Prevention of counterfeit parts and materials policy

Purpose
Establish Procedure for Fraudulent/Counterfeit Parts and/or Assuring Acquisition of Authentic and Conforming Material. The purpose of this procedure is to document the necessary avoidance, detection, mitigation, and disposition processes to prevent counterfeit parts, and or materials from entering into our customer’s supply stream, thereby enabling the fulfillment of our customers’ requirements, and continued customer satisfaction.

Scope
This procedure is applicable to all procured parts and materials that are used to manufacture, assembly or subassembly parts at Precision Die and Stamping. This procedure shall be flowed down to all applicable Precision Die and Stamping suppliers.

Objective
The Objective of this procedure is to document a process for counterfeit avoidance in accordance with AS6174 section 3, AS5553 section 4, and applicable customer requirements.

Requirements for Precision Die and Stamping suppliers
Suppliers shall establish and maintain a Counterfeit Parts\Material Prevention and Control Plan using AS5553 (Reference elements of Section 4) and/or AS6174 (Reference elements of Section 3) to ensure that counterfeit goods are not delivered to Precision Die and Stamping. The purpose of the control plan shall be to develop a robust process to prevent the delivery of counterfeit commodities and control commodities identified as counterfeit.

Suppliers shall only purchase products to be delivered or incorporated as goods to buyer directly from the Original Component Manufacturer (OCM)/Original Equipment Manufacturer (OEM), OCM/OEM authorized distributor chain, aftermarket manufacturer, or authorized reseller. These products shall have verification that goods are traceable to OCM/OEM; OCM/OEM authorized distributor chain, aftermarket manufacturer, or authorized reseller that identifies the name and location of all the supply chain intermediaries from the part manufacturer to the direct source of the product. If Goods can only be acquired from independent distributors or brokers in cases of diminishing material supply (DMS) or obsolescence, written notice shall be provided to the Precision Die and Stamping Quality Manager and Purchasing Department prior to procurement of these goods. After written approval by Precision Die and Stamping is received by supplier, goods shall be subjected to testing and screening process appropriate to the commodity (in accordance with AS5553 and AS6174) using a Precision Die and Stamping approved third party laboratory. Records of evidentiary tests and inspections performed that ensure verification of the
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goods shall be provided to Precision Die and Stamping for review and approval by Precision Die and Stamping Quality Manager and Purchasing Department prior to delivery.

Written notice is not required for raw material and standard hardware purchased from independent distributors or brokers, but products must be able to provide commodity level traceability to the OCM/OEM.

Requirements for Precision Die and Stamping

Precision Die and Stamping shall establish and maintain Counterfeit Part Risk Mitigation Control plan using AS5553 (Reference elements of Section 4) and/or AS6174 (Reference elements of Section 3) to ensure that counterfeit goods are not delivered to Precision Die and Stamping customers.

The purpose of the control plan shall be to develop and maintain a robust process to prevent the delivery of counterfeit commodities and control commodities identified as counterfeit.

Precision Die and Stamping shall only purchase products to be delivered or incorporated as goods to buyer or customer directly from the Original Component Manufacturer (OCM)/Original Equipment Manufacturer (OEM), OCM/OEM authorized distributor chain, aftermarket manufacturer, or authorized reseller. These products shall have verification that goods are traceable to OCM/OEM; OCM/OEM authorized distributor chain, aftermarket manufacturer, or authorized reseller that identifies the name and location of all the supply chain intermediaries from the part manufacturer to the direct source of the product. If Goods can only be acquired from independent distributors or brokers in cases of diminishing material supply (DMS) or obsolescence, written notice shall be provided to the Precision Die and Stamping Quality Manager prior to procurement of these goods by the Purchasing Department.

Quality Manager/Quality department shall review applicable customer requirements to ensure compliance. After written approval by Quality Manager is received by the Purchasing Department goods shall be subjected to a testing and screening process appropriate to the commodity (in accordance with AS5553 and AS6174) using a Precision Die and Stamping approved third party laboratory. Records of evidentiary tests and inspections performed that ensure verification of the goods shall be provided to Quality Manager/Quality Department for review and approval prior to delivery.

Written notice is not required for raw material and standard hardware purchased from independent distributors or brokers, but products must be able to provide commodity level traceability to the Original Manufacturer.
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**Precision Die and Stamping** Quality Manager shall notify customer within 24 hours if Precision Die and Stamping becomes aware or suspects that it has furnished counterfeit goods. Format and method of communication shall be based on customer requirements.

**Precision Die and Stamping** purchasing department shall include this clause or equivalent provisions in supplier contracts or purchase orders for the delivery of items that will be included in or furnished as goods.

If counterfeit goods are discovered by Precision Die and Stamping counterfeit goods shall be contained and dispositioned in accordance with Nonconforming Material procedure.

Counterfeit Avoidance program includes training of applicable personnel to this procedure.

**Reference Documents:**
AS5553 Fraudulent/Counterfeit Parts
AS6174 Counterfeit Material