

Counterfeit Product Prevention Policy

for Purchased Product

1. PURPOSE

To protect Pointe Precision Inc., our supply partners and ultimately our customers from the introduction of counterfeit or questionable traceable components/material into our end products. This procedure was developed in support of customer requirements and AS6174.

2. SCOPE

This policy applies to all components or raw material delivered to Pointe Precision Inc., either in assemblies or as individual component. Pointe Precision Inc.'s supply partners are required to purchase from OCM, OEM, or authorized distributors for such OCM/OEM, as sole and exclusive sources for all components or raw materials to be delivered to Pointe Precision, Inc. and to obtain and retain written records for such. Suppliers shall provide a C of C for all components / raw materials to be provided to Pointe Precision, Inc. (upon request). These certifications will be maintained on file as described within applicable Pointe Precision, Inc.'s purchase order and in compliance with AS9100 requirements.

3. DEFINITIONS

Counterfeit Product – Willful intent to misrepresent materials, components or their certification.

OCM – Original Component Manufactures

OEM – Original Equipment Manufactures

C of C – Certificate of Conformance or Certificate of Compliance

Authorized/Franchised distributors – Those distributors with which OCM/OEM have contractual agreements identified them as “Authorized” or in a like manner to buy, stock, re-package, sell and distribute their product lines.

Non-Authorized Suppliers/Brokers – A Non-Authorized/Franchised distributors, Independent distributors or any organization other than an OCM, OEM or their Authorized/Franchised distributors.

4. SUPPLIER RESPONSIBILITY

All suppliers are required to take the following actions:

- A. Implement and enforce a written Counterfeit Parts Prevention and Control Plan designed to preclude, detect, and remove any counterfeit components from all deliveries to Pointe Precision, Inc. As an integral part of this plan the supplier shall maintain a database of counterfeit components received and applicable source data.
- B. As a best practice review and to confirm internal procedures are appropriate and effective
- C. Implementation of this policy to eliminate counterfeit components from all products.
- D. Ensure this policy and the expected actions are communicated to quality and business leaders throughout your company.

- E. Review the above policy and provide written confirmation of compliance to Pointe Precision, Inc.
- F. Supplier shall provide written notification to Pointe Precision Quality Manager and Purchasing Department within 24 hours if supplier becomes aware or suspects that it has furnished Counterfeit Goods to Pointe Precision, Inc. Suppliers shall provide to Pointe Precision Quality Manager and Purchasing Department upon request, the supply chain traceability to an Original Manufacture or authorized distributor chain that identifies the name and location of all the supply chain intermediaries from the part manufacturer to the direct source of the product. Supplier shall have a documented process in place to ensure Counterfeit goods are contained and do not reenter the supplier chain.
- G. Supplier shall include this clause or equivalent provisions in lower tier subcontracts for the delivery of items that will be included in or finished as goods to Pointe Precision, Inc. as applicable.

5. USE OF NON-AUTHORIZED SUPPLIER

The use of Non-Authorized suppliers without express written consent by Pointe Precision Inc. is hereby strictly prohibited. Should business reasons (obsolescence, cost, lead time, customer commitments, etc.) dictate the use of such suppliers, the following process is required:

- A. Supplier shall notify the supply chain representative of Pointe Precision Inc. (in writing) of a requirement to utilize a non-authorized source.
- B. Supplier shall provide specific details regarding the suggested source, the known details on component pedigree, suggested verification/test plan.
- C. Supplier shall submit Pointe Precision approval and signoff.
- D. Pointe Precision shall review the supplier request and will either approve, reject, or return with comments of requested changes including but not limited to additional or alternative verification requirements. Visual inspection, part marking inspection, and C of C shall be included as critical verification.
- E. Should Pointe Precision provide approval, the supplier shall provide a C of C, verification documentation and any test results prior to shipment to Pointe Precision.
- F. Supplier is not approved to deliver product(s) to Pointe Precision until signed approval is provided, confirming compliance to the details agreed upon in the approved supplier request notification.

Signature below acknowledges receipt and acceptance of policy. Not acceptance and return of this document will result in your company being listed as high risk and may affect future orders. Please attach a document listing any exceptions to this policy for review by Pointe Precision.

Company Name	Authorized Signature	Title
	Printed Name	Date
Pointe Precision Approval Signature: _____		Date: _____