

Counterfeit Parts Policy

Our policy is to purchase new and authentic materials from authorized suppliers.

Independent distributors are only used after a reasonable search for material from franchised/authorized sources has been exhausted and after consideration of an alternate part from an authorized source. The use of independent distributors requires the approval of the customer or the approval of the President of the company. When independent distributors are used, they should be certified to AS6081 or CCAP-101.

Materials and Quality management perform periodic evaluation of suppliers to assure that approved/ongoing sources of supply are maintaining effective processes for mitigating the risks of supplying counterfeit electronic parts and to evaluate overall performance.

Purchased product is verified before use to assure detection of counterfeit parts prior to formal acceptance. The rigor of the verification process shall be commensurate with product risk. Product risk is determined by the criticality of the part and the assessed likelihood of receiving a counterfeit part. Inspection checks the order against purchasing documents to verify the identification, quantity and condition of the items in the order. Verification may include: obtaining objective evidence of the quality of the product from suppliers through documentation, certificate of conformity, test reports etc., review of required documentation, visual inspection of products upon receipt, XRF verification, X-ray inspection, non-destructive evaluation, and destructive testing.

If material is identified as suspect or counterfeit, it will be immediately tagged or marked as counterfeit, segregated, and quarantined. The NCMR process will be followed.

The supplier will be contacted and provided with the data that supports the counterfeit nature of the material. If the vendor contests the determination that the parts are counterfeit then they may request that the parts are sent to an agreed upon independent third-party test house.

If the parts are confirmed to be counterfeit the material must be made unusable and documentary evidence provided to the supplier. Specifically, the parts should be physically destroyed (e.g., grinding, breaking, or crushing) prior to disposal.

Counterfeit parts are reported to the applicable Government authorities, Government reporting organizations (e.g. GIDEP or equivalent), industry supported reporting programs (e.g., ERAI or equivalent), and other authorities having jurisdiction in order that other users at large may become aware of the existence of the material in question and review their own supply chain for any risks as applicable.

Date Issued:
January 27, 2016

Authorized Signature:

A handwritten signature in black ink, appearing to read "James Henderson", with a long horizontal flourish extending to the right.

James Henderson, President