

## Counterfeit Part Policy

### **1. PURPOSE**

To protect Habco Tool and Development Company, our supplier partners, and ultimately our customers from the introduction of counterfeit or questionable traceable components into our end products.

### **2. SCOPE**

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

### **3. BACKGROUND**

Some of Habco Tool and Development Company's customers are requiring their suppliers to implement a counterfeit policy with their suppliers.

### **4. DEFINITIONS**

*OCM* – Original Component Manufacturers

*OEM* – Original Equipment Manufacturers

*C-of-C* – Certification of Conformance

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

*Non-authorized supplier* – Brokers, Non-Franchised distributors, Independent distributors or any organization other than OCM, OEM or Authorized/Franchised

### **5. SUPPLIER RESPONSIBILITY**

All suppliers are required to take the following actions:

1. Implement and enforce a written Counterfeit Parts Prevention and Control Plan designed to preclude, detect, and remove any counterfeit components from all deliveries to Habco Tool and Development Company. As an integral part of this plan, the supplier shall maintain a database of counterfeit components received, and applicable source data.
2. Habco requires that suppliers review AS6081 for reference, as best practice review, and to confirm internal procedures are appropriate and effective.
3. Actively cooperate with Habco Tool and Development Company in the implementation of this policy to eliminate counterfeit components from all products.
4. Ensure this policy and the expected actions are communicated to quality and business leaders throughout your company.
5. Review the above policy and provide written acknowledgement and confirmation of compliance to Habco Tool and Development.

### **6. USE OF NON-AUTHORIZED SUPPLIERS**

The use of Non-Authorized suppliers without express written consent by Habco Tool and Development 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:

1. Supplier shall notify the supply chain representative of Habco Tool and Development (in writing) of a requirement to utilize a non-authorized source.
2. Supplier shall provide specific details regarding the suggested source, the known details on component pedigree, date code, and a suggested verification/test plan.
3. Supplier shall provide all details in writing on a supplier request form document which includes a customer sign off and approval section.
4. The affected Habco Tool facility (supply chain, quality, and engineering representatives as needed) shall review the supplier request and 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 inspection shall be included as critical verification steps in all such instances.

5. Should Habco provide approval, the supplier shall provide C-of-C, verification documentation, and any test results promptly to Habco.

6. Supplier is not approved to deliver product(s) to Habco until signed approval is provided, and certification of conformance and test results are provided and confirmed to be compliant to the details agreed upon in the approved supplier request form.

## **7. INTERPRETATION**

Habco can be contacted for further interpretation or clarification of this policy.