


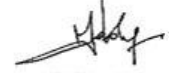




Doc. Title: <b>FOOD FRAUD VULNERABILITY ASSESSMENT RECORDS</b>	Page No.:	Page 1 of 37
	Effective Date:	9-Jan-2023

**1.0 Assemble Food Fraud Vulnerability Assessment Team**

Name	Department	Signature	Date
Koo Chee Khoon	QA Dept		9-Jan-2023
Mohamad Syazwan bin Salim	QA Dept		9-Jan-2023
Ting Bing Keh	Production Dept / Maintenance Dept		9-Jan-2023
Tenh Swee Kheng	Warehouse Dept (Receiving)		9-Jan-2023
Tong Su Ling	Store and Purchasing Dept (Purchase and receive)		9-Jan-2023
Ravin	Production Dept.		9-Jan-2023

**2.0 List of Materials (or group of materials)**

- Cocoa Bean – Sole ingredient for all cocoa products
- Processing Aid - permitted alkalising agent used in small quantity and classified as processing aid by international cocoa industry. For instance: Potassium carbonate, Sodium hydroxide, Potassium Bicarbonate, Ammonium bicarbonate, Ammonium Hydrogen Carbonate, Potassium Hydrogen Carbonate, Potassium Hydroxide, Sodium Carbonate, Sodium Bicarbonate and others Permitted Alkalizing Agents
- Packaging Material – Paper carton, plastic bag, paper bag, jumbo bulk bag
- Cocoa products- **Cocoa Mass (Cocoa liquor)**, cocoa butter, cocoa cake, cocoa powder

**3.0 Map Out Supply Chain**

Cocoa Bean	Processing Aid	Packaging material	Cocoa Products
Cocoa Farmer ↓ (Optional ) Cocoa Collector ↓ Cocoa exporter ↓ Delivery to GCB Cocoa Malaysia ↓ Receipt of cocoa bean by GCB Cocoa Malaysia Warehouse Dept	Manufacturing Factory ↓ (Optional) Trading company ↓ Delivery to GCB Cocoa Malaysia ↓ Receipt of processing aid by GCB Cocoa Malaysia Store and Purchasing Dept	Manufacturing Factory ↓ (Optional) Trading company ↓ Delivery to GCB Cocoa Malaysia ↓ Receipt of packaging material by GCB Cocoa Malaysia Store and Purchasing Dept	Processed cocoa product in <b>Guan Chong</b> ↓ Storage of finished product in <b>Guan Chong warehouse</b> ↓ Delivery to customer

Doc. Title: <b>FOOD FRAUD VULNERABILITY ASSESSMENT RECORDS</b>	Page No.:	Page 2 of 37
	Effective Date:	9-Jan-2023

**4.0 VULNERABILITY/RISK ANALYSIS: Identify potential vulnerability/risks - Evaluate Risk - control measures**

**4.1 VULNERABILITY/RISK ANALYSIS – COCOA BEAN**

Step in supply chain	Identify potential vulnerability/risks	General Control Measures applied to prevent this vulnerability/risk	Likely-hood	Severity	Risk Level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD FRAUD REDUCTION applied to prevent this SIGNIFICANT vulnerability/risk
Cocoa Farmer	Historical Incidents of fraud case:  Adulteration of other material in cocoa beans at farmer such as stone to gain weight – did occur – info from cocoa collector/exporter.	Cocoa collector/exporter do check on each bag of dried cocoa bean upon receiving from farmer. Collector/exporter – do have sieving machine to sieve out adulterated material from dried cocoa bean and re-bag into export ready gunny sack bag. – Cocoa collector/export has capability to reduce this vulnerability/risk  As for GCB Cocoa Malaysia control measures, we do not rely on supplier certificate of analysis, all incoming cocoa beans are subjected to heavy sampling plan, i.e. 30%, test every lot during incoming.	2	3	6	No	-
	Emerging concerns/news/alert:  No vulnerability identified	-	-	-	-	No	-

Doc. Title: <b>FOOD FRAUD VULNERABILITY ASSESSMENT RECORDS</b>	Page No.:	Page 3 of 37
	Effective Date:	9-Jan-2023

Step in supply chain	Identify potential vulnerability/risks	General Control Measures applied to prevent this vulnerability/risk	Likely-hood	Severity	Risk Level	Is this a Significant Risk? ( <5) (Yes / No)	Specific Control Measures for FOOD FRAUD REDUCTION applied to prevent this SIGNIFICANT vulnerability/risk
	<p>Economic Factors/Price Fluctuations:</p> <p>Adulteration of other material in cocoa beans at farmer such as stone to gain weight – to gain economical advantage</p>	<p>Cocoa collector/exporter do check on each bag of dried cocoa bean upon receiving from farmer.</p> <p>Collector/exporter – do have sieving machine to sieve out adulterated material from dried cocoa bean and re-bag into export ready gunny sack bag. – Cocoa collector/export has capability to reduce this vulnerability/risk</p> <p>As for GCB Cocoa Malaysia control measures, we do not rely on supplier certificate of analysis, all incoming cocoa beans are subjected to heavy sampling plan, i.e. 30%, test every lot during incoming.</p>	2	3	6	No	-
	<p>Country/Area of origin:</p> <p>Cocoa bean area: African, Oceania, American, Indonesia/Asian</p> <p>Although the practise of dried cocoa bean are not exactly the same. Its adulteration vulnerability is similar. - Info from cocoa traders and supplier audits conducted.</p>	<p>Cocoa collector/exporter do check on each bag of dried cocoa bean upon receiving from farmer.</p> <p>Collector/exporter – do have sieving machine to sieve out adulterated material from dried cocoa bean and re-bag into export ready gunny sack bag. – Cocoa collector/export has capability to reduce this vulnerability/risk</p> <p>As for GCB Cocoa Malaysia control measures, we do not rely on supplier certificate of analysis, all incoming cocoa beans are subjected to heavy sampling plan, i.e. 30%, test every lot during incoming.</p>	2	3	6	No	-

Doc. Title: <b>FOOD FRAUD VULNERABILITY ASSESSMENT RECORDS</b>	Page No.:	Page 4 of 37
	Effective Date:	9-Jan-2023

Step in supply chain	Identify potential vulnerability/risks	General Control Measures applied to prevent this vulnerability/risk	Likely-hood	Severity	Risk Level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD FRAUD REDUCTION applied to prevent this SIGNIFICANT vulnerability/risk
	<p>Length and complexity of supply chain / direct or indirect sourcing:</p> <p>Simple: Normally cocoa farmer is of small size – 1-2 acres are most common. Farmer grow and dry their own cocoa</p> <p>No vulnerability identified</p>	-	-	-	-	No	-
	<p>Storage and distribution of supplier facility:</p> <p>Simple. Farmer is commonly small size grower, and store cocoa at their own home</p> <p>However, it is possible to have unintentional adulteration with other crop during storage, as the farmer may mix up with other crop they grow/dry.</p>	<p>Cocoa collector/exporter do check on each bag of dried cocoa bean upon receiving from farmer. Collector/exporter – do have sieving machine to sieve out adulterated material from dried cocoa bean and re-bag into export ready gunny sack bag. – Cocoa collector/export has capability to reduce this vulnerability/risk</p> <p>As for GCB Cocoa Malaysia control measures, we do not rely on supplier certificate of analysis, all incoming cocoa beans are subjected to heavy sampling plan, i.e. 30%, test every lot during incoming.</p>	2	3	6	No	-

Doc. Title: <b>FOOD FRAUD VULNERABILITY ASSESSMENT RECORDS</b>	Page No.:	Page 5 of 37
	Effective Date:	9-Jan-2023

Step in supply chain	Identify potential vulnerability/risks	General Control Measures applied to prevent this vulnerability/risk	Likely-hood	Severity	Risk Level	Is this a Significant Risk? ( <5) (Yes / No)	Specific Control Measures for FOOD FRAUD REDUCTION applied to prevent this SIGNIFICANT vulnerability/risk
	<p>Availability/ Scarcity of supplied material</p> <p>Main crop season with huge quantity of cocoa, have less chance of adulteration</p> <p>Mid crop season when cocoa is less, there is higher chance of adulteration to mix into cocoa. Common risk is farmer try to increase waste, e.g. stone to gain economic advantage</p>	<p>Cocoa collector/exporter do check on each bag of dried cocoa bean upon receiving from farmer. Collector/exporter – do have sieving machine to sieve out adulterated material from dried cocoa bean and re-bag into export ready gunny sack bag. – Cocoa collector/export has capability to reduce this vulnerability/risk</p> <p>As for GCB Cocoa Malaysia control measures, we do not rely on supplier certificate of analysis, all incoming cocoa beans are subjected to heavy sampling plan, i.e. 30%, test every lot during incoming.</p>	2	3	6	No	-
(Optional ) Cocoa Collector	<p>Historical Incidents of fraud case:</p> <p>Adulteration of other material in cocoa beans at collector centre such as stone to gain weight – did occur – info from cocoa exporter.</p>	<p>Cocoa exporters do check on each bag of dried cocoa bean upon receiving from cocoa collector. Exporter – do have sieving machine to sieve out adulterated material from dried cocoa bean and re-bag into export ready gunny sack bag. – Cocoa collector/export has capability to reduce this vulnerability/risk</p> <p>As for GCB Cocoa Malaysia control measures, we do not rely on supplier certificate of analysis, all incoming cocoa beans are subjected to heavy sampling plan, i.e. 30%, test every lot during incoming.</p>	2	3	6	No	-
	<p>Emerging concerns/news/alert:</p> <p>No vulnerability identified</p>	-	-	-	-	No	-

Doc. Title: <b>FOOD FRAUD VULNERABILITY ASSESSMENT RECORDS</b>	Page No.:	Page 6 of 37
	Effective Date:	9-Jan-2023

Step in supply chain	Identify potential vulnerability/risks	General Control Measures applied to prevent this vulnerability/risk	Likely-hood	Severity	Risk Level	Is this a Significant Risk? ( <5) (Yes / No)	Specific Control Measures for FOOD FRAUD REDUCTION applied to prevent this SIGNIFICANT vulnerability/risk
	<p>Economic Factors/Price Fluctuations:</p> <p>Adulteration of other material in cocoa beans at collector centre such as stone to gain weight – to gain economical advantage</p>	<p>Cocoa exporters do check on each bag of dried cocoa bean upon receiving from cocoa collector. Exporter – do have sieving machine to sieve out adulterated material from dried cocoa bean and re-bag into export ready gunny sack bag. – Cocoa collector/export has capability to reduce this vulnerability/risk</p> <p>As for GCB Cocoa Malaysia control measures, we do not rely on supplier certificate of analysis, all incoming cocoa beans are subjected to heavy sampling plan, i.e. 30%, test every lot during incoming.</p>	2	3	6	No	-
	<p>Country/Area of origin:</p> <p>Cocoa bean area: African, Oceania, American, Indonesia/Asian</p> <p>Although the practise of dried cocoa bean are not exactly the same. Its adulteration vulnerability is similar. - Info from cocoa traders and supplier audits conducted.</p>	<p>Cocoa exporters do check on each bag of dried cocoa bean upon receiving from cocoa collector. Exporter – do have sieving machine to sieve out adulterated material from dried cocoa bean and re-bag into export ready gunny sack bag. – Cocoa collector/export has capability to reduce this vulnerability/risk</p> <p>As for GCB Cocoa Malaysia control measures, we do not rely on supplier certificate of analysis, all incoming cocoa beans are subjected to heavy sampling plan, i.e. 30%, test every lot during incoming.</p>	2	3	6	No	-

Doc. Title: <b>FOOD FRAUD VULNERABILITY ASSESSMENT RECORDS</b>	Page No.:	Page 7 of 37
	Effective Date:	9-Jan-2023

Step in supply chain	Identify potential vulnerability/risks	General Control Measures applied to prevent this vulnerability/risk	Likely-hood	Severity	Risk Level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD FRAUD REDUCTION applied to prevent this SIGNIFICANT vulnerability/risk
	<p>Length and complexity of supply chain / direct or indirect sourcing:</p> <p>More complex: Normally cocoa collectors collect from a network of farmers. Hence, chances of facing adulteration from bad farmer do exist.</p>	<p>Cocoa exporters do check on each bag of dried cocoa bean upon receiving from cocoa collector. Exporter – do have sieving machine to sieve out adulterated material from dried cocoa bean and re-bag into export ready gunny sack bag. – Cocoa collector/export has capability to reduce this vulnerability/risk</p> <p>As for GCB Cocoa Malaysia control measures, we do not rely on supplier certificate of analysis, all incoming cocoa beans are subjected to heavy sampling plan, i.e. 30%, test every lot during incoming.</p>	2	3	6	No	-
	<p>Storage and distribution of supplier facility:</p> <p>Cocoa collector has bigger storage facility. They may process different crop also. Hence, it is possible to have unintentional adulteration with other crop during storage, as the collector may mix up with other crop they process</p>	<p>Cocoa exporters do check on each bag of dried cocoa bean upon receiving from cocoa collector. Exporter – do have sieving machine to sieve out adulterated material from dried cocoa bean and re-bag into export ready gunny sack bag. – Cocoa collector/export has capability to reduce this vulnerability/risk</p> <p>As for GCB Cocoa Malaysia control measures, we do not rely on supplier certificate of analysis, all incoming cocoa beans are subjected to heavy sampling plan, i.e. 30%, test every lot during incoming.</p>	2	3	6	No	-

Doc. Title: <b>FOOD FRAUD VULNERABILITY ASSESSMENT RECORDS</b>	Page No.:	Page 8 of 37
	Effective Date:	9-Jan-2023

Step in supply chain	Identify potential vulnerability/risks	General Control Measures applied to prevent this vulnerability/risk	Likely-hood	Severity	Risk Level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD FRAUD REDUCTION applied to prevent this SIGNIFICANT vulnerability/risk
	<p>Availability/ Scarcity of supplied material</p> <p>Main crop season with huge quantity of cocoa, have less chance of adulteration</p> <p>Mid crop season when cocoa is less, there is higher chance of adulteration to mix into cocoa. Common risk is collector may try to increase waste, e.g. stone to gain economic advantage, especially during mid crop season.</p>	<p>Cocoa exporters do check on each bag of dried cocoa bean upon receiving from cocoa collector. Exporter – do have sieving machine to sieve out adulterated material from dried cocoa bean and re-bag into export ready gunny sack bag. – Cocoa collector/export has capability to reduce this vulnerability/risk</p> <p>As for GCB Cocoa Malaysia control measures, we do not rely on supplier certificate of analysis, all incoming cocoa beans are subjected to heavy sampling plan, i.e. 30%, test every lot during incoming.</p>	2	3	6	No	-



Doc. Title: <b>FOOD FRAUD VULNERABILITY ASSESSMENT RECORDS</b>	Page No.:	Page 9 of 37
	Effective Date:	9-Jan-2023

Step in supply chain	Identify potential vulnerability/risks	General Control Measures applied to prevent this vulnerability/risk	Likely-hood	Severity	Risk Level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD FRAUD REDUCTION applied to prevent this SIGNIFICANT vulnerability/risk
Cocoa Exporter	<p>Historical Incidents of fraud case:</p> <p>Adulteration of other material in cocoa beans at Exporter base such as stone to gain weight – did occur - base on GCB Cocoa Malaysia test data</p>	GCB Cocoa Malaysia control measures, we do not rely on supplier certificate of analysis, all incoming cocoa beans are subjected to heavy sampling plan, i.e. 30%, test every lot during incoming.	2	2	4	YES	<ul style="list-style-type: none"> <li>Buy Cocoa Bean only from Approved Supplier, as per P-FT-002.</li> <li>Conduct Incoming Testing as per WI-QA-001.- Sampling 30% of all cocoa bean lot. Test adulterated waste vs contractual “waste” specification</li> <li>Direct apply discount against supplier invoice for over specification of (adulterated) waste, if any</li> <li>As per P-FT-001, all purchase shall be conducted base on International cocoa trading rules, which enable us to bring dispute of adulteration waste, if any, to international arbitration court.</li> </ul> <p>Note: There is a specification on waste for dried cocoa bean contract – which is a measurable index for adulterated waste, if any.</p>
	Emerging concerns/news/alert:	-	-	-	-	No	-
	No vulnerability identified	-	-	-	-	-	-

Doc. Title: <b>FOOD FRAUD VULNERABILITY ASSESSMENT RECORDS</b>	Page No.:	Page 10 of 37
	Effective Date:	9-Jan-2023

Step in supply chain	Identify potential vulnerability/risks	General Control Measures applied to prevent this vulnerability/risk	Likely-hood	Severity	Risk Level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD FRAUD REDUCTION applied to prevent this SIGNIFICANT vulnerability/risk
	<p>Economic Factors/Price Fluctuations:</p> <p>Adulteration of other material in cocoa beans at exporter centre such as stone to gain weight – to gain economical advantage</p> <p>This could happen especially when there is negative margin period suffered by cocoa exporter</p>	GCB Cocoa Malaysia control measures, we do not rely on supplier certificate of analysis, all incoming cocoa beans are subjected to heavy sampling plan, i.e. 30%, test every lot during incoming.	2	2	4	YES	<ul style="list-style-type: none"> <li>Buy Cocoa Bean only from Approved Supplier, as per P-FT-002.</li> <li>Conduct Incoming Testing as per WI-QA-001.- Sampling 30% of all cocoa bean lot. Test adulterated waste vs contractual “waste” specification</li> <li>Direct apply discount against supplier invoice for over specification of (adulterated) waste, if any</li> <li>As per P-FT-001, all purchase shall be conducted base on International cocoa trading rules, which enable us to bring dispute of adulteration waste, if any, to international arbitration court.</li> </ul> <p>Note: There is a specification on waste for dried cocoa bean contract – which is a measurable index for adulterated waste, if any.</p>

Doc. Title: <b>FOOD FRAUD VULNERABILITY ASSESSMENT RECORDS</b>	Page No.:	Page 11 of 37
	Effective Date:	9-Jan-2023

Step in supply chain	Identify potential vulnerability/risks	General Control Measures applied to prevent this vulnerability/risk	Likely-hood	Severity	Risk Level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD FRAUD REDUCTION applied to prevent this SIGNIFICANT vulnerability/risk
	<p>Country/Area of origin:</p> <p>Cocoa bean area: African, Oceania, American, Indonesia/Asian</p> <p>Although the practise of dried cocoa bean are not exactly the same. Its adulteration vulnerability is similar. - Info from cocoa traders and supplier audits conducted.</p>	<p>GCB Cocoa Malaysia control measures, we do not rely on supplier certificate of analysis, all incoming cocoa beans are subjected to heavy sampling plan, i.e. 30%, test every lot during incoming.</p>	2	2	4	YES	<ul style="list-style-type: none"> <li>Buy Cocoa Bean only from Approved Supplier, as per P-FT-002.</li> <li>Conduct Incoming Testing as per WI-QA-001.- Sampling 30% of all cocoa bean lot. Test adulterated waste vs contractual “waste” specification</li> <li>Direct apply discount against supplier invoice for over specification of (adulterated) waste, if any</li> <li>As per P-FT-001, all purchase shall be conducted base on International cocoa trading rules, which enable us to bring dispute of adulteration waste, if any, to international arbitration court.</li> </ul> <p>Note: There is a specification on waste for dried cocoa bean contract – which is a measurable index for adulterated waste, if any.</p>

Doc. Title: <b>FOOD FRAUD VULNERABILITY ASSESSMENT RECORDS</b>	Page No.:	Page 12 of 37
	Effective Date:	9-Jan-2023

Step in supply chain	Identify potential vulnerability/risks	General Control Measures applied to prevent this vulnerability/risk	Likely-hood	Severity	Risk Level	Is this a Significant Risk? ( <5) (Yes / No)	Specific Control Measures for FOOD FRAUD REDUCTION applied to prevent this SIGNIFICANT vulnerability/risk
	<p>Length and complexity of supply chain / direct or indirect sourcing:</p> <p>complex: Normally cocoa exporter buys from a network of farmers/collector. The exporters may buy &amp; sell among exporter. Hence, chances of facing adulteration from bad counter party are higher.</p>	GCB Cocoa Malaysia control measures, we do not rely on supplier certificate of analysis, all incoming cocoa beans are subjected to heavy sampling plan, i.e. 30%, test every lot during incoming.	2	2	4	YES	<ul style="list-style-type: none"> <li>Buy Cocoa Bean only from Approved Supplier, as per P-FT-002.</li> <li>Conduct Incoming Testing as per WI-QA-001.- Sampling 30% of all cocoa bean lot. Test adulterated waste vs contractual “waste” specification</li> <li>Direct apply discount against supplier invoice for over specification of (adulterated) waste, if any</li> <li>As per P-FT-001, all purchase shall be conducted base on International cocoa trading rules, which enable us to bring dispute of adulteration waste, if any, to international arbitration court.</li> <li><i>Conduct data analysis on yearly supplier performance (waste level) and suggest preferred exporter to guan chong trader</i></li> </ul> <p>Note: There is a specification on waste for dried cocoa bean contract – which is a measurable index for adulterated waste, if any.</p>

Doc. Title: <b>FOOD FRAUD VULNERABILITY ASSESSMENT RECORDS</b>	Page No.:	Page 13 of 37
	Effective Date:	9-Jan-2023

Step in supply chain	Identify potential vulnerability/risks	General Control Measures applied to prevent this vulnerability/risk	Likely-hood	Severity	Risk Level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD FRAUD REDUCTION applied to prevent this SIGNIFICANT vulnerability/risk
	Storage and distribution of supplier facility:  Cocoa exporter has bigger storage facility. They may process different crop also. Hence, it is possible to have unintentional adulteration with other crop during storage, as the collector may mix up with other crop they process	GCB Cocoa Malaysia control measures, we do not rely on supplier certificate of analysis, all incoming cocoa beans are subjected to heavy sampling plan, i.e. 30%, test every lot during incoming.	2	2	4	YES	<ul style="list-style-type: none"> <li>Conduct Incoming Testing as per WI-QA-001.- Sampling 30% of all cocoa bean lot. Test adulterated waste vs contractual "waste" specification</li> <li><i>Bean tester will conduct smell screening to detect any off notes, including adulteration of other crop (which could be spices)</i></li> <li><i>During bean dumping into production line, Production operators will screen the cocoa bean dumped into the grid line. And will report if there is adulteration</i></li> </ul>

Doc. Title: <b>FOOD FRAUD VULNERABILITY ASSESSMENT RECORDS</b>	Page No.:	Page 14 of 37
	Effective Date:	9-Jan-2023

Step in supply chain	Identify potential vulnerability/risks	General Control Measures applied to prevent this vulnerability/risk	Likely-hood	Severity	Risk Level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD FRAUD REDUCTION applied to prevent this SIGNIFICANT vulnerability/risk
	<p>Availability/ Scarcity of supplied material</p> <p>Main crop season with huge quantity of cocoa, have less chance of adulteration</p> <p>Mid crop season when cocoa is less, there is higher chance of adulteration to mix into cocoa. Common risk is collector may try to increase waste, e.g. stone to gain economic advantage, especially during mid crop season.</p>	GCB Cocoa Malaysia control measures, we do not rely on supplier certificate of analysis, all incoming cocoa beans are subjected to heavy sampling plan, i.e. 30%, test every lot during incoming.	2	2	4	YES	<ul style="list-style-type: none"> <li>Buy Cocoa Bean only from Approved Supplier, as per P-FT-002.</li> <li>Conduct Incoming Testing as per WI-QA-001.- Sampling 30% of all cocoa bean lot. Test adulterated waste vs contractual “waste” specification</li> <li>Direct apply discount against supplier invoice for over specification of (adulterated) waste, if any</li> <li>As per P-FT-001, all purchase shall be conducted base on International cocoa trading rules, which enable us to bring dispute of adulteration waste, if any, to international arbitration court.</li> </ul> <p>Note: There is a specification on waste for dried cocoa bean contract – which is a measurable index for adulterated waste, if any.</p>
Delivery to GCB Cocoa Malaysia	Historical Incidents of fraud case	-	-	-	-	No	-
	No historical incident						
	Emerging concerns/news/alert:	-	-	-	-	No	-
	No vulnerability identified						

Doc. Title: <b>FOOD FRAUD VULNERABILITY ASSESSMENT RECORDS</b>	Page No.:	Page 15 of 37
	Effective Date:	9-Jan-2023

Step in supply chain	Identify potential vulnerability/risks	General Control Measures applied to prevent this vulnerability/risk	Likely-hood	Severity	Risk Level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD FRAUD REDUCTION applied to prevent this SIGNIFICANT vulnerability/risk
	<p>Economic Factors/Price Fluctuations</p> <p>Possible of stealing cocoa bean in bulk vessel/container, and replace by other material by crew members</p>	<p>Cocoa bean are transport in sealed containers – using bullet seal</p> <p>Or bulk vessel – chartered by GCB Cocoa Malaysia, and the hatch is sealed</p> <p>All incoming cocoa beans are subjected to heavy sampling plan, i.e. 30%, test every lot during incoming.</p> <p>We do not rely on declared weight by supplier. Final weighment at GCB Cocoa Malaysia warehouse.</p>	3	2	6	No	-
	<p>Country/Area of origin:</p> <p>Cocoa bean area: African, Oceania, American, Indonesia/Asian</p> <p>Although the practise of transport dried cocoa bean are not exactly the same. The risk is similar.</p>	<p>Cocoa bean are transport in sealed containers – using bullet seal</p> <p>Or bulk vessel – chartered by GCB Cocoa Malaysia, and the hatch is sealed</p> <p>All incoming cocoa beans are subjected to heavy sampling plan, i.e. 30%, test every lot during incoming.</p> <p>We do not rely on declared weight by supplier. Final weighment at GCB Cocoa Malaysia warehouse.</p>	3	2	6	No	-

Doc. Title: <b>FOOD FRAUD VULNERABILITY ASSESSMENT RECORDS</b>	Page No.:	Page 16 of 37
	Effective Date:	9-Jan-2023

Step in supply chain	Identify potential vulnerability/risks	General Control Measures applied to prevent this vulnerability/risk	Likely-hood	Severity	Risk Level	Is this a Significant Risk? ( <5) (Yes / No)	Specific Control Measures for FOOD FRAUD REDUCTION applied to prevent this SIGNIFICANT vulnerability/risk
	<p>Length and complexity of supply chain / direct or indirect sourcing</p> <p>The route of delivery can be long and complex, as we may buy CIF basis, with supplier charter their own shipment route</p> <p>For longer route, the risk is higher to have possible of stealing cocoa bean in bulk vessel/container, and replace by other material by crew members</p>	<p>Cocoa bean are transport in sealed containers – using bullet seal</p> <p>Or bulk vessel – chartered by GCB Cocoa Malaysia, and the hatch is sealed</p> <p>All incoming cocoa beans are subjected to heavy sampling plan, i.e. 30%, test every lot during incoming.</p> <p>We do not rely on declared weight by supplier. Final weighment at GCB Cocoa Malaysia warehouse.</p>	3	2	6	No	-
	<p>Storage and distribution of supplier facility</p> <p>Possible storage of containers at trans-shipment port. Theft, smuggling can happen</p>	<p>Cocoa bean are transport in sealed containers – using bullet seal</p> <p>Or bulk vessel – chartered by GCB Cocoa Malaysia, and the hatch is sealed</p> <p>All incoming cocoa beans are subjected to heavy sampling plan, i.e. 30%, test every lot during incoming.</p> <p>We do not rely on declared weight by supplier. Final weighment at GCB Cocoa Malaysia warehouse.</p>	3	2	6	No	-
	<p>Availability/ Scarcity of supplied material</p> <p>Not application for this step</p>	-	-	-	-	No	-
(Receipt of cocoa bean by GCB Cocoa)	<p>Historical Incidents of fraud case</p> <p>No historical incident</p>	-	-	-	-	No	-



Doc. Title: <b>FOOD FRAUD VULNERABILITY ASSESSMENT RECORDS</b>	Page No.:	Page 17 of 37
	Effective Date:	9-Jan-2023

Step in supply chain	Identify potential vulnerability/risks	General Control Measures applied to prevent this vulnerability/risk	Likely-hood	Severity	Risk Level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD FRAUD REDUCTION applied to prevent this SIGNIFICANT vulnerability/risk
Malaysia Warehouse Dept	Emerging concerns/news/alert  News on syndicated theft , involving employee steeling cocoa bean at other cocoa factory	GCB Cocoa Malaysia practices – check- and – balance approach with 2 control measures below: <ul style="list-style-type: none"> <li>Warehouse vs security Receiving warehouse – are counter checked by security officer from HR&amp; administration department. All cargo in/out and documents are verified by security team</li> <li>Production vs Finance Finance Dept – financial control section calculates and report yield (inverse of waste/cocoa bean grind) to top management. This yield figures are cross checked with production department figures. Any suspicious drop in yield i.e. increase of unexplainable waste – will trigger company scale investigation.</li> </ul>	3	2	6	No	-

Doc. Title: <b>FOOD FRAUD VULNERABILITY ASSESSMENT RECORDS</b>	Page No.:	Page 18 of 37
	Effective Date:	9-Jan-2023

Step in supply chain	Identify potential vulnerability/risks	General Control Measures applied to prevent this vulnerability/risk	Likely-hood	Severity	Risk Level	Is this a Significant Risk? ( <5) (Yes / No)	Specific Control Measures for FOOD FRAUD REDUCTION applied to prevent this SIGNIFICANT vulnerability/risk
	<p>Economic Factors/Price Fluctuations</p> <p>With high cocoa price Cocoa bean may be stolen by employee.</p>	<p>GCB Cocoa Malaysia practices – check- and – balance approach with 2 control measures below:</p> <ul style="list-style-type: none"> <li>Warehouse vs security Receiving warehouse – are counter checked by security officer from HR&amp; administration department.</li> </ul> <p>All cargo in/out and documents are verified by security team</p> <ul style="list-style-type: none"> <li>Production vs Finance Finance Dept – financial control section calculates and report yield (inverse of waste/cocoa bean grind) to top management.</li> </ul> <p>This yield figures are cross checked with production department figures.</p> <p>Any suspicious drop in yield i.e. increase of unexplainable waste – will trigger company scale investigation.</p>	3	2	6	No	-
	Country/Area of origin	-	-	-	-	No	-
	Not application for this step	-	-	-	-	No	-
	Length and complexity of supply chain / direct or indirect sourcing	-	-	-	-	No	-
	Not application for this step	-	-	-	-	No	-

Doc. Title: <b>FOOD FRAUD VULNERABILITY ASSESSMENT RECORDS</b>	Page No.:	Page 19 of 37
	Effective Date:	9-Jan-2023

Step in supply chain	Identify potential vulnerability/risks	General Control Measures applied to prevent this vulnerability/risk	Likely-hood	Severity	Risk Level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD FRAUD REDUCTION applied to prevent this SIGNIFICANT vulnerability/risk
	Storage and distribution of supplier facility  GCB Cocoa Malaysia bean warehouse storage area is huge. Theft, smuggling can happen	GCB Cocoa Malaysia warehouse are fenced with minimum exit point.  All exit points are guarded by security  CCTV is installed for security purpose.	3	2	6	No	-
	Availability/ Scarcity of supplied material  Not application for this step	-	-	-	-	No	-

Doc. Title: <b>FOOD FRAUD VULNERABILITY ASSESSMENT RECORDS</b>	Page No.:	Page 20 of 37
	Effective Date:	9-Jan-2023

**4.2 VULNERABILITY/RISK ANALYSIS – PROCESSING AID**

Step in supply chain	Identify potential vulnerability/risks	General Control Measures applied to prevent this vulnerability/risk	Likely-hood	Severity	Risk Level	Is this a Significant Risk? ( <5) (Yes / No)	Specific Control Measures for FOOD FRAUD REDUCTION applied to prevent this SIGNIFICANT vulnerability/risk
Manufacturing Factory	Historical Incidents of fraud case:  No historical incident	-	-	-	-	No	-
	Emerging concerns/news/alert:  No vulnerability identified	-	-	-	-	No	-
	Economic Factors/Price Fluctuations:  Adulteration of other material in cocoa processing aid, as volume filler to gain weight – to gain economical advantage	Buy from approved supplier, as per P-PU-002  Obtain and verify Certificate of Analysis from supplier  Production process recipe are controlled, any adulterated processing aid will cause unattended pH with a fix dosage of processing aid as per our recipe. Hence, adulterated processing aid can be easily detected during Production.  Conduct purity testing – as verification monitoring program	3	3	9	No	-

Doc. Title: <b>FOOD FRAUD VULNERABILITY ASSESSMENT RECORDS</b>	Page No.:	Page 21 of 37
	Effective Date:	9-Jan-2023

Step in supply chain	Identify potential vulnerability/risks	General Control Measures applied to prevent this vulnerability/risk	Likely-hood	Severity	Risk Level	Is this a Significant Risk? ( <5) (Yes / No)	Specific Control Measures for FOOD FRAUD REDUCTION applied to prevent this SIGNIFICANT vulnerability/risk
	Country/Area of origin: Varies, but the risk is similar.	Buy from approved supplier, as per P-PU-002  Obtain and verify Certificate of Analysis from supplier  Production process recipe are controlled, any adulterated processing aid will cause unattended pH with a fix dosage of processing aid as per our recipe. Hence, adulterated processing aid can be easily detected during Production.  Conduct purity testing – as verification monitoring program	3	3	9	No	-
	Length and complexity of supply chain / direct or indirect sourcing:  Manufacturing factory manufactured the processing aid themselves.  No vulnerability identified	-	-	-	-	No	-
	Storage and distribution of supplier facility:  Storage of processing aid as finished product at manufacturing site – has minimum chances of adulteration  No vulnerability identified	-	-	-	-	No	-

Doc. Title: <b>FOOD FRAUD VULNERABILITY ASSESSMENT RECORDS</b>	Page No.:	Page 22 of 37
	Effective Date:	9-Jan-2023

Step in supply chain	Identify potential vulnerability/risks	General Control Measures applied to prevent this vulnerability/risk	Likely-hood	Severity	Risk Level	Is this a Significant Risk? ( <5) (Yes / No)	Specific Control Measures for FOOD FRAUD REDUCTION applied to prevent this SIGNIFICANT vulnerability/risk
	<p>Availability/ Scarcity of supplied material</p> <p>In short supplied period, one cannot rule out manufacturer of processing aid factory may dilute or lower down purity of processing aid</p>	<p>Buy from approved supplier, as per P-PU-002</p> <p>Obtain and verify Certificate of Analysis from supplier</p> <p>Production process recipe are controlled, any adulterated processing aid will cause unattended pH with a fix dosage of processing aid as per our recipe. Hence, adulterated processing aid can be easily detected during Production.</p> <p>Conduct purity testing – as verification monitoring program</p>	3	3	9	No	-
(Optional ) Trading Company	<p>Historical Incidents of fraud case:</p> <p>No historical incident</p>	-	-	-	-	No	-
	<p>Emerging concerns/news/alert:</p> <p>No vulnerability identified</p>	-	-	-	-	No	-

Doc. Title: <b>FOOD FRAUD VULNERABILITY ASSESSMENT RECORDS</b>	Page No.:	Page 23 of 37
	Effective Date:	9-Jan-2023

Step in supply chain	Identify potential vulnerability/risks	General Control Measures applied to prevent this vulnerability/risk	Likely-hood	Severity	Risk Level	Is this a Significant Risk? ( <5) (Yes / No)	Specific Control Measures for FOOD FRAUD REDUCTION applied to prevent this SIGNIFICANT vulnerability/risk
	<p>Economic Factors/Price Fluctuations:</p> <p>Adulteration of other material in cocoa processing aid, as volume filler to gain weight – to gain economical advantage</p>	<p>Buy from approved supplier, as per P-PU-002</p> <p>Obtain and verify Certificate of Analysis from manufacturer</p> <p>Production process recipe are controlled, any adulterated processing aid will cause unattended pH with a fix dosage of processing aid as per our recipe. Hence, adulterated processing aid can be easily detected during Production.</p> <p>Conduct purity testing – as verification monitoring program</p>	3	3	9	No	-
	<p>Country/Area of origin:</p> <p>Varies, but the risk is similar.</p>	<p>Buy from approved supplier, as per P-PU-002</p> <p>Obtain and verify Certificate of Analysis from manufacturer</p> <p>Production process recipe are controlled, any adulterated processing aid will cause unattended pH with a fix dosage of processing aid as per our recipe. Hence, adulterated processing aid can be easily detected during Production.</p> <p>Conduct purity testing – as verification monitoring program</p>	3	3	9	No	-

Doc. Title: <b>FOOD FRAUD VULNERABILITY ASSESSMENT RECORDS</b>	Page No.:	Page 24 of 37
	Effective Date:	9-Jan-2023

Step in supply chain	Identify potential vulnerability/risks	General Control Measures applied to prevent this vulnerability/risk	Likely-hood	Severity	Risk Level	Is this a Significant Risk? ( <5) (Yes / No)	Specific Control Measures for FOOD FRAUD REDUCTION applied to prevent this SIGNIFICANT vulnerability/risk
	<p>Length and complexity of supply chain / direct or indirect sourcing:</p> <p>Trading company may source from different manufacturing factories.</p> <p>One cannot rule out that with varies grade from different manufacturing factories, the trading company may mix with lower grade purity</p>	<p>Buy from approved supplier, as per P-PU-002</p> <p>Obtain and verify Certificate of Analysis from manufacturer</p> <p>Production process recipe are controlled, any adulterated processing aid will cause unattended pH with a fix dosage of processing aid as per our recipe. Hence, adulterated processing aid can be easily detected during Production.</p> <p>Conduct purity testing – as verification monitoring program</p>	3	3	9	No	-
	<p>Storage and distribution of supplier facility:</p> <p>Storage of processing aid as finished product at trading company warehouses – enable spaces and workers for possible mixing with lower grade chemical/processing aid</p>	<p>Buy from approved supplier, as per P-PU-002</p> <p>Obtain and verify Certificate of Analysis from manufacturer</p> <p>Production process recipe are controlled, any adulterated processing aid will cause unattended pH with a fix dosage of processing aid as per our recipe. Hence, adulterated processing aid can be easily detected during Production.</p> <p>Conduct purity testing – as verification monitoring program</p>	3	3	9	No	-



Doc. Title: <b>FOOD FRAUD VULNERABILITY ASSESSMENT RECORDS</b>	Page No.:	Page 25 of 37
	Effective Date:	9-Jan-2023

Step in supply chain	Identify potential vulnerability/risks	General Control Measures applied to prevent this vulnerability/risk	Likely-hood	Severity	Risk Level	Is this a Significant Risk? ( <5) (Yes / No)	Specific Control Measures for FOOD FRAUD REDUCTION applied to prevent this SIGNIFICANT vulnerability/risk
	<p>Availability/ Scarcity of supplied material</p> <p>In short supplied period, one cannot rule out trading company may mix with lower grade material</p>	<p>Buy from approved supplier, as per P-PU-002</p> <p>Obtain and verify Certificate of Analysis from manufacturer</p> <p>Production process recipe are controlled, any adulterated processing aid will cause unattended pH with a fix dosage of processing aid as per our recipe. Hence, adulterated processing aid can be easily detected during Production.</p> <p>Conduct purity testing – as verification monitoring program</p>	3	3	9	No	-
Delivery to GCB Cocoa Malaysia	<p>Historical Incidents of fraud case</p> <p>No historical incident</p>	-	-	-	-	No	-
	<p>Emerging concerns/news/alert:</p> <p>No vulnerability identified</p>	-	-	-	-	No	-
	<p>Economic Factors/Price Fluctuations</p> <p>Possible of stealing processing aid in container, and replace by other material by crew members</p>	Processing aid are transport in sealed containers – using bullet seal	3	2	6	No	-
	<p>Country/Area of origin:</p> <p>Varies, but the risk is similar.</p>	Processing aid are transport in sealed containers – using bullet seal	3	2	6	No	-

Doc. Title: <b>FOOD FRAUD VULNERABILITY ASSESSMENT RECORDS</b>	Page No.:	Page 26 of 37
	Effective Date:	9-Jan-2023

Step in supply chain	Identify potential vulnerability/risks	General Control Measures applied to prevent this vulnerability/risk	Likely-hood	Severity	Risk Level	Is this a Significant Risk? ( <5) (Yes / No)	Specific Control Measures for FOOD FRAUD REDUCTION applied to prevent this SIGNIFICANT vulnerability/risk
	<p>Length and complexity of supply chain / direct or indirect sourcing</p> <p>The route of delivery can be long and complex, as we may buy CIF basis, with supplier charter their own shipment route</p> <p>For longer route, the risk is higher to have possible of stealing processing aid in bulk container, and replace by other material by crew members</p>	Processing aid are transport in sealed containers – using bullet seal	3	2	6	No	-
	<p>Storage and distribution of supplier facility</p> <p>Possible storage of containers at trans-shipment port. Theft, smuggling can happen</p>	Processing aid are transport in sealed containers – using bullet seal	3	2	6	No	-
	<p>Availability/ Scarcity of supplied material</p> <p>Not application for this step</p>	-	-	-	-	No	-
Receipt of processing aid by GCB Cocoa Malaysia Store and Purchasing Dept	<p>Historical Incidents of fraud case</p> <p>No historical incident</p>	-	-	-	-	No	-
	<p>Emerging concerns/news/alert</p> <p>No historical incident</p>	-	-	-	-	No	-

Doc. Title: <b>FOOD FRAUD VULNERABILITY ASSESSMENT RECORDS</b>	Page No.:	Page 27 of 37
	Effective Date:	9-Jan-2023

Step in supply chain	Identify potential vulnerability/risks	General Control Measures applied to prevent this vulnerability/risk	Likelihood	Severity	Risk Level	Is this a Significant Risk? ( <5) (Yes / No)	Specific Control Measures for FOOD FRAUD REDUCTION applied to prevent this SIGNIFICANT vulnerability/risk
	Economic Factors/Price Fluctuations  With high chemical price, processing may be stolen by employee.	GCB Cocoa Malaysia practices – check- and – balance approach with 2 control measures below: <ul style="list-style-type: none"> <li>• Store vs security</li> </ul> Receiving store – are counter checked by security officer from HR& administration department. All cargo in/out and documents are verified by security team	3	2	6	No	-
	Country/Area of origin  Not application for this step	-	-	-	-	No	-
	Length and complexity of supply chain / direct or indirect sourcing  Not application for this step	-	-	-	-	No	-
	Storage and distribution of supplier facility  GCB Cocoa Malaysia storage area is huge. Theft, smuggling can happen	GCB Cocoa Malaysia premises are fenced with minimum exit point.  All exit points are guarded by security  CCTV is installed for security purpose.	3	2	6	No	-
	Availability/ Scarcity of supplied material  Not application for this step	-	-	-	-	No	-

Doc. Title: <b>FOOD FRAUD VULNERABILITY ASSESSMENT RECORDS</b>	Page No.:	Page 28 of 37
	Effective Date:	9-Jan-2023

**4.3 VULNERABILITY/RISK ANALYSIS – PACKAGING MATERIAL**

Step in supply chain	Identify potential vulnerability/risks	General Control Measures applied to prevent this vulnerability/risk	Likelihood	Severity	Risk Level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD FRAUD REDUCTION applied to prevent this SIGNIFICANT vulnerability/risk
Manufacturing Factory	Historical Incidents of fraud case:  No historical incident	-	-	-	-	No	-
	Emerging concerns/news/alert:  No vulnerability identified	-	-	-	-	No	-
	Economic Factors/Price Fluctuations:  Adulteration of other material packaging material, as replacing with thinner packaging layer – to gain economical advantage	Buy from approved supplier, as per P-PU-002  Obtain and verify Certificate of Analysis from supplier  Conduct inspection testing – as verification monitoring program	2	2	4	YES	<ul style="list-style-type: none"> <li>Buy Packaging Material only from Approved Supplier, as per P-PU-002.</li> <li>Conduct Incoming Testing as per WI-QA-001.-</li> <li>Sampling size of each type of packaging has mentioned in WI-QA-001.</li> <li>Test the thickness of packaging material vs Packaging Material specification</li> </ul>
	Country/Area of origin:  Varies, but the risk is similar.	Buy from approved supplier, as per P-PU-002  Obtain and verify Certificate of Analysis from supplier  Conduct inspection testing – as verification monitoring program	3	3	9	No	-

Doc. Title: <b>FOOD FRAUD VULNERABILITY ASSESSMENT RECORDS</b>	Page No.:	Page 29 of 37
	Effective Date:	9-Jan-2023

Step in supply chain	Identify potential vulnerability/risks	General Control Measures applied to prevent this vulnerability/risk	Likelihood	Severity	Risk Level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD FRAUD REDUCTION applied to prevent this SIGNIFICANT vulnerability/risk
	Length and complexity of supply chain / direct or indirect sourcing:  Manufacturing factory manufactured the packaging material themselves.  No vulnerability identified	-	-	-	-	No	-
	Storage and distribution of supplier facility:  Storage of packaging material as finished product at manufacturing site – has minimum chances of adulteration  No vulnerability identified	-	-	-	-	No	-
	Availability/ Scarcity of supplied material  In short supplied period, one cannot rule out manufacturer may modify the composition of packaging material	Buy from approved supplier, as per P-PU-002  Obtain and verify Certificate of Analysis from supplier  Conduct inspection testing – as verification monitoring program	3	3	9	No	-
(Optional ) Trading Company	Historical Incidents of fraud case:  No historical incident	-	-	-	-	No	-
	Emerging concerns/news/alert:  No vulnerability identified	-	-	-	-	No	-

Doc. Title: <b>FOOD FRAUD VULNERABILITY ASSESSMENT RECORDS</b>	Page No.:	Page 30 of 37
	Effective Date:	9-Jan-2023

Step in supply chain	Identify potential vulnerability/risks	General Control Measures applied to prevent this vulnerability/risk	Likelihood	Severity	Risk Level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD FRAUD REDUCTION applied to prevent this SIGNIFICANT vulnerability/risk
	<p>Economic Factors/Price Fluctuations:</p> <p>Adulteration of other material packaging material, as replacing with thinner packaging layer – to gain economical advantage</p>	<p>Buy from approved supplier, as per P-PU-002</p> <p>Obtain and verify Certificate of Analysis from supplier</p> <p>Conduct inspection testing – as verification monitoring program</p>	2	2	4	YES	<ul style="list-style-type: none"> <li>Buy Packaging Material only from Approved Supplier, as per P-PU-002.</li> <li>Conduct Incoming Testing as per WI-QA-001.-</li> <li>Sampling size of each type of packaging has mentioned in WI-QA-001.</li> <li>Test the thickness of packaging material vs Packaging Material specification</li> </ul>
	<p>Country/Area of origin:</p> <p>Varies, but the risk is similar.</p>	<p>Buy from approved supplier, as per P-PU-002</p> <p>Obtain and verify Certificate of Analysis from supplier</p> <p>Conduct inspection testing – as verification monitoring program</p>	2	3	6	No	-
	<p>Length and complexity of supply chain / direct or indirect sourcing:</p> <p>Trading company may source from different manufacturing factories.</p> <p>One cannot rule out that with varies grade from different manufacturing factories, the trading company may mix with lower grade of packaging material</p>	<p>Buy from approved supplier, as per P-PU-002</p> <p>Obtain and verify Certificate of Analysis from supplier</p> <p>Conduct inspection testing – as verification monitoring program</p>	3	3	9	No	-

Doc. Title: <b>FOOD FRAUD VULNERABILITY ASSESSMENT RECORDS</b>	Page No.:	Page 31 of 37
	Effective Date:	9-Jan-2023

Step in supply chain	Identify potential vulnerability/risks	General Control Measures applied to prevent this vulnerability/risk	Likely-hood	Severity	Risk Level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD FRAUD REDUCTION applied to prevent this SIGNIFICANT vulnerability/risk
	Storage and distribution of supplier facility:  Storage of packaging material as finished product at trading company warehouses – enable spaces and workers for possible mixing with lower grade of packaging material	Buy from approved supplier, as per P-PU-002  Obtain and verify Certificate of Analysis from supplier  Conduct inspection testing – as verification monitoring program	3	3	9	No	-
	Availability/ Scarcity of supplied material  In short supplied period, one cannot rule out trading company may mix with defected packaging material	Buy from approved supplier, as per P-PU-002  Obtain and verify Certificate of Analysis from supplier  Conduct inspection testing – as verification monitoring program	3	3	9	No	-
Delivery to GCB Cocoa Malaysia	Historical Incidents of fraud case  No historical incident	-	-	-	-	No	-
	Emerging concerns/news/alert:  No vulnerability identified	-	-	-	-	No	-

Doc. Title: <b>FOOD FRAUD VULNERABILITY ASSESSMENT RECORDS</b>	Page No.:	Page 32 of 37
	Effective Date:	9-Jan-2023

Step in supply chain	Identify potential vulnerability/risks	General Control Measures applied to prevent this vulnerability/risk	Likelihood	Severity	Risk Level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD FRAUD REDUCTION applied to prevent this SIGNIFICANT vulnerability/risk
	<p>Economic Factors/Price Fluctuations</p> <p>Possible of stealing packaging material in container, and replace by other material by crew members</p>	Packaging material are transport in sealed containers – using bullet seal	2	2	4	YES	<ul style="list-style-type: none"> <li>Buy Packaging Material only from Approved Supplier, as per P-PU-002.</li> <li>Conduct Incoming Testing as per WI-QA-001.-</li> <li>Sampling size of each type of packaging has mentioned in WI-QA-001.</li> <li>Test the thickness of packaging material vs Packaging Material specification</li> </ul>
	<p>Country/Area of origin:</p> <p>Varies, but the risk is similar.</p>	Packaging material are transport in sealed containers – using bullet seal	3	2	6	No	-
	<p>Length and complexity of supply chain / direct or indirect sourcing</p> <p>The route of delivery can be long and complex, as we may buy CIF basis, with supplier charter their own shipment route</p> <p>For longer route, the risk is higher to have possible of packaging material in bulk container, and replace by other material by crew members</p>	Packaging material are transport in sealed containers – using bullet seal	3	2	6	No	-
	<p>Storage and distribution of supplier facility</p> <p>Possible storage of containers at trans-shipment port. Theft, smuggling can happen</p>	Packaging material are transport in sealed containers – using bullet seal	3	2	6	No	-



Doc. Title: <b>FOOD FRAUD VULNERABILITY ASSESSMENT RECORDS</b>	Page No.:	Page 33 of 37
	Effective Date:	9-Jan-2023

Step in supply chain	Identify potential vulnerability/risks	General Control Measures applied to prevent this vulnerability/risk	Likelihood	Severity	Risk Level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD FRAUD REDUCTION applied to prevent this SIGNIFICANT vulnerability/risk
	Availability/ Scarcity of supplied material Not application for this step	-	-	-	-	No	-
Receipt of packaging material by GCB Cocoa Malaysia Store and Purchasing Dept	Historical Incidents of fraud case No historical incident	-	-	-	-	No	-
	Emerging concerns/news/alert No historical incident	-	-	-	-	No	-
	Economic Factors/Price Fluctuations Not application for this step	-	-	-	-	No	-
	Country/Area of origin Not application for this step	-	-	-	-	No	-
	Length and complexity of supply chain / direct or indirect sourcing Not application for this step	-	-	-	-	No	-
	Storage and distribution of supplier facility GCB Cocoa Malaysia storage area is huge. Theft, smuggling can happen	GCB Cocoa Malaysia premises are fenced with minimum exit point. All exit points are guarded by security CCTV is installed for security purpose.	3	2	6	No	-
	Availability/ Scarcity of supplied material Not application for this step	-	-	-	-	No	-

Doc. Title: <b>FOOD FRAUD VULNERABILITY ASSESSMENT RECORDS</b>	Page No.:	Page 34 of 37
	Effective Date:	9-Jan-2023

**4.4 VULNERABILITY/RISK ANALYSIS – PACKAGING MATERIAL**

Step in supply chain	Identify potential vulnerability/risks	General Control Measures applied to prevent this vulnerability/risk	Likely-hood	Severity	Risk level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD FRAUD REDUCTION applied to prevent this SIGNIFICANT vulnerability/risk
Processed into cocoa products from dried cocoa beans in Guan Chong	Historical Incidents of fraud case:  No historical incident	-	-	-	-	No	-
	Emerging concerns/news/alert:  Unapproved material (such as GMO or clone) processed into products	<ul style="list-style-type: none"> <li>Buy raw materials from approved supplier as per P-FT-002 and P-PU-001</li> <li>Conduct GMO testing for cocoa products at least annually</li> </ul>	3	2	6	No	-
	Economic Factors/Price Fluctuations:  No vulnerability identified	-	-	-	-	No	-
	Country/Area of origin:  Not application for this step	-	-	-	-	No	-
	Length and complexity of supply chain / direct or indirect sourcing:  Manufacturing factory manufactured the cocoa products ourselves  No vulnerability identified	-	-	-	-	No	-

Doc. Title: <b>FOOD FRAUD VULNERABILITY ASSESSMENT RECORDS</b>	Page No.:	Page 35 of 37
	Effective Date:	9-Jan-2023

Step in supply chain	Identify potential vulnerability/risks	General Control Measures applied to prevent this vulnerability/risk	Likely-hood	Severity	Risk level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD FRAUD REDUCTION applied to prevent this SIGNIFICANT vulnerability/risk
	Storage and distribution of supplier facility:  Storage of finished product at manufacturing site – has minimum chances of adulteration  No vulnerability identified	-	-	-	-	No	-
	Availability/ Scarcity of supplied material  No vulnerability identified	-	-	-	-	No	-
Storage of Cocoa products in Guan Chong Warehouse	Historical Incidents of fraud case  No historical incident	-	-	-	-	No	-
	Emerging concerns/news/alert  No historical incident	-	-	-	-	No	-
	Economic Factors/Price Fluctuations  Not application for this step	-	-	-	-	No	-
	Country/Area of origin  Not application for this step	-	-	-	-	No	-
	Length and complexity of supply chain / direct or indirect sourcing  Not application for this step	-	-	-	-	No	-

Doc. Title: <b>FOOD FRAUD VULNERABILITY ASSESSMENT RECORDS</b>	Page No.:	Page 36 of 37
	Effective Date:	9-Jan-2023

Step in supply chain	Identify potential vulnerability/risks	General Control Measures applied to prevent this vulnerability/risk	Likely-hood	Severity	Risk level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD FRAUD REDUCTION applied to prevent this SIGNIFICANT vulnerability/risk
	Storage and distribution of supplier facility  Guan Chong storage area is huge. Theft, smuggling can happen	Guan Chong premises are fenced with minimum exit point.  All exit points are guarded by security  CCTV is installed for security purpose.	3	2	6	No	-
	Availability/ Scarcity of supplied material  Not application for this step	-	-	-	-	No	-
Delivery to customer	Historical Incidents of fraud case  No historical incident	-	-	-	-	No	-
	Emerging concerns/news/alert  No historical incident	-	-	-	-	No	-
	Economic Factors/Price Fluctuations  Possible of stealing cocoa products in container, and replace by other material during voyage	Cocoa products that are transported in sealed containers by using bullet seal	3	2	6	No	-
	Country/Area of origin  Varies, but the risk is similar.	Cocoa products that are transported in sealed containers by using bullet seal	3	2	6	No	-
	Length and complexity of supply chain / direct or indirect sourcing  The route of delivery can be long and complex, for longer route, the risk is higher to have possible of stealing cocoa products in bulk	Cocoa products that are transported in sealed containers by using bullet seal	3	2	6	No	-

Doc. Title: <b>FOOD FRAUD VULNERABILITY ASSESSMENT RECORDS</b>	Page No.:	Page 37 of 37
	Effective Date:	9-Jan-2023

Step in supply chain	Identify potential vulnerability/risks	General Control Measures applied to prevent this vulnerability/risk	Likely-hood	Severity	Risk level	Is this a Significant Risk? (<5) (Yes / No)	Specific Control Measures for FOOD FRAUD REDUCTION applied to prevent this SIGNIFICANT vulnerability/risk
	container, and replace by other material						
	Storage and distribution of supplier facility  Possible storage of containers at trans-shipment port. Theft, smuggling can happen	Cocoa products that are transported in sealed containers by using bullet seal	3	2	6	No	-
	Availability/ Scarcity of supplied material  Not application for this step	-	-	-	-	No	-