

# SCAN INSIGHT

Quarterly Newsletter





# SCAN INSIGHT

For many of us the last few weeks, months, or year has been anything but business as usual. The amount of volatility in 2017 so far has been unprecedented and whether directly or indirectly we have all been impacted. Our hearts go out to those who have been in the path of destruction from Hurricanes Harvey, Irma, Jose, and Maria. Like many of you, I've been reaching out to friends and family to make sure they're safe. This includes one of our own, Senior Manager at The Home Depot and SCAN Chairman, Kendra Hobbs, who resides in Florida. Shortly after the hurricane, I received a response from Kendra, "Thanks for moving forward. I have no power, no water, no phone. But safe."

It's times like this when I truly realize and appreciate the importance of working collectively, and that we can achieve so much more if we work together to accomplish a shared vision versus working independently. With limited resources, global footprints, and competing priorities, concepts like the SCAN association are so critically important in achieving our end goal. Through my experiences so far with the association, I've come to view my peers and colleagues as critical partners in global supply chain security. It's true, CTPAT is a partnership program, and the partnership between Customs and the trade community is critically important. But the most important partnerships are those that we develop with our like-minded peers, some who may also be our direct competitors. Whether through association benchmarking discussions, committee meetings, or informal conversations, the opportunity to learn and collaborate across the membership is incomparable.

Moments of disaster remind us of what's important. Safety is paramount and without that we fail to move forward. We also fail to move forward if we haven't properly planned. Personally and professionally, it's important to pause and think about resiliency and what's required to get our life or business back on track. For those of you who haven't dusted off your business resiliency plans in the last year, I urge you to do so. If you don't "own" business resiliency, then take action to find out who does and ask when was the last time your company's plan was reviewed? Ask questions and know your resiliency plans. You will likely play a key role in recovery efforts. For those of you impacted by recent events, our hearts go out to you and your families. We are here to support you in any way that we can.



*Lisa Schulte*  
*SCAN Board Vice Chair*



## EXECUTIVE SUMMARY

Last month, the SCAN Association Board of Directors hosted an open meeting for current and prospective SCAN members, as well as Audit Service Providers, to present the SCAN model to those attending the Custom's and Border Protection CTPAT Conference in Detroit, Michigan. At this event, a historical overview and SCAN's framework were presented, including its current Board of Directors and participating membership body.

In addition, the Board was pleased to welcome brief remarks from Carlos Ochoa, the Supervisory Program Manager for CTPAT, Office of Field Operations, CBP. SCAN Board members in attendance shared program testimonials and provided an update to the transportation provider discussion, as well as the steps SCAN is taking to prepare for the CTPAT Minimum Security Criteria (MSC) rewrite. More information on this can be found in a special feature article highlighting the MSC rewrite and its newest updates.

At this event, SCAN's Program Administrators also had the opportunity to present out a Q2 Business Review, with key program status updates and Audit/CAPA analytics. This information, along with other program metrics, can be found in this issue of *SCAN Insight*. In addition to the business review, an informative system demonstration of the SCAN Repository and Supplier Compliance Manager (SCM) applications were also presented at the event. For a copy of this presentation please contact SCAN Program Administrators at [scan@scrisksolutions.com](mailto:scan@scrisksolutions.com).

In Q2, SCAN welcomed three new members, Michaels, Associated Premium, and RMS. They, along with our membership, can benefit from a total of over 4,000 SCAN audits that have been conducted since program inception to end of Q2 and which are available in the repository. 297 new SCAN factory locations were added to the SCAN Repository in Q2, bringing the total number of Repository locations to 11,743. At least 36% of the conducted audits are shared by more than one SCAN member, along with 17% of SCAN factories in the Repository being shared by more than one SCAN member, demonstrating the power of the shared audit model. Additional program indicators, along with CAPA program metrics and key statistics may also be found in this issue.

### SCAN Member Buddy System

If you would like to get in contact with one of our SCAN Members to understand how to implement SCAN into your supply chain program, please contact:

[info@scanassociation.com](mailto:info@scanassociation.com)

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### In this Issue:

This issue features SCAN's quarterly program statistics for Q2, new exciting system enhancements, and a country risk highlight of Vietnam. There are also special feature articles on the upcoming CTPAT Minimum Security Criteria rewrite, as well as a Factory FAQ Page.

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### Check out SCAN's Website!

[www.scanassociation.com](http://www.scanassociation.com) for recently added updates & past newsletters. If you would like to request a demo of the SCAN audit repository, please contact [info@scanassociation.com](mailto:info@scanassociation.com) and a representative will contact you.

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### Comments or Feedback?

SCAN's Program Administrators welcomes SCAN members and factories alike to email their comments or feedback regarding this publication, to [scan@scrisksolutions.com](mailto:scan@scrisksolutions.com).



The SCAN membership includes some of the top fortune 500 industry leaders. These organizations have added 11,743 factories to the SCAN Audit Repository, allowing members and factories to benefit from shared audits. We would like to welcome SCAN's newest members **Michaels, Associated Premium, and RMS International.**

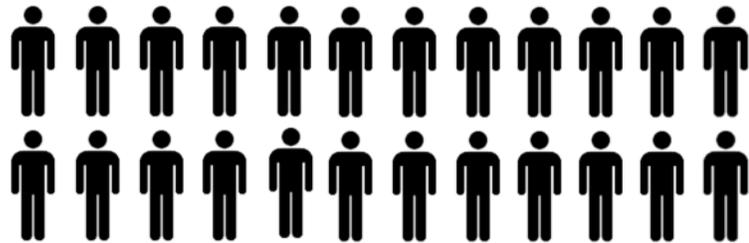
# \$905 Billion

In combined annual revenue between the membership

# 24

**SCAN Members**

Representing Multiple Industries: Retail, Apparel, Food, Sporting Goods, and Pharmaceuticals.



**36%** of the conducted audits are shared by more than one SCAN Member. The shared audits have increased by **1%** since the last quarter.

**17%** of factories in the SCAN Audit Repository are shared by more than one SCAN member.

In Q2, audits were conducted in **23** countries. The most audited countries during that quarter were China, Vietnam, Bangladesh, India, and Sri Lanka.

# 2,064

Shared Audits

# 11,743

Active Factories

# 4,098

Conducted Audits



China – 82%



Vietnam – 3%



Bangladesh – 3%



India – 3%



Sri Lanka – 2%

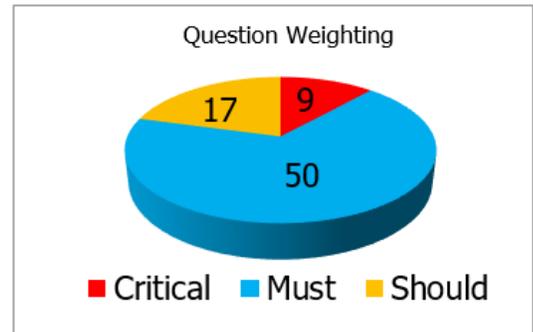


## Corrective Actions

The total number of SCAN audits reviewed with CAPAs in Q2 was 421, with an average CAPA compliance score of 89%. The CAPA completion rate for Q2 was 99%, with only 3 audits falling into Incomplete CAPA status. From Program to end of Q2, this brings the total number of reviewed SCAN audits to 3,615, with an average post CAPA compliance score of 96%.

Based on the initial findings captured during the onsite audit, all SCAN factories are given 60 days to complete their assigned Corrective and Preventative Actions (CAPAs) and submit them to the SCM portal. In Q2, the average number of days for a SCAN factory to complete and submit their CAPAs to the portal was 21 days, with 57% of factories completing their CAPAs in 15 days or less. Those factories that fail to successfully complete their CAPAs within the allowed 60 days have their audits closed out after 75 days and the audit report is given an Incomplete status. BSI Program Administrators strive to contact every audit with CAPAs in progress to ensure that all actions are submitted by the factory on time. Since last quarter, the Incomplete CAPA rate improved 2.3%, in comparison to Q1's 3.3% Incomplete CAPA rate.

In an effort to be aligned with CTPAT's Minimum Security Criteria, SCAN audits are assigned CAPAs based on their weighting classification of Should, Must, and Critical. Since program inception to the end of Q2, a total of 30,593 CAPAs have been assigned. On average, approximately 9 CAPAs are assigned to each SCAN audit, however in Q2 an average of 13 CAPAs were assigned per audit. Below is a chart displaying the total number of CAPAs assigned since program inception to the end of Q2 based on compliance category. Here, SCAN factories have been assigned CAPAs related to non-compliances found mostly in the categories of Container & Trailer Security, Conveyance Security, Physical Access Controls, and Business Partner Requirements.





## CTPAT's Minimum Security Criteria Update



During last month's CTPAT conference in Detroit, Michigan, US Customs provided an update regarding the current rewrite of CTPAT's Minimum Security Criteria (MSC) as well as launched the new CTPAT logo. CTPAT's MSC criteria is a strong

contributor to the SCAN Criteria and related audits. SCAN also incorporates criteria from other major governmental supply chain security programs, including Europe's Authorized Economic Operator (AEO), World Custom's Organization criteria, and Canada's Partners in Protection (PIP). This unified standard approach allows SCAN members to have a single supply chain security audit conducted which exceeds the requirements of CTPAT, AEO, and WCO's program. SCAN's audit approach and consolidated security criteria audit program continues to be named a best practice by US Customs.

For the MSC rewrite, CTPAT solicited the assistance of trade professionals whose companies they work for are currently well established CTPAT Tier III members. Tier III certification recognizes a firm as being 100% compliant with CTPAT's MSC and supports several best practice programs. Approximately 50 members from the import and transportation community took part in the MSC rewrite. Several of these members include current SCAN members and SCAN's Board of Directors.

Why update the CTPAT standard? The answer is simple. Security technologies and mitigation processes have improved since the program's inception following the events of Sept 11<sup>th</sup>, 2001. Yesterday's security best practice is today's industry norm and the standard was seen as dated. Furthermore, risks and threats within the global supply chain are constantly evolving and adapting to security technologies. Just as criminal elements and terrorists adapt to overcome security infrastructure, we too must stay a couple steps ahead of these perpetrators by keeping the standard current.

What's next and when can the SCAN factory community expect to see some changes? Per CTPAT, the new criteria will be a slow and staged rollout to the Import community. We can expect to see the initial publication of the draft criteria sometime in the fourth quarter of this year. From there, it is expected to be rolled out slowly starting in the third quarter of 2018. SCAN's Audit Committee has already begun evaluating gaps in our current audit program with the SCAN audit checklist. Fortunately, it appears that SCAN will have many of the new criteria elements addressed on Day 1. The current process of SCAN's Corrective Action Program, as an example, aligns perfectly with the new criteria and in some facets exceeds expectations. The Audit Committee, led by Home Depot's Ken McElroy, is working hard to ensure an early release of the SCAN / CTPAT audit checklist so we can further extend the value of SCAN to its membership. As updates with the CTPAT MSC become formalized, we will continue to keep our SCAN members, Audit Service Providers, and SCAN Factories apprised of this information in our quarterly *SCAN Insight*.



## Audit Committee Report - Kenneth McElroy, The Home Depot

The SCAN audit has certainly evolved since its original creation in 2014-2015. While, at times, our audit committee may not have seen eye to eye during that process, the SCAN committee is thrilled with CBP's announcement that the CTPAT Minimum Security Criteria (MSC) will be updated by mid-2018. Our initial efforts were to ensure that with a high level of security compliance and documentation, it would position SCAN ahead of those who have adopted the minimum standards. Fortunately, SCAN members accounted for some good representation on the COAC and subject matter experts (SME) teams that supported and participated in the MSC rewrite. Since then, the SCAN Audit committee has attacked the audit rewrite with passion. Along with our partnership with the SCAN administrator accomplishments, this includes a side-by-side comparison of our existing SCAN audit checklist and new criteria elements. Already, we have been able to identify the gaps, as well as discuss any feedback that has been provided to the COAC, SME, and CBP teams. Today, the SCAN Audit committee has plans well underway to close these gaps between our existing SCAN Audit and the new MSC. We expect to have an updated audit completed and available for implementation in early 2018.

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## SCM SYSTEM UPDATES AND IMPROVEMENTS

As program administrators, BSI continues to drive its commitment to the SCAN Association through its enhancements of the SCM tool used to leverage and manage the program. This August, exciting new features and system enhancements were released and are now available for members with an SCM Premium account. See below for a brief overview of what's new! For more information on any of these releases please contact the SCAN program administrators at [scan@scriskolutions.com](mailto:scan@scriskolutions.com).

### August Release:

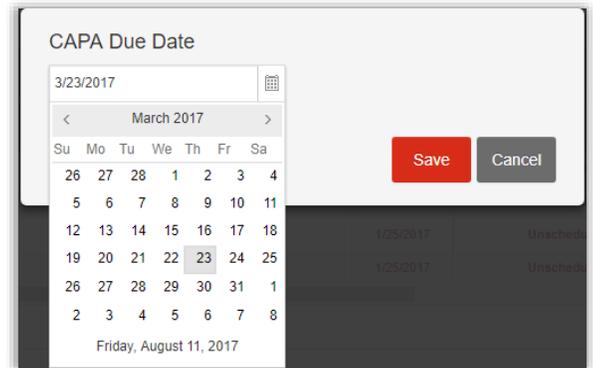
- New User Grid Page
- Ability to Extend CAPA Due Dates
- User's Time Zone displayed beneath the Ribbon Bar
- Filter option "Does Not Contain" has been added to all Grids
- "Audit and CAPA Rollup Report" now included in Report Builder
- "Follow Up Methodology" Column added to Audit Management Grid



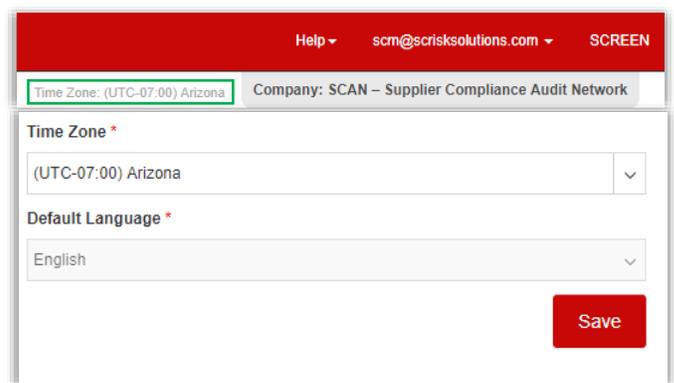
**User Grid:** This new page located under the SCM Compliance tab offers a full list of all registered users at the factory level, including information such as the user's first and last name, email address, language, time zone, and their current status (i.e., whether they have activated their account or not). Other selected column filters will display the user's login history and any updates made to user profiles in the system. The user grid, like many of the grids within SCM, can be exported to Excel and will ultimately eliminate the need to individually navigate to a location's user profile to determine the registered factory contact.

Business Partner	Location	Last Login Date	Last Password Changed Date	Year Created	User Created By	User Last Updated Date	User Last Updated By	Location Country	Location Status	Time Zone
America Electronics	Western Coils & Electric	3/23/2017	3/23/2017	3/23/2017	scm@scrisolutions.com	3/23/2017	scm@scrisolutions.com	Canada	Active	UTC-07:00
America Electronics	TaylorMade Tools	3/23/2017	3/23/2017	3/23/2017	scm@scrisolutions.com	3/23/2017	scm@scrisolutions.com	Germany	Active	UTC-07:00
America Electronics	Musky Corp	3/23/2017	3/23/2017	3/23/2017	scm@scrisolutions.com	3/23/2017	scm@scrisolutions.com	Indonesia	Active	UTC-07:00
America Electronics	Starkland Propane	3/23/2017	3/23/2017	3/23/2017	scm@scrisolutions.com	3/23/2017	scm@scrisolutions.com	United States of America	Active	UTC-07:00
America Electronics	Three Waters	3/23/2017	3/23/2017	3/23/2017	scm@scrisolutions.com	3/23/2017	scm@scrisolutions.com	Brazil	Active	UTC-07:00
America Electronics	Water and Power	3/23/2017	3/23/2017	3/23/2017	scm@scrisolutions.com	3/23/2017	scm@scrisolutions.com	United States of America	Active	UTC-07:00
AZ Carls Co.	121 Manufacturing	3/23/2017	3/23/2017	3/23/2017	scm@scrisolutions.com	3/23/2017	scm@scrisolutions.com	Canada	Active	UTC-07:00
AZ Carls Co.	Auton, Inc.	3/23/2017	3/23/2017	3/23/2017	scm@scrisolutions.com	3/23/2017	scm@scrisolutions.com	Germany	Active	UTC-07:00
AZ Carls Co.	Smith and Co.	3/23/2017	3/23/2017	3/23/2017	scm@scrisolutions.com	3/23/2017	scm@scrisolutions.com	Germany	Active	UTC-07:00
AZ Carls Co.	Fox Bore	3/23/2017	3/23/2017	3/23/2017	scm@scrisolutions.com	3/23/2017	scm@scrisolutions.com	Germany	Active	UTC-07:00
AZ Carls Co.	ABC Tension	3/23/2017	3/23/2017	3/23/2017	scm@scrisolutions.com	3/23/2017	scm@scrisolutions.com	Russia	Active	UTC-07:00
AZ Carls Co.	Wagner Corp	3/23/2017	3/23/2017	3/23/2017	scm@scrisolutions.com	3/23/2017	scm@scrisolutions.com	United States of America	Active	UTC-07:00
AZ Carls Co.	Stevens Company	3/23/2017	3/23/2017	3/23/2017	scm@scrisolutions.com	3/23/2017	scm@scrisolutions.com	United States of America	Active	UTC-07:00

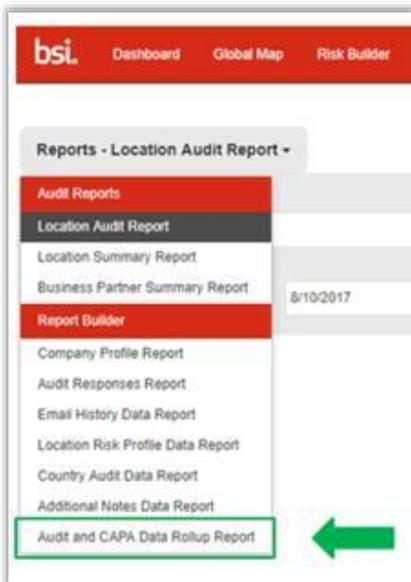
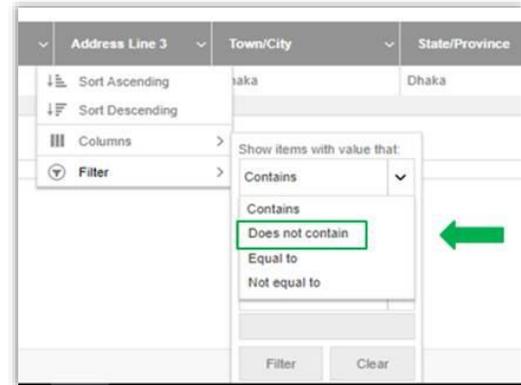
**Extending CAPA Due Dates:** CAPA due dates can now be extended directly within the Audit Management grid. This will enable those SCAN Factory users who are past their 60 day CAPA due date to extend into their 15 additional day window in order to complete their CAPAs and avoid an Incomplete CAPA closure status.



**SCM User's Time Zone Displayed:** This new feature can be found at the top of the landing page when a SCAN member, Audit Service Provider, or Factory user logs into the SCM portal. To set or change a time zone, the user clicks on this link and a window will generate allowing them to select from a list of available time zones. User's will also be able to select their desired language in this window. Once the selections are made, the user must then select Save and both will remain as their default everytime they log in to the system.



**Filter option “Does not Contain” now included on all SCM grids:** This new feature allows SCM users to easily exclude text or values from a filtered search. For example, if you wanted to exclude your search with factories located in Cambodia, you would select “Does Not Contain” and type in the field box “Cambodia” then select Filter. The Audit Management grid would only display audits in all countries except Cambodia, which could then be exported to excel.



**Audit and CAPA Rollup Report:** Located in SCM’s Report Builder section, this excel report provides a variety of key Audit and CAPA data pulled from a SCAN Member’s Premium SCM account. This data can be leveraged to determine average audit and CAPA compliance scores by country and risk index, as well as average number of days for a factory to submit their CAPAs and the number of total CAPAs assigned per SCAN audit. The audit’s status and sub status are also captured here, along with the audit and CAPA assigned dates and completion dates.

## SCAN Country Risk Highlight: Vietnam



Factories in Vietnam were the second most audited country by SCAN in Q2, along with Bangladesh. The average compliance score for audits conducted in Vietnam was 87%. With corrective actions, the average compliance score was increased to 98%. SCAN’s risk-based audit approach uses BSI’s SCREEN Intelligence to incorporate geographical threats as part of the supplier risk assessment. SCAN’s approach has been noted by CTPAT as an Industry best practice and uses three risk variables to quantify local threats: Unmanifested Cargo Introduction, Supply Chain Terrorism and Anti-Western Terrorism.

The threat of cargo disruption in Vietnam is High, and the country is ranked 45<sup>th</sup> in terms of financial losses due to cargo theft. Corruption is endemic in Vietnam, presenting risks to both the security of cargo transiting the country and to the rights of Vietnamese workers. Pilferage and partial load theft are common, but whole container or truck theft in the country is rare. Ho Chi Minh City and the Tan Thuan Export Processing Zone in particular see a higher rate of cargo disruption incidents. Illegal imports of substandard goods have been seized in Lang Son province, a mountainous area on the border with China. The extensive seaport system in Vietnam is an attractive target for cargo-related crime as well, though an Anti-Smuggling Task Force proposal to boost the capacity of marine patrols and update equipment at the ports was recently approved.

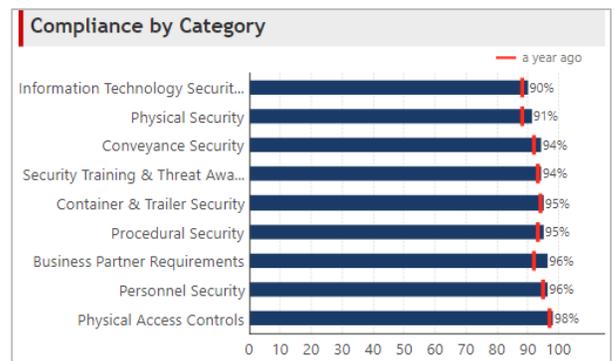
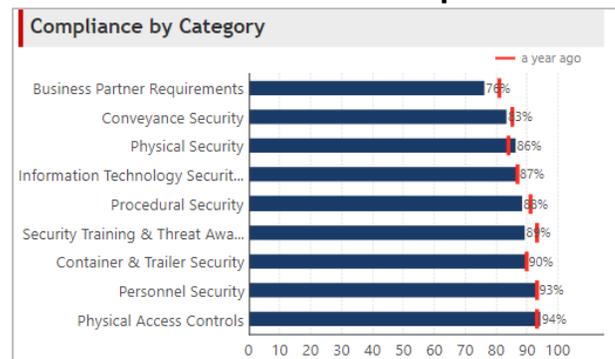
### Unmanifested Cargo Introduction

Vietnam has an overall Guarded risk of unmanifested cargo introduction. Vietnam is located near major illegal drug production areas and a frequent source country for human traffickers. However, criminals do not typically use it as a transit point for the trafficking of these drugs, contributing to a relatively low risk of drug introduction into cargo. Similarly, introductions of small arms and weapons and human stowaways do not occur at high levels in Vietnam.

### Anti- Western Terrorism

The threat of anti-Western terrorism in Vietnam is Low. There are no known anti-Western terrorist groups operating in Vietnam, nor have there been any reported terror attacks targeting Western businesses or interests in the country. The threat of anti-Western terrorism is significant throughout Southeast Asia, but to date there have been no

### Pre and Post CAPA Compliance



known large-scale attacks in which Vietnam was a target. The Vietnamese government has claimed that several small-scale attacks have been thwarted in the country, including an attack on the U.S. Consulate in Ho Chi Minh City. The attack was never carried out and there do not appear to be any subsequent threats against U.S. diplomatic facilities.

### Supply Chain Terrorism

The threat of supply chain terrorism in Vietnam is Low. There are no known terrorist groups that target the supply chain in Vietnam, and there is no indication that groups will start operations within the country.

### Working Conditions

The threat to working conditions in Vietnam is Severe. Poor working conditions are common in the apparel and footwear, seafood, and mining sectors, with workers in these industries frequently employed in settings that are hazardous or detrimental to their health. The weak regulatory environment in Vietnam and an insufficient number of labor inspectors contribute to the prevalence of working conditions violations in the country. In the latest year for which reliable statistics are available, over 800 workers were killed due to workplace accidents, underscoring the threat hazardous working conditions pose to employees in the country.



Areas of Concern: Child Labor, Forced Labor, and Working Conditions in Vietnam



### Child Labor

The threat of child labor in Vietnam is High. Surveys of Vietnam’s workforce estimate that nearly one out of every ten children in Vietnam between the ages of five and 17 are employed in some form of work. The majority of working children are employed in the agricultural sector, but children have been reported working in the brick and garment manufacturing industries as well. Vietnamese law prohibits children under the age of 18 from working in hazardous industries, but exceptions exist for youths that fall in several age brackets for specified industries. Further, enforcement shortfalls and broad societal acceptance facilitate the continued use of child laborers in several industries

Major Exports	Child Labor Utilized?
Electronics	No
Apparel	Yes
Footwear	Yes
Coffee and Tea	Yes
Rice	Yes
Nuts	Yes
Oil	No
Fish	Yes



## SCAN Testimonials

### Member Testimonial

**Ryan Klath, Senior Manager, Global Trade Security – Target**

SCAN has been crucial in helping us reduce the audit fatigue felt by our manufacturers. Upon becoming a member, we were immediately able to decrease the number of onsite audits performed by almost 450. SCAN members are able to view audits already completed at shared facilities and can accept these in lieu of performing internal audits. The corrective action plans are also managed by SCAN. This service allows you the flexibility to pivot your resources towards more proactive supply chain security measures.



Using SCAN's risk builder, you can also view how certain countries and facilities perform on top of just audit and CAPA scores. This not only saves you time but helps you make better risk based auditing decisions for your supply chain. We have also enjoyed the benefit of being able to network with likeminded individuals within the industry. SCAN allows us a platform to continue the partnership spirit of CTPAT. Being a member lets you have a seat at the table in regards to helping drive audit consistency.

During Target's recent CTPAT Revalidation, our Supply Chain Security Specialist went on to call out SCAN under our best practice section specifically, as it relates to risk assessments, and shared this comment: *"SCAN is at the leading edge of supply chain security and has America's most prominent retailers as members. The audits of vendors are consistent with CTPAT criteria and reaches all levels of the supply chain."*

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### Factory Testimonial

A SCAN Vendor in China's Fujian province provided the below comments following his experience with a recent SCAN audit and receiving his copy of last quarter's *SCAN Insight*:

关于SCAN的新闻报，SCAN确实给工厂提供了便利，因为可以共享报告，省去重复审核的费用。谢谢采纳意见。

*"Regarding the SCAN newsletter, we did benefit from SCAN program very much because the audit report can be shared with all SCAN members, which helped us save money and avoid duplicate audits."*



# SCAN Factory FAQ's

## What is the SCAN program?

SCAN is an industry trade association that provides a common approach whereby mutually acceptable global compliance standards are achieved to reduce audit and operational redundancy for common supply chain stakeholders. SCAN's shared audit program benefits SCAN's global factories through fewer audits with consistent standards and expectations that build upon globally recognized use of best practices.

### Program benefits include:

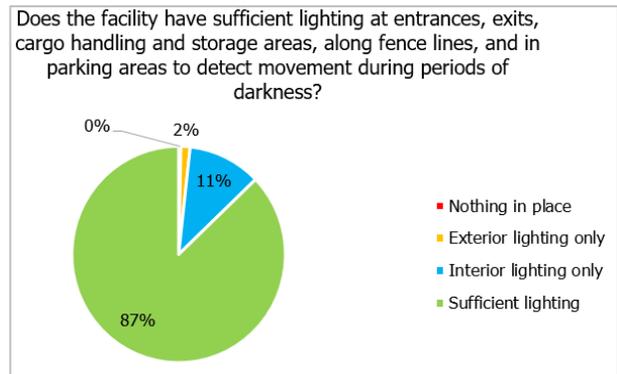
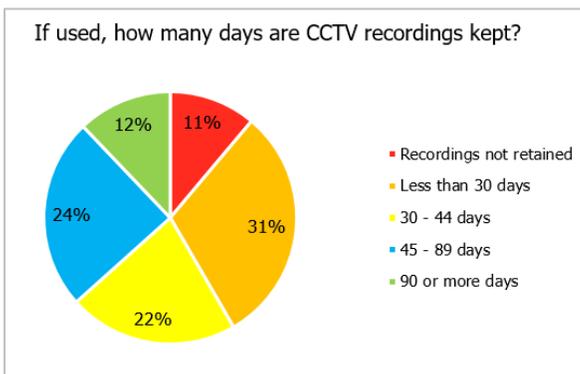
- ✓ Reduce or eliminate factory audit fatigue by utilizing one agreed upon audit result shared amongst member companies.
- ✓ Increase audit efficiency by streamlining processes used by multiple member companies.
- ✓ A standardized corrective action plan for consistent factory improvement expectations.
- ✓ An automated method to share audit results while maintaining confidentiality.
- ✓ An accessible report for factories to share with SCAN members.

### SCAN CAPA Process:

Once the onsite SCAN audit has been conducted, those findings are submitted to the SCM tool by the Audit Service Provider and then reviewed by SCAN's Program Administrators to determine CAP/CAPA assignment. Each factory must appoint a CAPA contact responsible for addressing the assigned actions and completing them online via the SCM portal. The top 5

Category	Audit Question
Container & Trailer Security	Does the shipping area use equipment to conduct a 7-point container inspection? Select all that apply.
Conveyance Security	Where possible, are transit routes from the facility to the port or next destination randomly changed?
Personnel Security	Is a written and verifiable procedure in place to validate information provided on an employment application, such as an address, previous employment history, education, personal or professional references, and a certification? Select all that apply.
Conveyance Security	What container or trailer tracking technologies does the facility require is used by contracted transportation company? Select all that apply.
Physical Security	Is there a designated employee and visitor vehicle parking area separated from the shipping and receiving area? Select all that apply.

frequently most assigned CAPs/CAPAs by compliance category are featured above. All Should, Must, and Critical Non-Compliant questions are assigned a Best Practice, CAP, or CAPA and the factory CAPA contact must then provide a narrative response with dates of implementation and upload supporting evidence to the portal that demonstrates criteria has been met.





## SCAN BOARD OF DIRECTORS AND COMMITTEE CHAIRMEN



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The Home Depot  
Board Chair



Lisa Schulte  
Target Stores  
Board Vice Chair



Pat Cerisano  
Husky Injection Molding  
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Ken McElroy  
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Ryan Klath  
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Stella Bray-Conrad  
Walmart Stores, Inc.  
Member at Large



Jennifer Kissner  
Newell Brands  
Board Secretary



## BECOME A MEMBER!

Join various industry leaders, such as the members listed below, in becoming an official SCAN Member! Contact to learn more about the association, membership options and the shared audit repository! Contact us at [info@scanassociation.com](mailto:info@scanassociation.com).

- Associated Premium
- Barnes & Noble, Inc.
- Cabela's
- Canadian Tire
- Carter's, Inc.
- Coleman Company, Inc.
- Columbia Sportswear Company
- Costco
- Hallmark Cards, Incorporated
- Husky Injection Molding Systems
- Jarden
- JCPenney
- Kroger
- Levi Strauss & Co
- Meijer, Inc.
- Michaels
- Patagonia, Inc.
- Rawlings Sporting Goods Company
- Renfro Corporation
- RMS International
- Target
- The Home Depot, Inc.
- Walmart
- Wolverine Worldwide



Visit our website to learn more about the SCAN Association, [www.scanassociation.com](http://www.scanassociation.com)

### SCAN Anti-Trust Statement

Our association understands the importance of antitrust compliance. Our goal is to avoid the appearance of impropriety. We make every effort to avoid any discussion of prices, pricing policies, terms and conditions of doing business, or of course any sort of market allocation. We also avoid any discussion that might be perceived as suggesting that anyone should cease doing business with a particular factory or customer, or any other discussion that might be viewed as coercive or exclusionary toward another company.

We encourage our members should they feel uncomfortable about any subject of discussion, or have any questions, to please speak up and bring their concerns to the attention of any Board Member who will stop the conversation until we can provide legal guidance.