



1.0 PURPOSE:

1.1 The objective of this policy is to avoid counterfeit parts from entering ETI Systems supply chain and products using ISO 9001:2015 standards.

2.0 SCOPE:

2.1 The policy applies to all ETI products and the employees that purchase, receive, inspect or process them.

3.0 DEFINITIONS:

3.1 Counterfeit Parts: Electronic parts that are an unauthorized copy, imitation, or modified part and knowingly misrepresented as a genuine part of the original manufacturer with the intent to mislead or defraud by presenting the imitation as original or genuine.

4.0 PURCHASING:

4.1 ETI Systems will utilize purchasing controls to procure materials that are manufactured by the original component manufacturers or their authorized distributors. Controls include surveys, audits, product inspections, qualification testing, and risk assessments. All approved suppliers are identified in the ETI Systems Approved Suppliers List.

4.2 Suppliers are required to provide Certificate of Conformance (CoC) that includes Manufacturer name, address, part number and applicable control numbers, certifying that the parts have met customer quality requirements and that all parts are authentic and original.

5.0 INCOMING INSPECTION:

5.1 All incoming parts undergo ETI Systems Incoming Inspection process for part quality and identification.

5.2 Parts that do not pass the Incoming Inspection process are quarantined and subject to the company Non-Conforming Materials process.

6.0 IN-PROCESS INSPECTION:

- 6.1 All parts used during production undergo ETI Systems In-process Inspection for part quality and identification.
- 6.2 Parts that do not pass In-process Inspection are quarantined and subject to the company Non-Conforming Materials process.

7.0 TRAINING:

- 7.1 ETI Systems employees associated with Incoming Inspection and Production are trained to visually identify parts that might not be original parts and could be suspected of counterfeit parts.
- 7.2 Any suspected observations will be brought to the attention of the Quality Assurance Manager.

8.0 QUARANTINING & REPORTING:

- 8.1 If there is suspicion of a part being Counterfeit, such parts will be removed from Receiving Area, Stock Room or Production Floor and will be quarantined for investigation. Such parts will be clearly labeled with a Red Tag for review by Quality Assurance.
- 8.2 Purchasing & Quality Assurance will further investigate the suspect parts and actions will be taken as necessary.
- 8.3 When suspect parts are either confirmed or have high probability of being counterfeit, then the part supplier, GIDEP and other applicable government or regulatory reporting agencies or organizations will be notified.
- 8.4 In the event a customer has received products with counterfeit parts, the customer(s) will be notified of such incidents and arrangements will be made to recall such products for corrective action. Any products in stock with such counterfeit parts will be reworked as per the corrective action to remove counterfeit parts from finished goods.

9.0 TRACEABILITY:

9.1 ETI Systems product batch codes enable the original component and any sub-component to be traced back to their origin.

10.0 PART AVAILABILITY

10.1 Purchasing controls will permit the use of available, authentic, original, and qualified parts.

10.2 When a part is no longer available or is going to become obsolete, ETI will notify the customer for proposed actions.