

Counterfeit Prevention Policy

Purpose

This policy establishes the procedures and responsibilities necessary to prevent the procurement, use, and distribution of counterfeit or suspect counterfeit electronic components and materials within Advanced Assembly Solutions Ltd operations. It is designed to comply with AS9100 (Rev. D or latest version), particularly clause 8.1.4, and aims to ensure the integrity of products delivered to our aerospace, defence, and other critical industry customers.

Scope

This policy applies to all employees, departments, subcontractors, and suppliers involved in the procurement, receipt, inspection, handling, assembly, and delivery of electronic components and materials used in Advanced Assembly Solutions Ltd products and services.

Definitions

Counterfeit Part: An unauthorized copy, imitation, substitute, or modified part which is knowingly misrepresented as a genuine part from the original component manufacturer (OCM) or original equipment manufacturer (OEM).

Suspect Counterfeit Part: A part in which credible evidence (e.g., test failure, markings, documentation) indicates it may be counterfeit.

Authorized Supplier: A supplier that has been authorized by the OCM/OEM to distribute their products.

Policy Statement

Advanced Assembly Solutions Ltd is committed to ensuring that only genuine, conforming, and traceable materials are used in our manufacturing processes. The introduction of counterfeit materials poses a significant safety and reliability risk and will not be tolerated. All procurement and quality assurance activities must include controls to detect, prevent, and respond to counterfeit parts.

Supplier Requirements

To mitigate the risk of counterfeit parts:

- Suppliers must procure components only from OEMs, OCMs, or their authorized distributors.
- Suppliers must provide full traceability to the original manufacturer.
- Certificates of Conformance (CoCs) and, where applicable, test reports must accompany all shipments.
- Suppliers must notify Advanced Assembly Solutions Ltd immediately if they become aware of counterfeit or suspect counterfeit parts in their supply chain.
- All suppliers must adhere to the requirements of AS9100 and AS5553 (or equivalent).

Internal Controls and Responsibilities

Procurement: All orders for electronic components must be purchased from the approved suppliers list.

Receiving Inspection: Incoming materials shall be inspected for authenticity through visual, functional, and documentation checks.

Quality Management: Maintains a list of approved suppliers and conducts audits to verify their adherence to counterfeit prevention measures.

Disposal Of Packaging: AAS ensures all component and material packaging is correctly disposed of (e.g. part numbers removed) to prevent being reused with counterfeit components and materials.

Suspect/Confirmed Counterfeit Handling

Any part suspected to be counterfeit must be quarantined and reported to the Quality Director immediately.

Suspect components shall not be used in any product and must be segregated from conforming stock.

Confirmed counterfeit components will be reported to the relevant authorities (e.g., GIDEP, customers, law enforcement) and disposed of in a controlled manner to prevent re-entry into the supply chain.

Training and Awareness

All employees involved in material handling, procurement, and quality assurance shall receive regular training on counterfeit part awareness, detection, and reporting in accordance with AS9100 and industry best practices.

Record Keeping

Records of supplier qualification, purchase traceability, inspection results, and counterfeit investigations shall be maintained per Advanced Assembly Solutions Ltd document control and retention policies.

Continuous Improvement

This policy will be reviewed annually, or more frequently as necessary, based on changes in industry standards, customer requirements, or internal risk assessments. Lessons learned from incidents or audits will be integrated into training and procedures.

Signed:

Sophie Bill & Shawn Wadham – Managing Directors

