

1.0 PURPOSE

1.1 This procedure describes the Anti-Counterfeit Control Plan at MCV Microwave.

2.0 SCOPE

2.1 This document applies to all Quality processes within the MCV Quality Management System.

3.0 PROCESS OWNER

3.1 Quality Manager is the owner of this document.

4.0 REFERENCE DOCUMENTS

4.1 AS-QM-9100-001 MCV Quality Management Systems (QMS) Manual

4.2 AS-QP-560-001 MCV Management Review Procedure

5.0 DEFINITIONS

5.1 Quality Management

6.0 RESPONSIBILITIES & AUTHORITY

6.1 The Quality Manager 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.

7.0 PROCESS DESCRIPTION

7.1 Anti-Counterfeit Policy

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

MCV has adopted this Anti-Counterfeit Policy to eliminate the impact of counterfeit products on MCV and its customers. This is a zero tolerance Policy against knowingly and intentionally trafficking in counterfeit goods.

To ensure that there is a low risk of counterfeit products entering our supply chain, MCV maintains processes to ensure purchases are only made directly from the Manufacturer or Manufacturer approved sources.

Should a suspect counterfeit or counterfeit product be found, MCV 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 of the Organization.

This Policy shall be communicated to all employees through meetings and postings.

7.2 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 MCV employees.

7.4 Register of Suppliers

MCV maintains a register of suppliers in compliance with AS9100.

7.4.1 Purchase Restrictions

MCV shall only purchase parts from the Manufacturer or from the Manufacturer's Authorized Distributor. When MCV purchases from an Authorized Distributor the distributor's authorization with the manufacturer shall be verified and documented.

7.5 Traceability, Record Retention and Retrieval

MCV retains and maintains records of product origin per AS9100. They are maintained for a minimum of 5 years per MCV document procedure.

7.5.3 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.

7.5.4 Retention Period

Manufacturer provided records of product origin are maintained for a minimum of 5 years per MCV document control procedures.

7.5.5 Certificate of Conformance

MCV's Certificate of Conformance is printed on every packing list.

7.6 Control of Suspect, Fraudulent and Confirmed Counterfeit Parts

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

7.6.1 Customer Returns

7.6.1.1 Return Policy

MCV shall issue an RMA to a customer when a Return is authorized.

7.6.2 Supplier Shipments

Manufacturers and other Authorized distributors are very low risk for counterfeit. Therefore inspection shall consist of count, kind, condition and documentation. The Quality Manager shall monitor this risk and revise this plan when warranted. MCV shall review documents supplied from the supplier with the shipment and ensure the shipment is from the intended supplier per the Purchase Order.

7.6.3 Disposition of Parts Deemed Suspect, Fraudulent or Counterfeit

Suspect Fraudulent and Counterfeit parts are treated as non-conforming product per AS9100 and dispositioned per non-conformity procedures in Returns and Products.

- A.** Records of the dispositions shall be maintained.
- B.** Suspect Parts may be returned to the Manufacturer for analysis and disposition to confirm their status as counterfeit or not counterfeit.
- C.** Confirmed Counterfeit Parts shall not be returned to the Customer and may be retained for investigative or training purposes. The Organization shall quarantine the Parts for 5 years, or longer, if required by legal requirements.
- D.** After 5 years or when legal requirements allow, the confirmed Counterfeit Parts shall be scrapped.

7.7 Training

Employees in Quality and Material Control shall be trained on their processes to prevent counterfeit. This training shall be documented in training requirements per applicable position

7.8 Inventory Control Plan

MCV has an inventory control system which provides for traceability of all stock movements. Customer Returns shall be traceable.

7.8.1 Segregation of Product

MCV intention is to only be authorized, if unauthorized stock is received by MCV, MCV shall treat it as suspect and scrap appropriately.

7.8.2 Traceability of Returned Parts

Customer returns are traced in the inventory control system. Customer Returns are not commingled with new and unused parts. There is sufficient capacity to exclude customer returns. Records of customer returns are maintained.

7.9 Reporting

Reporting on confirmed counterfeit parts shall be authorized by the Quality Manager. The Vice President of Quality Manager shall make appropriate reports to executive management, affected Customers and affected Manufacturer. Confirmed counterfeit can only be determined by the Manufacturer. The Quality Manager will report confirmed counterfeit incidents through GIDEP.

7.10 Audits

This anti-counterfeiting plan and referenced processes are listed and scheduled for internal audit. This also makes the plan part of MCV's QMS and subject to our third part registrar to AS9100.

7.11 Counterfeit Awareness

The Quality Manager is responsible for keeping informed on current counterfeiting information and trends, including detection and avoidance techniques contained in appropriate industry standards, and using such information and techniques for continuously upgrading internal processes.

7.12 GIDEP Participation

The Quality Manager shall ensure MCV is a member of GIDEP. The Quality Manager shall screen GIDEP reports and other credible sources of counterfeiting information to avoid the purchase or use of counterfeit electronic parts.

ECO #	REV	DATE	DESCRIPTION OF CHANGE	D.C. APPROVAL
1031	A	07/09/2018	Initial Release	T. Hedrick
	B	08/28/2022	Update company logo	