

Counterfeit Parts Policy

Assembly Contract Ltd



The unintentional purchase of counterfeit components and parts is becoming an increasing risk across many industries. The substandard performance of components against expected design criteria poses a threat to the safe operation and performance of products. In order to mitigate the possible risk to ACL and our customers we will carefully select and monitor our suppliers and supply chain via implementation of this policy. To prevent the purchase of counterfeit, suspect or unapproved products, unless supplier is specified by the Customer/Client, we will purchase components directly from:

- **Original Component Manufacturers (OCM)**
- **Original Equipment Manufacturers (OEM)**
- **Authorized Franchised Distributors**
- **Approved After-Market Distributors**

The above categories of companies must provide the following documents if applicable or if, when specified for components/parts/product:

- **Certificate of Conformance back to the OEM or OCM**
- **Certificate of Conformance from Authorized Franchised Distributors**
- **Supply Chain Traceability and Ownership**
- **Product specification tests and inspection requirements (as requested).**

ACL carefully selects and monitors our suppliers by utilizing a variety of criteria, including rigorous inspection procedures for counterfeit detection. Unless supplier is specified by the Customer/Client the criteria used to assess supplier compliance for counterfeit avoidance includes one or several of the following:

- **ISO 9001 Certification or Compliance (International Standards for Organizations)**
- **AS9100 Certification or compatibility (Aerospace Standard)**
- **AS5553 Compliance (Counterfeit Electronic Parts; Avoidance, Detection, Mitigation, and Disposition)**
- **AS9120 Compliance (Aerospace Requirements for Distributors)**

Due to an ever increasing demand for obsolete parts in the industries we serve and the products we manufacture for our Customers/Clients, counterfeit has been identified as a growing risk within this market if ignored. Assembly Contracts Ltd will proactively address potential obsolescence issues along with suggested alternatives as appropriate. Purchasing reviews all items for end of life data as required along with PCNs and EOL documents received with notifications emailed to Customers/Clients as applicable. Where the Customer is responsible to this end we will work with them to mitigate obsolescence risk. Hard-to-find or obsolete products may not always be available from these primary sources. In such instances, it may be deemed necessary to attempt to source components through non-approved sources. In this case we must always seek approval in writing from our Customers/Clients or appropriate authority prior to purchase.

A handwritten signature in grey ink, appearing to read 'Lee Williams'.

(Lee Williams Operation/Production Director)

Ref No: ACL-CPP-01

Owner: Operation/Production Director

Date: 4th Feb 2019

Issue: 01