

1. Purpose and Scope:

This document describes the processes to be followed in order to prevent the procurement, receipt and use of materials into any company product and services of Counterfeit Parts. This document applies to the purchasing/procurement activities within CW-901D.

2. Applicable Documents:

- 2.1 CW-901D Quality Manual (PM-01)
- 2.2 CW-901D Standard Purchase Order Terms and Conditions (WI-12-002)
- 2.3 CW-901D Standard Quality Clauses (WI-13-001)
- 2.4 SAE International Standard: AS5553, Counterfeit Electronic Parts; Avoidance, Detection, Mitigation and Disposition
- 2.5 SAE International Standard AS6174: Standard for Assuring Acquisition of Authentic and Conforming Material
- 2.6 CW-901D Discrepant Material Report (QF-08)

3. Definitions:

- 3.1 GIDEP - Government Industry Data Exchange Program.
- 3.2 OEM - Original Equipment Manufacturer: Person or entity that designs, engineers and/or manufactures a physical component and has obtained (or is lawfully pursuing) the intellectual property rights to make or have made such component.
- 3.3 Suspect Part - a part in which there is an indication by visual inspection, testing or other information indicating the item may have been misrepresented by the Supplier or Manufacturer.
- 3.4 Counterfeit Part - a suspect part identified as a copy or substitute without the legal right or authority to do so or a part whose material, performance or characteristics are knowingly misrepresented by a Supplier in the Supply Chain. The Counterfeit Parts include, but are not limited to:
 - Parts not containing the proper internal construction (die, manufacturer, wire bonding, etc.) consistent with the ordered part.
 - Used, refurbished or reclaimed parts represented as new product.
 - Parts with a different package style, type or surface plating/finish than the required or ordered product.
 - Parts not successfully completing the full production and/or test flow of the Original Component Manufacturer (OCM) that are represented as completed product.
 - Parts sold or delivered with modified labeling or markings intended to misrepresent the form, fit, function or grade of the intended product.
- 3.5 Authorized Supplier - is the OEM, or a reseller/distributor authorized by the OEM.
- 3.6 Broker - in the independent distribution market, brokers are professionally referred to as an Independent Distributor.

4. Responsibilities:

- 4.1 Purchasing department is responsible to procure the correct part/material using the applicable drawing, specification, description or other information to ensure the product meets the customer's requirements and intended use.
- 4.2 CW-901D Design and Configuration Management. Engineering department is responsible for ensuring designs and assemblies meet customer expectations and meet all applicable regulatory and statutory regulations.
- 4.3 Quality Control (QC) department ensures all products received meet PO requirements and ensures parts are received from the OEM or approved distributor. QC also provides training on counterfeit parts prevention awareness.

5. Procedures:

- 5.1 Whenever possible, parts shall be obtained from Authorized Suppliers.
- 5.2 CW-901D Purchasing department is responsible for verifying that considered sources of supply for a given part are Authorized Suppliers.
- 5.3 If no Authorized Supplier is found, CW-901D will notify the Project Manager in Charge of the project on which the part is used. The Project Manager will then contact the customer to either request or propose an alternate source of supply. Any source of supply that is not an Authorized Supplier shall be approved by the customer on a case-by-case basis.
- 5.4 All CW-901D suppliers are required to provide a Certificate of Conformance (CofC) REF: Standard PO Terms and Conditions (WI-12-002).
- 5.5 Purchasing must specify the flow down requirements from the Counterfeit Parts Procedure applicable to the supplier or subcontractor. Purchasing must perform some level of risk assessment if the supplier or subcontractor does not maintain a documented counterfeit part control plan.
- 5.6 In order to minimize the risk of procuring counterfeit parts the Purchase Order must specify requirements to ensure conforming, original and authentic parts are provided. The Purchase Order may list requirements for certification and traceability; deliverable record of test and/or inspection results; and Quality Management System requirement for the supplier.
- 5.7. The CW-901D Quality Department Personnel receiving, inspecting or processing parts/material must examine the product to ensure the drawing, specification, type, class, style, part number, manufacturer, certificate of conformance or other related information is present to detect or identify suspect or counterfeit parts.
- 5.8 Suspect or counterfeit parts shall be quarantined and recorded on a CW-901D Discrepant Material Report (QF-08) and reported on the GIDEP web site within 30 days. Additionally, CW-901D will notify any and all potentially affected customers directly, if the suspect part affects any product that had been received prior.
- 5.9 Purchasing Department shall review on a regular basis all GIDEP alerts and notify the Quality Assurance Manager if an alert pertains to a part currently in stock or being procured.

- 5.10 In the event the Purchasing Department cannot procure a needed component from an OCM, then a Broker may be utilized. The Broker being utilized must be able to provide evidence that the part being procured, is traceable back to the OCM, via the documentation, if the Broker, cannot provide the needed traceability, this Broker will not be utilized to provide the component.
- 5.11 CW-901D will provide training, to all required employees, as needed so that a full and complete understanding of counterfeit parts detection and reporting of same, is understood.
- 5.12 CW-901D Purchasing will verify any and all franchised agreements, between CW-901D and Brokers, to assure that the Broker, can continue to supply an item prior to placing a purchase order with the Broker. Certified documentation is required, as evidence, listing availability on a Broker website does not constitute that the Broker can supply the OCM part.
- 5.13 CW-901D suppliers will be held accountable for the parts they provide to CW-901D to assure that no malpractice - (Fraudulent) product or practices is/are provided, this will be flowed down to the suppliers through CW-901D's Terms and Conditions.