

Additional Measures of Internal Control

In addition to the internal control measures embedded within VTTI's Terminal Management System, BzCtrl. is implemented as a dedicated compliance tool to support and govern CGT compliance.

BzCtrl. is currently used for the following purposes:

1. **(Bi-)weekly stand-up meetings**

Short (maximum 15-minute) meetings with terminals to enable the CSC Manager to track CGT-related action items and to ensure ongoing involvement of the HQ CGT team.

2. **Periodic controls (automatically scheduled) and KPIs**, including:

- a. Monthly stock reconciliations, forming the basis for monthly customs declarations;
- b. Bi-weekly verification of the discharge of outgoing documents and monitoring of follow-up actions;
- c. Periodic incident reviews to identify structural root causes and to feed outcomes into training and process optimization.

3. **Annual AEO compliance monitoring controls**

Controls based on FETSA industry standards to ensure continued compliance with the requirements of the AEO authorisation, which serves as an umbrella license for all customs-related permits.

4. **Training and awareness**

A basic set of e-learning modules based on FETSA industry standards, supplemented by VTTI-specific e-learning programs tailored to various roles and the full UCC learning program as offered by the European Commission.

Revision #1

Created 26 January 2026 23:07:17 by Remy Geerts

Updated 26 January 2026 23:07:17 by Remy Geerts