



Counterfeit Parts Prevention

1.0 Purpose

The purpose of this document is to describe the process performed to prevent the purchase and / or use of Counterfeit Parts and to outline the Detection, Mitigation and Disposition.

- a. Maximize availability of authentic parts.
- b. Procure parts from reliable sources.
- c. Assure authenticity and conformance of purchased product.
- d. Control parts identified as counterfeit.
- e. And Report counterfeit parts to other potential users and Government investigative authorities.

2.0 Scope

This document applies to the procurement activities of MilAero Electronics

3.0 Applicable Documents

- AS9100 REV C, Quality Management System Requirements
- QCP- 11.0, Control of Non Conforming Products
- QCP- 6.0, Purchasing

4.0 Definitions

4.1 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 and may in turn meet the definition of a Counterfeit Part.



4.2 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:

4.2.1 Parts not containing the proper internal construction (manufacturer, wire bonding, etc.) consistent with the ordered part.

4.2.2 Used, refurbished, or reclaimed parts represented as new product.

4.2.3 Parts with a different package style, type of package, or surface plating/finish than the required or order product.

4.2.4 Parts not successfully completing the full production and/or test procedures of the Original Component Manufacturer

4.2.5 Parts sold or delivered with modified labeling or markings intended to misrepresent the form, fit, function, or grade of the intended product.
Note: Refinished, or updated parts identified accordingly are not considered counterfeit product.

4.3 Aftermarket Manufacturer – A manufacturer meeting one or more of these criteria:

4.3.1 A manufacturer authorized by the original component manufacturer to produce or provide replacement parts. The parts supplied originate from the original component manufacturer to the aftermarket manufacturer.

4.3.2 The manufacturer produces parts using tooling or equipment manufactured by and traceable to an Original Component Manufacturer that was properly stored until use. The parts are subsequently assembled, tested, and qualified using processes meeting the technical specifications without violating the intellectual property rights, patents, or copyrights of the Original Component Manufacturer.

4.3.3 The manufacturer produces parts by emulation, reverse engineering, or redesign using processes matching the Original Component Manufacturer specification. The parts must meet the Customer needs without violating the OCM intellectual property rights, patents, or copyrights.

4.4 Approved Supplier – Suppliers who are formally assessed and determined to have a low risk of providing counterfeit product.



4.5 Franchised Distributor – A distributor with which the Original Component Manufacturer has a contractual agreement to buy, stock, re-package, sell and distribute its product

4.6 Independent Distributors – A distributor that purchases new parts with the intention to sell and redistribute them back into the market. Purchased parts may be obtained from original equipment manufacturers (OEM's) or contract manufacturers (typically from excess inventories), or from other independent distributors. Re-sale of the purchased parts (re-distribution) may be to OEM's, contract manufactures, or other independent distributors

4.7 Used – Electrically charged parts removed from a prior application. Parts should be examined for nonstandard packaging, mixed lots / dates, parts from various sites, scratches, bends, test dots, faded marking, chemical residue, or other signs of use. Used parts should be declared accordingly.

5.0 Responsibility

Purchasing, engineering, Operations and other associates as appropriate or required are responsible to comply with the requirements and processes identified in this document.

5.1 Purchasing is responsible to procure the correct part using the applicable drawing, specification, description, or other information.

5.2 Engineering is responsible to ensure the drawing, specification, process, or description identifies the applicable type, class, style, part number, manufacturer, or other related information so the correct part or product is identified.

5.3 Receiving Inspection/Quality Manager is responsible to examine, inspect, and/or maintain the parts to identify or mitigate the receipt and/or use of counterfeit parts.

6.0 Procedure

6.1 Part Availability: The processes shall maximize availability of authentic, originally designed and/or qualified parts throughout the product's life cycle, including management of parts obsolescence.

6.2 Purchasing to examine a potential source of supply and assess the risk of receiving counterfeit parts. Assessment may be a survey, audit and a review of the supplier quality data to determine performance.



6.3 Purchasing must maintain a list of suppliers to minimize the risk associated with the supply and / or receipt of counterfeit parts. (REF. Form # -Approved Supplier List)

6.4 Purchasing should focus buying efforts to obtain parts directly from a Manufacturer , approved distributor, authorized resell organization, or franchised aftermarket supplier.

6.5 Assure that approved sources of supply are maintaining effective processes for mitigating the risks of supplying counterfeit parts. At a minimum, the supplier should be required to provide certificates of conformance and acquisition traceability. These certification requirements must be clearly identified on the purchase document as deliverable data.

6.6 Purchasing must specify the flowdown 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. (REF. Supplier RA Survey)

6.7 The purchase order must specify the applicable requirements of the Counterfeit Part Procedure to the supplier to minimize the risk of receiving counterfeit parts. In order to minimize the risk of procuring counterfeit parts the purchase order should include requirements to ensure conformance, and authentic parts are provided. The purchase order will also list certification or traceability requirements, test and / or inspection results and Quality System requirement for the supplier.

6.8 Receiving inspectors, or personnel processing parts 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. Suspect or counterfeit parts are then placed on a nonconformance report so the items may be identified and moved to the quarantine cabinet.

6.9 This procedure shall assure that all occurrences of counterfeit parts are reported to customers, government reporting organizations.

7.0 Verification

MilAero Electronics considers the due diligence applied to the material purchased successful when this procedure is followed and when finished product meet the test or inspection requirements identified for the product or the standard established for the product. A failed Product does not mean that it is/was caused



by a counterfeit part. MilAero Electronics QA department, must verify the cause of the nonconformance and disposition the defect per QCP-11.0 Control of Nonconforming Product. This procedure will apply if the deficiency is suspected or connected to a counterfeit part.