

COUNTERFEIT PREVENTION POLICY

POLICY STATEMENT

At Flexitallic UK Ltd, safety is our overriding priority, followed by quality and delivery. We believe that the co-operation of our supply chain throughout all tiers is essential to maintaining the highest standards for all the products and services in which we supply.

We recognise the risks and concerns associated the supply of Counterfeit, Fraudulent and Suspect Items (CFSI) within the supply chain, and to this end we only use suppliers that can demonstrate the quality and source of the goods which we require.

Counterfeit, Fraudulent and Suspect Items are those whose age, composition, configuration, certification or any other characteristic are different to those of authentic goods, however, are still represented as original.

Flexitallic UK Ltd is committed to preventing such items from entering our facilities and processes.

All employees who are involved in the purchasing of goods have been trained and made aware of the potential risks associated with CFSI in the supply chain. Where possible, we purchase directly from original manufacturers and only use suppliers who have been rigorously evaluated and approved through our supplier evaluation process.

Any occurrences of counterfeit parts or material identified at Flexitallic UK Ltd or within the supply chain will be reported, as appropriate, to customers, government reporting organisations, industry supported reporting programs, and criminal investigative authorities.

These items will then be subject to our **Counterfeit Product Control Procedure** where they will be controlled in order to avoid them re-entering the supply chain.

The Managing Director of Flexitallic UK Ltd or his nominee is responsible for the development and implementation of this policy and for ensuring that the necessary resources are provided for its implementation within our Business Management System.

A handwritten signature in black ink, appearing to be "MH" or similar initials.

Mark Horton
President and Managing Director
Flexitallic UK Ltd
Date: 15/12/2023

CFSI Risk Mitigation

Flexitallic UK Ltd have a number of processes in place to mitigate the risk of Counterfeit, Fraudulent and Suspect Items, as stated below:

Purchasing:

- All suppliers are thoroughly evaluated on an ongoing basis which includes assessment on determining their likelihood of delivering authentic and conforming materials and products.
- Only approved suppliers are used to purchase materials and products.
- Material and products are purchased in accordance with specifications, purchase orders submitted to approved suppliers specify the flow down of CFSI requirements.

Goods In:

- Materials and products are supplied with certification which is checked during the Goods In process with the aim to detect any CFSI's prior to acceptance.
- Products and materials are inspected and tested during the Goods In process with the aim to detect any CFSI's prior to acceptance.

Manufacturing:

- During production, excess and nonconforming product is controlled to prevent it from entering the supply chain under fraudulent circumstances.
- Operators visually verify materials for any unusual circumstances or markings that may indicate CFSI's and report it to management if suspicions arise.
- Materials and products are inspected and tested and any non-conformance or CFSI's are subject to the Control of Nonconforming product process.

Goods Out:

- Operators visually verify products during the Goods Out process for any unusual circumstances or markings that may indicate CFSI's and report it to management if suspicions arise.

Identification and Traceability:

- Materials and products requiring traceability are marked in a way that provides this traceability.
- Products and materials are identified throughout all Flexitallic UK Ltd processes to establish what they are and to define their current inspection and test status.

Reporting:

- Any occurrences of counterfeit parts or materiel will be reported, as appropriate, to customers, government reporting organisations, industry supported reporting programs, and criminal investigative authorities.
- CFSI's are controlled and/or destroyed to preclude its use or re-entry into the supply chain.
- Flexitallic UK Ltd management team will oversee these activities.