal Register</i> may be found at the following Web site address:</p> <p>http://www.access.gpo.gov/su_docs/fedreg/a011213c.html</p>			
11	<p>Do you have a reliable procedure that includes a written system to ensure that you correctly apply the Country of Origin Making and Special Marking Requirements by US Customs?</p>			
12	<p>Do you have a reliable procedure that includes a written system to ensure that you correctly apply the Prohibitions, Restrictions and Other Agency Requirements by US Customs?</p> <p>For example:</p> <p>Fruits, vegetables, and nuts: Certain agricultural commodities (including fresh tomatoes, avocados, mangoes, limes, oranges, grapefruit, green peppers, Irish potatoes, cucumbers, eggplants, dry onions, walnuts and filberts, processed dates, prunes, raisins, and olives in tins) must meet United States import requirements relating to grade, size, quality, and maturity (7 U.S.C. 608(e)). These commodities are inspected and an inspection certificate must be issued by the Food Safety and Inspection Service of the Department of Agriculture to indicate import compliance.</p> <p>Plant and Plant Products. The importation of plants and plant products is subject to regulations of the Department of Agriculture and may be restricted or prohibited. Plants and plant products include fruits, vegetables, plants, nursery stock, bulbs, roots, seeds, certain fibers including cotton and broomcorn, cut flowers, sugarcane, certain cereals, elm logs, and elm lumber with bark attached. Import permits are required. Further information should be obtained from APHIS. Also, certain endangered species of plants may be prohibited or require permits or certificates. The Food and Drug Administration also regulates plant and plant products, particularly fruits and vegetables.</p>			
13	<p>Do you have a reliable procedure that includes a written system to ensure that you correctly apply for a permit to export certain fresh fruits and vegetables including fresh herbs and sprouts?</p> <p>Have you a procedure the determine the entry requirements for your product at the Import Authorization System?</p> <p>Have you a procedure to apply by obtaining PPQ Form 587?</p>			

	<p>Have you a procedure to complete the APHIS Import Authorization System (Online Permitting)?</p> <p>Do you have a copy of The Complete Fruits and Vegetable Manual?</p>			
14	<p>Do you have a reliable procedure that includes a written system to ensure that you correctly submit Prior Notice Interim Final Rule (1.280(b) and see 1.283) for fruits and vegetables to the US?</p> <p>Do you have a procedure that ensures you obtain updated versions of the FDA Rules? For example, the Prior Notice System Interface (PNSI) was issued in December 2003 and revised in June 2004.</p> <p>Phase III of the U.S. Bioterrorism Act came into force on 4 June 2004 at 06:00am. Unless prior notice of all food for humans and animals imported or offered for import the merchandise will be refused entry.</p>			
15	<p>Do you have a reliable procedure that includes a written system to ensure that you comply with the regulations for standards and labeling?</p>			
16	<p>Do you have a reliable procedure that includes a written system to ensure that you comply with the regulations for exports other than textile and apparel from a QIZ:</p> <ul style="list-style-type: none"> - Permit/ certificate from the Ministry of Agriculture for any agricultural product; - Certificate from the National Resources Authority for mineral products; - Ministry of Health. 			
17	<p>Do you have a reliable procedure that includes a written system to ensure that you comply with the regulations for the export of pharmaceuticals?</p> <p>Do you have an information capture procedure that ensures you obtain all the regulatory requirements?</p> <p>For example:</p> <p>Jordan:</p> <ol style="list-style-type: none"> 1. authorization to establish a pharmaceutical plant; 2. product marketing authorization: each new product needs an authorization from the Ministry of Health. <p>U.S. Food and Drug Administration (FDA):</p> <ol style="list-style-type: none"> 1. Register the product with the FDA; 2. the FDA inspects the facility and product (for each product); 3. FDA issues a marketing authorization/approval for the product manufactured in Jordan. <p>Export documentation requirements include: commercial invoices, packing list, certificate of origin and for each batch that is exported it is necessary to provide technical documentation (certificate of analysis).</p>			

EXPORT TO THE EUROPEAN UNION

The Jordan-EU Partnership Agreement

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p>Do you have a reliable procedure that includes a written system to ensure that you comply with the regulations and requirements for The Jordan-EU Association Agreement?</p> <p>Do you have copies of The Jordan-EU Association Agreement made available for members of your staff and your supply chain partners?</p> <p>Do you have copies of the four Protocols and seven Annexes that clarify the various details of the legal text and explains the agreed upon mechanisms of implementation made available to members of your staff and your supply chain partners?</p> <p>Protocols:</p> <ul style="list-style-type: none"> • 1 and 2: Concerning the Arrangements Applicable to the Importation into the Community of Agricultural Products originating in Jordan or in the EU; • 3: Concerning the Definition of the Concept “Originating Product” and Methods of Administration Cooperation; • 4: On Mutual Assistance between Administrative Authorities in Customs Matters. <p>Annexes:</p> <ul style="list-style-type: none"> • 1-4: Lists of Industrial Products Originating in Jordan or in the EU on which Respective Parties may Retain an Agricultural Component, or Implement a Schedule for Tariff Dismantling upon Importation into their Respective Territories; • 5: EU Reservation List in the Area of Right of Establishment; • 6: Jordan Reservation List on the Area of Right of Establishment; • 7: Intellectual, Industrial and Commercial Property Protection. 			
2	<p>Do you have a reliable procedure that includes a written system to ensure that you comply with the requirements made in the Joint Declarations that include:</p>			

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	<ul style="list-style-type: none"> • Rules of Origin Implementation; • Protection of intellectual, commercial and industrial property rights, etc; 			
3	<p>Do you have a reliable procedure that includes a written system to ensure that you comply with the requirements of the Special Agreement (Exchange of Letters) that has been concluded with the EU for fresh cut flowers, flower bulbs and shrubs?</p>			
4	<p>Do you have a reliable procedure that includes a written system to ensure that you comply with the HS and with the Combined Nomenclature (CN) and which subheading the goods need to be designated and according to the products family and the level of processing or manufacture:</p> <ol style="list-style-type: none"> 1. Raw materials; 2. Semi-processed products; 3. Ready products. <p>Do you have a procedure that ensures you maintain the list of 17 item groups that are excluded from preferential treatment?</p>			
5	<p>Do you have a reliable procedure that includes a written system to ensure that you capture and maintain a list of goods originating with Infant Industries?</p> <p>The list of goods produced by Infant Industries may be subject to change. In addition, exceptional measures of a limited duration may be taken.</p>			
6	<p>Do you have a reliable procedure that includes a written system to ensure that you comply with the provisions for Rules of Origin?</p> <p>For example:</p> <ul style="list-style-type: none"> • Category I: “Wholly Obtained”; • Category II: “Products Containing Non-Originating Materials” <p>Do you have a procedure that enables you to understand the key terms in the Rules of Origin?</p>			
7	<p>Do you have a procedure that ensures you comply with the requirements for Preferential Origin and Protocol Three and the four annexes?</p> <ul style="list-style-type: none"> • Sub Annex I: Introductory Notes and explains how sub-annex should be read; • Sub Annex II: all working and processing requirements are listed in sub annex 2 (Known as the List); • Sub Annex III: Notes and explanation of the Movement Certificate EUR1; • Sub Annex IV: Invoice Declaration, etc. 			

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8	Do you have a procedure that ensures you comply with the requirements for The Bagatelle Rule?			
9	Do you have a procedure that ensures you comply with the requirements for the Special Rules for textile products?			
10	Do you have a procedure that ensures you comply with the requirements for Product Specific Conditions (Accessories and sets)?			
11	Do you have a procedure that ensures you comply with the requirements of the Accumulation Rules: bilateral and diagonal cumulation rules?			
12	and how it can be applied to the Jordan-EU Association Agreement?			
13	Do you have a procedure that ensures you comply with the requirements, procedure, preparing the necessary documentation and obtaining the supporting documents of the Sub Annex III for the Movement Certificate EUR1			
14	Do you have a procedure that ensures you comply with the requirements for the acceptance of your products to ensure that they are manufactured in accordance with the EU product regulations? Do you have a procedure that distinguishes between the “old approach” (chemical characteristics) and the “new approach” (physical characteristics) and where no EU provisions govern the safety of a product Directive 92/59 “General Product Safety “ applies?			
15	Do you have a procedure that ensures you comply with the requirements for the CE Mark in the EU?			
16	Do you have a procedure that ensures you comply with the requirements for: <ul style="list-style-type: none"> • Testing and Certification; • Quality Management Systems? 			
17	Do you have a procedure that ensures you comply with the requirements for The Hazard Analysis Critical Control Point system (HACCP) for food manufacturing /processing companies?			
18	Do you have a procedure that ensures you comply with the requirements for EU packaging and labeling?			
19	Do you have a procedure that ensures you comply with the requirements for EU Directives on packaging waste, which are not currently compulsory throughout the EU? Do you have a procedure to comply with EU member state environmental label laws?			

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A Customs Due Diligence Model cannot cover every circumstance and product. We suggest that this is an example of the requirement for the company to conduct a product specific review. For example the export of cosmetics to the EU includes fifteen different issues:

No	Export of cosmetics Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p>Do you have a reliable written procedure to maintain your internal controls that ensures you comply with the requirements for the EU?</p> <ul style="list-style-type: none"> • EU Directive EEC/76/768; • Application texts from each member state, for example Public Health Code for Republic of France; • Codes of good practices; • Transport Regulations (Road, Sea and Air); • Prohibited and Limited Ingredients; • Closed List for Special Ingredients; • Technical data sheets of ingredients: 2 Technical leaflets, 1. EEC Directive 93/112 safety data sheet, 2. Certificate of analysis for each batch (Must accompany each sample and each consignment); • See “Cosmetex” edited by EC Vol 1to3; • Other Regulations EEC Directive 79/831 Dangerous Substances; • Does the imported have the appropriate level of professional qualifications or experience (Art1 89/48/CEE); • Local Regulations from EEC/93/35 and EEC/76/768 (Article 7a); • 2003/15/CE Directive; • ISO 9000 v2002; • Container and Packaging Directive 76/768/EEC (Article 6) and 80/232/EEC; • Transport packaging regulations for dangerous substances: ADR, RID, IATA and OACI, IMDG Code; • Directive 75/324/EEC; • US Food and Drugs No21 Parts 600 to 799, especially 700 to 740. 			

SUPPLY CHAIN SECURITY VALIDATION PROCESS GUIDELINES

The Supply Chain Security validation process guidelines are based upon the C-TPAT and World Customs Organization (WCO) Supply Chain Security and Facilitation and the Advance Cargo Information Guidelines.

Objectives

Develop and implement a sound plan to enhance security procedures throughout your supply chain. Where your company as an exporter does not control a facility, conveyance or process subject to these recommendations, the exporter agrees to make every reasonable effort to secure compliance by the responsible party. The following are general recommendations that should be followed on a case-by-case basis depending on the company’s size and structure and may not be applicable to all.

Procedural Security

Procedural security assures recorded and verifiable location of goods in the supply chain. Procedures should provide for the security of goods throughout the supply chain. Contingent procedures should be included within the scope of procedural security.

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Does your company have reliable procedures and a written system in place to protect against non manifested material being introduced into the supply chain?			
2	Does your company have reliable procedures and a written system to ensure your supply chain has security controls that include: <ul style="list-style-type: none"> • the recorded and verified introduction/removal of cargo that is supervised by a designated company official and / or authorized representative: broker, transport operator? • the proper marking, • weighing, • counting and documenting of cargo/cargo equipment verified against manifest documents, • the detecting/reporting of shortages/overages, and • the detecting of irregularity or illegal activities, • procedures for verifying seals on containers, trailers, and railcars? 			
3	Does your company have reliable procedures and a written system to ensure that the incoming and outgoing of goods is supervised and monitored?			
4	Does your company have reliable procedures and a written system to ensure that random, unannounced security assessments of areas in your company’s control within the supply chain are conducted?			

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5	Does your company have reliable procedures and a written system to ensure that the procedures for notifying Customs and other law enforcement agencies in cases where anomalies or illegal activities are detected, or suspected, by the company are in place?			
6	Does your company have reliable procedures and a written system to ensure that your company Facility/Terminal operators have written and verifiable security procedures in place with regards to areas under your company control?			
7	Does your company have an integrated computer information exchange system (Connectivity and share) with your suppliers, freight forwarder (Supply chain participants) and your company sections and divisions that are involved with your import transaction and physical movement of your goods and consignments?			
8	Does your company computer system allow the connectivity to exchange sufficient quality information that has the required detail to record in-transit visibility and exception reporting and product identification for each consignment / container in real time (Tracking using spreadsheets and faxes are not sufficient)?			
9	Does your company have a real time computer information collection and connection system that engages with your supply chain partners who have different technical capabilities, and data message integrity that can offset human errors and foster product identification?			
10	Is your company computer system sophisticated enough to record container opening, tampering and other dock to dock tracking visibility?			
11	Is your company computer system sophisticated enough to inform you where a shipment is supposed to be and if delivery is ahead or behind schedule, wrong direction, radiation, seawater or chemical problem, temperature change beyond tolerance levels, as well as other client specific information and consequently produces an exception report (Your transportation agent or freight forwarder may have this type of system capability)?			
12	Does your computer system or the computer system of your transportation operator / agent and freight forwarder have the capability to produce a complete audit trail of where the container has traveled and when and where exceptions have been generated, detection capture, communication of breaches in real time and that exceptions generate real time notification to you via e-mail, pager or XML/EDI transactions?			
13	Does your company transportation operator and or			

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	freight forwarder use detection devices that are attached in such a way that a thief cannot breach the container without generating an exception, even if the container door is removed completely?			
14	Does your company have reliable procedures and a written system to ensure that your company properly stores empty and full containers to prevent unauthorized access, including the use of tamper-proof / non-counterfeitable seals?			
15	Does your company have reliable procedures and a written system to ensure that your company checks empty containers received for storage or loading to ensure its structure has not been modified?			
16	Does your company have reliable procedures and a written system to ensure that affixing, recording, tracking, and verifying tamper-proof / non-counterfeitable seals on containers, trailers and railcars?			
17	Does your company have reliable procedures and a written system to ensure that seals are not used in strict numeric sequence and that seals are not registered and controlled by a single person?			
18	Does your company have reliable procedures and a written system to ensure that your company verifies the identity and authority of the carrier requesting delivery of cargo prior to cargo release?			
19	Does your company have reliable procedures and a written system to ensure that your company employees notify Jordan Customs and other law enforcement agencies of suspected illegal activities?			
20	Does your company have reliable procedures and a written system to ensure that your company carries out random and unannounced security assessments?			
21	Does your company have reliable procedures and a written system to ensure that your company employees inspect persons and packages?			
22	Does your company have reliable procedures and a written system to ensure that your company has and carries out additional security procedures for high value and high risk goods?			

Physical Security:

Physical security includes security measures that monitor and control the facility’s exterior and interior perimeters. This will include Mail Service Security, Lock and Key Control, and Perimeter and Interior Alarms.

Recommended features to be installed as appropriate:

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No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Are all of your company buildings and rail yards constructed of materials that resist unlawful entry and have protection from outside intrusion?			
2	<p>Do your company buildings and offices have physical security that includes:</p> <ul style="list-style-type: none"> • perimeter fences, locking devices (International standard) on reinforced external and internal doors; • windows with mesh, metal bars; • International standard locking devices on external and internal doors, windows, gates and fences. Exterior doors and windows must be equipped with alarms; • perimeter fences and interior fencing, • gates and gatehouses; • adequate lighting inside and lighting outside the facility that includes CCTV; • electronic security systems that include theft alarm systems and alarmed access control systems; • have the segregation and marking of international, domestic, high-value, and dangerous goods cargo within the warehouse by a safe, caged or otherwise fenced-in area; • Large dual language signage: that display and instruct direction, health and safety and restricted areas? 			
3	Does your company plan and implement a maintenance program that comprises regular scheduled inspections to keep fencing, gates, lights and cameras in good condition and working order (maintain the integrity of security measures)?			
4	Does your company have a reliable procedure and a written system that ensures your company has implemented controls to stop the theft of goods, vehicles and company documents?			
5	Does your company have a reliable procedure to undertake random inspections and “walk through” to inspect and check all physical security measures and facilities?			
6	Does your company have emergency lighting / power systems for key operational areas and high value cargo areas?			

Recommended procedures to be implemented as appropriate:

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Depending upon the company size a security company may be required to undertake some of the physical security duties and measures?			
2	Gates or doors through which vehicles and personnel enter or exit should be manned or under observation by management or security personnel			
3	Access to employee vehicle parking must be controlled			
4	Employee vehicle parking must be in a separate area from visitor parking			
5	Private passenger vehicles must be prohibited from parking in cargo areas or immediately adjacent to cargo storage and office buildings			
6	Lock and key control including signing in and out of high risk areas			
7	Restrict access to document and cargo storage areas			

Access Controls:

Access controls prohibit unauthorized access to facilities, vehicles, loading and unloading equipment, vessels, aircraft, shipping, loading docks, break bulk areas and cargo areas. If, access control is not possible increased precautions in other security aspects is needed.

Recommended procedures to be conducted as appropriate:

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Do you have reliable procedures and physical facilities that stops non authorized persons access to company facilities and conveyances, and that positively identifies, records and tracks all employees, contractors, visitors and suppliers?			
2	Do you have procedures and physical access controls that include positive identification of all employees, visitors, and vendors, that includes check in and check outs and labeling?			
3	Do you have procedures and physical access controls that trigger an alarm when visitors attempt to enter an unauthorized area?			
4	Do you have procedures and written instructions for all employees which results in your employees and guards safely challenging unauthorized/unidentified persons and removing unauthorized/unidentified persons?			

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5	<p>Does your company control and monitor the parking of all vehicles around the companies offices and port/terminal buildings that include segregation and restricted areas access?</p> <p>Does your company vehicle parking procedure and control system include the authorization by an adequate gate/pass and/or decal system?</p> <p>Does your company have a procedure that ensures vehicle parking for office employees, terminal/warehouse (facility) workers and visitors are physically segregated and restricted to designated areas?</p>			
6	Do you have procedures, written instructions and trained personnel that ensures vehicles are inspected before they enter operation facilities?			
7	Do you have procedures, written instructions and trained personnel that ensures you control the time individuals have access to facilities?			
8	Do you have procedures, written instructions that ensures you display large dual language maps of restricted areas within the view of all employees and visitors?			

Personnel Security:

Personnel security is concerned with the screening of employees and prospective employees, as appropriate and as allowed for by law.

Recommended procedures to be conducted as appropriate:

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Do you have a written procedure that ensures you conduct employment screening and interviewing of prospective employees?			
2	Do you have a written procedure that ensures you conduct periodic background checks and resume / application verifications?			
3	Do you a written procedure that ensures your verify job application information?			
4	Do you have a written procedure that ensures you contact references?			
5	Do you have a written procedure that ensures you review the skill requirements for key positions?			
6	Do you have a written procedure that ensures you align job skill requirements with individual skills?			
7	Do you have a written procedure that ensures you			

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	check the background and corporate structure of independent contractors?			
8	Do you have a written procedure that ensures you conduct drug testing (as allowed for by law): <ul style="list-style-type: none"> • Before hiring; • Random periodic testing; • At times of reasonable suspicion? 			
9	Do you have a written procedure that ensures you implement different color ID cards to employees that designate access privileges?			
10	Do you have a written procedure that ensures you implement gate passes to vehicle drivers and other carriers to control and identify those authorized to enter the facility?			
11	Do you have a written procedure that ensures you issue to employees different color uniforms for each sensitive area?			
12	Do you have a written procedure that ensures you issue different color uniforms for your security staff?			
13	Does your company have an authorized and responsible senior company manager and or director that is responsible for company security plans and for the implementation of security measures and procedures?			
14	Does your senior company manager and or director responsible for security have the authority to announce a security threat level on the company property and to company employees?			
15	Does the company person responsible for security have the authority to undertake a Security Assessment (Risk analysis) and as a result of the Security Assessment implement a Security Plan that includes various controls and compliance measures?			
16	Does the company have an Internal Code of Conduct that is a part of the employees contract of employment?			
17	Does your company Internal Code of Conduct include a written system and procedure for the reporting / disclosure to management of any problems and issues that relate to personnel security and to the security of facilities, goods and documents?			

Education and Training Awareness:

Education, training and awareness encompass education and training of personnel regarding security policies, encouraging alertness for deviations from those policies and knowing what actions to take in response to security lapses.

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No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Do you have a written procedure that ensures you communicate security policies and standards to employees, including consequences of noncompliance?			
2	Do you conduct a security awareness program for all employees that includes the recognition of internal conspiracies, maintaining cargo integrity, and determining and addressing (solving) unauthorized access?			
3	<p>Does your security awareness programs provide for incentives for active employee participation in security controls?</p> <p>The security education and training awareness programs must encourage active employee participation in security controls.</p>			
4	Does your security awareness program includes the use of press releases, e-mail distribution lists and bulletin boards?			
5	<p>Does your company have a reliable process by which you search for and obtain new supply chain security information?</p> <p>For example: World Customs Organization (WCO) initiatives and programs: Convention and commentary on Mutual Administrative Assistance in Customs Matters, WCO Data Model and the list of essential data elements required for the identification of high risk consignments, International Customs guidelines on advance cargo information, etc.</p>			
6	Does your company partake in Jordan Customs and Port plans and programs to introduce and implement or enhance the Port Facility Security Plan (PFSP)?			
7	<p>Does your company have a copy of the International Ship and Port Facility Security Code (ISPS) and copies of other security measures adopted by the International Maritime Organization (IMO)?</p> <p>Does your company have a reliable procedure to obtain new measures to the ISPS Code?</p> <p>Does your company have a reliable procedure that obtains the new measures to the ISPS Code in order that it is aware of the repercussions that ships</p>			

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	<p>might face after 1 July 2004 if they are found not to be in compliance with the requirements of that regulation and Section A/9.81 of the ISPS Code?</p> <p>The repercussions to ports should also be assessed. Requirements for port facilities include:</p> <ul style="list-style-type: none"> • Monitoring and controlling access; • Monitoring the activities of people and cargo; • Ensuring security communications are readily available. 			
8	<p>Does your company have a copy of the International Labor Organization (ILO) and IMO Code of Practice on Security in Ports?</p> <p>Does your company have a reliable procedure to obtain and circulate to all your relevant company new measures to enhance maritime security to the ISPS Code?</p>			
9	<p>Does your company have a copy of the Safety of Life at Sea Convention (SOLAS), with attention to SOLAS regulation X1-2/9 on “Control and compliance measures”?</p> <p>Does your company have a reliable procedure to obtain and circulate to all your relevant company personnel a copy of the new SOLAS measures (New Chapter X1-2) that enter into force on 1 July 2004?</p>			
10	<p>Does the company education and awareness training include hands on training for all company employees to recognize and address potentially dangerous items during packing, loading and unloading process?</p>			

Conveyance Security:

Conveyance security provides protection against the introduction of unauthorized personnel and material into the supply chain, including the areas between the links of the supply chain.

Recommended procedures to be conducted as appropriate:

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Does your company have a reliable procedure and written system that ensures there is protection in your transportation system that protects it from the introduction of unauthorized personnel and material?			
2	Does your company have a reliable procedure and written system that ensures that the security procedure includes the physical search of all: <ul style="list-style-type: none"> • readily accessible areas, the securing of internal/external compartments and panels, and • procedures for reporting cases in which unauthorized personnel, non manifested materials, or signs of tampering, are discovered. 			
3	Does your company have reliable procedures and a written system that is implemented and consequently it physically controls and monitors all cargo transfer operations within your company facilities / terminal?			
4	Does your company have a reliable procedure and a written agreement with suppliers and transportation and freight forwarders to ensure that they establish and implement procedures to guard against the packing and loading of goods of unknown articles and materials? <ul style="list-style-type: none"> • Supervised loading and unloading of all goods; • Proper sealing, marking, and counting of goods and packages and boxes loaded into containers; • The correct documentation for the goods that are loaded into the container must be sent in advance to Jordan; • Approved procedures for affixing, recording, tracking and verifying seals on containers and trailers are in place. 			
5	Does your company have a reliable procedure and a written system that ensures your company uses where necessary C TPAT High Security Compliant			

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	Bolt Seals and C TPAT compliant Heavy Duty Bolt Locks on containers?			
6	Use tamper-proof / non-counterfeitable seals or electronic seals to secure conveyance.			
7	If cost effective, use transponders to facilitate continual tracking of conveyances.			
8	Use automatic electronic transmittal of “smart-card” data to Customs if available.			
9	Use “smart-card” technology containing vehicle, consignment and driver information where automated border crossings are in place.			
10	Consider cost and future standardization issues related to the use of smart cards, electronic seals and transponders.			
11	Stay informed regarding development of standards and requirements regarding smart cards, electronic seals and transponders by World Customs Organization, International Maritime Organization and International Standards Organization, etc.			

Service Provider Requirements: forwarders and operative sub contractors

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Does your company have reliable procedures and a written system that is implemented to ensure that plant, equipment and vehicles brought by suppliers and sub-contractor plant and equipment into your company facilities and buildings and onto your company property is assessed and physically inspected for security?			
2	Does your company have reliable procedures and a written system that is implemented to ensure quality control records and procedures on production processes maintain system integrity?			
3	Does your company have reliable procedures and a written system that is implemented to ensure that financial assessments are implemented to determine the service providers fiscal soundness and ability to deliver goods and services within contract obligations?			
4	Does your company have reliable procedures and a written system that is implemented to ensure internal controls are implemented for the selection of service providers?			
5	Does your company have reliable procedures and a written system that is implemented to ensure profiles of your main suppliers who are receiving and packing finished commodities and equipment are maintained and available for review?			
6	Does your company have reliable procedures and			

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<p>a written system that is implemented to ensure those service providers with whom your company is contracted are participants in:</p> <ul style="list-style-type: none">• Jordan Golden List;• Customs Trade Partnership Against Terrorism (C TPAT);• Jordan Customs Industry Partnership programs, and;• Jordan Anti Smuggling program;• Etc.			
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Trading and Transportation Operator Security

Trading partner security extends supply chain security to your suppliers and customers. Communication, assessment, training and improvement are key components.

Recommended procedures to be conducted as appropriate:

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Do you check the integrity of your international transport operator?			
2	Do you have a procedure and a methodology to check your international transportation operator? For example, is your transportation operator compliant with the Container Security Initiative (CSI) and with the Customs-Trade Partnership Against Terrorism (C-TPAT) Guidelines, etc?			
3	Do you check if your transport operator is in full compliance with the laws and regulations of Jordan? <ul style="list-style-type: none"> • Business documents: registration, license, driver licenses, qualifications, Tax and Sales Tax certificates, etc; • TIR Carnet; • Certificate of vehicle compliance? 			
4	Do you encourage your trading partners and suppliers and contractors to assess and enhance, if required, their supply chain security?			
5	Do you request written security agreements with trading partners/suppliers/contractors to include controls such as: <ul style="list-style-type: none"> • Tamper-proof/non-counterfeitable seals; • Signatures; • Time controls; • Agreed means of communication? 			
6	Do you document mutual supply chain security policies?			
7	Do you have extensive exchange of information between trading partners/suppliers/contractors?			
8	Do you advise Customs and foreign authorities of security agreements with trading partners?			
9	Do you have or receive education, training and awareness of security aspects of the supply chain from trading partners?			
10	Do you if possible include equivalent security provisions as a condition of contract for contractors/suppliers providing services?			

Internal Company Record Keeping System

Does your company have an established internal record keeping system, a Quality Management System, and or a compliance guidebook, that ensures that all documents related to your import transaction and import processing documents are correct and stored (3 years)?

Customs require hard copies of all documents. Therefore, does your company have all hard copies or does it hold some documents on a computer software system, such as SAP, or as part of a company private exchange system such as Cisco’s eHub, etc?

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p>Does your company Quality Management System have an internal record keeping system to meet the following criteria?</p> <p>The term “records” means any information made or normally kept in the ordinary course of business which pertains to the following activities:</p> <ul style="list-style-type: none"> • Accounts: Record of Reconciliation, receipts, payment documents, VAT payments, etc • Warehouse documents: delivery notes, goods received notes, inventory lists, record of deliveries, etc • Technical specification: technical passport • any importation, declaration or entry; • the transportation or storage of merchandise carried or held under guarantee into or from the customs territory of your country and the other countries that you operate in; • the filing of a drawback claim (re-export), etc; • the collection and payment of fees, duties and taxes to Customs; • any other activity required to be undertaken pursuant to laws or regulations administered by Customs, such as transfer pricing and expert independent inspection, etc; <p>The term “records” includes any information required for the entry of merchandise and other information pertaining to or from which is derived, any information element set forth in a collection of information required by the Customs Law in connection with an activity described above. The term includes, but is not limited to:</p> <ul style="list-style-type: none"> • statements, declarations, documents; • electronically generated or machine readable data; • electronically stored or transmitted information or data; 			

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	<ul style="list-style-type: none"> • books, papers, correspondence; • accounts, financial accounting data • technical data; • computer programs necessary to retrieve information in a usable form; • file of drawback claims; • transport or warehouse / store merchandise documents held in bond. <p>Or, documents that are required by law to be stored.</p>			
2	Do you have a lockable secure storage place for your records?			
3	Are your records indexed in a retrievable fashion?			
4	Have you established a reliable destruction cycle to prevent the premature destruction of required records; and do you have the right documentation that allows you to dispose of and proves that you have disposed of documents that are more than 3 years old?			
5	Do you have a responsible person assigned as your custodian of records; Chief Accountant or an Inventory Accountant, etc?			
6	Do you have a compliance improvement plan framework?			
7	Do you have a reliable procedure and a written system that ensures all of your company section / division personnel retain and store original and or electronic documents for each import transaction?			
8	Does your company have a record of paying penalties for not keeping documents for the prescribed minimum of three years in Jordan?			
9	<p>Does your company have a procedure and a written requirement as an instruction to all company personnel, and a document archive facility to keep and store the following list of documents:</p> <ul style="list-style-type: none"> • Air way bill; • Bill of lading; • Carries certificate; • Declaration of entry; • Power of Attorney; • Consolidated shipments authority: if this procedure is used; • Packing list; • Bond information; • Vessel, vehicle or air manifest; • Certificates of Origin; 			

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	There are other documents that are relevant for specific commodities and transport modes, etc., that need to be retained.			
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Documentation and Information Processing Security

Documentation processing security, both electronic and manual, assures that information is legible and protected against the loss of data or introduction of erroneous information.

Recommended procedures to be conducted as appropriate:

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Do you have a written procedure that ensures you safeguard computer access and information?			
2	Do you have a written procedure that ensures you control access to information systems, both by level of job responsibility?			
3	Do you have physical security in computer areas?			
4	Do you have written procedures that ensure you monitor employee use of data systems?			
5	Do you have written procedures that you have processes to backup computer system data?			
6	Do you have a written procedure that ensures you record the amount of cargo by packing unit type, packing conditions, and security seal stamps. Furthermore, you your procedures that discrepancies are recorded with a note, photograph and scale weight records?			
7	Do you have a written procedure that ensures you obtain signatures for all process checkpoints (e.g., document preparation, when seals are applied/broken, vehicle inspection, opening the vault, cargo delivery, cargo receipt, counting unshipped pieces, etc.)?			
8	Do you have a written procedure that ensures you fix times for the preparation of documents, and for the shipping and unshipping of cargoes?			
9	Do you have a written procedure that ensures you use special control procedures to prepare emergency / last minute shipments and if necessary notify authorities regarding such shipments?			
10	Do you have a written procedure that ensures your software system registers transactions and supports operations, and if possible make a follow up of the activities that it handles?			
11	Do you have a written procedure that ensures you record the entrance and exit time of people receiving and delivering goods?			

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12	Do you have a written procedure that ensures you document significant process delays?			
13	Manifest security: Do you have a written procedure that ensures your manifests are complete, legible, accurate, and submitted within the prescribed time period in compliance with the Jordan Customs Law?			
14	Does your company have reliable procedures and a written system that ensures the security of all electronic assets, including advising employees of the need to protect passwords and computer access?			
15	Does your company have reliable procedures and a written system that ensures measures are taken to secure sensitive information in order to prevent the loss or unauthorized use of such information?			

Future automated data exchange and authorized supply chain related procedures:

1	Establish electronic customs reporting systems based upon World Customs Organization Customs Data Model and the Unique Consignment Reference (UCR)?			
2	Establish advance manifest reporting systems?			
3	Advance lodgement of data			
4	The single window system			
5	Risk Management			
6	Authorization			
7	Customs mutual assistance arrangements			

Internal finance and accountancy controls

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Does your company have a reliable procedure and a written system that ensures you obtain and maintain a record of all new finance and accountancy laws, regulations and guidelines a copy of which is each provided to each member of your staff that is involved with transactions and record keeping?			
2	Do you maintain an original document and electronic document audit trail from procurement, accountancy, goods received, warehousing and to payments in your company?			
3	Are the financial and accountancy control systems in your company consistent with and compliant with the Financial Audit and Certified Public Accountancy that are legally enforced in Jordan? Do the audit measures cover: <ul style="list-style-type: none"> • Control environment; • Risk assessment; • Control activities; 			

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	<ul style="list-style-type: none"> • Information and communication, and; • Monitoring? 			
4	Does your company have a written system that ensures that you implement reliable control procedures in the company sections and or divisions and subsidiaries that participate or effect the importation of goods?			
5	Has your company identified financial and accountancy risks that are related to your import operations and procedures?			
6	Does your company have a reliable procedure and a written system that ensures you correct compliance deficiencies?			
7	Does your company have a reliable procedure and a written system that ensures you plan and perform periodic testing and assessment in the company operations and divisions that have an effect on imported goods? Does the procedure include a minimum annual review of the significant risk areas?			
8	Does your company have a reliable procedure and a written system that ensures you hold interdepartmental meetings to discuss and coordinate changes to your financial and accountancy internal control systems when the tests and assessments or other information show a need for compliance improvement?			
9	Does your company have an authorized and responsible person that can initiate appropriate disclosure of financial and accountancy?			
10	Does your company have a reliable procedure and a written system that ensures you have an internal control process that document and retain all the tests and assessments?			
11	Does your company have a reliable procedure and a written system that ensures you retain and store for three years all the test and assessment documents?			

Can all the specific procedures and written systems be made available to Jordan Customs in a verifiable format at an identified location?

Identifying perceived weaknesses in security and compliance will not necessarily prohibit participation in the Jordan Customs “Golden List” program. Jordan Customs is committed to working with the trade community to identify effective corrections and adjustments to a company process that will result in a more secure supply chain operation. Meeting the objectives can be helped by your company implementing responsibility of self assessment and a Jordan Customs Risk Management Department assessment.

Appendix 3: Warehouse Operators

Guide

The questions in the checklist are a guide to allow JCD and Golden List candidate companies to determine if the applicant is ready to assume the responsibilities of self-assessment. The check list questions are designed to determine if the Jordan company has made a commitment to implement specific actions (internal procedures and controls) that will enhance compliance. A Jordan company that does not have procedures and controls in place may answer that it plans to develop and implement procedures and controls and specify a target date for implementation.

Response Yes or No

A respond yes or no in this column indicates whether a Jordan company has implemented procedures and controls response to the question. If, a Jordan company has adequate procedures and controls that it believes document that the company is ready to assume the responsibility of self-assessment, the Jordan company can answer yes to the question. If, the Jordan company does not have adequate procedures and controls, whether they are generally adequate or need significant improvement, the Jordan company can answer no under this column and indicate in the next column that it plans to implement procedures that will be adequate for the company to assume responsibility of self-assessment.

If No, Plan to implement or improve (yes or no)

If, the Jordan company indicated “no” under the previous column, the Jordan company can respond yes or no in this column to indicate whether it plans to implement or improve procedures and controls. Whether the Jordan company procedures and controls are generally adequate but need small improvements, or need significant improvements, we recommend the JCD accept the company into the Golden List under certain conditions. The company must commit to making the necessary improvements and demonstrates that the steps are in process. If, the Jordan company agrees to make needed improvements the company should respond yes in this column. The JCD must periodically monitor the improvement process. Failure to follow through would then result in removal from the Golden List. If, the Jordan company does not have or plan to have these procedures and controls Jordan Customs Risk Management Directorate will need to consult with the company to ascertain their readiness to assume responsibility of self assessment. Shipments associated with non-participants in the Golden List Program will be subject to other risk assessment factors.

Target date

If, the Jordan company indicates that it is going to implement procedures and controls under this column, it should provide the target date to have the procedures and controls implemented and working in this column by the target date.

DEFINED RESPONSIBILITIES

This section incorporates the business responsibilities and practices of a warehouse operator. For commercial as well as operation aspects does your warehouse company have adequate and reliable accountability and control procedures in place?

A Customs Warehouse for the purposes of the model includes public and private warehouses.

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No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	In compliance with the Jordan Customs Code Article 108 Section B, Article 116 and Article 117 is your license to operate a Customs Warehouse current?			
2	Are all other business licenses current?			
3	<p>Do you have personnel that are warehouse and or customs trained and qualified?</p> <p>Do they hold Jordan warehouse and or Jordan Customs training certificates?</p> <p>Do they hold international standard warehouse, transport and logistics and or customs qualifications (certificates and or diploma, etc)?</p>			
4	Is your company currently ISO 9000 registered or are you in the registration process?			
5	Are your operating and management procedures in compliance with the Jordan Customs Law Code, other laws and pertinent regulations regarding the activities of a Jordan Customs Warehouse operator?			
6	<p>Do you have a signed, written, current contract with all your clients?</p> <p>Does the contract describe the responsibilities of each party regarding the storage of or use of the Customs warehouse?</p> <p>Do you check the bank references of all new clients?</p> <p>Do you check the business registration documents of each new client?</p> <p>Do you have a reliable procedure to pre-check the goods and or commodity that a new client will present for storage and for processing through your Customs Warehouse?</p>			
7	<p>Do you have a written internal company Code of Conduct for employees regarding the requirements for safeguarding the confidential client information contained in your files?</p> <p>Do you conduct routine training on the obligations for the safeguarding of confidential information?</p> <p>Does each employee sign an acknowledgement that they have read and understood your internal Code of Conduct requirements and is that record maintained in your personnel files?</p>			
8	If, you have a company Code of Conduct does it contain a policy statement prohibiting the offering of bribes and			

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	responding to solicitation of bribes?			
9	If, you have a company Code of Conduct does it include a provision for non-participation in any attempts to commit a fraud against the Government and an obligatory requirement to report frauds or attempted frauds by clients to the proper authorities?			
10	If, you have a company Code of Conduct does it include a provision for employees to reveal conspiracies to defraud, attempted fraud and or commit criminal acts to the company security officer, managing director and the law enforcement agencies?			
11	Do you have a system in place to maintain the physical security of client records? Is your physical security system enforced by a procedure to prevent the accidental or inadvertent review of privileged, confidential information by unauthorized persons?			
12	Do you retain client funds? If, you retain client funds do you have systems in place to safeguard these funds? Do you have reliable safeguards that prohibit client financial information and banking data from being seen by unauthorized persons?			
13	Do you have a professional liability insurance and business insurance?			
14	Do you have on file a complete and current copy of the Jordan Customs Code and all relevant Jordan Customs and other Government Regulations or the countries where you operate pertaining to the operation of a customs warehouse? If, your warehouse operations are a type of specialized warehouse such as a duty free store or free customs zone does this include the specialized customs, building regulations and other requirements for your particular business?			
15	Do you have a reliable procedure in place to verify that you are current and up to date on all applicable changes in Jordan regarding the Customs Law, Customs Regulations and other laws and regulations governing Customs Warehouses? Do you subscribe for the Jordan Official Gazette?			
16	Do you have a continual employee development and training system and policy for your warehouse personnel that ensure your employees comply with the duties and obligations of working in a customs warehouse?			

Internal expert

If, you are not retaining and using an external customs expert, have you taken the following steps?

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p>Does your company have an internal expert on Jordan Customs import matters?</p> <p>What steps have you taken to verify the training and technical expertise of your Jordan customs person (e.g., does he have a certificate as a customs issues specialist that is officially recognized by industry and Jordan Customs)?</p> <p>Do you have an internal expert on all U.S. Customs and Border Protection export issues (For example: 24–Hour Rule, etc)?</p> <p>Do you have an internal expert on all U.S. Federal Department of Agriculture (FDA) requirements for the export of food products and fruit and vegetables?</p>			
2	<p>Do you have a copy of the current Jordan Tariff Schedule and the countries that you operate in?</p>			
3	<p>As a consequence of relying upon your internal expertise only do you have a continuous import, export and warehouse development and training system for your internal expert?</p>			

Note: If you are not using and external expert we strongly recommend you also review the Due Diligence model for Customs Clearance Agents, Export and Import and apply the relevant steps in your internal processes where they relate to warehouse operations and management.

Internal reviews

Do you have an effective internal audit program?

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Do you have a scheduled series of internal audits to ensure conformity with Jordan Customs Laws and Jordan Customs Regulations and Jordan warehouse laws and regulations and with other Jordan government regulations?			
2	Do you have a process for taking corrective actions through voluntary disclosures to Jordan Customs for errors or omissions discovered during internal audits?			

Internal Records and Documentation

Have you established an internal record keeping system that ensures that all documents related to your external economic activities are retained?

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p>Do you have an internal record keeping system to meet the following criteria?</p> <p>The term “records” means any information made or normally kept in the ordinary course of business which pertains to the following activities:</p> <ul style="list-style-type: none"> • any importation, declaration or entry; • the transportation or storage of merchandise carried or held under guarantee into or from the customs territory Jordan or the countries where you operate; • the filing of a drawback claim; • the collection and payment of fees, duties and taxes to Jordan Customs; • any other activity required, being undertaken pursuant to laws or regulations administered by Jordan Customs. <p>The term “records” includes any information required for the entry of merchandise and other information pertaining to or from which is derived, any information element set forth in a collection of information required by the Jordan Customs Law in connection with an activity described above.</p> <p>The term includes, but is not limited to:</p>			

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	<ul style="list-style-type: none"> • statements, declarations, documents; • electronically generated or machine readable data; • electronically stored or transmitted information or data; • books, papers, correspondence; • accounts, financial accounting data • technical data; • computer programs necessary to retrieve information in a usable form. 			
2	Do you have a secure storage place for your records?			
3	Are your records indexed in a retrievable fashion?			
4	Have you established a reliable destruction cycle to prevent the premature destruction of required records?			
5	Do you have a responsible person assigned as your custodian of customs and warehouse records?			
6	Do you have a backup of your records?			
7	<p>Record keeping and reporting on goods stored in a warehouse</p> <ul style="list-style-type: none"> • Do you have a warehouse management system with written procedures to ensure that all warehouse (receipts, etc) and office records (stock account, etc) are maintained up to date, and that records actual date of stock movement? • Do you have warehouse written procedures that include stock control (inventory control) that includes documentary evidence of physical stocktaking? • Does your stock control procedures include physical stock check with stock account records? • Do you keep written procedure for keeping records of all goods cleared through your bonded warehouse in compliance with the bonded warehouse customs regime? • Do you record the placement date of the goods into the warehouse? • Do you record the name of the goods? • Do you record the number of items and the gross weight in kilogram's? • Do you record the number of documents that accompany the goods? • Do you record the number of the cargo customs declaration and the date of issue? • Do you have a written procedure prepare and submit reports on goods stored in the warehouse to the customs authorities? • Have you ascertained the format and procedure in which reports on goods stored in the warehouse shall be compiled and submitted to the customs authorities? • Do you have a written procedure to all of your warehouse and office staff instructing them as to what information the record keeping / inventory system will list? 			

	<ul style="list-style-type: none"> • Does the record keeping / inventory systems comply with the requirements of your tax inspector? • Does your Chief Accountant have monthly access to your record keeping / inventory system and its information? • Does your record keeping / inventory systems comply with the tax policy of Jordan? • Do you keep a registration book for your warehouse record keeping? • Do you record the customs registration document? • Does your registration book and the manner in which information is recorded comply with the established format? • Have you agreed what the established registration book format is? • Do you have a written procedure to ensure that the records are checked for errors? • Do you have a written procedure that ensures that your registration book does contain the prescribed information? • Do you have a written procedure to ensure that stock records / inventory records are submitted to the customs authority? • Do you have a written procedure to ensure that in the event of a discrepancy with physical stock and the written records an internal audit is undertaken? • Do you have a written procedure to ensure that you record and file and store all physical stock tacking records and that these records were compared with book stock? • Do you have a written procedure that ensures that you record all tacking of samples and specimens? , • Do you have a written procedure to allow the customs authorities to undertake an inventory of goods and means of transport stored in the bonded warehouse? • Do you have a written procedure to ensure that you store all registration documents of goods and means of transport at your bonded warehouse for 5 years? • Do you have an audit trail that tracks removals from stock accounts through to declaration? (This is to avoid goods being released without declaration) • Do you have a written procedure that allows release of goods after evidence of acceptance of the removal declaration is held by the warehouse manager / supervisor, and that entry has been made in the record for clearance procedure? (This is to avoid goods being released before duty point or before entry into the stock account record) • Do you have a written procedure to ensure that the entry in the customs warehouse records is made before the goods are released, which also identifies the duty point is correctly identified and is correctly applied to the customs declaration? 			
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	<ul style="list-style-type: none"> • Do you have a written procedure to ensure that goods arriving in the warehouse were previously entered as Temporary Import, etc? (This is to check if goods of that commodity code are being removed to free circulation and liable to compensatory payment) • Do you have a written procedure to check the traders (client) system to prevent mistakes in picking stock, and avoid discrepancies of goods declared and the actual goods removed? (This is to avoid the wrong goods / products being removed from the warehouse resulting in an inaccurate duty declaration. Physical examination to be made as a test, and check declaration ad commercial documents); • Do you record the time of arrival of the means of transport and the submission of the short form declaration to customs? (The procedure should ensure there is timely entry into the stock account when goods are received at the warehouse premises) • Do you record the goods inward documentation to confirm the actual date of receipt, and check this documentation with the entry in stock account record? (This is to avoid delays in booking goods received into the customs warehouse recording system) • Do you check receipts to ensure correct data are being captured in the stock account record? (This is to eliminate errors on incorrect value, rate of exchange and the nature of the goods recorded. The warehouse operator and supervisor must have documentary evidence of the value, rate of exchange and nature of the goods at the time of the first entry into the procedure). 			
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Physical Security

Is the warehouse properly equipped to ensure the security and the integrity of the cargo that is subject to Customs Control?

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p>Does the warehouse have designated means of entrance and exit: no other means of un-authorized access and intruder escape?</p> <p>The entrance and exit doors must comply with the fire regulations.</p>			
2	<p>Do you have designated personnel that work in the customs warehouse that are distinguishable from other</p>			

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	<p>company employees that have no right to be in the warehouse (separate color overalls, different color safety helmet, etc)?</p> <p>Do the warehouse employees have photo I.D. Cards?</p> <p>Do you have a reliable employee identification system that positively identifies authorized employees and customs for entry and leaving the warehouse?</p> <p>Does the identification system record each employee entry time and leaving time?</p> <p>Does the identification system provide an alert report in the event of non authorized entry?</p>			
3	<p>Does the warehouse have ways that would permit unauthorized persons to access (vehicles, damaged perimeter fence, windows, un-guarded doors, weak wall material, no wire mesh caged areas, lack of international standard padlocks, bolts and locks, lack of steel reinforced doors with metal frames, etc)?</p>			
4	<p>Is the warehouse protected by a secure perimeter fence and or wall?</p>			
5	<p>Do you have a routine schedule for checking the physical security condition of your warehouse?</p>			
6	<p>Do you have an alarm system that would detect attempts at unauthorized access?</p> <p>Does your alarm system have a routine maintenance system that ensures that the alarm (including smoke alarms, sprinklers, and fire extinguishers) system is working in accordance with the manufacturer's compliance certificate?</p>			
7	<p>Do you have security guards?</p> <p>Are the security guards trained?</p>			
8	<p><u>Recruitment of Customs Warehouse personnel:</u> Are routine background checks performed on persons prior to hiring them where they would have either physical access to the goods or in a position to manipulate inventory records?</p> <p>Are background checks carried out on employees who have been employed by the company for a long duration?</p> <p>Does the warehouse training include safety and security awareness education?</p>			
9	<p>Is there a procedure to evacuate the warehouse in case of fire or crisis?</p>			

Risk management

Warehouse operators provide storage facility and services for clients and consequently assume an element of risk. This section incorporates the risk management of commercial and operation issues of a customs warehouse.

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p>General concepts and purposes of risk management application</p> <ul style="list-style-type: none"> • Do you check for possible non-compliance with the Jordan Customs Law and other customs regulations and as a result of this check do you measure (benchmark) the number of non-compliance instances? • Do you keep a comparative month by month record? • Is the incidence of non-compliance being reduced? • Do you have an agreed method to share this record with the Jordan Customs Department? • Do you as a result of your self assessment due diligence checklist implement procedures and personnel training to increase and improve compliance? • Do all levels of the company personnel have compliance checks: <ul style="list-style-type: none"> -Directors -warehouse managers -warehouse supervisors -warehouse operatives -accountant -human resources supervisor -clerical personnel • Do you have a system that proves to the Jordan Customs Department that your company has a preventative warehouse due diligence system to assess risk in the warehouse and in the office? • Does your company have a system that checks your client's documentation for compliance? • Does the company warehouse due diligence system indicate to warehouse and office personnel as to how risk can be introduced by certain client's goods and transport operator practices? • Does your warehouse due diligence system help the Jordan Customs Risk Management Department with high risk? 			
2	<p style="text-align: center;">Risk Categories</p> <ul style="list-style-type: none"> • Do you have a warehouse due diligence list that includes the following aspects and do you check the following categories for risk: - 			

	<ul style="list-style-type: none"> -type of goods? -commodity code? -country of departure? -country of destination? -means of transport? -customs value? -transportation routes of goods? -participants in the transaction? -documents presented for customs clearance? 			
3	<p>Risk Assessment and Management</p> <ul style="list-style-type: none"> • Do you collect statistical data and operational data on compliance and violations? • Do you have a warehouse due diligence system that lists the different risk indicators? • Does the warehouse due diligence system present the information in an annual report, including statistics? • Does the warehouse due diligence system measure annual improvement? • Does your system include a check with Jordan Customs to ascertain their annual list of risk factors? • Does your warehouse due diligence checklist and written procedures allow for changes that may occur with regard to risk indicators? 			
4	<p>Criteria for determination of risk factors</p> <p>1. Types of goods: -</p> <ul style="list-style-type: none"> • Do you check the goods that are most often subject to smuggling; unlawful entry into the customs territory of Jordan? • Do you check the volume and other possible changes; unlawful removal of goods from customs surveillance? • Do you record the interval between the arrival of the goods and their presentation to customs; possible substitution and theft? • Do you check how the customs declaration is completed? • Do you check the accuracy of the declaration; incorrect or false, or partially incorrect or false goods description and / or accompanying documents; • Do you insist on your clients changing the term “Freight all Kinds” and instead listing every piece of cargo? • Do you check for non-compliance with current import prohibitions or restrictions; • Do you have a system for the faster physical movement and faster processing of documentation for perishables? • Do you check if the goods, which would be subject to a quantitative quota or anti-dumping duty when, released for free circulation? • Do you have a due diligence check list and system 			

	<p>for high value goods, such as the import of foreign cars?</p> <ul style="list-style-type: none"> • Do you have a due diligence check list and method of identifying goods stipulated for special handling and testing: sealing, sampling, customs laboratory analysis and JISM Certification, etc? • Do you have a due diligence check list that enables you to identify cases of inward processing where there is a need for the application of certain procedures for industrial input products? • Do you have a due diligence check list and method to identify parts and components where anti dumping duties apply to the finished product? • Do you check if there is a guarantee lodged to ensure payment of any customs or tax debt, which might be incurred? • Do you record your client trading patterns? • Do you check for possible counterfeit and pirated goods? • Do you check the goods and documentation in cases where your client may have permission to manufacture some goods outside the customs territory of Jordan? • Do you check if your client has registered his company brand name? • Do you check the goods and documents in cases where the goods are luxury products and or products of leading USA and European designer brands (clothing, perfumes, fashion accessories such as watches, sunglasses, shoes, etc)? • Do you check the goods and documents of spare parts for vehicles, aircraft and other capital goods? • Do you check the goods and documents for pharmaceuticals and chemicals? • Do you check the goods and documents for toys and video games? • Do you check the goods and documents for data means and audiovisual media? • Do you check the goods and documents for printed works? • Do you check the goods and documents in cases where there are plans, designs, and models as these will come under the heading of intellectual property rights? • Do you check if the packaging is unsuitable for the type of goods? • Do you check for dubious labeling badly printed, badly spelt, distorted, or faded? • Do you check for labeling in compliance with the labeling and marking requirements in Jordan? • Do you check if there is an unusual combination of products, for example watches and perfumes, or goods from different manufacturers? • Do you check for goods in non-standard 			
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	<p>packaging, for example watches in bags instead of in boxes?</p> <ul style="list-style-type: none"> • Do you check in the case of textiles that the labeling indicates the fiber or care instructions? • Do you check for a manufacturer guarantee? • Do you check small consignments from suspect countries with senders name missing, incomplete or illegible sender name? • Do you check in compliance with the international 1973 Washington CITES Convention on endangered animal and plant species? • Do you check for the transport and storage of nuclear and radioactive products? • Do you have written guidelines in compliance with the United Nations guidelines for the transport and storage of nuclear and radioactive materials? • Do you have a checklist and a method for the import and export of hazardous waste and other dangerous products? • Do you have a checklist and method to control the export and re-export (including transshipment) of dual use goods? <p>2. Commodity code: -</p> <ul style="list-style-type: none"> • Do you check if the goods are entitled to tariff preferences? • Do you check goods that are subject to excise duties? • Do you check the excise duty deposit details? • Do you check the accuracy of excise seals? • Do you check the classification / commodity codes in case the goods are different: possible avoidance of higher duty level? • Do you have a due diligence check list and method for identifying exchange and re-imported products and equipment, returned products, following calibration, etc? • Do you have a due diligence check list and a method in cases where the duties to be deducted are assessed on a broader basis, leading to overstatement of quantity, or understatement of value at re-import? • Do you have a due diligence check list and method to identify misdeclared goods under a tariff heading? • Do you have a due diligence check list and method to verify tariff code interpretations? • Do you have a due diligence check list and method for temporary import that entails partial relief from customs duties and full relief from customs duty? • Do you have a due diligence check list and a method for consignments presented for temporary admission that are intended for trade fairs, conferences, international meetings, concerts, etc? 			
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	<ul style="list-style-type: none"> • Does your due diligence check list and method for trade fairs, conferences, meetings and concerts allow for the identification of equipment, machinery and tools, etc., that are in excess of what would be required for demonstration purposes? • Do you have a due diligence check list that identifies if the declaration document for products states “Other”? <p>3. Goods originating in countries that are granted preferential tariff treatment: -</p> <ul style="list-style-type: none"> • Do you have a due diligence check lists of countries of origin whose goods upon import are entitled to preferential tariff treatment? • Does your due diligence check list and process check imports consigned from a preferential country lying on a direct route between the country subject to anti-dumping duties and the point of entry in the territory of Jordan? <p>4. Countries of departure of goods: -</p> <ul style="list-style-type: none"> • Do you have a due diligence check list and method that identifies countries considered to be high risk: Iraq, Afghanistan, etc., (<i>The list of high risk countries is usually made by customs</i>) • Do you have a due diligence check list and method that provides for the receiving of intelligence from customs to prevent fraud? • Do you check that the country of consignment bordering on, or close to, a country subject to anti-dumping duties on the same products; provenance? <p>5. Destination countries that have offshore zones: -</p> <ul style="list-style-type: none"> • Do you have a due diligence check list and method that identifies exports to offshore zones? <p>6. Means of transport: -</p> <ul style="list-style-type: none"> • Do you have a due diligence check list and method that identifies reputable and non-reputable road transport operators: - <ul style="list-style-type: none"> -registered TIR transporter? -certified vehicle in compliance with TIR rules? -international weight certificate? -registered for tax and VAT in Jordan? -record of any Jordan Customs Law violations? • Do you have a due diligence check list and method that ensures that in cases of sea transport you have documentation in advance of the arrival of the cargo, such as the manifest, bill of lading, invoices and compliance certificate, in order for you to target checks and compliance? • Do you have communications, in the form of a web based information exchange system? For example, Cisco eHub, or your company private 			
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	<p>web based information exchange system etc., with the transport company, customs clearance agent, ocean transportation intermediary and sea carrier?</p> <ul style="list-style-type: none"> • Do you check the departure times of ships? • Do you have a due diligence check list and a method that permits a random selection and check of categories of goods that arrive by air? • Do you have a due diligence check list and a method in cases of express parcels that permits the use of the companies tracking system to identify high and low risk consignments? • Do you have a due diligence check list item for the examination of all air way bills? • Do your personnel understand several foreign languages so that the airway bills can be checked properly? • Do you have a method of ascertaining what the fraud trend is? • Does your due diligence checklist include checking your client internal operating systems? • Does your due diligence checklist include examination of documents and goods handled by persons who are not the actual owners? • Do you check if the means of transport was previously used in the illegal transportation of goods? • Do you check the goods from vessels and containers that carry mixed cargo: regional and non-regional goods? <p>7. Customs value: -</p> <ul style="list-style-type: none"> • Do you check that the goods are declared to customs for verification with all commercial documents? • Do you check for the reliability of all the commercial documents: - <ul style="list-style-type: none"> -invoices? -contract between the buyer and seller? -customs control documents from other countries? -all customs documents that will enable the Jordan Customs Department to determine the customs value of imported goods as per Article 28 of the Jordan Customs Law? • Do you check if sales have been made prior to import, as in cases of fictitious sales prior to importation may be fabricated as a means to writing up the value of the goods? • Do you always check the declared value? • Do you check if fixed duties apply, when there is a risk of the value being understated to lower the tax base? • Do you check if variable duties apply, when there is a risk of the value being overstated? • Do you check if the free-at-frontier price is higher 			
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	<p>that the transaction value?</p> <ul style="list-style-type: none"> • Do you check if payment is postponed until after the day following release of the goods for free circulation? <p>8. Transport routes: -</p> <ul style="list-style-type: none"> • Do you check if the route used for each mode of transport is a normal one, and if there has been an unaccounted for or unjustified detour (check the odometer)? • Do you check if the duration of the transport journey is normal and if there has been an unaccounted delay in the journey time? • Do you check more frequently the documentation and goods that use the routes most often used for smuggling? • Do you check cases of complicated route plans? <p>9. Trader based risks: -</p> <ul style="list-style-type: none"> • Do you check if the trader / importer is a first-time user of the customs procedure? • Do you check if the participants in the import and export transaction are registered for tax and VAT and has a company registration certificate and company charter? • Do you check if the trader uses a succession of customs procedures; same regime or a series of different ones? • Do you check if the trader is requesting a renewal of an authorization on the basis of new particulars? • Do you check cases where the reliability of the traders' internal systems has not been established by a prior check, and audit of his inward and outward processing? • Do you check the corporate structure of your clients? • Do you check the legal relationship between the importing firm (parent company) and enterprises in the countries to which anti-dumping duty applies (subsidiaries), or a special commercial relationship? • Do you check for changes in supplier countries following the introduction of anti-dumping duties? • Do you check for double invoicing? • Do you check and keep a record of suspect suppliers and forwarders? • Do you check if the trader or the foreign subsidiary is in financial trouble? • Do you check if the trader is a recently established company? • Do you check if the trader is in a business sector involved in sensitive goods, for example scrap metal, etc? • Do you check if the trader has changed his supplier 			
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	<p>country?</p> <ul style="list-style-type: none"> • Do you check if the supplier country is inappropriate for the type of goods shown in the customs declaration? • Do you check if the importer usually uses a different customs office of entry? • Do you check if your client / trader has had a cancellation or withdrawal of authorization to use a simplified procedure or pre arrival declaration? • Do you check if your client / trader has had previous violations of the administrative code? • Do you check the client if they have links with companies located in high-risk countries: Iraq, Afghanistan, Iran, etc? • Do you check unfamiliar consignees? • Do you check the goods and documentation when you know that the transport operator or client (importer and exporter) is working outside his usual field? • Do you check for procedure based risk indicators such as where guarantee documents look suspicious, for example dates or country names difficult to read? • Do you check when stamps are illegible or too clear (possible falsification)? • Do you check your client when there is an absence or presence of seals, for example seals that have been removed, tampered with or where there are new seals? • Do you ensure that the inspection of the transit and transport documents is a high priority? 			
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Compliance with the Jordan Customs Law

This section incorporates some of the Articles of the Jordan Customs Law that apply to warehouses. Warehouse operators are advised to check the Due Diligence Models for Export and Import to ensure compliance with the Jordan Customs Law and to provide a compliant warehouse service for their clients.

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p><u>Application of Customs Tariff</u> Article 16: Do you have a reliable written procedure for imported goods that are intended for local consumption or for re-export and, goods coming out of free zones and duty-free shops to be submitted for local consumption to ensure that they are subject to customs tariffs, and that the customs tariffs are paid, that are in force at the date of registering their customs declarations at a Jordan</p>			

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	<p>Customs House?</p> <p>Do you have a reliable written procedure to ensure that those goods intended for re-exportation and on which customs duties have been paid before wholly entering the customs zone, the part of those goods which has not yet entered shall be subject to the customs tariff in force upon entering the customs zone?</p>			
2	<p>Article 18, Section A:</p> <p>Do you have a reliable written procedure to ensure that when duties on goods stored in the warehouse are due for collecting by reason of expiry of the deposit delay period and failure to extend it, the provisions of the tariff in force at the time of expiry of the deposit delay period shall be applied?</p> <p>Section B:</p> <p>Do you have a reliable written procedure to ensure that goods withdrawn illegally from the warehouse or those found short upon reviewing the warehouse accounts, shall be subject to the tariff in force at the date of the last withdrawal from the warehouse, or the date at which the shortage is discovered or the date of its occurrence, if this is determinable, depending on whichever has the highest duties?</p>			
3	<p><u>Inspection of Goods</u></p> <p>Article 71, Sections A, B and C:</p> <p>Do you have a reliable written procedure to ensure that you accurately check and record the condition in which all goods are received in the warehouse?</p> <p>Does your checking procedure and record system produce an exception report in cases where goods are received in an un-sound condition?</p> <p>Does your procedure include reporting cases of un-sound goods, shortages and replacement of goods to Jordan Customs?</p>			
4	<p>Article 72</p> <p>Do you have a reliable written procedure to ensure that you provide access to the warehouse for Jordan Customs officials and provide working space?</p> <p>Do you have a reliable written procedure to ensure that you facilitate a Jordan Customs inspection of the goods and to check the warehouse written documentation, for example the warehouse inventory, etc?</p>			
5	<p>Chapter Three</p> <p>Warehouses</p> <p>A – General Provisions</p> <p>Article 105:</p> <p>Do you have a reliable written procedure to ensure that all gates are locked by two different padlocks?</p>			
6	<p>Article 106:</p>			

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	<p>Do you have a reliable written procedure to ensure that goods are not admitted into the warehouse except after presenting a storage declaration arranged in accordance with the provisions of the Jordan Customs Law?</p> <p>Do you have a reliable written procedure to ensure the control of the circulation of goods?</p> <p>The Jordan Customs Department will keep a record to monitor warehouse operations. The records will serve as a reference to audit and reconcile the stock inventory of the warehouse with the Jordan Customs entries.</p>			
7	<p>Article 107: Do you have a reliable written procedure to ensure that goods kept in a public and private warehouse are kept for not more than one year?</p> <p>Do you have a reliable written procedure to ensure that you extend the period for more than one year?</p>			
8	<p>B – The Public Warehouse</p> <p>Article 108: Do you have a reliable written procedure to ensure that under the terms of operation, storage fees and other costs and revenues payable to a warehouse are paid?</p>			
9	<p>Article 109: Do you have a reliable written procedure to ensure that prohibited goods such as explosives or semi-explosive materials, radio active materials, inflammable materials, goods bearing signs of decay, goods whose presence in the warehouse entails dangers or threatens the quality of other products, goods whose preservation requires special facilities as well as bulk goods are not stored in a warehouse that is not constructed and approved for special storage purposes?</p>			
10	<p>Article 110: Do you have a reliable written procedure to ensure that Jordan Customs can supervise the warehouse?</p>			
11	<p>Article 112, Section B: Do you have a reliable written procedure to ensure that you and your client receives the sum of money that were obtained as a consequence of a sale by Jordan Customs?</p> <p>Do you have a reliable written procedure to ensure that the monies are claimed before the three year expiry period?</p>			
12	<p>Article 113: Do you have a reliable written procedure to ensure that you record and control taking the covers off goods, transfer the goods from one container to another, assemble the packages or separate them (break bulk) and carry out all other acts aimed at maintaining the products or improving their appearance or facilitating their disposal, with the consent of the Jordan Customs</p>			

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	Director and under the supervision of the Jordan Customs Department and the official competent party?			
13	Article 114, Section A: Do you have a reliable written procedure to ensure that you pay the fees and taxes to Jordan Customs in cases of any increase, decrease, loss or replacement of goods in addition to fines imposed by Jordan Customs Department?			
14	Article 115: Do you have a reliable written procedure to ensure that you record and control moving goods from a public warehouse to another warehouse or to any customs center in accordance with declarations of guaranteed undertakings? Do you have a reliable written procedure to ensure that you sign the undertakings and present a certificate stating that the goods have been entered into a public warehouse or into a customs center for string or submitted for consumption or in accordance with any other customs status?			
15	C – Private Warehouse Article 118: Do you have a reliable written procedure to ensure that goods placed in the warehouse will be presented to Jordan Customs Department upon each request?			

C-TPAT Warehouse Security Recommendations for warehouses handling exports to the USA

The C-TPAT Warehouse Security Recommendations are the same as those stipulated by U.S. Customs and Border Protection for U.S. Warehouse Operators.

Jordan warehouse operators that handle exports to the U.S. may want to develop and implement a sound plan to enhance security procedures. These are general recommendations that should be followed on a case-by-case basis depending on the company’s size and structure and may not be applicable to all. Warehouses as defined in this guideline are facilities that are used to store and stage both Customs bonded and non-bonded cargo. The company should have a written security procedure in place addressing the following:

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<u>Physical Security</u> All buildings should be constructed of materials, which resist unlawful entry and protect against outside intrusion. Physical security should include: <ul style="list-style-type: none"> • Adequate locking devices for external and internal doors, windows and fences; • Adequate lighting provided inside and outside the facility to include parking areas; 			

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	<ul style="list-style-type: none"> • Segregation and marking of international, domestic, high value, and dangerous goods cargo within the warehouse by a safe, caged, or otherwise fenced-in-area; • Separate parking area for private vehicles separate from the shipping, loading dock, and cargo areas; • Having internal / external communications systems in place to contact internal security personnel or local law enforcement police. 			
2	<p><u>Access Controls</u> Unauthorized access to facilities should be prohibited. Controls should include:</p> <ul style="list-style-type: none"> • The positive identification of all employees, visitors, and vendors; • Procedures for challenging unauthorized / unidentified persons. 			
3	<p><u>Procedural Security</u> Procedures should be in place to protect against unmanifested material being introduced into the warehouse. Security controls should include:</p> <ul style="list-style-type: none"> • Having a designated security officer to supervise the introduction / removal of cargo; • Properly marked, weighed, counted, and documented cargo / cargo equipment verified against manifest documents; • Procedures for verifying seal on containers, trailers, and railcars; • Procedures for detecting and reporting shortages and overages; • Procedures to notify Customs and other law enforcement agencies in cases where anomalies or illegal activities are detected or suspected by the company; • Proper storage of empty and full containers to prevent unauthorized access. 			
4	<p><u>Personnel Security</u> Companies should conduct employment screening and interviewing of prospective employees to include periodic background checks and application verifications.</p>			
5	<p><u>Education and Training Awareness</u> A security awareness program should be provided to employees including recognizing internal conspiracies, maintaining cargo integrity, and determining and addressing unauthorized access. These programs should encourage active employee participation in security controls.</p>			

The Supply Chain Security Validation Process Guidelines have not been included in this model. Jordan companies that operate warehouses can refer to the larger supply chain security check list if they wish to undertake a comprehensive validation process check.

Appendix 4: Customs Agents

Guide

The questions in the checklist are a guide to allow JCD and Golden List candidate companies to determine if the applicant is ready to assume the responsibilities of self-assessment. The check list questions are designed to determine if the Jordan company has made a commitment to implement specific actions (internal procedures and controls) that will enhance compliance. A Jordan company that does not have procedures and controls in place may answer that it plans to develop and implement procedures and controls and specify a target date for implementation.

Response Yes or No

A respond yes or no in this column indicates whether a Jordan company has implemented procedures and controls response to the question. If, a Jordan company has adequate procedures and controls that it believes document that the company is ready to assume the responsibility of self-assessment, the Jordan company can answer yes to the question. If, the Jordan company does not have adequate procedures and controls, whether they are generally adequate or need significant improvement, the Jordan company can answer no under this column and indicate in the next column that it plans to implement procedures that will be adequate for the company to assume responsibility of self-assessment.

If No, Plan to implement or improve (yes or no)

If, the Jordan company indicated “no” under the previous column, the Jordan company can respond yes or no in this column to indicate whether it plans to implement or improve procedures and controls. Whether the Jordan company procedures and controls are generally adequate but need small improvements, or need significant improvements, we recommend the JCD accept the company into the Golden List under certain conditions. The company must commit to making the necessary improvements and demonstrates that the steps are in process. If, the Jordan company agrees to make needed improvements the company should respond yes in this column. The JCD must periodically monitor the improvement process. Failure to follow through would then result in removal from the Golden List. If, the Jordan company does not have or plan to have these procedures and controls Jordan Customs Risk Management Directorate will need to consult with the company to ascertain their readiness to assume responsibility of self assessment. Shipments associated with non-participants in the Golden List Program will be subject to other risk assessment factors.

Target date

If, the Jordan company indicates that it is going to implement procedures and controls under this column, it should provide the target date to have the procedures and controls implemented and working in this column by the target date.

Licensing and Certification

Are you currently meeting all qualifications for a Customs Clearance Agent in Jordan?

No	Description of due diligence / guide	Yes or No	Plant to implement or improve: Yes or No	Target date
1	Jordan Customs Law Article 166: Is your license to operate as a Customs Clearance Agent valid?			
2	Jordan Customs Law Article 166: 1. Is the person on the Customs Clearance Agent license Jordanian national; Over 23 of age; 2. Hold General Secondary Study Certificate, or has worked as a customs official in the Customs Department for 15 years; 3. Have practiced clearance or customs work with a licensed body in the Kingdom or worked as a classified official in the Customs Department for at least 5 years; 4. He must be of good reputation and character and has not been sentenced in any crime or misdemeanor encroaching on personal honor.			
3	Does the legal person meet the requirements of the Jordan Customs Law Article 166 section C to K inclusive?			
4	Are all other business licenses current?			
5	Do your personnel have other industry, association or training certifications to confirm your company's qualifications?			
6	Are you currently ISO 9000 registered or are you in the registration process?			
7	What steps have you taken to ensure that key personnel in your company are certified as Customs Experts?			
8	Does your company have proof of payment of the bank guarantee of 5000 Dinars as per Jordan Customs Law Article 167 Section B?			

Legal

Do you have policies and procedures in place to ensure compliance with legal requirements (both government and civil liability) as a customs clearance agent?

No	Description of due diligence	Yes or No	Plant to implement or improve: Yes or No	Target date
1	Are you in compliance with the Jordan Customs Law, other laws and other pertinent regulations regarding the activities of Customs Agents in Jordan?			
2	Do you have a written contract with all clients and does your contract specifically identify the responsibilities of each party regarding the submission of truthful and accurate information to Jordan Customs and the corresponding liabilities for the submission of false or inaccurate information?			
3	Do you have a signed Power of Attorney for each client you represent and is this Power of Attorney current? Do you have an administrative procedure to ensure that the Power of Attorney is current?			
4	Do you have a written internal company Code of Conduct for employees regarding the requirements for safeguarding the confidential client information contained in your files? Do you conduct routine training on the obligations for the safeguarding of confidential information? Does each employee sign an acknowledgement that they have read and understood your internal Code of Conduct requirements and is that record maintained in your personnel files?			
5	If you have a company Code of Conduct does it contain a policy statement on offering bribes and responding to solicitation of bribes?			
6	If you have a company Code of Conduct does it include a provision for non-participation in any attempts to commit a fraud against the Government and an obligatory requirement to report frauds or attempted frauds by clients to the proper authorities?			
7	Do you have a system in place to maintain the physical security of client records? Is your physical security system enforced by a procedure to prevent the accidental or inadvertent review of privileged, confidential information by unauthorized persons?			
8	Do you retain client funds? If you retain client funds do you have systems in place to safeguard these funds?			
9	Do you have a professional liability insurance and business insurance?			

Technical specialization

Are you technically qualified to act as a customs agent and represent your clients?

Do you have a systematic approach insuring that your technical capabilities are continuously updated?

No	Description of due diligence	Yes or No	Plant to implement or improve: Yes or No	Target date
1	Do you have on file a complete and current copy of the Jordan Customs Law and all relevant Customs and other Government Regulations for your country or the countries where you operate pertaining to the importation and exportation of commodities?			
2	Do you have a copy of the current Jordan Customs Tariff Schedule as published in the Official Gazette (Jordan Customs Law Article 14), or the countries where your clients operate? Do you have a reliable written procedure to ensure that you apply the tariff in force at the date of the sale or release for consumption (Jordan Customs Law Article 21)?			
3	Do you have or have ready access to other internationally recognized reference materials. Examples would include but are not limited to the World Customs Organization Classification Handbook with up to date Notes, Amending Supplements to the Notes and Compendium of Classification Opinions; International Chamber of Commerce INCOTERMS; World Trade Organization General Agreement on Tariffs and Trade.			
4	Do you have a procedure in place to verify that you are current and up to date on all applicable changes to the Jordan Customs Law or the countries where you operate Customs Laws and regulations?			
5	Do you have an ongoing training system and policy for your internal customs specialists and other staff?			
6	If you operate in multiple locations, do you have an accurate mechanism and system for the sharing of information between your different locations. If, this is an electronic exchange via the Internet, do you have firewall safeguards to ensure confidentiality of the information?			
7	Do you have sufficient staffing at all locations where you operate as a Customs Agent to ensure that a highly qualified specialist reviews all declarations?			
8	Do you have an internal policy to confirm that you have sufficient expertise within your firm to represent the needs of each client? In the event that you do not believe you can adequately represent your potential client because of the specific client			

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	requirements, do you have an internal policy for referring the potential client to another customs broker who you believe may more adequately meet the client needs?			
9	Do you have an established program for clients to use independent laboratory analysis if required to substantiate merchandise classification issues?			
10	Are you currently using expedited clearance procedures for time sensitive shipments?			
11	Do you have an established program to advise clients on the potential benefits or disadvantages of using the various alternative Customs regimes?			

Process oversight

Do you have sufficient safeguards in place to ensure that each transaction with a client or with Jordan Customs meets the highest standards?

No	Description of due diligence	Yes or No	Plant to implement or improve: Yes or No	Target date
1	Do you discuss importations in advance with your clients and have you provided your clients with sufficient information to assure yourself they understand their responsibilities?			
2	For clients engaged in multiple importations have you established a reliable system to ensure the client notifies you of any changes between importations that would effect the transaction with Jordan Customs?			
4	Have you provided or established reliable procedures to ensure you provide a complete and accurate description of your clients' merchandise to Customs in accordance with the Jordan Customs Law and regulations?			
5	Have you provided or established reliable procedures to ensure you provide a correct tariff classification of your clients' merchandise to Jordan Customs in accordance with the Jordan Customs Tariff schedule (Jordan Customs Law Article 21 and 22)?			
6	Where merchandise description or tariff classification information is not immediately available from your client, have you established a reliable procedure for obtaining that information, and is the procedure being followed?			
7	Have you participated in a Jordan Customs pre-classification of your client's merchandise relating to proper merchandise description and classification?			
8	Have you consulted the Jordan tariff schedules, Jordan Customs regulations, court cases, World Custom Organization Harmonized System rulings and the countries where you operate Customs rulings to assist you in describing and classifying the			

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	merchandise?			
9	Have you consulted with an industry or commodity expert to assist in the description and/or classification of the merchandise?			
10	If your client is claiming a conditionally free or special tariff classification/provision for their merchandise, how have you verified that the merchandise qualifies for such status? Have you obtained or developed reliable procedures to obtain any required or necessary documentation to support the claim?			
11	Is the nature of your client's merchandise such that a laboratory analysis or other specialized procedure is suggested to assist in proper description and classification?			
12	Have you developed a reliable program or procedure to maintain and produce any required Jordan Customs declaration documentation and supporting information?			
13	Have you provided or established reliable procedures to provide Jordan Customs with a proper declared value for your client's merchandise in accordance with the Jordan Customs Law?			
14	Have you consulted the Jordan Customs valuation laws and regulations, and World Trade Organization or the countries where you operate Customs rulings to assist you in valuing merchandise?			
15	If, needed as in the case of constructed value, have you consulted with an industry expert or with your company accounting and procurement experts to assist with the valuation of the merchandise?			
16	If your client purchased the merchandise from a "related" seller, have you established procedures to ensure that you and your client have fully discussed the ramifications of such a transaction? Have you obtained all relevant information from your client to document all test requirements to determine if the relationship has influenced the valuation in accordance with the requirements of the Jordan Customs Law? Have you reported to Jordan Customs the related party transaction and taken measures or established reliable procedures to ensure that value reported to Jordan Customs meets one of the "related party" tests?			
17	Have you taken measures or established reliable procedures to ensure that your client has been advised of the requirement to include in the value all of the legally required costs or payments associated with the imported merchandise? Have these costs been reported to Jordan Customs (e.g., shipping, insurance, assists, all commissions, indirect payments or rebates, royalties, etc.)?			
18	If, you are declaring a value based on a transaction in which your client is not the buyer, have you			

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	substantiated that the transaction is a bona fide sale at arm's length and that the merchandise was clearly destined to Jordan or the countries where you operate at the time of sale?			
19	If, you are claiming a conditionally free or special tariff classification/provision for your merchandise, have you established a reliable system or program to ensure that you reported the required value information and obtained any required or necessary documentation to support the claim?			
20	Have you established a reliable program or procedure to produce any required declaration documentation and supporting information as required both for the declaration process and subsequent post entry review by Jordan Customs?			
21	Have you established reliable procedures to ensure that you report the correct country of origin on Jordan Customs entry documents in behalf of your client?			
22	Have you established reliable procedures to verify or ensure that your client ensures that the merchandise is properly marked upon entry with the correct country of origin (if required) and language and any other applicable special marking requirement?			
23	Have you consulted with your client to ensure that merchandise meets the criteria regarding the correct country of origin/proper marking of their merchandise? Specifically have you discussed with your client the difference between country of export and country of origin?			
24	In those cases where the goods imported by your client have been processed or manufactured in more than one country, have you established that the goods meet the substantial transformation criteria?			
25	Have you established procedures to ensure that your client has taken reliable and adequate measures to communicate country of origin or other marking requirements to their foreign supplier prior to importation?			
26	If your client is claiming a change in the origin of the merchandise or claiming that the goods are of origin from the importing country, have you taken required measures to substantiate your claim?			
27	Have you developed reliable procedures to ensure that your client knows and understands their responsibility to assure that no illegal transshipment or false or fraudulent practices were involved?			
28	Does your client know how and who makes their goods from raw materials to finished goods, and where?			
29	Have you checked with Jordan Customs and developed a reliable procedure or system to ensure that if applicable, the quota category is correct?			
30	Have you assisted your client in checking or developing reliable procedures to check the Status			

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	Report on Current Import Quotas (Restraint Levels) issued by Jordan Customs, if applicable? Further to determine if their goods are subject to a quota category which has “part” categories?			
31	Have you prepared or developed a reliable program to prepare the proper country of origin certificate?			
32	Have you established a reliable maintenance program or procedure to ensure you can produce any required declaration documentation and supporting information, including any required certificates of origin?			
33	If, your client is importing goods or packaging bearing a trademark registered in your country or the countries where you operate, have you checked or established a reliable procedure to ensure that it is genuine and not restricted from importation, or that your client has permission from the trademark holder to import such merchandise?			
34	If your client is importing goods or packaging which consist of, or contain registered copyrighted material, have you assisted your client in checking or establishing a reliable procedure to ensure that it is authorized and genuine?			
35	If your client is importing sound recordings of live performances, have you advised your client of their responsibility to take reasonable steps to ensure that the recordings were authorized?			
36	Have you checked or developed a reliable procedure to see if your client’s merchandise is subject to an exclusion order?			
37	Have you established a reliable procedure to ensure that you maintain and can produce any required declaration documentation and supporting information?			
38	Have you taken measures or developed reliable procedures to check to see if your client’s goods are subject to a dumping or countervailing duty investigation or determination, and if so, have you complied or developed reliable procedures to ensure compliance with Jordan Customs reporting requirements upon entry?			
39	Have you taken reliable measures to ensure and verify that you are filing the correct type of Jordan Customs declaration and regime (e.g., warehouse, consumption entry, mail entry, etc.) on behalf of your client, as well as ensure that your client has the right to make entry under the Jordan Customs Regulations?			
40	Have you taken measures or developed reliable procedures to ensure that your client’s merchandise complies with other agency requirements prior to or upon entry, including the procurement of any necessary licenses or permits? Have you communicated with your client prior to			

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	importation the other agency requirements?			
41	In the course of business what steps have you taken to verify that associated companies such as your bank and your client's bank have systems in place to adequately meet the legal requirements of secondary record keepers?			
42	Regarding the transportation of your client's imports or exports what steps have you taken to verify that the transporter meets standards and norms for international haulage?			

Information exchange coordination

Do you have an effective process for exchanging information with clients, industry experts and with Jordan Customs?

No	Description of due diligence	Yes or No	Plant to implement or improve: Yes or No	Target date
1	Have you developed and are you routinely using a documented process for the exchange of information with clients? Does this include a due diligence questionnaire that effectively advises clients of their responsibilities in the Customs process and documents the critical information provided to you by your clients?			
2	Do you have a process that assigns account ownership within your firm to specific clients? Does this process assign a responsible person within your firm for the responsibility for the exchange of critical information with the client?			
3	Do you have an established relationship for the exchange of information with Jordan Customs at both the Border, Port and at the Headquarters level? Do you maintain a correspondence tracking system for rulings by Jordan Customs?			
4	Are you part of an industry exchange program with other customs brokers for comparison of rulings by customs on similar issues?			

Internal Reviews

Do you have an effective internal audit program?

No	Description of due diligence	Yes or No	Plant to implement or improve: Yes or No	Target date
1	Do you on a routine and scheduled basis conduct internal audits to ensure conformity to Jordan Customs and other governmental regulations?			
2	Do you have a process for taking corrective actions through voluntary disclosures for errors or omissions discovered during internal audits?			

Internal Records and Documentation

Have you established an internal record keeping system that ensures that all documents related to your external economic activities are retained?

No	Description of due diligence	Yes or No	Plant to implement or improve: Yes or No	Target date
1	<p>Do you have an internal record keeping system to meet the following criteria?</p> <p>The term “records” means any information made or normally kept in the ordinary course of business which pertains to the following activities:</p> <ul style="list-style-type: none"> • any importation, declaration or entry; • the transportation or storage of merchandise carried or held under guarantee into or from the customs territory of Jordan or the countries where you operate; • the filing of a drawback claim; • the collection and payment of fees, duties and taxes to Jordan Customs; • any other activity required, being undertaken pursuant to laws or regulations administered by Jordan Customs. <p>The term “records” includes any information required for the entry of merchandise and other information pertaining to, or from which is derived, any information element set forth in a collection of information required by the Jordan Customs Law in connection with an activity described above. The term includes, but is not limited to:</p> <ul style="list-style-type: none"> • statements, declarations, documents; • electronically generated or machine readable data; 			

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	<ul style="list-style-type: none">electronically stored or transmitted information or data;books, papers, correspondence;accounts, financial accounting datatechnical data;computer programs necessary to retrieve information in a usable form.			
2	Do you have a secure storage place for your records?			
3	Are your records indexed in a retrievable fashion?			
4	Have you established a reliable destruction cycle to prevent the premature destruction of required records?			
5	Do you have a responsible person assigned as your custodian of records?			
6	Do you have a backup of your records?			

Supply Chain Security validation process guidelines

The Supply Chain Security validation process guidelines are based upon the US Customs Transport Partnership Against Terrorism (C-TPAT) and World Customs Organization (WCO) Supply Chain Security and Facilitation and the Advance Cargo Information Guidelines. Consequently, the number of guidelines is extensive and the description of the requirements are detailed.

The C-TPAT recommendations for U.S. Customs licensed customs brokers are general and extend to about one page.

Some U.S. importers have a supply chain security acknowledgement form that their suppliers complete.

Objectives

Develop and implement a sound plan to enhance security procedures throughout your clients supply chain. Where your company as part of the supply chain does not control a facility, conveyance or process subject to these recommendations, the customs agent agrees to make every reasonable effort to secure compliance by the responsible party. The following are general recommendations that should be followed on a case-by-case basis depending on the company's size and structure and may not be applicable to all.

Procedural Security

Procedural security assures recorded and verifiable location of goods in the supply chain. Procedures should provide for the security of goods throughout the supply chain. Contingent procedures should be included within the scope of procedural security.

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No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Does your company have reliable procedures and a written system in place to protect against non manifested material being introduced into the supply chain?			
2	<p>Does your company have reliable procedures and a written system to ensure your supply chain has security controls that include:</p> <ul style="list-style-type: none"> • the recorded and verified introduction/removal of cargo that is supervised by a designated company official? • the proper marking, • weighing, • counting and documenting of cargo/cargo equipment verified against manifest documents, • the detecting/reporting of shortages/overages, and • the detecting of irregularity or illegal activities, • procedures for verifying seals on containers, trailers, and railcars? 			
3	Does your company have reliable procedures and a written system to ensure that the incoming and outgoing of goods is supervised and monitored?			
4	Does your company have reliable procedures and a written system to ensure that random, unannounced security assessments of areas in your company's control within the supply chain are conducted?			
5	Does your company have reliable procedures and a written system to ensure that the procedures for notifying Jordan Customs and other law enforcement agencies in cases where anomalies or illegal activities are detected, or suspected, by the company are in place?			
6	Does your company have reliable procedures and a written system to ensure that your company Facility/Terminal operators have written and verifiable security procedures in place with regards to areas under your company control?			
7	Does your company have an integrated computer information exchange system (Connectivity and share) with your clients suppliers, freight forwarder (Supply chain participants) and your company sections and divisions that are involved with the import and export transaction and physical movement of your goods and consignments?			
8	Does your company computer system allow the connectivity to exchange sufficient quality information that has the required detail to record in-transit visibility and exception reporting and			

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	product identification for each consignment / container in real time (Tracking using spreadsheets and faxes are not sufficient)?			
9	Does your company have a real time computer information collection and connection system that engages with your supply chain partners who have different technical capabilities, and data message integrity that can offset human errors and foster product identification?			
10	Is your company computer system sophisticated enough to record container opening, tampering and other dock to dock tracking visibility?			
11	Is your company computer system sophisticated enough to inform you where a shipment is supposed to be and if delivery is ahead or behind schedule, wrong direction, radiation, seawater or chemical problem, temperature change beyond tolerance levels, as well as other client specific information and consequently produces an exception report?			
12	Does your computer system or the computer system of the transportation operator / agent and freight forwarder have the capability to produce a complete audit trail of where the container has traveled and when and where exceptions have been generated, detection capture, communication of breeches in real time and that exceptions generate real time notification to you via e-mail, pager or XML / EDI transactions?			
13	Does the clients transportation operator and or freight forwarder use detection devices that are attached in such a way that a thief cannot breach the container without generating an exception, even if the container door is removed completely?			
14	Does your company have reliable procedures and a written system to ensure that your company and your clients properly stores empty and full containers to prevent unauthorized access, including the use of tamper-proof / non-counterfeitable seals?			
15	Does your company have reliable procedures and a written system to ensure that your company checks empty containers received for storage or loading to ensure its structure has not been modified?			
16	Does your company have reliable procedures and a written system to ensure that affixing, recording, tracking, and verifying tamper-proof / non-counterfeitable seals on containers, trailers and railcars?			
17	Does your company have reliable procedures and a written system to ensure that seals are not used in strict numeric sequence and that seals are not registered and controlled by a single person?			
18	Does your company have reliable procedures and a written system to ensure that your company verifies			

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	the identity and authority of the carrier requesting delivery of cargo prior to cargo release?			
19	Does your company have reliable procedures and a written system to ensure that your company employees notify Jordan Customs and other law enforcement agencies of suspected illegal activities?			
20	Does your company have reliable procedures and a written system to ensure that your company carries out random and unannounced security assessments?			
21	Does your company have reliable procedures and a written system to ensure that your company employees inspect persons and packages?			
22	Does your company have reliable procedures and a written system to ensure that your company has and carries out additional security procedures for high value and high risk goods?			

Physical Security:

Physical security includes security measures that monitor and control the facility’s exterior and interior perimeters. This will include Mail Service Security, Lock and Key Control, and Perimeter and Interior Alarms.

Recommended features to be installed as appropriate:

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Are all of your company buildings and rail yards constructed of materials that resist unlawful entry and have protection from outside intrusion?			
2	Does your company buildings and offices have physical security that includes: <ul style="list-style-type: none"> • perimeter fences, locking devices (International standard) on reinforced external and internal doors; • windows with mesh, metal bars; • International standard locking devices on external and internal doors, windows, gates and fences. Exterior doors and windows must be equipped with alarms; • perimeter fences and interior fencing, • gates and gatehouses; • adequate lighting inside and lighting outside the facility that includes CCTV; • electronic security systems that include theft alarm systems and alarmed access control systems; 			

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	<ul style="list-style-type: none"> • have the segregation and marking of international, domestic, high-value, and dangerous goods cargo within the warehouse by a safe, caged or otherwise fenced-in area; • Large dual language signage: that display and instruct direction, health and safety and restricted areas? 			
3	Does your company plan and implement a maintenance program that comprises regular scheduled inspections to keep fencing, gates, lights and cameras in good condition and working order (maintain the integrity of security measures)?			
4	Does your company have a reliable procedure and a written system that ensures your company has implemented controls to stop the theft of goods, vehicles and company documents?			
5	Does your company have a reliable procedure to undertake random inspections and “walk through” to inspect and check all physical security measures and facilities?			
6	Does your company have emergency lighting / power systems for key operational areas and high value cargo areas?			

Recommended procedures to be implemented as appropriate:

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Depending upon the company size a security company may be required to undertake some of the physical security duties and measures?			
2	Gates or doors through which vehicles and personnel enter or exit should be manned or under observation by management or security personnel			
3	Access to employee vehicle parking must be controlled			
4	Employee vehicle parking must be in a separate area from visitor parking			
5	Private passenger vehicles must be prohibited from parking in cargo areas or immediately adjacent to cargo storage and office buildings			
6	Lock and key control including signing in and out of high risk areas			
7	Restrict access to document and cargo storage areas			

Access Controls:

Access controls prohibit unauthorized access to facilities, vehicles, loading and unloading equipment, vessels, aircraft, shipping, loading docks, break bulk areas and cargo areas. If, access control is not possible increased precautions in other security aspects is needed.

Recommended procedures to be conducted as appropriate:

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Do you have reliable procedures and physical facilities that stops non authorized persons access to company facilities and conveyances, and that positively identifies, records and tracks all employees, contractors, visitors and suppliers?			
2	Do you have procedures and physical access controls that include positive identification of all employees, visitors, and vendors, that includes check in and check outs and labeling?			
3	Do you have procedures and physical access controls that trigger an alarm when visitors attempt to enter an unauthorized area?			
4	Do you have procedures and written instructions for all employees which results in your employees and guards safely challenging unauthorized/unidentified persons and removing unauthorized/unidentified persons?			
5	<p>Does your company control and monitor the parking of all vehicles around the companies offices and port/terminal buildings that include segregation and restricted areas access?</p> <p>Does your company vehicle parking procedure and control system include the authorization by an adequate gate/pass and/or decal system?</p> <p>Does your company have a procedure that ensures vehicle parking for office employees, terminal/warehouse (facility) workers and visitors are physically segregated and restricted to designated areas?</p>			
6	Do you have procedures, written instructions and trained personnel to ensure that vehicles are inspected before they enter operation facilities?			
7	Do you have procedures, written instructions and trained personnel that ensures you control the time individuals have access to facilities?			
8	Do you have procedures, written instructions that ensures you display large dual language maps of restricted areas within the view of all employees and visitors?			

Personnel Security:

Personnel security is concerned with the screening of employees and prospective employees, as appropriate and as allowed for by law.

Recommended procedures to be conducted as appropriate:

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Do you have a written procedure that ensures you conduct employment screening and interviewing of prospective employees?			
2	Do you have a written procedure that ensures you conduct periodic background checks and resume / application verifications?			
3	Do you a written procedure that ensures your verify job application information?			
4	Do you have a written procedure that ensures you contact references?			
5	Do you have a written procedure that ensures you review the skill requirements for key positions?			
6	Do you have a written procedure that ensures you align job skill requirements with individual skills?			
7	Do you have a written procedure that ensures you check the background and corporate structure of independent contractors?			
8	Do you have a written procedure that ensures you conduct drug testing (as allowed for by law): <ul style="list-style-type: none"> • Before hiring; • Random periodic testing; • At times of reasonable suspicion? 			
9	Do you have a written procedure that ensures you implement different color ID cards to employees that designate access privileges?			
10	Do you have a written procedure that ensures you implement gate passes to vehicle drivers and other carriers to control and identify those authorized to enter the facility?			
11	Do you have a written procedure that ensures you issue to employees different color uniforms for each sensitive area?			
12	Do you have a written procedure that ensures you issue different color uniforms for your security staff?			
13	Does your company have an authorized and responsible senior company manager and or director that is responsible for company security plans and for the implementation of security measures and procedures?			
14	Does your senior company manager and or director responsible for security have the authority to			

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	announce a security threat level on the company property and to company employees?			
15	Does the company person responsible for security have the authority to undertake a Security Assessment (Risk analysis) and as a result of the Security Assessment implement a Security Plan that includes various controls and compliance measures?			
16	Does the company have an Internal Code of Conduct that is a part of the employees contract of employment?			
17	Does your company Internal Code of Conduct include a written system and procedure for the reporting / disclosure to management of any problems and issues that relate to personnel security and to the security of facilities, goods and documents?			

Education and Training Awareness:

Education, training and awareness encompass education and training of personnel regarding security policies, encouraging alertness for deviations from those policies and knowing what actions to take in response to security lapses.

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Do you have a written procedure that ensures you communicate security policies and standards to employees, including consequences of non-compliance?			
2	Do you conduct a security awareness program for all employees that includes the recognition of internal conspiracies, maintaining cargo integrity, and determining and addressing (solving) unauthorized access?			
3	Does your security awareness programs provide for incentives for active employee participation in security controls? The security education and training awareness programs must encourage active employee participation in security controls.			
4	Does your security awareness program includes the use of press releases, e-mail distribution lists and bulletin boards?			
5	Does your company have a reliable process by which you search for and obtain new supply chain security information? For example: World Customs Organization (WCO) initiatives and programs: Convention and commentary on Mutual Administrative Assistance in Customs Matters, WCO Data Model and the list of essential data elements required for the identification of high risk consignments, International Customs guidelines on advance cargo information, etc.			
6	Does your company partake in Jordan Customs and Port plans and programs to introduce and implement or enhance the Port Facility Security Plan (PFSP)?			
7	Does your company have a copy of the International Ship and Port Facility Security Code (ISPS) and copies of other security measures adopted by the International Maritime Organization (IMO)? Does your company have a reliable procedure to			

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	<p>obtain new measures to the ISPS Code?</p> <p>Does your company have a reliable procedure that obtains the new measures to the ISPS Code in order that it is aware of the repercussions that ships might face after 1 July 2004 if they are found not to be in compliance with the requirements of that regulation and Section A/9.81 of the ISPS Code?</p> <p>The repercussions to ports should also be assessed. Requirements for port facilities include:</p> <ul style="list-style-type: none"> • Monitoring and controlling access; • Monitoring the activities of people and cargo; • Ensuring security communications are readily available. 			
8	<p>Does your company have a copy of the International Labor Organization (ILO) and IMO Code of Practice on Security in Ports?</p> <p>Does your company have a reliable procedure to obtain and circulate to all your relevant company new measures to enhance maritime security to the ISPS Code?</p>			
9	<p>Does your company have a copy of the Safety of Life at Sea Convention (SOLAS), with attention to SOLAS regulation X1-2/9 on “Control and compliance measures”?</p> <p>Does your company have a reliable procedure to obtain and circulate to all your relevant company personnel a copy of the new SOLAS measures (New Chapter X1-2) that enter into force on 1 July 2004?</p>			
10	<p>Does the company education and awareness training include hands on training for all company employees to recognize and address potentially dangerous items during packing, loading and unloading process?</p>			

Conveyance Security:

Conveyance security provides protection against the introduction of unauthorized personnel and material into the supply chain, including the areas between the links of the supply chain.

Recommended procedures to be conducted as appropriate:

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Does your company have a reliable procedure and written system that ensures there is protection in your transportation system that protects it from the introduction of unauthorized personnel and material?			
2	Does your company have a reliable procedure and written system that ensures that the security procedure includes the physical search of all: <ul style="list-style-type: none"> • readily accessible areas, the securing of internal/external compartments and panels, and • procedures for reporting cases in which unauthorized personnel, non manifested materials, or signs of tampering, are discovered. 			
3	Does your company have reliable procedures and a written system that is implemented and consequently it physically controls and monitors all cargo transfer operations within your company facilities / terminal?			
4	Does your company have a reliable procedure and a written agreement with suppliers and transportation and freight forwarders to ensure that they establish and implement procedures to guard against the packing and loading of goods of unknown articles and materials? <ul style="list-style-type: none"> • Supervised loading and unloading of all goods; • Proper sealing, marking, and counting of goods and packages and boxes loaded into containers; • The correct documentation for the goods that are loaded into the container must be sent in advance to Jordan; • Approved procedures for affixing, recording, tracking and verifying seals on containers and trailers are in place. 			

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5	Does your company have a reliable procedure and a written system that ensures your company uses where necessary C TPAT High Security Compliant Bolt Seals and C TPAT compliant Heavy Duty Bolt Locks on containers?			
6	Use tamper-proof / non-counterfeitable seals or electronic seals to secure conveyance.			
7	If cost effective, use transponders to facilitate continual tracking of conveyances.			
8	Use automatic electronic transmittal of “smart-card” data to Customs if available.			
9	Use “smart-card” technology containing vehicle, consignment and driver information where automated border crossings are in place.			
10	Consider cost and future standardization issues related to the use of smart cards, electronic seals and transponders.			
11	Stay informed regarding development of standards and requirements regarding smart cards, electronic seals and transponders by World Customs Organization, International Maritime Organization and International Standards Organization, etc.			

Service Provider Requirements: operative sub contractors

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Does your company have reliable procedures and a written system that is implemented to ensure that plant, equipment and vehicles brought by suppliers and sub-contractor plant and equipment into your company facilities and buildings and onto your company property is assessed and physically inspected for security?			
2	Does your company have reliable procedures and a written system that is implemented to ensure quality control records and procedures on production processes maintain system integrity?			
3	Does your company have reliable procedures and a written system that is implemented to ensure that financial assessments are implemented to determine the service providers fiscal soundness and ability to deliver goods and services within contract obligations?			
4	Does your company have reliable procedures and a written system that is implemented to ensure internal controls are implemented for the selection of service providers?			
5	Does your company have reliable procedures and			

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	a written system that is implemented to ensure profiles of your main suppliers who are receiving and packing finished commodities and equipment are maintained and available for review?			
6	Does your company have reliable procedures and a written system that is implemented to ensure those service providers with whom your company is contracted are participants in: <ul style="list-style-type: none"> • Jordan Golden List; • Customs Trade Partnership Against Terrorism (C-TPAT); • Jordan Customs Industry Partnership programs, and; • Jordan Anti Smuggling program; • Etc. 			

Trading and Transportation Operator Security

Trading partner security extends supply chain security to your suppliers and customers. Communication, assessment, training and improvement are key components.

Recommended procedures to be conducted as appropriate:

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Do you check the integrity of the international transport operator used by your clients?			
2	Do you have a procedure and a methodology to check the international transportation operator? For example, is the transportation operator compliant with the Container Security Initiative (CSI) and with the Customs-Trade Partnership Against Terrorism (C-TPAT) Guidelines, etc?			
3	Do you check if your transport operator is in full compliance with the laws and regulations of Jordan? <ul style="list-style-type: none"> • Business documents: registration, license, driver licenses, qualifications, Tax and Sales Tax certificates, etc; • TIR Carnet; • Certificate of vehicle compliance? 			
4	Do you encourage your trading partners and suppliers and contractors to assess and enhance, if required, their supply chain security?			

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5	Do you request written security agreements with trading partners/suppliers/contractors to include controls such as: <ul style="list-style-type: none">• Tamper-proof/non-counterfeitable seals;• Signatures;• Time controls;• Agreed means of communication?• A supply chain security acknowledgement form requested by U.S. import companies?			
6	Do you document mutual supply chain security policies?			
7	Do you have extensive exchange of information between trading partners/suppliers/contractors?			
8	Do you advise Jordan Customs and foreign authorities of security agreements with trading partners?			
9	Do you have or receive education, training and awareness of security aspects of the supply chain from trading partners?			
10	Do you if possible include equivalent security provisions as a condition of contract for contractors/suppliers providing services?			

Internal Company Record Keeping System

Does your company have an established internal record keeping system, a Quality Management System, and or a compliance guide book, which ensures that all documents related to your import transaction and import processing documents are correct and stored (3 years)?

Customs require hard copies of all documents. Therefore, does your company have all hard copies or does it hold some documents on a computer software system, such as SAP, or as part of a company private exchange system such as Cisco's eHub, etc?

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p>Does your company Quality Management System have an internal record keeping system to meet the following criteria?</p> <p>The term “records” means any information made or normally kept in the ordinary course of business which pertains to the following activities:</p> <ul style="list-style-type: none"> • Accounts: Record of Reconciliation, receipts, payment documents, VAT payments, etc • Warehouse documents: delivery notes, goods received notes, inventory lists, record of deliveries, etc • Technical specification: specification handbooks and brochures that are applicable for the machinery and or equipment consignment; • any importation, declaration or entry; • the transportation or storage of merchandise carried or held under guarantee into or from the customs territory of your country and the other countries that you operate in; • the filing of a drawback claim (re-export), etc; • the collection and payment of fees, duties and taxes to Jordan Customs; • any other activity required to be undertaken pursuant to laws or regulations administered by Jordan Customs, such as transfer pricing and expert independent inspection, etc; <p>The term “records” includes any information required for the entry of merchandise and other information pertaining to or from which is derived, any information element set forth in a collection of information required by the Jordan Customs Law in connection with an activity described above. The term includes, but is not limited to:</p> <ul style="list-style-type: none"> • statements, declarations, documents; • electronically generated or machine readable data; • electronically stored or transmitted information or data; • books, papers, correspondence; • accounts, financial accounting data • technical data; • computer programs necessary to retrieve information in a usable form; • file of drawback claims; • transport or warehouse / store merchandise documents held in bond. 			

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	Or, documents that are required by law to be stored.			
2	Do you have a lockable secure storage place for your records?			
3	Are your records indexed in a retrievable fashion?			
4	Have you established a reliable destruction cycle to prevent the premature destruction of required records; and do you have the right documentation that allows you to dispose of and proves that you have disposed of documents that are more than 3 years old?			
5	Do you have a responsible person assigned as your custodian of records; Chief Accountant or an Inventory Accountant, etc?			
6	Do you have a compliance improvement plan framework?			
7	Do you have a reliable procedure and a written system that ensures all of your company section / division personnel retain and store original and or electronic documents for each import transaction?			
8	Does your company have a record of paying penalties for not keeping documents for the prescribed minimum of three years in Jordan?			
9	<p>Does your company have a procedure and a written requirement as an instruction to all company personnel, and a document archive facility to keep and store the following list of documents:</p> <ul style="list-style-type: none"> • Air way bill; • Bill of lading; • Carries certificate; • Declaration of entry; • Power of Attorney; • Consolidated shipments authority: if this procedure is used; • Packing list; • Bond information; • Vessel, vehicle or air manifest; • Certificates of Origin; <p>There are other documents that are relevant for specific commodities and transport modes, etc., which need to be retained.</p>			

Documentation and Information Processing Security

Documentation processing security, both electronic and manual, assures that information is legible and protected against the loss of data or introduction of erroneous information.

Recommended procedures to be conducted as appropriate:

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Do you have a written procedure that ensures you safeguard computer access and information?			
2	Do you have a written procedure that ensures you control access to information systems, both by level of job responsibility?			
3	Do you have physical security in computer areas?			
4	Do you have written procedures that ensure you monitor employee use of data systems?			
5	Do you have written procedures that you have processes to backup computer system data?			
6	Do you have a written procedure that ensures you record the amount of cargo by packing unit type, packing conditions, and security seal and stamps. Furthermore, do your procedures record discrepancies with a note, photograph and scale weight records?			
7	Do you have a written procedure that ensures you obtain signatures for all process checkpoints (e.g., document preparation, when seals are applied / broken, vehicle inspection, opening the vault, cargo delivery, cargo receipt, counting unshipped pieces, etc.)?			
8	Do you have a written procedure that ensures you fix times for the preparation of documents, and for the shipping and unshipping of cargoes?			
9	Do you have a written procedure that ensures you use special control procedures to prepare emergency / last minute shipments and if necessary notify authorities regarding such shipments?			
10	Do you have a written procedure that ensures your software system registers transactions and supports operations, and if possible make a follow up of the activities that it handles?			
11	Do you have a written procedure that ensures you record the entrance and exit time of people receiving and delivering goods?			
12	Do you have a written procedure that ensures you document significant process delays?			
13	Manifest security: Do you have a written procedure that ensures your manifests are complete, legible, accurate, and submitted within the prescribed time period in compliance with the Jordan Customs Law?			

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14	Does your company have reliable procedures and a written system that ensures the security of all electronic assets, including advising employees of the need to protect passwords and computer access?			
15	Does your company have reliable procedures and a written system that ensures measures are taken to secure sensitive information in order to prevent the loss or unauthorized use of such information?			

For your information: future automated data exchange and authorized supply chain related procedures:

1	Establish electronic customs reporting systems based upon World Customs Organization Customs Data Model and the Unique Consignment Reference (UCR)?			
2	Establish advance manifest reporting systems?			
3	Advance lodgement of data			
4	The single window system			
5	Risk Management			
6	Authorization			
7	Customs mutual assistance arrangements			

Internal finance and accountancy controls

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Does your company have a reliable procedure and a written system that ensures you obtain and maintain a record of all new finance and accountancy laws, regulations and guidelines a copy of which is each provided to each member of your staff that is involved with transactions and record keeping?			
2	Do you maintain an original document and electronic document audit trail from procurement, accountancy, goods received, warehousing and to payments in your company?			
3	<p>Are the financial and accountancy control systems in your company consistent with and compliant with the Financial Audit and Certified Public Accountancy that are legally enforced in Jordan?</p> <p>Do the audit measures cover:</p> <ul style="list-style-type: none"> • Control environment; • Risk assessment; • Control activities; • Information and communication, and; • Monitoring? 			
4	Does your company have a written system that ensures that you implement reliable control procedures in the company sections and or divisions and subsidiaries that participate or effect the importation of goods?			
5	Has your company identified financial and accountancy risks that are related to your import operations and procedures?			
6	Does your company have a reliable procedure and a written system that ensures you correct compliance deficiencies?			
7	<p>Does your company have a reliable procedure and a written system that ensures you plan and perform periodic testing and assessment in the company operations and divisions that have an effect on imported goods?</p> <p>Does the procedure include a minimum annual review of the significant risk areas?</p>			
8	Does your company have a reliable procedure and a written system that ensures you hold interdepartmental meetings to discuss and coordinate changes to your financial and accountancy internal control systems when the tests and assessments or other information show a need for compliance improvement?			

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9	Does your company have an authorized and responsible person that can initiate appropriate disclosure of financial and accountancy?			
10	Does your company have a reliable procedure and a written system that ensures you have an internal control process that document and retain all the tests and assessments?			
11	Does your company have a reliable procedure and a written system that ensures you retain and store for three years all the test and assessment documents?			

Can all the specific procedures and written systems be made available to Jordan Customs in a verifiable format at an identified location?

Identifying perceived weaknesses in security and compliance will not necessarily prohibit participation in the Jordan Customs “Golden List” program.

Jordan Customs is committed to working with the trade community to identify effective corrections and adjustments to a company process that will result in a more secure supply chain operation.

Meeting the objectives can be helped by your company implementing responsibility of self assessment and a Jordan Customs Risk Management Department assessment.

Appendix 5: Transport Operators & Ocean Transportation intermediaries

Guide

The questions in the checklist are a guide to allow JCD and Golden List candidate companies to determine if the applicant is ready to assume the responsibilities of self-assessment. The check list questions are designed to determine if the Jordan company has made a commitment to implement specific actions (internal procedures and controls) that will enhance compliance. A Jordan company that does not have procedures and controls in place may answer that it plans to develop and implement procedures and controls and specify a target date for implementation.

Response Yes or No

A respond yes or no in this column indicates whether a Jordan company has implemented procedures and controls response to the question. If, a Jordan company has adequate procedures and controls that it believes document that the company is ready to assume the responsibility of self-assessment, the Jordan company can answer yes to the question. If, the Jordan company does not have adequate procedures and controls, whether they are generally adequate or need significant improvement, the Jordan company can answer no under this column and indicate in the next column that it plans to implement procedures that will be adequate for the company to assume responsibility of self-assessment.

If No, Plan to implement or improve (yes or no)

If, the Jordan company indicated “no” under the previous column, the Jordan company can respond yes or no in this column to indicate whether it plans to implement or improve procedures and controls. Whether the Jordan company procedures and controls are generally adequate but need small improvements, or need significant improvements, we recommend the JCD accept the company into the Golden List under certain conditions. The company must commit to making the necessary improvements and demonstrates that the steps are in process. If, the Jordan company agrees to make needed improvements the company should respond yes in this column. The JCD must periodically monitor the improvement process. Failure to follow through would then result in removal from the Golden List. If, the Jordan company does not have or plan to have these procedures and controls Jordan Customs Risk Management Directorate will need to consult with the company to ascertain their readiness to assume responsibility of self assessment. Shipments associated with non-participants in the Golden List Program will be subject to other risk assessment factors.

Target date

If, the Jordan company indicates that it is going to implement procedures and controls under this column, it should provide the target date to have the procedures and controls implemented and working in this column by the target date.

Transport Operators and Road Transport Facility Operators Defined Responsibilities

Do you have sufficient safeguards in place to ensure that each haulage across an international border, or a haulage from a clients premises to a border crossing point or to a sea port is compliant with the Jordan Customs, other government agency requirements and the requirements of an Ocean Transportation Intermediary and Port of Aqaba for the exportation and importation of the commodities you are transporting?

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No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p>Is your certificate to operate the transport equipment used for transportation and the container used for cargo handling current?</p> <ul style="list-style-type: none"> • Road Vehicle Test / Examination Certificate; • Vehicle and container certificate of approval as per TIR Article 12, Annex 3 and 4; • Container construction conformity as per TIR Part I and II of Annex 7 			
2	<p>Is your transport equipment currently certified to operate in all countries where you will undertake international transportation?</p>			
3	<p>Are the international transportation and company business certificates current?</p> <ul style="list-style-type: none"> • Registration with Jordan business authorities; • Company Registration and Charter Documents proving ownership and members of the company board of directors and shareholding(s); • Operators License; • Transport Operators Association; • TIR Carnet Registration; • Compliance with IRU requirements; • Certificate confirming the undertaking of international transport; • IRU certificate; • International Convention on the Harmonization of Frontier Controls of Goods 1982 that the following best practice is undertaken for: <ul style="list-style-type: none"> • -perishable foodstuffs • -recognition of technical prescriptions for trucks • -visa facilitation for drivers • -operational border crossing procedures such as the acceptance of an international vehicle weight certificate doing away with weighing at the border crossing point • (please refer to the UNECE document TRANS/WP.30/2001/16 at www.unece.org/trans/new_tir/wp30/nwdoc15aug1.html) 			
4	<p>Do your company personnel have other industry, association or training certifications to confirm your company's qualifications?</p> <ul style="list-style-type: none"> • National Jordan heavy goods vehicle and or 40 foot container vehicle accredited Jordan training center certificate for drivers; • International heavy goods vehicle and or 40 foot container vehicle accredited training center certificate for drivers; 			

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	<ul style="list-style-type: none"> Does each full time and part time and contracted driver have a valid heavy goods and articulated vehicle (tractor unit and trailer) driving license? 			
5	Is your company currently ISO 9000 registered or are you in the registration process?			
6	<p>Is your means of transport and other equipment in good operating order and in compliance with industry standards?: -</p> <ul style="list-style-type: none"> Approval certificate for a road vehicle for the transport of goods under customs seal (as per TIR Convention), valid for 2 years; Jordan Ministry of Transport Annual Road Test / Examination Certificate; Does the vehicle unit have a certificate in accordance with the environmental emission control EUR 1, EUR 2 and EUR 3; Valid Transport Tax certificate; Registration Certificate from the Jordan Ministry of Transport; Manufacturers / Factory certificate of vehicle and equipment compliance; If the vehicle has canvas or plastic-covered sheets are they all in a good condition as per TIR Annex 2, Article 3; Are the vehicle ropes, steel wire and or nylon ropes in compliance with TIR Annex 2 Article 3 Section 9; Is the device on which customs seals can be fixed in compliance with TIR Annex 2, Section 2.2.1 (b); Do the container security bolts comply with international industry standards? 			
6	<p>Do you have a complete company manual on the standard company operating procedures for international transportation?</p> <ul style="list-style-type: none"> List of required documents; List of duties and responsibilities. 			
7	Are you in compliance with the Jordan Customs Law, other Jordan laws and other pertinent regulations regarding the activities of a transport operator?			
8	<p>Compliant with the provisions of Jordan Government Regulations “Regarding requirements for International Transportation”:</p> <ul style="list-style-type: none"> Axle weight regulations; Transport of Hazardous and Dangerous Goods as per the ADR Convention and rules for road transportation, RID rules for train transportation, IATA and OACI rules for air cargo transport and IMDG for sea transport; Transport of waste; Transport of nuclear materials and radioactive isotopes; Transport of scrap metals; 			

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	<ul style="list-style-type: none"> Compliant with the provisions of the “OEC Framework Agreement on Transit Traffic”, dated 9th May 1998 if and when ratified by Jordan Government; TIR Carnet provisions. 			
9	<p>In agreeing to transport the cargo, do you have a standard procedure established exercising due diligence to ensure that cargo you are transporting is as manifested?</p> <ul style="list-style-type: none"> Driver signs “Box 18” of the IRU Document (that the driver is not responsible for the content of the trailer / container that is under customs seal); Article 5 of the TIR Convention: prevention of violations; Register of documents (driver signs that he has received all the required documents); Product related due diligence: excise duty products, country of origin; Client based due diligence: recently established company, client handles sensitive goods, client has had past customs infringements; Excise duty transit arrangement and deposit documentation. 			
10	<p>Do you have an established company procedure to ensure that the required documents for the transport of the cargo are with the person in charge of the transport or another person so designated?</p> <ul style="list-style-type: none"> Is this a written policy using checklist verification? Driver signs the document list / register? 			
11	<p>Do you have a standard procedure manual or instructions to the person in charge of the transport what actions to take in the case of emergency diversion or breakdown?</p> <p>Does the person in charge of the transport retain this procedures manual or instruction while in route?</p>			
12	<p>Do you have a training program for your transport operating personnel that covers compliance with the relevant Jordan Customs Law, regulations and procedures?</p> <p>Does this training include both routine operations and situations requiring diversion or breakdown?</p> <p>Is this training delivered by an accredited training organization that is experienced with Jordan transport, Jordan customs and international transport requirements?</p>			
13	<p>Do you have a written contract with all clients and does your contract specifically identify the responsibilities of each party regarding the submission of truthful and accurate information to Jordan Customs and the</p>			

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	corresponding liabilities for the submission of false or inaccurate information?			
14	<ul style="list-style-type: none"> • Do you check the reliability of your client? • Is the importer / exporter registered with the Jordan Customs; • Company registration documents; • Bank reference for new clients; • Tax Registration; • Do you check newly registered companies? • Do you check the origin of the goods (For example, regarding clients trading with Iraq and Afghanistan, etc) • Do you check with the client in cases of a new route plan or goods transported for the first time? • Do you check client documentation for accuracy and possible falsification (stamps, guarantee documents, absence of seals, lack of labels on the product and illegible description)? • Do you check client documentation if the goods are known types that Jordan Customs reports as being sold in the market of the transit country? • 			
15	<p>Does your contract permit the use of a subcontractor for transportation?</p> <p>If, so what steps have you taken to ensure that each subcontractor is exercising due diligence relative to Jordan Customs and supply chain security matters?</p>			
16	<p>Do you have a written internal company Code of Conduct for employees regarding the requirements for safeguarding confidential client information and non-disclosure of security related information?</p> <ul style="list-style-type: none"> • Do you conduct training on the obligations for the safeguarding of confidential information and non-disclosure of information? • Does each employee sign an acknowledgement that they have read and understood your internal Code of Conduct requirements and is that record maintained in your personnel files? • Confidentiality should be provided for in the Employment Contract: contracts of employment or organizational rules should contain provisions requiring personnel not to divulge security related information concerning transport means equipment, facility and cargo handling equipment, security training, access control systems, locations of security or communications equipment and work routines business of the facility to persons who do not have a direct need to know. 			
17	If, you have a company Code of Conduct does it contain a policy statement on offering bribes and responding to the solicitation of bribes?			
18	If, you have a company Code of Conduct does it include			

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	a provision for non-participation in any attempts to commit a fraud against the Government and an obligatory requirement to report frauds or attempted frauds by clients to the proper authorities?			
19	<p>Do you have a system in place to maintain the physical security of client records?</p> <ul style="list-style-type: none"> • Is your physical security system enforced by a procedure to prevent the accidental or inadvertent review of privileged, confidential information by unauthorized persons? • Do you have a 24-hour guard to the entrance of your premises? • Do you have cupboards / filing cabinets in which client records are kept under lock and key? 			
20	<p>Do you retain client money?</p> <ul style="list-style-type: none"> • If you retain client money do you have systems in place to safeguard the money? • Do you have a safe for the money? (under the authority of the Chief Accountant); • Do you have an alarm system? (as per criminal police guidelines) 			
21	<p>Do you have a professional liability insurance and business insurance?</p> <ul style="list-style-type: none"> • Professional liability insurance? • Third Party Liability Insurance? 			
22	Do you have on file a complete and current copy of the Jordan Customs Law and all relevant Jordan Customs and other Government Regulations and where relevant for the countries where you operate pertaining to the importation and exportation of commodities?			
23	<p>Do you have or have ready access to other internationally recognized reference materials?</p> <p>Examples include but are not limited to the World Customs Organization Classification Handbook with up to date Notes, Amending Supplements to the Notes and Compendium of Classification Opinions; International Chamber of Commerce INCOTERMS; World Trade Organization General Agreement on Tariffs and Trade.</p> <ul style="list-style-type: none"> • Jordan Transport Association Bulletins; • Relevant copy of the Bulletin text provided to drivers; • Do you have a procedure in place to verify that you are current and up to date on all applicable changes in Jordan Customs laws and regulations? • TIR Convention including copies of all legally binding explanatory notes; • TIR Handbook (UNECE document ECE/TRANS/17/Amend.21 and ECE/TRANS/17/Amend.22; see www.unece.org/trans/new_tir/tir/amend.htm) 			

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24	If, applicable: in accordance with the International Convention on the Harmonization of Frontier Controls of Goods, 1982 Annex 8 (under approval by TIR Geneva) do you have an international vehicle weight certificate (Appendix 2, Article 5)?			
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Internal Expert (Qualified Manager of International Transport)

If you are not retaining and using an external customs expert, have you taken the following steps?

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p>Does your company have an internal expert / International Transport Manager that has a qualification and / or experience with Jordan Customs Law, regulations and procedures?</p> <ul style="list-style-type: none"> • What steps have you taken to verify the training and technical expertise of your customs person (e.g., does he have a certificate as a customs issues specialist)? • International Transport Manager trained by an accredited international transport organization (For example, Chartered Institute of Logistics and Transport); • Diploma issued under the International Road Union (IRU): “Specialist in International Transport” (includes tax, INCOTERMS and customs, etc) • Do you employ ex-customs service personnel? (who would have passed the Jordan Customs Service examinations) 			
2	In relying on internal expertise only do have an ongoing training policy for your internal expert?			

(Note: If you are not using an external expert we strongly recommend you also review the Due Diligence model for Customs Clearance Agents and apply these same steps in your internal processes where they relate to transport.)

Internal Reviews

Do you have an effective internal audit program?

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Do you conduct on a scheduled basis internal audits to ensure you're company, operation and operatives comply with Jordan Transport Laws and with Jordan Customs Law and regulations and other governmental regulations?			
2	Do you have a process for taking corrective actions through voluntary disclosures to Jordan Customs for errors or omissions discovered during internal audits?			

Internal Records and Documentation

Have you established an internal record keeping system that ensures that all documents related to your commercial activities are retained?

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p>Do you have an internal record keeping system to meet the following criteria?</p> <ul style="list-style-type: none"> • driver document check list <p>The term “records” means any information made or normally kept in the ordinary course of business which pertains to the following activities:</p> <ul style="list-style-type: none"> • any importation, declaration or entry; • the transportation or storage of merchandise carried or held under guarantee into or from the customs territory of Jordan; • Customs documentation; • Transport documents including TIR Carnet; • Power of Attorney; • Copy of the Contract; • License to undertake international transportation; • Insurance documents; • Veterinary; • Health; • any other activity required to be undertaken 			

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	<p>pursuant to laws or regulations administered by Jordan Ministry of Transport and Jordan Customs Department.</p> <p>The term “records” includes any information required for the entry of merchandise and other information pertaining to or from which is derived, any information element set forth in a collection of information required by the Jordan Customs Law and Jordan Ministry of Transport in connection with an activity described above. The term includes, but is not limited to:</p> <ul style="list-style-type: none"> • statements, declarations, documents; • electronically generated or machine readable data; • electronically stored or transmitted information or data; • books, papers, correspondence; • accounts, financial accounting data; in compliance with the Jordan Accounts Policy all documents must be stored for 3 years; • technical data; • computer programs necessary to retrieve information in a usable form. 			
2	Do you have a secure storage place for your records?			
3	Are your records indexed in a retrievable fashion?			
4	Have you established a reliable destruction cycle to prevent the premature destruction of required records?			
5	Do you have a responsible person assigned as your custodian of records (Chief Accountant, Manager of International Transport, General Director, Managing Director, etc)?			
6	Do you have a backup (copy) of your records?			

Physical Security

Is the means of transportation properly equipped to ensure the security and the integrity of the cargo that is subject to Jordan Ministry of Transport requirements, Jordan Customs Law and or supply chain security control?

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Does the means of transport and equipment have a valid vehicle test / examination certificate issued by the Jordan Ministry of Transport?			
2	Does the equipment have a means of placing security seals? Are the seals in compliance with the international industry standards?			
3	Does the tachograph have a valid Calibration Certificate? Is the calibration certificate issued by an accredited tachograph company registered with Jordan ISM?			
4	Does the transport equipment have ways that would permit unauthorized persons to access the cargo while in transit? Note: For trucks an excellent standard is the requirements for TIR certification. The full requirements may be found at the TIR website in the TIR handbook http://www.unece.org/trans/new_tir/handbook/english/newtirhand/10.pdf			
5	Do you have a routine schedule for checking the physical security conditions of your means of transport?			
6	Do you have an alarm system that would detect attempts at unauthorized access and is it properly working?			
7	Does the vehicle have a satellite tracking system?			
8	Does the driver have a mobile telephone?			
9	Does the means of transport number plate match the vehicle registration number on the vehicle documentation and Jordan Ministry of Transport Vehicle Test Certificate?			
10	Do you have a written and reliable procedure for informing your client, cargo handling center at the airport and or sea port of the correct vehicle registration number and the full name and I.D. number of the vehicle driver before the arrival of the vehicle at the next facility?			

Sea Carrier and Ocean Transportation Intermediary

Defined responsibilities for onshore facilities and procedures

In addition to some of the defined responsibilities outlined in the above check list for road transport operators sea transport operators and ocean transportation intermediaries should consider the following recommendations that need to be followed on a case-by-case basis depending on the company’s size and structure.

The recommendations are based upon international transportation agency and U.S. Department of Homeland Security strategies.

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p><u>24-Hour Advanced Manifest Rule</u> Does your company have the resources, facilities and reliable written procedures to implement the 24-Hour Advanced Manifest Rule?</p> <p>All sea carriers with the exception of bulk carriers and approved break bulk cargo are required to provide proper cargo descriptions and valid consignee addresses 24 hours before the cargo is loaded in Port Aqaba for shipment to the United States through the Sea Automated Manifest System. Failure to meet the 24-hour Advanced Manifest Rule results in a “do not load” message and other penalties. Through this program, administered by DHS’s Customs and Border Protection (CBP) advance information enables DHS to evaluate the terrorist risk from sea containers.</p>			
2	<p><u>Container Security Initiative (CSI)</u> Does your company have the resources, facilities and reliable written procedures to implement the Container Security Initiative?</p> <p>Under the CSI program, the screening of containers that pose a risk for terrorism is accomplished by teams of CBP officials deployed to work in harmony with host nation counterparts.</p>			
3	<p><u>Customs-Trade Partnership Against Terrorism (C-TPAT)</u> Is your company an accredited member of the C-TPAT?</p> <p>C-TPAT is not mandatory but many sea carriers are accredited for C-TPAT</p> <p>Sea carriers should develop and implement a sound plan to enhance security procedures.</p>			

	<p>Sea Carrier Recommendations for C-TPAT are:</p> <ol style="list-style-type: none"> 1. Conveyance Security; 2. Access Controls; 3. Procedural Security; 4. Manifest Procedures: companies should participate in the Automated Manifest System (AMS); 5. Personnel Security; 6. Education and Training Awareness; 7. Physical Security. <p>Through C-TPAT , thousands of importers, carriers, customs agents, forwarders, ports and terminals and international manufacturers have taken the necessary steps to secure their supply chains. Under the C-TPAT initiative, business participants providing verifiable security information are eligible for special benefits.</p>			
4	<p><u>International Ship and Port Facility Security (ISPS) Code</u></p> <p>Do your company ships that load and or unload in Port of Aqaba have a valid International Ship Security Certificate (ISSC) in compliance with SOLAS Chapter XI-2 and Part A of the ISPS Code?</p> <p>Do you have a Company Security Officer?</p> <p>Does each ship have a Ship Security Officer (which can be the master)?</p> <p>Does each ship have a Ship Security Plan?</p> <p>Does each ship have fitted an Automatic Information System (AIS)?</p> <p>Does each ship have access to a company long-range identification and tracking (LRIT) system?</p> <p>Does each ship have a Continuous Synopsis Record (CSR) in compliance with Regulation XI-1/5?</p> <p>Does each ship have security level indicators from 1 to 3?</p> <p>Does each ship prior to entering Port Aqaba or U.S. gateway port and whilst in port (at dock and at anchor) have a system for ascertaining the security level of the port and or the security level set by the Government?</p> <p>Does each ship have a ship security alert system (SSA) in compliance with Regulation XI-2/5?</p>			

	<p>Has the Ship Security Officer and the Company Security Officer received training in the requirements and duties as prescribed in the ISPS Code and SOLAS amendments?</p> <p>Do the crew members of each ship hold valid Seafarers Identity Documents as per IMO Conference Resolution 8?</p> <p>Does the company have the facility to check which port has an approved Port Facility Security Plan (PFSP) by accessing the ISPS Code Database?</p> <p>Does the company provide data for the IMO Global Integrated Shipping Information System (GISIS) in compliance with SOLAS regulation XI-2/13?</p>			
5	<p><u>World Customs Organization (WCO) instruments for Container security</u></p> <p>Measures are to be taken by all parties in the supply chain (e.g. shipper, consolidator, terminal operators, warehouse operators, etc) for the security of closed cargo transport units (CTUs).</p> <p>Does your company electronic system data entry fields comply with the amended WCO data Model and the list of 27 essential data elements for identification of high risk consignments?</p> <p>Does your company electronic cargo tracking (tracing) system match or is similar to the customs guidelines for Advanced Cargo Information (ACI Guidelines) to enable the advance (pre-arrival) electronic transmission of customs data (The Guidelines are also called “Integrated Supply Chain Management Guidelines” ISMG)?</p> <p>Is your company aware of the WCO High Level Guidelines for Co-operative Arrangements between Members and private industry to increase supply chain security and facilitate the flow of international trade (TF 0004E3, Brussels, 13 May 2003)?</p> <p>Is your company aware that the WCO High Level Guidelines endorsed by the WCO Task Force on Security and Facilitation of the International Supply Chain includes the recommendation for the use of Unique Consignment Reference (UCR)?</p> <p>Is your company aware of the International Convention on Mutual Administrative Assistance in Customs Matters to assist Members in developing a legal basis to enable the advance electronic transmission of customs data (Brussels,</p>			

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	<p>27 June 2003)?</p> <p>Is your company aware that the WCO is currently working on further supplementary instruments for the implementation of the above mentioned instruments with a view to finalizing them by the end of 2004?</p> <p>Is your company aware that the WCO is currently developing detailed guidelines for business sectors?</p>			
6	<p><u>The International Shippers and Freight Forwarders Security Code (Draft)</u></p> <p>Is your company aware of the development work currently being undertaken by the United Nations International Trade Procedures Working Group (ITPWG) to provide a holistic approach to supply chain security whilst maintaining the efficiency of world trade and the achievements in trade facilitation?</p> <p>Is your company aware of the recommendation in the draft code for a Security Management System?</p>			

Defined responsibilities for transit

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p><u>Smart Box Initiative</u></p> <p>Does your company operate Smart Boxes that have an internationally approved mechanical seal affixed to an alternate location on the contained door?</p> <p>Does your company have the resources and electronic container security facilities to track and record “tamper evident” containers?</p> <p>If, someone attempts to open the cargo door of a “tamper evident” Smart Box after it has been sealed, the Smart Box device on the door will reflect that there has been an attempted intrusion into the container. This part of the DHS Operation Safe Commerce.</p>			
2	<p><u>Ship Security Alert System SSAS</u></p> <p>Do your company vessels in transit from Jordan have a SSAS?</p> <p>The SSAS is like a silent alarm in a bank. It allows a vessel operator to send a covert alert to shore for incidents involving acts of violence (such as piracy</p>			

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	<p>or terrorism), indicating the security of the ship in under threat or has been compromised. The ISPS Code requires new passenger and cargo ships of at least 500 gross tones to install this equipment by 1 July 2004. Existing passenger and cargo vessels must have the equipment installed prior to the first radio survey after 1 July 2004 or by 1 July 2006. Other types of vessels may carry and use SSAS voluntarily.</p>			
3	<p><u>Automated Targeting System (ATS)</u> Do your company vessels participate with and operate ATS?</p> <p>CBP's ATS serves as a tool for performing transactional risk assessments and evaluating potential security risks posed by cargo and passengers arriving by sea, air, truck and rail. Using pre-arrival information and input from the intelligence community, this rules-based system identifies high-risk targets before they arrive in the United States.</p>			
4	<p><u>96-Hour Advance Notice of Arrival</u> Does your company participate and operate the U.S. Coast Guard 96-hour advance notice of arrival system?</p> <p>Ships must notify the U.S. Coast Guard 96-hours before arriving in a U.S. port and provide detailed information on the crew, passenger, cargo and voyage history. This information is analyzed using databases and intelligence information, including reviewing previous security problems with the vessel or illegal activity on the part of the crew. Part of this analysis will also account for the security environment in previous ports of call.</p>			
5	<p><u>Operation Port Shield</u> Is the sea carrier company and each vessel aware that the U.S. Coast Guard will board every vessel, at sea or at the U.S. dock on its first visit to a U.S. port on or after 1 July 2004 to ensure that the vessel is compliant with U.S. security standards?</p>			

SEA PORT OPERATOR

Defined Responsibilities

Each contracting Government to the IMO has to ensure completion of a Port Facility Security Assessment. The Port Facility Security Assessment is a risk analysis of all aspects of a ports facility’s operation in order to determine which parts of it are more susceptible, and / or more likely, to be the subject of attack.

Upon completion of the analysis, it will be possible to produce an overall assessment of the level of risk and produce the Port Facility Security Plan (PFSP). This plan should indicate the operational and physical security measures the port facility should take to ensure that it always operates at security level 1. The plan should also indicate the additional, or intensified, security measures the port facility can take to move to and operate at security level 2 when instructed to do so. It should also indicate the possible preparatory actions the port facility could take to allow prompt response to the instructions that may be issued at security level 3.

Ships using port facilities may be subject to port Jordan State control inspections and additional control measures. The Jordan authorities may request the provision of information regarding the ship, its cargo, passengers and crew prior to the ship’s entry into port. There may be circumstances in which entry into port could be denied.

Port of Aqaba is governed by an approved Port Facility Security Plan. The PFSP is administered by Port Security Committee.

Port of Aqaba Container Terminal operation, management and marketing is contracted to APM Terminals for two years. APM Terminals is a business subsidiary of Maersk whose parent is A.P. Moller – Maersk Group registered in Denmark. APM Terminals are in compliance with the ISPS Code.

A security contract has been awarded to Global Village Strategies (GVS). GVS has regional experience implementing port facility security related to the ISPS Code.

The C-TPAT has Marine Port and Terminal security recommendations.

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p><u>C-TPAT Security Profile Questionnaire</u> In addition to the security requirements of the ISPS Code does the port meet the minimum elements of the C-TPAT?</p> <p>Do you have an Executive Summary outlining the process elements of the security procedures you currently have in place:</p> <ol style="list-style-type: none"> 1. Security Program: <ol style="list-style-type: none"> 1. Facilities security; 2. Theft prevention; 3. Shipping and receiving controls; 			

	<p>4. Information security controls – integrity of automated systems;</p> <p>5. Internal controls – process established for reporting and correcting problems.</p> <ul style="list-style-type: none"> • Personnel Security: <ol style="list-style-type: none"> 1. Pre-employment screening and periodic background reviews; 2. Employee training on security awareness and procedures; 3. Internal codes of conduct; 4. Internal controls – process established for reporting and managing problems and personnel security. • Service Provider Requirements (i.e., contract security companies): <ol style="list-style-type: none"> 1. Written standards for service providers’ physical and procedural security; 2. Internal controls for the selection of service providers; 3. Indicate if your service providers participate in U.S. CBP customs industry partnership programs: C-TPAT, the Carrier Initiative Program (CIP), the Super Carrier Initiative Program (SCIP) and the Business Anti-Smuggling Coalition (BASC). <p>Are you able to indicate specific detailed procedures noted above to Jordan Customs (Voluntary) and to U.S. Customs (Voluntary) in a verifiable format?</p> <p>Are you able to include an assessment of your security processes, as well as information on what changes you envision making to improve security?</p> <p>Identifying perceived weaknesses or gaps will not necessarily prohibit participation in C-TPAT.</p>			
2	<p><u>C-TPAT Marine Port and Terminal Security Recommendations</u></p> <p>Operators should develop and implement a comprehensive plan to enhance port/terminal security procedures. C-TPAT recommendations are general and should be followed on a case-by-case basis. C-TPAT is not mandatory but to facilitate supply chain logistics security many logistics providers and U.S. importers have achieved an audit and have been accredited by U.S. Customs and Border Protection.</p>			

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	<p>The recommendations are:</p> <ol style="list-style-type: none"> 1. Access Controls; 2. Parking Controls; 3. Procedural Security; 4. Personnel Security; 5. Security Awareness; 6. Physical Security; 7. Maintenance. 			
3	<p>Are the sea carrier companies using your port / terminal accredited for C-TPAT?</p> <p>Some major sea carriers are accredited for C-TPAT</p>			
4	<p><u>International Port Security Program</u> Has the U.S. Coast Guard visited or contacted the port to jointly evaluate the compliance with the ISPS Code in Jordan?</p>			
5	<p><u>Operation Port Shield</u> Have any U.S. Coast Guard officers that are members of this program visited Port Aqaba?</p> <p>Has U.S. Customs and Border Protection officers conducted Customs Interdiction and Proliferation Training?</p>			
6	<p><u>Code of Practice on Security in Ports</u> Does the port comply with the Code of Practice?</p> <p>The Code of Practice has several areas:</p> <ol style="list-style-type: none"> 1. Aim of a security policy; 2. Roles and tasks; 3. Security levels; 4. Port security assessment (PSA); 5. Port security plan (PSP); 6. Physical security of the port; 7. Security awareness and training; 8. Confidentiality and non-disclosure of information. <p>The Code of Practice does not replace the ISPS Code. The Code of Practice has been developed by the IMO and the ILO, Geneva 2003</p>			
7	<p><u>International Ship and Port Facility Security (ISPS) Code</u> As part of the ISPS Code does the port have an approved Port Facility Security Plan?</p>			
8	<p>Does the PFSP include implementation of security in the following six areas:</p> <ol style="list-style-type: none"> 1. Access Control; 2. Cargo Handling and the ship / vessel interface; 3. Unaccompanied Baggage; 4. Restricted Areas; 			

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	5. Ship Stores; 6. Monitoring Security Regime.			
9	Has the port completed a Port Security Assessment (PSA)?			
10	Does the port have a Security Officer?			
11	Have the port personnel received relevant security training commensurate with their function?			
12	Does the port have physical security? Has the port contracted physical security to a security and ISPS Code specialist company?			
13	Does the port have a Port Risk Assessment (PRA)?			
14	Does the port have a Port Facility Risk Assessment (PFRA)?			
15	Does the port undertake Ship Security Assessments?			
16	Have the port and facility security officers received training?			
17	Has the port undertaken validation exercises of Security Plans?			
18	Has the port undertaken project management of port facility remedial security works?			
20	Does the port have specialist guidance on scanning systems for containers for organic materials and illegal immigrants? Does the port have container X-Ray detection systems? Does the port have hand held gamma ray systems?			
21	Does the port have crisis and emergency management education and training?			
22	Does the port have a terrorist minimization and management plan?			
23	Does the port undertake fire service and safety consulting and audits?			
24	Does the port undertake formal and informal security consulting with Jordan and international authorities responsible for intelligence gathering, policing and smuggling, etc?			

SUPPLY CHAIN SECURITY VALIDATION PROCESS GUIDELINES

The Supply Chain Security validation process guidelines are based upon the US Customs Transport Partnership Against Terrorism (C-TPAT) and World Customs Organization (WCO) Supply Chain Security and Facilitation and the Advance Cargo Information Guidelines. Consequently, the number of guidelines are extensive and the description of the requirements are detailed.

Objectives

Develop and implement a sound plan to enhance security procedures throughout your clients supply chain. Where your company as part of the supply chain does not control a facility, conveyance or process subject to these recommendations, the transport operator (Road or air freight consolidator), Ocean Transportation Intermediary and Sea Carrier agrees to make every reasonable effort to secure compliance by the responsible party. The following are general recommendations that should be followed on a case-by-case basis depending on the company’s size and structure and may not be applicable to all.

Procedural Security

Procedural security assures recorded and verifiable location of goods in the supply chain. Procedures should provide for the security of goods throughout the supply chain. Contingent procedures should be included within the scope of procedural security.

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Does your company have reliable procedures and a written system in place to protect against non manifested material being introduced into the supply chain?			
2	Does your company have reliable procedures and a written system to ensure that your terminal / port / logistics base has security controls that include: <ul style="list-style-type: none"> • the recorded and verified introduction/removal of cargo that is supervised by a designated company official? • the proper marking, • weighing, • counting and documenting of cargo/cargo equipment verified against manifest documents, • the detecting/reporting of shortages/overages, and • the detecting of irregularity or illegal activities, • procedures for verifying seals on containers, trailers, and railcars? 			
3	Does your company have reliable procedures and a written system to ensure that the incoming and outgoing of goods is supervised and monitored?			
4	Does your company have reliable procedures and a written system to ensure that random, unannounced security assessments of areas in your company’s control within the supply chain are conducted?			
5	Does your company have reliable procedures and a written system to ensure that the procedures for notifying Jordan Customs, Port Security Committee, and other law enforcement agencies in cases where anomalies or illegal activities are detected, or suspected, by the company are in place?			

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	Criminal activity is reportable to the Police.			
6	Does your company have reliable procedures and a written system to ensure that your company Facility / Terminal operators have written and verifiable security procedures in place with regards to areas under your company control?			
7	Does your company have an integrated computer information exchange system (Connectivity and share) with your clients suppliers, freight forwarder (Supply chain participants) and your company sections and divisions that are involved with the import and export transaction and physical movement of your goods and consignments?			
8	Does your company computer system allow the connectivity to exchange sufficient quality information that has the required detail to record in-transit visibility and exception reporting and product identification for each consignment / container in real time (Tracking using spreadsheets and faxes are not sufficient)?			
9	Does your company have a real time computer information collection and connection system that engages with your supply chain partners who have different technical capabilities, and data message integrity that can offset human errors and foster product identification?			
10	Is your company computer system sophisticated enough to record container opening, tampering and other dock to dock tracking visibility?			
11	Is your company computer system sophisticated enough to inform you where a shipment is supposed to be and if delivery is ahead or behind schedule, wrong direction, radiation, seawater or chemical problem, temperature change beyond tolerance levels, as well as other client specific information and consequently produces an exception report?			
12	Does your computer system or the computer system of the transportation operator / agent and freight forwarder have the capability to produce a complete audit trail of where the container has traveled and when and where exceptions have been generated, detection capture, communication of breeches in real time and that exceptions generate real time notification to you via e-mail, pager or XML / EDI transactions?			
13	Do you as the clients transportation operator and or freight forwarder use detection devices that are attached in such a way that a thief cannot breach the container without generating an exception report, even if the container door is removed completely?			
14	Does your company have reliable procedures and a written system to ensure that your company and your clients properly store empty and full			

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	containers to prevent unauthorized access, including the use of tamper-proof / non-counterfeitable seals?			
15	Does your company have reliable procedures and a written system to ensure that your company checks empty containers received for storage or loading to ensure its structure has not been modified?			
16	Does your company have reliable procedures and a written system to ensure that affixing, recording, tracking, and verifying tamper-proof / non-counterfeitable seals on containers, trailers and railcars?			
17	Does your company have reliable procedures and a written system to ensure that seals are not used in strict numeric sequence and that seals are not registered and controlled by a single person?			
18	Does your company have reliable procedures and a written system to ensure that your company verifies the identity and authority of the carrier requesting delivery of cargo prior to cargo release?			
19	Does your company have reliable procedures and a written system to ensure that your company employees notify Jordan Customs and other law enforcement agencies of suspected illegal activities?			
20	Does your company have reliable procedures and a written system to ensure that your company carries out random and unannounced security assessments?			
21	Does your company have reliable procedures and a written system to ensure that your company employees inspect persons and packages?			
22	Does your company have reliable procedures and a written system to ensure that your company has and carries out additional security procedures for high value and high risk goods?			
23	Does your company have reliable procedures and a written system to ensure that your company employees process, identify and isolate unaccompanied baggage? Do you have a reliable procedure to inspect persons and packages and unaccompanied baggage?			

Physical Security:

Physical security includes security measures that monitor and control the facility’s exterior and interior perimeters. This will include Mail Service Security, Lock and Key Control, and Perimeter and Interior Alarms.

Recommended features to be installed as appropriate:

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Are all of your company buildings and rail yards constructed of materials that resist unlawful entry and have protection from outside intrusion?			
2	<p>Does your company buildings and offices have physical security that includes:</p> <ul style="list-style-type: none"> • perimeter fences, locking devices (International standard) on reinforced external and internal doors; • windows with mesh, metal bars; • International standard locking devices on external and internal doors, windows, gates and fences. Exterior doors and windows must be equipped with alarms; • perimeter fences and interior fencing, • gates and gatehouses; • adequate lighting inside and lighting outside the facility that includes CCTV: making sure that there are no “black-spots”; • electronic security systems that include theft alarm systems and alarmed access control systems; • have the segregation and marking of international, domestic, high-value, and dangerous goods cargo within the warehouse by a safe, caged or otherwise fenced-in area; • Large dual language signage: that display and instruct direction, health and safety and restricted areas? 			
3	Does your company plan and implement a maintenance program that comprises regular scheduled inspections to keep fencing, gates, lights and cameras in good condition and working order (maintain the integrity of security measures)?			
4	Does your company have a reliable procedure and a written system that ensures your company has implemented controls to stop the theft of goods, vehicles and company documents?			
5	Does your company have a reliable procedure to undertake random inspections and “walk through”			

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	to inspect and check all physical security measures and facilities?			
6	Does your company have emergency lighting / power systems for key operational areas and high value cargo areas?			

Recommended procedures to be implemented as appropriate:

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Depending upon the company size a security company may be required to undertake some of the physical security duties and measures?			
2	Gates or doors through which vehicles and personnel enter or exit should be manned or under observation by management or security personnel			
3	Access to employee vehicle parking must be controlled			
4	Employee vehicle parking must be in a separate area from visitor parking			
5	Private passenger vehicles must be prohibited from parking in cargo areas or immediately adjacent to cargo storage and office buildings			
6	Lock and key control including signing in and out of high risk areas			
7	Restrict access to document and cargo storage areas			

Access Controls:

Access controls prohibit unauthorized access to facilities, vehicles, loading and unloading equipment, vessels, aircraft, shipping, loading docks, break bulk areas and cargo areas. If, access control is not possible increased precautions in other security aspects is needed.

Recommended procedures to be conducted as appropriate:

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Do you have reliable procedures and physical facilities that stops non authorized persons access to company facilities and conveyances, and that positively identifies, records and tracks all employees, contractors, visitors and suppliers?			
2	Do you have procedures and physical access controls that include positive identification of all employees, visitors, and vendors, that includes check in and check outs and labeling?			
3	Do you have procedures and physical access controls that trigger an alarm when visitors attempt			

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	to enter an unauthorized area?			
4	Do you have procedures and written instructions for all employees which results in your employees and guards safely challenging unauthorized/unidentified persons and removing unauthorized/unidentified persons?			
5	Does your company control and monitor the parking of all vehicles around the companies offices and port/terminal buildings that include segregation and restricted areas access? Does your company vehicle parking procedure and control system include the authorization by an adequate gate/pass and/or decal system? Does your company have a procedure that ensures vehicle parking for office employees, terminal/warehouse (facility) workers and visitors are physically segregated and restricted to designated areas?			
6	Do you have procedures, written instructions and trained personnel to ensure that vehicles are inspected before they enter operation facilities?			
7	Do you have procedures, written instructions and trained personnel that ensures you control the time individuals have access to facilities?			
8	Do you have procedures, written instructions that ensures you display large dual language maps of restricted areas within the view of all employees and visitors?			

Personnel Security:

Personnel security is concerned with the screening of employees and prospective employees, as appropriate and as allowed for by law.

Recommended procedures to be conducted as appropriate:

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Do you have a written procedure that ensures you conduct employment screening and interviewing of prospective employees?			
2	Do you have a written procedure that ensures you conduct periodic background checks and resume / application verifications?			
3	Do you a written procedure that ensures your verify job application information?			
4	Do you have a written procedure that ensures you contact references?			
5	Do you have a written procedure that ensures you			

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	review the skill requirements for key positions?			
6	Do you have a written procedure that ensures you align job skill requirements with individual skills?			
7	Do you have a written procedure that ensures you check the background and corporate structure of independent contractors?			
8	Do you have a written procedure that ensures you conduct drug testing (as allowed for by law): <ul style="list-style-type: none"> • Before hiring; • Random periodic testing; • At times of reasonable suspicion? 			
9	Do you have a written procedure that ensures you implement different color ID cards to employees that designate access privileges?			
10	Do you have a written procedure that ensures you implement gate passes to vehicle drivers and other carriers to control and identify those authorized to enter the facility?			
11	Do you have a written procedure that ensures you issue to employees different color uniforms for each sensitive area?			
12	Do you have a written procedure that ensures you issue different color uniforms for your security staff?			
13	Does your company have an authorized and responsible senior company manager and or director that is responsible for company security plans and for the implementation of security measures and procedures?			
14	Does your senior company manager and or director responsible for security have the authority to announce a security threat level on the company property and to company employees?			
15	Does the company person responsible for security have the authority to undertake a Security Assessment (Risk analysis) and as a result of the Security Assessment implement a Security Plan that includes various controls and compliance measures?			
16	Does the company have an Internal Code of Conduct that is a part of the employees contract of employment?			
17	Does your company Internal Code of Conduct include a written system and procedure for the reporting / disclosure to management of any problems and issues that relate to personnel security and to the security of facilities, goods and documents?			

Education and Training Awareness:

Education, training and awareness encompass education and training of personnel regarding security policies, encouraging alertness for deviations from those policies and knowing what actions to take in response to security lapses.

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Do you have a written procedure that ensures you communicate security policies and standards to employees, including consequences of non-compliance?			
2	Do you conduct a security awareness program for all employees that includes the recognition of internal conspiracies, maintaining cargo integrity, and determining and addressing (solving) unauthorized access?			
3	Does your security awareness programs provide for incentives for active employee participation in security controls? The security education and training awareness programs must encourage active employee participation in security controls.			
4	Does your security awareness program includes the use of press releases, e-mail distribution lists and bulletin boards?			
5	Does your company have a reliable process by which you search for and obtain new supply chain security information? For example: World Customs Organization (WCO) initiatives and programs: Convention and commentary on Mutual Administrative Assistance in Customs Matters, WCO Data Model and the list of essential data elements required for the identification of high risk consignments, International Customs guidelines on advance cargo information, etc.			
6	Does your company partake in Jordan Customs and Port plans and programs to introduce and implement or enhance the Port Facility Security Plan (PFSP)?			
7	Does your company have a copy of the International Ship and Port Facility Security Code (ISPS) and copies of other security measures adopted by the International Maritime Organization (IMO)? Does your company have a reliable procedure to			

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	<p>obtain new measures to the ISPS Code?</p> <p>Does your company have a reliable procedure that obtains the new measures to the ISPS Code in order that it is aware of the repercussions that ships might face after 1 July 2004 if they are found not to be in compliance with the requirements of that regulation and Section A/9.81 of the ISPS Code?</p> <p>The repercussions to ports should also be assessed. Requirements for port facilities include:</p> <ul style="list-style-type: none"> • Monitoring and controlling access; • Monitoring the activities of people and cargo; • Ensuring security communications are readily available. 			
8	<p>Does your company have a copy of the International Labor Organization (ILO) and IMO Code of Practice on Security in Ports?</p> <p>Does your company have a reliable procedure to obtain and circulate to all your relevant company new measures to enhance maritime security to the ISPS Code?</p>			
9	<p>Does your company have a copy of the Safety of Life at Sea Convention (SOLAS), with attention to SOLAS regulation X1-2/9 on “Control and compliance measures”?</p> <p>Does your company have a reliable procedure to obtain and circulate to all your relevant company personnel a copy of the new SOLAS measures (New Chapter X1-2) that enter into force on 1 July 2004?</p>			
10	<p>Does the company education and awareness training include hands on training for all company employees to recognize and address potentially dangerous items during packing, loading and unloading process?</p>			

Conveyance Security:

Conveyance security provides protection against the introduction of unauthorized personnel and material into the supply chain, including the areas between the links of the supply chain.

Recommended procedures to be conducted as appropriate:

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Does your company have a reliable procedure and written system that ensures there is protection in your transportation system that protects it from the introduction of unauthorized personnel and material?			
2	<p>Does your company have a reliable procedure and written system that ensures that the security procedure includes the physical search of all:</p> <ul style="list-style-type: none"> • readily accessible areas, the securing of internal/external compartments and panels, and • procedures for reporting cases in which unauthorized personnel, non manifested materials, or signs of tampering, are discovered. 			
3	Does your company have reliable procedures and a written system that is implemented and consequently it physically controls and monitors all cargo transfer operations within your company facilities / terminal?			
4	<p>Does your company have a reliable procedure and a written agreement with suppliers and transportation and freight forwarders to ensure that they establish and implement procedures to guard against the packing and loading of goods of unknown articles and materials?</p> <ul style="list-style-type: none"> • Supervised loading and unloading of all goods; • Proper sealing, marking, and counting of goods and packages and boxes loaded into containers; • The correct documentation for the goods that are loaded into the container must be sent in advance to Jordan; • Approved procedures for affixing, recording, tracking and verifying seals on containers and trailers are in place. 			
5	Does your company have a reliable procedure and a written system that ensures your company uses where necessary C TPAT High Security Compliant			

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	<p>Bolt Seals and C TPAT compliant Heavy Duty Bolt Locks on containers?</p> <p>Do the high security bolts comply with ISO/PAS 17712 specification?</p> <p>Are the bolts:</p> <ol style="list-style-type: none"> 1. Load to failure test: to 3,300Lbs or to 2,900Lbs; 2. Sheer tested: to >750 Lbs; 3. Impact tested: at -27C > 30 Lb./Ft. with no visual damage. 			
6	Use tamper-proof / non-counterfeitable seals or electronic seals to secure conveyance.			
7	If cost effective, use transponders to facilitate continual tracking of conveyances.			
8	Use automatic electronic transmittal of “smart-card” data to Customs if available.			
9	Use “smart-card” technology containing vehicle, consignment and driver information where automated border crossings are in place.			
10	Consider cost and future standardization issues related to the use of smart cards, electronic seals and transponders.			
11	Does your company stay informed regarding development of standards and requirements regarding smart cards, electronic seals and transponders by World Customs Organization, International Maritime Organization and International Standards Organization, etc.			
12	Does your company use technology to communicate with other forms of Automatic Identification and Data Collection (AIDC) technologies such as bar codes, passive RFID, sensors, electronic seals, and satellite systems, GPS, EDI to read any and all data needed to manage your supply chain?			
13	<p>Does your company operate real time RFID infrastructure, electronic seals, biometrics, sensors, and satellite tracking systems with a web based application providing automated alerts that instantly notify security, operational managers, and appropriate law enforcement agencies the moment there is a breach in security and supply chain protocol?</p> <p>Does the RFID infrastructure have the following solution features:</p> <ol style="list-style-type: none"> 1. Instant notification of container security breaches; 2. Administrative functions to manage sensors and intrusion detection devices like creating sensors, disposing sensors, modifying sensor attributes and moving sensors; 			

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	<ol style="list-style-type: none"> 3. Document and image capture from non-intrusive inspection technologies such X-Ray / Gamma Ray scanners; 4. Route planning and verification, and dynamic route adjustments based on actual asset movements; 5. Virtual security inspection and monitoring ; 6. Container history and audit trail reports; 7. Required vessel information and listing reports for import customs and port authorities; 8. Complete information profile on each container – contents, routing, and schedule – creates a “virtual” container that is tracked and managed within the network. 			
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Service Provider Requirements: operative sub contractors

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Does your company have reliable procedures and a written system that is implemented to ensure that plant, equipment and vehicles brought by suppliers and sub-contractor plant and equipment into your company facilities and buildings and onto your company property is assessed and physically inspected for security?			
2	Does your company have reliable procedures and a written system that is implemented to ensure quality control records and procedures on production processes maintain system integrity?			
3	Does your company have reliable procedures and a written system that is implemented to ensure that financial assessments are implemented to determine the service providers fiscal soundness and ability to deliver goods and services within contract obligations?			
4	Does your company have reliable procedures and a written system that is implemented to ensure internal controls are implemented for the selection of service providers?			
5	Does your company have reliable procedures and a written system that is implemented to ensure profiles of your main suppliers who are receiving and packing finished commodities and equipment are maintained and available for review?			
6	Does your company have reliable procedures and a written system that is implemented to ensure those service providers with whom your company is contracted are participants in: <ul style="list-style-type: none"> • Jordan Golden List; • Customs Trade Partnership Against Terrorism 			

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	(C-TPAT); <ul style="list-style-type: none"> • Jordan Customs Industry Partnership programs, and; • Jordan Anti Smuggling program;Etc. 			
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Trading and Transportation Operator Security

Trading partner security extends supply chain security to your suppliers and customers. Communication, assessment, training and improvement are key components.

Recommended procedures to be conducted as appropriate:

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Do you check the integrity of the international transport operator used by your clients?			
2	Do you have a procedure and a methodology to check the international transportation operator? For example, is the transportation operator compliant with the Container Security Initiative (CSI) and with the Customs-Trade Partnership Against Terrorism (C TPAT) Guidelines, etc?			
3	Do you check if your transport operator is in full compliance with the laws and regulations of Jordan? <ul style="list-style-type: none"> • Business documents: registration, license, driver licenses, qualifications, Tax and Sales Tax certificates, etc; • TIR Carnet; • Certificate of vehicle compliance? 			
4	Do you encourage your trading partners and suppliers and contractors to assess and enhance, if required, their supply chain security?			
5	Do you request written security agreements with trading partners/suppliers/contractors to include controls such as: <ul style="list-style-type: none"> • Tamper-proof/non-counterfeitable seals; • Signatures; • Time controls; • Agreed means of communication? • A supply chain security acknowledgement form requested by U.S. import companies? 			
6	Do you document mutual supply chain security policies?			
7	Do you have extensive exchange of information between trading partners/suppliers/contractors?			
8	Do you advise Jordan Customs and foreign authorities of security agreements with trading			

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	partners?			
9	Do you have or receive education, training and awareness of security aspects of the supply chain from trading partners?			
10	Do you if possible include equivalent security provisions as a condition of contract for contractors/suppliers providing services?			

Internal Company Record Keeping System

Does your company have an established internal record keeping system, a Quality Management System, and or a compliance guide book, which ensures that all documents related to your import transaction and import processing documents are correct and stored (3 years)?

Customs require hard copies of all documents. Therefore, does your company have all hard copies or does it hold some documents on a computer software system, such as SAP, or as part of a company private exchange system such as Cisco’s eHub, etc?

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p>Does your company Quality Management System have an internal record keeping system to meet the following criteria?</p> <p>The term “records” means any information made or normally kept in the ordinary course of business which pertains to the following activities:</p> <ul style="list-style-type: none"> • Accounts: Record of Reconciliation, receipts, payment documents, VAT payments, etc • Warehouse documents: delivery notes, goods received notes, inventory lists, record of deliveries, etc • Technical specification: specification handbooks and brochures that are applicable for the machinery and or equipment consignment; • any importation, declaration or entry; • the transportation or storage of merchandise carried or held under guarantee into or from the customs territory of your country and the other countries that you operate in; • the filing of a drawback claim (re-export), etc; • the collection and payment of fees, duties and taxes to Jordan Customs; • any other activity required to be undertaken pursuant to laws or regulations administered by Jordan Customs, such as transfer pricing and expert independent inspection, etc; <p>The term “records” includes any information required for the entry of merchandise and other information pertaining to or from which is derived, any information element set forth in a collection of information required by the Jordan Customs Law in connection with an activity described above. The term includes, but is not limited to:</p> <ul style="list-style-type: none"> • statements, declarations, documents; • electronically generated or machine readable data; 			

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	<ul style="list-style-type: none"> • electronically stored or transmitted information or data; • books, papers, correspondence; • accounts, financial accounting data • technical data; • computer programs necessary to retrieve information in a usable form; • file of drawback claims; • transport or warehouse / store merchandise documents held in bond. <p>Or, documents that are required by law to be stored.</p>			
2	Do you have a lockable secure storage place for your records?			
3	Are your records indexed in a retrievable fashion?			
4	Have you established a reliable destruction cycle to prevent the premature destruction of required records; and do you have the right documentation that allows you to dispose of and proves that you have disposed of documents that are more than 3 years old?			
5	Do you have a responsible person assigned as your custodian of records; Chief Accountant or an Inventory Accountant, etc?			
6	Do you have a compliance improvement plan framework?			
7	Do you have a reliable procedure and a written system that ensures all of your company section / division personnel retain and store original and or electronic documents for each import transaction?			
8	Does your company have a record of paying penalties for not keeping documents for the prescribed minimum of three years in Jordan?			
9	<p>Does your company have a procedure and a written requirement as an instruction to all company personnel, and a document archive facility to keep and store the following list of documents:</p> <ul style="list-style-type: none"> • Air way bill; • Bill of lading; • Carries certificate; • Declaration of entry; • Power of Attorney; • Consolidated shipments authority: if this procedure is used; • Packing list; • Bond information; • Vessel, vehicle or air manifest; • Certificates of Origin; <p>There are other documents that are relevant for specific commodities and transport modes, etc., which need to be retained.</p>			

Documentation and Information Processing Security

Documentation processing security, both electronic and manual, assures that information is legible and protected against the loss of data or introduction of erroneous information.

Recommended procedures to be conducted as appropriate:

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Do you have a written procedure that ensures you safeguard computer access and information?			
2	Do you have a written procedure that ensures you control access to information systems, both by level of job responsibility?			
3	Do you have physical security in computer areas?			
4	Do you have written procedures that ensure you monitor employee use of data systems?			
5	Do you have written procedures that you have processes to backup computer system data?			
6	Do you have a written procedure that ensures you record the amount of cargo by packing unit type, packing conditions, and security seal and stamps. Furthermore, do your procedures record discrepancies with a note, photograph and scale weight records?			
7	Do you have a written procedure that ensures you obtain signatures for all process checkpoints (e.g., document preparation, when seals are applied / broken, vehicle inspection, opening the vault, cargo delivery, cargo receipt, counting unshipped pieces, etc.)?			
8	Do you have a written procedure that ensures you fix times for the preparation of documents, and for the shipping and unshipping of cargoes?			
9	Do you have a written procedure that ensures you use special control procedures to prepare emergency / last minute shipments and if necessary notify authorities regarding such shipments?			
10	Do you have a written procedure that ensures your software system registers transactions and supports operations, and if possible make a follow up of the activities that it handles?			
11	Do you have a written procedure that ensures you record the entrance and exit time of people receiving and delivering goods?			
12	Do you have a written procedure that ensures you document significant process delays?			
13	Manifest security: Do you have a written procedure that ensures your manifests are complete, legible, accurate, and submitted within the prescribed time period in compliance with the Jordan Customs Law?			
14	Does your company have reliable procedures and a			

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	written system that ensures the security of all electronic assets, including advising employees of the need to protect passwords and computer access?			
15	Does your company have reliable procedures and a written system that ensures measures are taken to secure sensitive information in order to prevent the loss or unauthorized use of such information?			

For your information: future automated data exchange and authorized supply chain related procedures:

1	Establish electronic customs reporting systems based upon World Customs Organization Customs Data Model and the Unique Consignment Reference (UCR)?			
2	Establish advance manifest reporting systems?			
3	Advance lodgment of data			
4	The single window system			
5	Risk Management			
6	Authorization			
7	Customs mutual assistance arrangements			

Internal finance and accountancy controls

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Does your company have a reliable procedure and a written system that ensures you obtain and maintain a record of all new finance and accountancy laws, regulations and guidelines a copy of which is each provided to each member of your staff that is involved with transactions and record keeping?			
2	Do you maintain an original document and electronic document audit trail from procurement, accountancy, goods received, warehousing and to payments in your company?			
3	Are the financial and accountancy control systems in your company consistent with and compliant with the Financial Audit and Certified Public Accountancy that are legally enforced in Jordan? Do the audit measures cover: <ul style="list-style-type: none"> • Control environment; • Risk assessment; • Control activities; • Information and communication, and; • Monitoring? 			
4	Does your company have a written system that ensures that you implement reliable control procedures in the company sections and or divisions and subsidiaries that participate or effect the			

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	importation of goods?			
5	Has your company identified financial and accountancy risks that are related to your import operations and procedures?			
6	Does your company have a reliable procedure and a written system that ensures you correct compliance deficiencies?			
7	Does your company have a reliable procedure and a written system that ensures you plan and perform periodic testing and assessment in the company operations and divisions that have an effect on imported goods? Does the procedure include a minimum annual review of the significant risk areas?			
8	Does your company have a reliable procedure and a written system that ensures you hold interdepartmental meetings to discuss and coordinate changes to your financial and accountancy internal control systems when the tests and assessments or other information show a need for compliance improvement?			
9	Does your company have an authorized and responsible person that can initiate appropriate disclosure of financial and accountancy?			
10	Does your company have a reliable procedure and a written system that ensures you have an internal control process that document and retain all the tests and assessments?			
11	Does your company have a reliable procedure and a written system that ensures you retain and store for three years all the test and assessment documents?			

Can all the specific procedures and written systems be made available to Jordan Customs in a verifiable format at an identified location?

Identifying perceived weaknesses in security and compliance will not necessarily prohibit participation in the Jordan Customs “Golden List” program.

Jordan Customs is committed to working with the trade community to identify effective corrections and adjustments to a company process that will result in a more secure supply chain operation.

Meeting the objectives can be helped by your company implementing responsibility of self assessment and a Jordan Customs Risk Management Department assessment.

Appendix 6: Qualified Industrial Zone

Guide

The questions in the checklist are a guide to allow JCD and Golden List candidate companies to determine if the applicant is ready to assume the responsibilities of self-assessment. The check list questions are designed to determine if the Jordan company has made a commitment to implement specific actions (internal procedures and controls) that will enhance compliance. A Jordan company that does not have procedures and controls in place may answer that it plans to develop and implement procedures and controls and specify a target date for implementation.

Response Yes or No

A respond yes or no in this column indicates whether a Jordan company has implemented procedures and controls response to the question. If, a Jordan company has adequate procedures and controls that it believes document that the company is ready to assume the responsibility of self-assessment, the Jordan company can answer yes to the question. If, the Jordan company does not have adequate procedures and controls, whether they are generally adequate or need significant improvement, the Jordan company can answer no under this column and indicate in the next column that it plans to implement procedures that will be adequate for the company to assume responsibility of self-assessment.

If No, Plan to implement or improve (yes or no)

If, the Jordan company indicated “no” under the previous column, the Jordan company can respond yes or no in this column to indicate whether it plans to implement or improve procedures and controls. Whether the Jordan company procedures and controls are generally adequate but need small improvements, or need significant improvements, we recommend the JCD accept the company into the Golden List under certain conditions. The company must commit to making the necessary improvements and demonstrates that the steps are in process. If, the Jordan company agrees to make needed improvements the company should respond yes in this column. The JCD must periodically monitor the improvement process. Failure to follow through would then result in removal from the Golden List. If, the Jordan company does not have or plan to have these procedures and controls Jordan Customs Risk Management Directorate will need to consult with the company to ascertain their readiness to assume responsibility of self assessment. Shipments associated with non-participants in the Golden List Program will be subject to other risk assessment factors.

Target date

If, the Jordan company indicates that it is going to implement procedures and controls under this column, it should provide the target date to have the procedures and controls implemented and working in this column by the target date.

Contents

1. Compliance Assessment;
2. Compliance with the Jordan Customs Law;
3. Exports to the USA;
4. Supply Chain Security Validation Process Guidelines.

COMPLIANCE ASSESSMENT

Objective: Determine if the entries of the QIZ exporter and importer meet an acceptable level of compliance with the Jordan Customs Law and Regulations and with the Jordan-US Free Trade Agreement during the period under review, and whether the QIZ exporter and importer has documented Customs internal controls.

Some of the questions are related to a company’s normal business activities and determine the commercial compliance with the Jordan requirements for company registration, licensing and certification, etc.

Qualified Industrial Zone responsibilities

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p><u>QIZ qualification</u> Has your company obtained qualification for its products to access the U.S. market?</p>			
2	<p><u>Merchandise Description</u> Do you have a reliable procurement and supply chain management procedure or program to ensure that you know what you have produced and that your manufactured item is composed of parts that you can substantiate the origin?</p> <p>Does your company have a reliable record keeping system that can prove you are contributing a minimum of 35% of the value of the materials used in the production of the manufactured good?</p> <p>Of that 35% content , at least:</p> <ol style="list-style-type: none"> 1. 11.7% must come from your company as a result of being qualified for a QIZ; 2. 8% from Israel (7% for high tech goods); 3. The remainder of the minimum may be fulfilled by content from your Jordan QIZ company, Israel, USA or West Bank / Gaza. <p>Your Jordan company as a manufacturer and Israel company must each contribute at least 20% of the total production cost of manufacturing the QIZ. good.</p> <p>Compliance will maintain QIZ status.</p>			

External Expert

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p><u>Rules of Origin</u> Have you contracted in accordance to the Articles, described in several laws that govern contracts with a licensed Customs Clearance Agent in the Hashemite Kingdom of Jordan to ensure that your company is in compliance with the Jordan Customs Law, Customs Regulations, with the Law on Import and Export, and regarding textiles and apparel compliance with the Uruguay Round Agreement Act, 19 U.S.C. 3592 Section 334, rules of origin?</p>			
2	<p>Have you contracted with a legal company or other customs expertise in order to undertake customs due diligence in Jordan and as a result of the expert advice establish a customs procedure for the export of your goods, materials, equipment and spare parts, etc?</p>			
3	<p>What steps have you taken to ensure the quality of your licensed Customs Clearance Agent and Ocean Transportation Intermediary?</p> <ul style="list-style-type: none"> • Checked the Customs Clearance Agent and Ocean Transportation Intermediary registration for validity? • Quality Management System, i.e., ISO 9000? • Checked if you have a valid Letter of Delegation (Power of Authority) for the Customs Clearance Agent / Ocean Transportation Intermediary; signed by the authorized company representative as per the notarized company Charter and Registration documents? • Checked the Customs Clearance Agent and Ocean Transportation Intermediary internal quality system and procedures? • Checked the professional qualifications of the personnel employed by the Customs Clearance Agent and Ocean Transportation Intermediary; does the agent and intermediary have personnel that will ensure that your exports comply with the requirements of the QIZ, Uruguay Round Agreement, Jordan Customs Law and with the Import and Export Law of Jordan? • Checked if your Customs Clearance Agent and Ocean Transportation Intermediary is a current member of the Jordan Shipping Association? • Checked if the Customs Clearance Agent is included in a list of agents, kept by Jordan 			

⁵ *Fines and penalties*

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	Customs Department, that have been penalized as a result of an infringement of the Jordan Customs Law5?			
4	Do you have a person in your company that is knowledgeable of the Jordan customs law, QIZ and Jordan customs export procedures and who is assigned to review and check the documentation and customs export process by your Customs Clearance Agent and Ocean Transportation Intermediary to ensure that it is full, complete and accurate?			
5	If your documentation was prepared outside your own organization, do you have a reliable system, or check list, in place to insure that you receive copies of the information as submitted to Jordan Customs and your clients; that it is reviewed for accuracy, missing documents and pages, and that originals are in the packet of documents where these are required in place of photo copies, etc., and in the event of mistakes and or missing documents that you disclose to Jordan Customs in a timely manner the need for corrections (No disclosure system and provisions exist in Jordan. There is a need for an enabling law and regulations to permit disclosure)?			

Internal Company Customs Expert

If you are not contracted with and using a Customs Clearance Agent and an Ocean Transportation Intermediary have you taken the following steps?

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p>Does your company have an internal export / customs and international transport expert (Shipping Manager)?</p> <ul style="list-style-type: none"> • What steps have you taken to verify the training, technical expertise and security of trade and facilities requirements, etc., with your customs person: a certificate as an export expert issued by a customs agent school or who has qualified by virtue of passing out of the Jordan Customs Training School? • Is the training certificate renewed annually after a recognized and attested training course, and is the certificate issued if the person has incorporated changes to Jordan customs laws and regulations? • Are the training certificates filed in the Personnel files as per the Labor Law for Jordan? 			
2	<ul style="list-style-type: none"> • Do you have on file a complete and current 			

	<p>copy of the Jordan Customs Law and Regulations and all relevant Jordan Customs Regulations pertaining to the goods, materials, and equipment that your company is exporting (Article 9), for example: -</p> <ul style="list-style-type: none"> • • Copy of the Income Tax and Sales Tax Law for Jordan? • Customs Decision regarding prohibited goods? • Convention International Transport of Endangered Species (CITES)? • Regulations on hazardous and dangerous goods and ADR? • Freight Transport Law for Jordan? • FIATA Regulations? • Harmonized System Convention? • Investment Promotion Law and Regulations? • Notarized contract with the Government as a Foreign Investor? • Vehicle axle weight laws and regulations? • Railway Regulations, Tariffs and dimensions for large loads? • Preferential customs duties (Jordan Customs Law Article 11 and 12): copies of Regional Trade Agreements: Jordan-European Union Association Agreement; Jordan European Free Trade Association Agreement (EFTA); Greater Arab Free Trade Area? • Preferential customs duties (Article 11-12): Copies of the Jordan-Singapore Free Trade Agreement? • Preferential customs duties (Articles 11 and 12): Copies of Bi Lateral Trade Agreements: Jordan-US Free Trade Agreement; Egypt; Algeria; Libya; Syria, Kuwait, Bahrain, Turkey; Iran; Pakistan; Sri Lanka; Brunei; Azerbaijan; Taiwan; Nepal; Japan; India; China? • Copies of Bilateral Commercial Agreements: Canada, Mexico, Cuba, Brazil, Uruguay, Chile, Morocco, Tunisia, Sudan, Ethiopia, Cameroon, Botswana, South Africa, Mauritania, Sierra Leone, Somalia, Nigeria, Djibouti, Ivory Coast, Palestinian National Authority, Israel, Lebanon, Yemen, Oman, Iraq (Oil for Food), United Arab Emirates, Saudi Arabia, Qatar, Australia, Indonesia, Philippines, Malaysia, North Korea, Singapore, Armenia, South Korea, Afghanistan, Thailand, Uzbekistan, Vietnam, Cyprus, Moldavia, Bosnia, Yugoslavia, Poland, Romania, Bulgaria, Malta, Slovak Republic, Ukraine, Russia, Hungary, Czech Republic and Croatia. • Copies of ratified international conventions: 			
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	<p>TIR, AETR, Container, Multi Modal, Passenger Vehicles, and ADR?</p> <ul style="list-style-type: none"> • Copy of the European Union and Jordan Free Trade Association Rules of Origin, and EUR1? • Copy of the Import and Export Law published by the Jordan Ministry of Industry and Trade? • Copy of the Law On Company published by Jordan Ministry of Industry and Trade; • Copy of the Phyto Sanitary Regulations administered by the Ministry of Agriculture, Ministry of Health and JISM? • Regulations for the import and export and transit of scrap metal? • Copies of current transit protection measures? • Copy of the Central Bank Law and Central Bank Regulations of Jordan? • Copy of the Jordan Intellectual Property Rights Laws and instructions and the TRIPS Agreement (regarding parallel trade and counterfeit goods)? • Instructions governing the export and import of heating, asphalt, fuels and raw materials from the Ministry of Power? • Instructions and permission rules for the import of frozen chicken? • Copy of the Jordan Customs Instructions providing for the licensing, operations, equipment and procedures of a Bonded storage warehouse? • 			
3	Do you have a procedure in place to verify that you are current and up to date on all applicable changes in the Customs Laws and Regulations?			
4	<p>Do you subscribe to professional journals that include information and news concerning new and amended Jordan and U.S. Customs and Border Protection, tax and accountancy laws and regulations?</p> <ul style="list-style-type: none"> • Do you have a system to disseminate copies of changes to export legislation to all company personnel that are involved with the export transaction? 			
5	Do you have a procedure to identify smuggling? (Article 20)			

(Note: If you are not using an external expert we strongly recommend that you review the Due Diligence model for Customs Clearance Agents and Transport Operator and apply the check list as part of your internal company procedure and as an extension of your supply chain security)

Licensing and Certification

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<ul style="list-style-type: none"> • Have you taken measures or developed reliable procedures to ensure that your merchandise complies with other agency requirements prior to export • Obtained original Jordan JISM Standard Certificates even though the goods and or equipment has a foreign Standards Certificate and analysis report? • Obtained and checked, where applicable an original copy of the relevant inspection and certification from an authorized agency in Jordan? 			

Accounting and Electronic Data Processing (EDP) Systems

Objective: gain an understanding of the company’s accounting and EDP systems in order to develop appropriate compliance tests on Customs transactions.

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<ul style="list-style-type: none"> • Does the company have a reliable written procedure as to how and where the company records Customs transactions in its accounts records? • Does the company conduct a regular accounting “walk through” of the accounting system from procurement order to payment to Customs entry and entry into the company’s accounting records? 			
2	Does the company confirm the accuracy and completeness of accounting records by reconciling the applicable general ledger accounts to cost of goods sold in the financial statement?			
3	<p>Can the company produce a description and/or a flow chart of it’s activities that includes the general ledger account numbers for recording the procurement of materials:</p> <ul style="list-style-type: none"> • Purchase; • Receipt; • Inventory record; • Payments; • Distribution; • Shipping. 			

Internal controls

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Do you have a reliable procedure that includes a written guideline that ensure you determine assists, commissions, royalties, license fees, freight and other dutiable costs are reported accurately and correctly to Jordan Customs?			
2	Do you have a reliable procedure that includes a written guideline that ensure you determine non-dutiable costs such as international freight and insurance accurately and that they are supported by documentation?			

COMPLIANCE WITH THE JORDAN CUSTOMS LAW

Chapter Two: Country of Origin

Have you taken reliable measures to ascertain the correct country of origin for the export of merchandise?

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Article 24: Have you established reliable procedures to ensure that you obtain the correct country of origin certificate from the Jordan Chamber of Commerce? • Checked the applicability of items (a) to (d) with your merchandise?			
2	Article 25: Section A: Have you established reliable procedures to check that where in the case of the origin of goods produced in more than one country shall be the country of the last manufacturing stage, provided that this manufacturing has been carried out in a purpose built project set up for the manufacture of a new product?			
3	Have you undertaken due diligence (customs advise) and taken reliable and adequate measures to communicate the requirements of Jordan Customs for country of origin (or other marking requirements) to your foreign supplier prior to the departure from the place of manufacture and or assembly and importation of your merchandise?			

Chapter Seven

Export and Re-Export

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Article 56: Do you have a reliable procedure that ensures the correct manifest of the goods is presented to Jordan Customs before the goods leave Jordan?			
2	Article 57: Do you have a reliable procedure that ensures the goods and the detailed declaration are presented to Jordan Customs Center?			

Chapter Eight

Common Provisions

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p>Article 60:</p> <p>Section A: Do you have a reliable procedure and written instruction that ensures that several sealed parcels are not put together in any way?</p> <p>Do you have a reliable procedure and written instruction that you obtain the Jordan Customs instructions regarding containers, pallets and trailers?</p> <p>Section B: Do you have a reliable procedure and written instruction that ensures that authorization is obtained to permit single consignments to be divided as long as no loss occurs to the Jordan Treasury?</p> <p>Do you have a reliable procedure and written instruction that ensures you obtain the Director of Jordan Customs directives to this effect?</p>			

Chapter Two

Inspection of Goods

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p>Article 69: Do you have a reliable procedure and written instruction that permits the inspection of the goods?</p> <p>Do you have a reliable procedure and written instruction that obtains and disseminate to all personnel concerned the inspection instructions of the Director of Jordan Customs?</p>			
2	<p>Article 70: Section A: Do you have a reliable procedure and written instruction that enables the customs inspection to be conducted at the QIZ Customs Center or in the nearest Jordan Customs Center?</p> <p>Do you have a reliable procedure and written instruction that enables the request for a customs inspection to be carried outside a Customs Center and in accordance with the rules set by the Director of Jordan Customs?</p> <p>Section B: Do you have a reliable procedure and written instruction that ensures the cost / fee for the transfer of goods to the inspection post, their unpacking and re-packing and all other steps to be paid for by the person / party that presented the customs declaration?</p> <p>Section C: Do you have a reliable procedure and written instruction that ensures the goods in store or in other places set for inspection are not transferred without the prior approval of the Jordan Customs Department?</p> <p>Section D: Do you have a reliable procedure and written instruction that ensures the persons involved in the transfer of goods and who present them for inspection are acceptable to the Jordan Customs Department?</p> <p>Section E: Do you have a reliable procedure and written instruction plus security measures and physical security to stop the access of unauthorized persons entering the stores, warehouses, depots, shelters and yards where goods are stored,</p>			

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	deposited for inspection and that no one enters these areas and facilities without the prior approval of the Jordan Customs Department?			
3	Article 71: Do you have a reliable procedure and written instruction to ensure that an inspection shall be carried out only in the presence of the person who presented the declaration or his representative in order that if a shortage is detected the responsibility can be defined?			
4	Article 72: Do you have a reliable goods inwards procedure that includes a written goods received record system and materials storage system and facilities to ensure that the Jordan Customs Department can open packages for inspection if Jordan Customs suspect the existence of prohibited goods or goods which contravene the contents of the customs documents? Do you have a reliable goods inwards procedure and written instruction that ensures that you or your representative receive notification of a customs inspection in order that you or your representative are present during the customs inspection? Do you have a reliable customs inspection procedure and written instruction that ensures that the customs inspection is undertaken by a committee and that a written report on the result of the inspection is received?			
5	Article 77: Do you have a reliable procedure that includes a written system that will ensure that you produce any additional documents to corroborate the accuracy of the contents of the manifest and present them to Jordan Customs?			
6	Article 79: Do you have a reliable procedure that includes a written system that will ensure that the owner and customs can re-inspect the goods in accordance with the provisions of Articles 69-78 of the Jordan Customs Law?			

QIZ companies that import materials that are used to manufacture goods for the U.S. must consult the Customs Due Diligence Import mode, with particular attention to Customs Value and Country of Origin.

QIZ companies that have a Bonded Warehouse and other storage facilities must consult the Customs Due Diligence model for Warehouse Operators.

EXPORTS TO THE USA

The Jordan-US Free Trade Agreement

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p>Do you have a reliable procedure that includes a written system to ensure that you are informed and can correctly implement the provisions of the Jordan-US. Trade Agreements if the goods are qualified to enter the U.S. market.</p> <p>The Jordan-US. Trade Agreement describes three different programs/agreements that either allow for duty free entry or customs duty reductions:</p> <ul style="list-style-type: none"> • Generalized System of Preferences: GSP; • Free Trade Agreement: FTA; • Qualified Industrial Zone: QIZ 			
2	<p>Do you have a reliable procedure that includes a written system to ensure that you can identify the Harmonized Tariff system (HTS) code of the product you plan to export to check its eligibility under the above three program/agreements?</p> <p>For example, the HTS numbers are available from the Data Web for the U.S. International Trade Commission, www.dataweb.usitc.gov</p> <p>The web site has a link that gives tariff reductions under the Jordan-US Free Trade Agreement by product for the years 2001-2010.</p>			
3	<p>Do you have a reliable procedure that includes a written system to ensure that you can identify the eligibility for:</p> <ul style="list-style-type: none"> • Customs duties under FTA. 			
4	<p>Do you have a reliable procedure that includes a written system to ensure that you are informed and can correctly interpret the local content requirement for local product?</p>			
5	<p>Do you have a reliable procedure that includes a written system to ensure that you are informed and can interpret correctly for QIZ products duty free access after fulfilling the 11.7% Jordanian content requirement, the 8% Israeli content requirement and the overall 35% content and substantial transformation?</p>			
6	<p>Do you have a reliable procedure that includes a written system to ensure that you undertake to optimize duty free access by case by case, which can vary according to product from 3.9% to 32%?</p>			
7	<p>Do you have a reliable procedure that includes a written system to ensure that you have an informed export compliance system that includes the importer in the U.S.</p>			

	<p>and the U.S. forwarder?</p> <p>As a result of the “informed compliance” does your U.S. importer claim preferential tariff treatment for originating Jordanian products by indicating the program or the agreement he wants to be treated under in the Special Program Indicator (SPI) Box on the import documentation.</p> <p>The symbol used for the agreements/programs are as follows:</p> <ul style="list-style-type: none"> • FTA: symbol “JO” is placed as a prefix to the subheading of the HTS of the exported product; • GSP: symbol “A” is placed as a prefix to the subheading of the HTS of the exported product; • QIZ: symbol “N” is placed as a prefix to the subheading of the HTS of the exported product. 			
8	<p>Do you have a reliable procedure that includes a written system to ensure that you as the exporter and the importer have an informed export compliance system that includes internal control questions:</p> <ol style="list-style-type: none"> 1. Are the GSP claimed products from an eligible country listed in General Note 4 of the Harmonized Tariff Schedules of the US? 2. Assure the importer that the articles are in fact the growth, product or manufacture of the Beneficiary Developing Country ? 3. Ensure that the value information to support the GSP claim is complete and accurate? 4. Provide proof of eligibility and all the required declarations at time of purchase; 5. Have a knowledgeable staff or forwarder that is familiar with the Customs requirements for handling the GSP export? 6. Does your U.S. importer have a broker who is familiar and sufficiently knowledgeable to review the accuracy of GSP importations? Have you provided him with all the necessary information? 7. Do you have a system of record keeping that addresses the aspect of whether the importations qualify for GSP? 8. Does the importer in the U.S. know anything about you to assure him that your products meet the requirements for GSP? 9. Have you or the importer ever addressed the issue of verification of GSP claims? Will you make your records available? 			
9	<p>Do you have a reliable procedure that includes a written system to ensure that you correctly apply the JFTA General Origin Rules?</p> <p>Section 102 of the JFTA (Public Law 107-43, 115 Stat. 243; 19 U.S.C. 2112 Note) provides for the rules of origin to determine whether a good qualifies for preferential</p>			

	<p>tariff treatment under the JFTA. Under the agreement, a good qualifies for preferential tariff treatment as a "Product of Jordan," only if:</p> <ul style="list-style-type: none"> (a) It is imported directly from Jordan into the U.S. and is wholly the growth, product, or manufacture of Jordan; or (b) It is imported directly from Jordan into the U.S. and is a new or different article of commerce that has been grown, produced, or manufactured in Jordan; and (c) The sum of: (1) the cost or value of the materials produced in Jordan, plus (2) the direct costs of processing operations performed in Jordan is not less than 35% of the appraised value of the article at the time it is entered into the territory of the U.S. (d) If the cost or value of materials produced in the customs territory of the United States is included for purposes of determining whether an article meets the requirement of containing 35% domestic content, no more than 15 percent of that article's appraised value that is attributable to the United States cost or value at the time it is entered may be applied toward determining the 35%. <p>Simple combining or packaging operations or mere dilution with water or another substance is not sufficient to confer origin for purposes of this agreement.</p> <p>There is no exception from paying the merchandise processing fees provided for in the agreement. These fees must be paid on entries of merchandise for which a preferential-tariff treatment claim is made under the JFTA.</p> <p>The JFTA does not affect merchandise entered from a Qualified Industrial Zone (QIZ). (See General Note 3[a][v], HTS, for a definition of QIZs.) Because duty reductions will be staged for certain products, it may be advantageous for importers to continue to enter merchandise manufactured in a Jordanian QIZ under General Note 3 (a) (v), rather than under the JFTA.</p>				
10	<p>Do you have a reliable procedure that includes a written system to ensure that you correctly apply the JFTA Textile and Apparel Articles Origin Rules?</p> <p>Pursuant to the provisions set forth under the JFTA Act, a textile or apparel article imported directly from Jordan into the customs territory of the United States will be eligible for preferential tariff treatment only if the</p>				

	<p>following conditions are met:</p> <ol style="list-style-type: none"> 1. The article is wholly obtained or produced in Jordan; 2. The article is a yarn, thread, twine, cordage, rope, cable or braiding, and <ol style="list-style-type: none"> a. the constituent staple fibers are spun in Jordan, or b. the continuous filament is extruded in Jordan; 3. The article is a fabric, including a fabric classified in chapter 59 of the HTS, and the constituent fibers, filaments or yarns are woven, knitted, needled, tufted, felted, entangled or transformed by any other fabric-making process in Jordan; or 4. The article is any other textile or apparel article that is wholly assembled in Jordan from its component pieces. <p>Textile and apparel articles not wholly obtained or produced in Jordan must comply with the above conditions and the value requirements described above under “General Origin Rules.”</p> <p>There are special rules for certain textile and apparel articles like knit-to-shape goods, linens, and certain fabrics and goods subjected to dyeing, printing, and two or more finishing operations (please see General Note 18 HTS).</p> <p>An article is “wholly obtained or produced in Jordan” if it is wholly the growth, product, or manufacture of Jordan. For more details or clarification of this provision, please consult the General Origin Rules and the relevant HTS headings.</p> <p>Eligible Articles</p> <p>Pursuant to Annex II of Presidential Proclamation 7512, a list of the HTS item numbers that are eligible for immediate duty-free treatment with respect to Jordanian goods that are either entered or withdrawn from warehouse for consumption, on or after December 17, 2001, may be found in the Federal Register (66 FR 64497-64734) dated December 13, 2001. This edition of the Federal Register may be found at the following Web site address: http://www.access.gpo.gov/su_docs/fedreg/a011213c.html</p>			
11	Do you have a reliable procedure that includes a written system to ensure that you correctly apply the Country of Origin Making and Special Marking Requirements by US Customs?			
12	Do you have a reliable procedure that includes a written system to ensure that you correctly apply the Prohibitions,			

	<p>Restrictions and Other Agency Requirements by US Customs?</p> <p>For example:</p> <p>Fruits, vegetables, and nuts: Certain agricultural commodities (including fresh tomatoes, avocados, mangoes, limes, oranges, grapefruit, green peppers, Irish potatoes, cucumbers, eggplants, dry onions, walnuts and filberts, processed dates, prunes, raisins, and olives in tins) must meet United States import requirements relating to grade, size, quality, and maturity (7 U.S.C. 608(e)). These commodities are inspected and an inspection certificate must be issued by the Food Safety and Inspection Service of the Department of Agriculture to indicate import compliance.</p> <p>Plant and Plant Products. The importation of plants and plant products is subject to regulations of the Department of Agriculture and may be restricted or prohibited. Plants and plant products include fruits, vegetables, plants, nursery stock, bulbs, roots, seeds, certain fibers including cotton and broomcorn, cut flowers, sugarcane, certain cereals, elm logs, and elm lumber with bark attached. Import permits are required. Further information should be obtained from APHIS. Also, certain endangered species of plants may be prohibited or require permits or certificates. The Food and Drug Administration also regulates plant and plant products, particularly fruits and vegetables.</p>			
13	<p>Do you have a reliable procedure that includes a written system to ensure that you correctly apply for a permit to export certain fresh fruits and vegetables including fresh herbs and sprouts?</p> <p>Have you a procedure to determine the entry requirements for your product at the Import Authorization System?</p> <p>Have you a procedure to apply by obtaining PPQ Form 587?</p> <p>Have you a procedure to complete the APHIS Import Authorization System (Online Permitting)?</p> <p>Do you have a copy of The Complete Fruits and Vegetable Manual?</p>			
14	<p>Do you have a reliable procedure that includes a written system to ensure that you correctly submit Prior Notice Interim Final Rule (1.280(b) and see 1.283) for fruits and vegetables to the US?</p> <p>Do you have a procedure that ensures you obtain updated versions of the FDA Rules? For example, the Prior Notice</p>			

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	<p>System Interface (PNSI) was issued in December 2003 and revised in June 2004.</p> <p>Phase III of the U.S. Bioterrorism Act came into force on 4 June 2004 at 06:00am. Unless prior notice of all food for humans and animals imported or offered for import the merchandise will be refused entry.</p>			
15	<p>Do you have a reliable procedure that includes a written system to ensure that you comply with the regulations for standards and labeling?</p>			
16	<p>Do you have a reliable procedure that includes a written system to ensure that you comply with the regulations for exports other than textile and apparel from a QIZ:</p> <ul style="list-style-type: none"> - Permit/ certificate from the Jordan Ministry of Agriculture for any agricultural product; - Certificate from the Jordan National Resources Authority for mineral products; - Jordan Ministry of Health. 			
17	<p>Do you have a reliable procedure that includes a written system to ensure that you comply with the regulations for the export of pharmaceuticals?</p> <p>Do you have an information capture procedure that ensures you obtain all the regulatory requirements?</p> <p>For example:</p> <p>Jordan:</p> <ol style="list-style-type: none"> 1. authorization to establish a pharmaceutical plant; 2. product marketing authorization: each new product needs an authorization from the Ministry of Health. <p>U.S. Food and Drug Administration (FDA):</p> <ol style="list-style-type: none"> 1. Register the product with the FDA; 2. the FDA inspects the facility and product (for each product); 3. FDA issues a marketing authorization/approval for the product manufactured in Jordan. <p>Export documentation requirements include: commercial invoices, packing list, certificate of origin and for each batch that is exported it is necessary to provide technical documentation (certificate of analysis).</p>			

SUPPLY CHAIN SECURITY VALIDATION PROCESS GUIDELINES

The Supply Chain Security validation process guidelines are based upon the C-TPAT and World Customs Organization (WCO) Supply Chain Security and Facilitation and the Advance Cargo Information Guidelines.

Objectives

The U.S. Customs and Border Protection Department recommends that U.S. importers develop and implement a sound plan to enhance security procedures throughout their supply chain. This recommendation should be implemented by U.S. importers and sea carriers that are accredited by U.S. Customs and Border Protection for the C-TAP.

In the case of a U.S. importer that does not control a facility, conveyance or process subject to the recommendations listed below, the exporter should agree to make every reasonable effort to secure compliance. Some U.S. importers have visited Jordan garment factories and during the normal factory and health and safety inspection have examined supply chain security measures and reviewed procedures. Furthermore, some U.S. importers have their suppliers complete a Supply Chain Security Acknowledgement Form.

The following are general recommendations that should be followed on a case-by-case basis depending on the company’s size and structure and may not be applicable to all.

To gain competitive advantage to access the U.S. market and to lower supply chain delays QIZ exporters may wish to undertake this part of the due diligence.

Procedural Security

Procedural security assures documented and recorded and verifiable location of goods in the supply chain. Procedures should provide for the security of goods throughout the supply chain. Contingent procedures should be included within the scope of procedural security.

The following can apply to CTU stuffers and packers.

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Does your company have reliable procedures and a written system in place to protect against non manifested material being introduced into the CTU container during stuffing and packing and consequently prohibiting non manifested material, packages and envelopes, etc., entering into the supply chain?			
2	Does your company have reliable procedures and a written system to ensure your supply chain has security controls that include: <ul style="list-style-type: none"> • the recorded and verified introduction / removal of cargo that is supervised by a designated company official and / or authorized representative: agent, transport operator? • the proper marking, • weighing, 			

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	<ul style="list-style-type: none"> • counting and documenting of cargo/cargo equipment verified against manifest documents, • the detecting/reporting of shortages/overages, and • the detecting of irregularity or illegal activities, • procedures for verifying seals on containers, trailers, and railcars? 			
3	Does your company have reliable procedures and a written system to ensure that the incoming and outgoing of goods is supervised and monitored?			
4	Does your company have reliable procedures and a written system to ensure that random, unannounced security assessments of areas in your company's control within the supply chain are conducted?			
5	Does your company have reliable procedures and a written system to ensure that the procedures for notifying Customs and other law enforcement agencies in cases where anomalies or illegal activities are detected, or suspected, by the company are in place?			
6	Does your company have reliable procedures and a written system to ensure that your company Packing and Unloading Facility/Terminal operators have written and verifiable security procedures in place with regards to areas under your company control?			
7	Does your company have an integrated computer information exchange system (Connectivity and share) with your suppliers, freight forwarder (Supply chain participants) and your company sections and divisions that are involved with your export and import transaction and physical movement of your goods and consignments?			
8	Does your company computer system allow the connectivity to exchange sufficient quality information that has the required detail to record in-transit visibility and exception reporting and product identification for each consignment / container in real time (Tracking using spreadsheets and faxes are not sufficient)?			
9	Does your company have a real time computer information collection and connection system that engages with your supply chain partners who have different technical capabilities, and data message integrity that can offset human errors and foster product identification?			
10	Is your company computer system sophisticated enough to record container opening, tampering and other dock to dock tracking visibility?			
11	Is your company computer system sophisticated enough to inform you where a shipment is supposed to be and if delivery is ahead or behind schedule, wrong direction, radiation, seawater or chemical problem, temperature change beyond			

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	tolerance levels, as well as other client specific information and consequently produces an exception report (Your transportation agent or freight forwarder may have this type of system capability)?			
12	Does your computer system or the computer system of your transportation operator / agent and freight forwarder have the capability to produce a complete audit trail of where the container has traveled and when and where exceptions have been generated, detection capture, communication of breeches in real time and that exceptions generate real time notification to you via e-mail, pager or XML/EDI transactions?			
13	Does your company transportation operator, transport operator, ocean transportation intermediary and sea carrier use detection devices that are attached in such a way that a thief cannot breach the container without generating an exception report, even if the container door is removed completely?			
14	Does your company have reliable procedures and a written system to ensure that your company properly stores empty and full containers to prevent unauthorized access, including the use of tamper-proof / non-counterfeitable seals?			
15	Does your company have reliable procedures and a written system to ensure that your company checks empty containers received for storage or loading to ensure its structure has not been modified?			
16	Does your company have reliable procedures and a written system to ensure that affixing, recording, tracking, and verifying tamper-proof / non-counterfeitable seals on containers, trailers and railcars?			
17	Does your company have reliable procedures and a written system to ensure that seals are not used in strict numeric sequence and that seals are not registered and controlled by a single person?			
18	Does your company have reliable procedures and a written system to ensure that your company verifies the identity and authority of the carrier requesting delivery of cargo prior to cargo release?			
19	Does your company have reliable procedures and a written system to ensure that your company employees notify Jordan Customs and other law enforcement agencies of suspected illegal activities?			
20	Does your company have reliable procedures and a written system to ensure that your company carries out random and unannounced security assessments?			
21	Does your company have reliable procedures and a written system to ensure that your company employees inspect persons and packages?			

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22	Does your company have reliable procedures and a written system to ensure that your company has and carries out additional security procedures for high value and high risk goods?			
23	<p><u>Specific Requirement to Stuffers and Packers</u></p> <ol style="list-style-type: none"> 1. Only the designated company security officer(s) or one of his designated deputies shall be physically present during loading/unloading of the CTU and supervise the introduction or removal of cargo into/from the CTU; 2. The supervision shall be uninterrupted from the start of the inspection and loading/unloading until the CTU is sealed; 3. The supervision shall include verification and document recording that seals on received CTU's are intact and conform with the appropriate records. 			

Physical Security:

Physical security includes security measures that monitor and control the facility's exterior and interior perimeters. This will include Mail Service Security, Lock and Key Control, and Perimeter and Interior Alarms.

Recommended features to be installed as appropriate:

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Are all of your company buildings and rail yards constructed of materials that resist unlawful entry and have protection from outside intrusion?			
2	<p>Do your company buildings and offices have physical security that includes:</p> <ul style="list-style-type: none"> • perimeter fences, locking devices (International standard) on reinforced external and internal doors; • windows with mesh, metal bars; • International standard locking devices on external and internal doors, windows, gates and fences. Exterior doors and windows must be equipped with alarms; • perimeter fences and interior fencing, • gates and gatehouses; • adequate lighting inside and lighting outside the facility that includes CCTV; • electronic security systems that include theft alarm systems and alarmed access control systems; • have the segregation and marking of 			

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	international, domestic, high-value, and dangerous goods cargo within the warehouse by a safe, caged or otherwise fenced-in area; <ul style="list-style-type: none"> • Large dual language signage: that display and instruct direction, health and safety and restricted areas? 			
3	Does your company plan and implement a maintenance program that comprises regular scheduled inspections to keep fencing, gates, lights and cameras in good condition and working order (maintain the integrity of security measures)?			
4	Does your company have a reliable procedure and a written system that ensures your company has implemented controls to stop the theft of goods, vehicles and company documents?			
5	Does your company have a reliable procedure to undertake random inspections and “walk through” to inspect and check all physical security measures and facilities?			
6	Does your company have emergency lighting / power systems for key operational areas and high value cargo areas?			

Recommended procedures to be implemented as appropriate:

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Depending upon the company size a security company may be required to undertake some of the physical security duties and measures?			
2	Gates or doors through which vehicles and personnel enter or exit should be manned or under observation by management or security personnel			
3	Access to employee vehicle parking must be controlled			
4	Employee vehicle parking must be in a separate area from visitor parking			
5	Private passenger vehicles must be prohibited from parking in cargo areas or immediately adjacent to cargo storage and office buildings			
6	Lock and key control including signing in and out of high risk areas			
7	Restrict access to document and cargo storage areas			

Access Controls:

Access controls prohibit unauthorized access to facilities, vehicles, loading and unloading equipment, vessels, aircraft, shipping, loading docks, break bulk areas and cargo areas. If, access control is not possible increased precautions in other security aspects is needed. Access control is particularly important during stuffing and packing containers.

Recommended procedures to be conducted as appropriate:

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Do you have reliable procedures and physical facilities that stops non authorized persons access to company facilities and conveyances, and that positively identifies, records and tracks all employees, contractors, visitors and suppliers?			
2	Do you have procedures and physical access controls that include positive identification of all employees, visitors, and vendors, that includes check in and check outs and labeling?			
3	Do you have procedures and physical access controls that trigger an alarm when visitors attempt to enter an unauthorized area?			
4	Do you have procedures and written instructions for all employees which results in your employees and guards safely challenging unauthorized/unidentified persons and removing unauthorized/unidentified persons?			
5	<p>Does your company control and monitor the parking of all vehicles around the company's offices, factory, shipping and warehousing buildings that include segregation and restricted areas access?</p> <p>Does your company vehicle parking procedure and control system include the authorization by an adequate gate/pass and/or decal system?</p> <p>Does your company have a procedure that ensures vehicle parking for office employees, terminal/warehouse (facility) workers and visitors are physically segregated and restricted to designated areas?</p>			
6	Do you have procedures, written instructions and trained personnel that ensures vehicles are inspected before they enter operation facilities?			
7	Do you have procedures, written instructions and trained personnel that ensure you control the time individuals have access to facilities?			
8	Do you have procedures, written instructions that ensure you display large dual language maps of restricted areas within the view of all employees and visitors?			

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Personnel Security:

Personnel security is concerned with the screening of employees and prospective employees, as appropriate and as allowed for by law.

Recommended procedures to be conducted as appropriate:

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Do you have a written procedure that ensures you conduct employment screening and interviewing of prospective employees?			
2	Do you have a written procedure that ensures you conduct periodic background checks and resume / application verifications?			
3	Do you a written procedure that ensures your verify job application information?			
4	Do you have a written procedure that ensures you contact references?			
5	Do you have a written procedure that ensures you review the skill requirements for key positions?			
6	Do you have a written procedure that ensures you align job skill requirements with individual skills?			
7	Do you have a written procedure that ensures you check the background and corporate structure of independent contractors?			
8	Do you have a written procedure that ensures you conduct drug testing (as allowed for by law): <ul style="list-style-type: none"> • Before hiring; • Random periodic testing; • At times of reasonable suspicion? 			
9	Do you have a written procedure that ensures you implement different color ID cards to employees that designate access privileges?			
10	Do you have a written procedure that ensures you implement gate passes to vehicle drivers and other carriers to control and identify those authorized to enter the facility?			
11	Do you have a written procedure that ensures you issue to employees different color uniforms for each sensitive area?			
12	Do you have a written procedure that ensures you issue different color uniforms for your security staff?			
13	Does your company have an authorized and responsible senior company manager and or director that is responsible for company security plans and for the implementation of security measures and procedures?			
14	Does your senior company manager and or director responsible for security have the authority to			

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	announce a security threat level on the company property and to company employees?			
15	Does the company person responsible for security have the authority to undertake a Security Assessment (Risk analysis) and as a result of the Security Assessment implement a Security Plan that includes various controls and compliance measures?			
16	Does the company have an Internal Code of Conduct that is a part of the employees contract of employment?			
17	Does your company Internal Code of Conduct include a written system and procedure for the reporting / disclosure to management of any problems and issues that relate to personnel security and to the security of facilities, goods and documents?			

Education and Training Awareness:

Education, training and awareness encompass education and training of personnel regarding security policies, encouraging alertness for deviations from those policies and knowing what actions to take in response to security lapses.

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Do you have a written procedure that ensures you communicate security policies and standards to employees, including consequences of noncompliance?			
2	Do you conduct a security awareness program for all employees that includes the recognition of internal conspiracies, maintaining cargo integrity, and determining and addressing (solving) unauthorized access?			
3	Does your security awareness programs provide for incentives for active employee participation in security controls? The security education and training awareness program must encourage active employee participation in security controls.			
4	Does your security awareness program include the use of press releases, e-mail distribution lists and bulletin boards?			
5	Does your company have a reliable process by which you search for and obtain new supply chain security information? For example: World Customs Organization (WCO) initiatives and programs: Convention and commentary on			

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	Mutual Administrative Assistance in Customs Matters, WCO Data Model and the list of essential data elements required for the identification of high risk consignments, International Customs guidelines on advance cargo information, etc.			
6	Does the company education and awareness training include hands on training for all company employees to recognize and address potentially dangerous items during packing, loading and unloading process?			

Conveyance Security:

Conveyance security provides protection against the introduction of unauthorized personnel and material into the supply chain, including the areas between the links of the supply chain.

Recommended procedures to be conducted as appropriate:

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Does your company have a reliable procedure and written system that ensures there is protection in your goods receiving, materials management, production, warehousing and transportation system that protects it from the introduction of unauthorized personnel and material?			
2	Does your company have a reliable procedure and written system that ensures that the security procedure includes the physical search of all: <ul style="list-style-type: none"> • readily accessible areas, the securing of internal/external compartments and panels in containers, and • procedures for reporting cases in which unauthorized personnel, non manifested materials, or signs of tampering, are discovered. 			
3	Does your company have reliable procedures and a written system that is implemented and consequently it physically controls and monitors all cargo transfer operations within your company facilities / terminal?			
4	Does your company have a reliable procedure and a written agreement with suppliers, transportation and ocean transportation intermediaries and sea carrier to ensure that they establish and implement procedures to guard against the packing and loading of goods of unknown articles and materials?			

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	<ul style="list-style-type: none"> • Supervised loading and unloading of all goods; • Proper sealing, marking, and counting of goods and packages and boxes loaded into containers; • The correct documentation for the goods that are loaded into the container must be sent in advance to Jordan; • Approved procedures for affixing, recording, tracking and verifying seals on containers and trailers are in place. 			
5	Does your company have a reliable procedure and a written system that ensures your company uses where necessary C TPAT High Security Compliant Bolt Seals and C TPAT compliant Heavy Duty Bolt Locks on containers?			
6	Use tamper-proof / non-counterfeitable seals or electronic seals to secure conveyance.			
7	If cost effective, use transponders to facilitate continual tracking of conveyances.			
8	Use automatic electronic transmittal of “smart-card” data to Customs if available.			
9	Use “smart-card” technology containing vehicle, consignment and driver information where automated border crossings are in place.			
10	Consider cost and future standardization issues related to the use of smart cards, electronic seals, transponders and Radio Frequency Identification (RFID) infrastructure.			
11	Stay informed regarding development of standards and requirements regarding smart cards, electronic seals and transponders by World Customs Organization, International Maritime Organization and International Standards Organization, etc.			

Service Provider Requirements: forwarders and operative sub contractors

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Does your company have reliable procedures and a written system that is implemented to ensure that plant, equipment and vehicles brought by suppliers and sub-contractor plant and equipment into your company facilities and buildings and onto your company property is assessed and physically inspected for security?			
2	Does your company have reliable procedures and a written system that is implemented to ensure quality control records and procedures on production processes maintain system integrity?			
3	Does your company have reliable procedures and a written system that is implemented to ensure that financial assessments are implemented to determine the service providers fiscal soundness and ability to deliver goods and services within contract obligations?			
4	Does your company have reliable procedures and a written system that is implemented to ensure internal controls are implemented for the selection of service providers?			
5	Does your company have reliable procedures and a written system that is implemented to ensure profiles of your main suppliers who are receiving and packing finished commodities and equipment are maintained and available for review?			
6	Does your company have reliable procedures and a written system that is implemented to ensure those service providers with whom your company is contracted are participants in: <ul style="list-style-type: none"> • Jordan Golden List; • Customs Trade Partnership Against Terrorism (C TPAT); • Jordan Customs Industry Partnership programs, and; • Jordan Anti Smuggling program; • Etc. 			

Trading and Transportation Operator Security

Trading partner security extends supply chain security to your suppliers and customers. Communication, assessment, training and improvement are key components.

Recommended procedures to be conducted as appropriate:

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Do you check the integrity of your international transport operator?			
2	Do you have a procedure and a methodology to check your international transportation operator? For example, is your transportation operator compliant with the Container Security Initiative (CSI) and with the Customs-Trade Partnership Against Terrorism (C TPAT) Guidelines, etc?			
3	Do you check if your transport operator is in full compliance with the laws and regulations of Jordan? <ul style="list-style-type: none"> • Business documents: registration, license, driver licenses, qualifications, Tax and Sales Tax certificates, etc; • TIR Carnet; • Certificate of vehicle compliance? 			
4	Do you encourage your trading partners and suppliers and contractors to assess and enhance, if required, their supply chain security?			
5	Do you request written security agreements / supply chain security acknowledgement forms with trading partners/suppliers/contractors to include controls such as: <ul style="list-style-type: none"> • Tamper-proof/non-counterfeitable seals; • Signatures; • Time controls; • Agreed means of communication? 			
6	Do you document mutual supply chain security policies?			
7	Do you have extensive exchange of information between trading partners/suppliers/contractors?			
8	Do you advise Customs and foreign authorities of security agreements with trading partners?			
9	Do you have or receive education, training and awareness of security aspects of the supply chain from trading partners?			
10	Do you if possible include equivalent security provisions as a condition of contract for contractors/suppliers providing services?			

Internal Company Record Keeping System

Does your QIZ company have an established internal record keeping system, a Quality Management System, and or a compliance guide book that ensures that all documents related to your export and import transaction and export and import processing documents are correct, accurate and stored (3 years)?

Customs require hard copies of all documents. Therefore, does your QIZ company have all hard copies or does it hold some documents on a company EDP system or in computer software system, such as SAP, or as part of a company private exchange system such as Cisco’s eHub, etc? A record keeping test should be conducted concurrently with the test for classification, quantity, value, country of origin, transshipment, etc.

Objective: determine whether the entries of the QIZ company export and import meet an acceptable level of compliance in maintaining, storing and producing information and whether the QIZ company has documented internal controls.

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	<p>Does your company Quality Management System have an internal record keeping system to meet the following criteria?</p> <p>The term “records” means any information made or normally kept in the ordinary course of business which pertains to the following activities:</p> <ul style="list-style-type: none"> • Accounts: Record of Reconciliation, receipts, payment documents, VAT payments, etc • Warehouse documents: delivery notes, goods received notes, inventory lists, record of deliveries, etc • any importation, declaration or entry; • the transportation or storage of merchandise carried or held under guarantee into or from the customs territory of your country and the other countries that you operate in; • the filing of a drawback claim (re-export), etc; • the collection and payment of fees, duties and taxes to Customs; • any other activity required to be undertaken pursuant to laws or regulations administered by Customs, such as transfer pricing and expert independent inspection, etc; <p>The term “records” includes any information required for the entry of merchandise and other information pertaining to or from which is derived, any information element set forth in a collection of information required by the Jordan Customs Law in connection with an activity described above. The term includes, but is not limited to:</p> <ul style="list-style-type: none"> • statements, declarations, documents; 			

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	<ul style="list-style-type: none"> • electronically generated or machine readable data; • electronically stored or transmitted information or data; • books, papers, correspondence; • accounts, financial accounting data • technical data; • computer programs necessary to retrieve information in a usable form; • file of drawback claims; • transport, warehouse / store merchandise documents held in bond. <p>Or, documents that are required by law to be stored.</p>			
2	Do you have a lockable secure storage place for your records?			
3	Are your records indexed in a retrievable fashion?			
4	Have you established a reliable destruction cycle to prevent the premature destruction of required records; and do you have the right documentation that allows you to dispose of and proves that you have disposed of documents that are more than 3 years old?			
5	Do you have a responsible person assigned as your custodian of records; Chief Accountant or an Inventory Accountant, etc?			
6	Do you have a compliance improvement plan framework?			
7	Do you have a reliable procedure and a written system that ensures all of your company section / division personnel retain and store original and or electronic documents for each export and import transaction?			
8	Does your company have a record of paying penalties for not keeping documents for the prescribed minimum of three years in Jordan?			
9	<p>Does your company have a procedure and a written requirement as an instruction to all company personnel, and a document archive facility to keep and store the following list of documents:</p> <ul style="list-style-type: none"> • Air way bill; • Bill of lading; • Carries certificate; • Declaration of entry; • Power of Attorney; • Consolidated shipments authority: if this procedure is used; • Packing list; • Bond information; • Vessel, vehicle or air manifest; • Certificates of Origin; 			

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	There are other documents that are relevant for specific commodities and transport modes, etc., need to be retained.			
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Documentation and Information Processing Security

Documentation processing security, both electronic and manual, assures that information is legible and protected against the loss of data or introduction of erroneous information.

Recommended procedures to be conducted as appropriate:

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Do you have a written procedure that ensures you safeguard computer access and information?			
2	Do you have a written procedure that ensures you control access to information systems, both by level of job responsibility?			
3	Do you have physical security in computer areas?			
4	Do you have written procedures that ensure you monitor employee use of data systems?			
5	Do you have written procedures that you have processes to backup computer system data?			
6	Do you have a written procedure that ensures you record the amount of cargo by packing unit type, packing conditions, and security seal and stamps. Furthermore, you your procedures that discrepancies are recorded with a note, photograph and scale weight records?			
7	Do you have a written procedure that ensures you obtain signatures for all process checkpoints (e.g., document preparation, when seals are applied/broken, vehicle inspection, opening the vault, cargo delivery, cargo receipt, counting unshipped pieces, etc.)?			
8	Do you have a written procedure that ensures you fix times for the preparation of documents, and for the shipping and unshipping of cargoes?			
9	Do you have a written procedure that ensures you use special control procedures to prepare emergency / last minute shipments and if necessary notify authorities regarding such shipments?			
10	Do you have a written procedure that ensures your software system registers transactions and supports operations, and if possible make a follow up of the activities that it handles?			
11	Do you have a written procedure that ensures you record the entrance and exit time of people receiving and delivering goods?			
12	Do you have a written procedure that ensures you document significant process delays?			

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13	Manifest security: Do you have a written procedure that ensures your manifests are complete, legible, accurate, and submitted within the prescribed time period in compliance with the Jordan Customs Law?			
14	Does your company have reliable procedures and a written system that ensures the security of all electronic assets, including advising employees of the need to protect passwords and computer access?			
15	Does your company have reliable procedures and a written system that ensures measures are taken to secure sensitive information in order to prevent the loss or unauthorized use of such information?			

Future automated data exchange and authorized supply chain related procedures:

1	Establish electronic customs reporting systems based upon World Customs Organization Customs Data Model and the Unique Consignment Reference (UCR)?			
2	Establish advance manifest reporting systems?			
3	Advance lodgement of data			
4	The single window system			
5	Risk Management			
6	Authorization			
7	Customs mutual assistance arrangements			
8	RFID			

Internal finance and accountancy controls

No	Description of due diligence / guide	Yes or No	Plan to implement or improve: yes or no	Target date
1	Does your company have a reliable procedure and a written system that ensures you obtain and maintain a record of all new finance and accountancy laws, regulations and guidelines a copy of which is each provided to each member of your staff that is involved with transactions and record keeping?			
2	Do you maintain an original document and electronic document audit trail from procurement, accountancy, goods received, warehousing and to payments in your company?			
3	Are the financial and accountancy control systems in your company consistent with and compliant with the Financial Audit and Certified Public Accountancy that are legally enforced in Jordan? Do the audit measures cover: <ul style="list-style-type: none"> • Control environment; • Risk assessment; • Control activities; • Information and communication, and; • Monitoring? 			

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4	Does your company have a written system that ensures that you implement reliable control procedures in the company sections and or divisions and subsidiaries that participate or effect the importation of goods?			
5	Has your company identified financial and accountancy risks that are related to your import operations and procedures?			
6	Does your company have a reliable procedure and a written system that ensures you correct compliance deficiencies?			
7	Does your company have a reliable procedure and a written system that ensures you plan and perform periodic testing and assessment in the company operations and divisions that have an effect on imported goods? Does the procedure include a minimum annual review of the significant risk areas?			
8	Does your company have a reliable procedure and a written system that ensures you hold interdepartmental meetings to discuss and coordinate changes to your financial and accountancy internal control systems when the tests and assessments or other information show a need for compliance improvement?			
9	Does your company have an authorized and responsible person that can initiate appropriate disclosure of financial and accountancy?			
10	Does your company have a reliable procedure and a written system that ensures you have an internal control process that document and retain all the tests and assessments?			
11	Does your company have a reliable procedure and a written system that ensures you retain and store for three years all the test and assessment documents?			

Can all the specific procedures and written systems be made available to Jordan Customs and U.S. Customs and Border Protection (Transaction verification) in a verifiable format at an identified location?

Identifying perceived weaknesses in security and compliance will not necessarily prohibit participation in the Jordan Customs “Golden List” program. Jordan Customs is committed to working with the trade community to identify effective corrections and adjustments to a company process that will result in a more secure supply chain operation. Meeting the objectives can be helped by your company implementing responsibility of self assessment and a Jordan Customs Risk Management Department assessment.