

SUPPLY CHAIN SECURITY

Protecting the supply chain from illegal and/or dangerous activity is an essential component of Starline's operation. We focus our efforts on insulating our supply chain against terrorism, piracy, theft, and more. Starline's Customs Trade Partnership Against Terrorism (CTPAT) Tier II Certified status is the cornerstone of our supply chain security program. We have been CTPAT members since April 9, 2012 and revalidate our membership annually.

As a voluntary supply chain security program based on trust, CTPAT is open to members of the trade community who can demonstrate excellence in supply chain security practices. Customs requires members have written and verifiable processes in place for its Minimum Security Criteria (MSC). The MSC is divided into three "Focus Areas." The First Focus Area is Corporate Security and is comprised of: Security Vision & Responsibility, Risk Assessment, Business Partner Relations, and Cybersecurity. The Second Focus Area is Transportation Security and encompasses: Conveyance and Instruments of International Traffic Security, Seal Security, Procedural Security, and Agricultural Security. Lastly, the Third Focus Area of People and Physical Security covers: Physical Security, Physical Access Controls, Personnel Security, and Education, Training and Awareness.

Starline selects and uses C-TPAT certified service providers when possible. When service providers are not CTPAT certified, they must verify that they are meeting Customs' MSC. Starline regularly engages with its service providers and conducts reviews on a periodic basis to accurately determine performance and detect areas of deficiency.

Additionally, Starline evaluates risk as it relates to its international supply chain through a five step risk assessment process. The Five Step Risk Assessment Process includes: Mapping Cargo/Data Flow and Control and Identifying Business Partners; Conducting a Threat Assessment focusing on Terrorism, Contraband Smuggling, Human Smuggling, Agricultural and Public Safety Threats, Organized Crime, and conditions in a country/region which may foster such threats, and ranking those threats; Conducting a Vulnerability Assessment in accordance with the C-TPAT MSC; and Preparing a Written Action Plan to Address Vulnerabilities; Documenting the Procedure for How Risk Assessments are Conducted, to Include Reviewing and Revising the Procedure Periodically.

Starline has built a culture of security. The security of our international supply chain is constantly monitored and reviewed to determine performance and detect areas of deficiency in our Supply Chain Security Program. It is the responsibility of every Starline Employee to comply with Starline's CTPAT policies and procedures and to uphold Starline's CTPAT Certification.

