

Counterfeit Component Process

1.0 Purpose:

This procedure describes the Anti-Counterfeit Control Plan at Eddy Pump Corporation in compliance with AS6496 Fraudulent/Counterfeit Electronic Parts; Avoidance, Detection, Mitigation, and Disposition.

2.0 Scope:

This procedure applies to all employees, product purchases and customer returns.

3.0 Responsibility

The Vice President of Operations is responsible for the final review and approval of this procedure. Employees with responsibilities for purchasing, receiving, or verifying parts shall also be responsible for compliance to this plan.

4.0 Detailed Procedure:

4.1 Anti-Counterfeit Policy

The following policy has been reviewed and approved by executive management.

Anti-Counterfeit Policy

Eddy Pump has adopted this Anti-Counterfeit Policy to eliminate the impact of counterfeit products on Eddy Pump and its customers.

This is a zero tolerance Policy against knowingly and intentionally trafficking in counterfeit goods.

To support this policy of ensuring that there is a low risk of counterfeit products entering our supply chain, Eddy Pump maintains processes to ensure purchases are only made directly from the Manufacturer or Manufacturer approved sources. This is accomplished through: Avoidance, Detection, Mitigation, and Disposition.

Should a suspect counterfeit or counterfeit product be found, Eddy Pump shall quarantine such material and report the finding to the supplier and appropriate authorities. This policy shall be communicated, understood, implemented, and maintained at all levels within Eddy Pump.

This policy shall be posted on [Eddy Pump's Web Site](#). It is also contained in this plan where it shall be available for the customer's records. This Policy shall also be communicated to all employees through meetings, Quality Awareness Training and postings.

4.2 Anti-Counterfeit Control Plan

This plan has been developed to give sufficient detail and/or references to other plans, procedures or records. This plan is for customers and Eddy Pump employees. It shall be posted on [Eddy Pump Web Site](#).

4.3 Customer Related Processes

4.3.1 Disclosure of Non-Authorization

It is Eddy Pump's plan to only perform Authorized Distribution. If this plan is changed and Eddy Pump agrees to perform unauthorized distribution, Eddy Pump shall notify the customer at the time of quote. When authorization is terminated, customers with outstanding orders shall be contacted.

4.3.2 Provision of Manufacturer's Warranty

In accordance with Manufacturer distribution agreements, Eddy Pump shall pass on applicable warranty and support such warranty.

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4.4 Register of Suppliers

Eddy Pump maintains an ERP database of suppliers.

4.4.1 Purchase Restrictions

Eddy Pump shall only purchase parts for resale from the Manufacturer or from the Manufacturer's Authorized Distributor.

4.4.2 Purchasing Preference

Eddy Pump has a preference to purchase Parts for resale directly from the Manufacturer.

4.5 Traceability, Record Retention and Retrievability

Eddy Pump retains maintains electronic records of procurements.

4.5.1 Provision of Traceability

Under normal circumstances Manufacturer provided records of product origin are not provided to customers on Commercial and Industrial Parts. When warranted by special circumstances or contract, Manufacturer provided records of product origin shall be provided to customers.

4.5.2 Retention Period

Manufacturer provided records of product origin are maintained electronically.

4.5.2.1 Records from Manufacturers shall be maintained as received. Scanning programs shall be suitable to produce readable copies of original forms. If any scanned document is not readable, reproductions from the Manufacturer shall be used.

4.5.3 Certificate of Conformance

Eddy Pump's Certificate of Compliance as requested by contract.

- (a) The Commercial Certificate of Compliance contains language as follows:

CERTIFICATE OF COMPLIANCE – Eddy Pump Corp. hereby certifies that the products furnished on this shipment were manufactured/purchased solely from original manufacturer or through the manufacturer's authorized distribution for component parts. The original manufacturer warrants and certifies that the products they produce meet their specifications. Evidence of this warranty and certification is maintained at the manufacturer and/or at Eddy Pump. This pack list is the Evidence of Conformity that this shipment meets the requirements of Eddy Pumps's Quality Management System and/or Customer Purchase Order requirements agreed on between Eddy Pump and Customer. Environmental

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compliance per producer documentation.

4.6 Control of Suspect, Fraudulent and Confirmed Counterfeit Parts

Eddy Pump has several processes imbedded into the QMS that evaluate and minimize the risk associated with potential counterfeit product infiltrating into Eddy Pump's inventory.

Rev	Date	Section	Paragraph	Summary of change	Authorized by
A	19MAR21			Initial issue	K. OSullivan