

Description: PREVENTION OF COUNTERFEIT PARTS		Level 2
COUNTERFEIT PARTS/MATERIALS	Revision: A	
	Date:1	0/23/23
Document owner:	Page	: :
Purchasing		1 of 5

Approval	Phuchalik,	Digitally signed by Pam Michalik Date: 2023.10.26 16:26:54 -05'00'
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Title:	PREVENTION OF COUNTERFEIT PARTS AND MATERIALS
Purpose:	Establish Procedure for Fraudulent/Counterfeit Parts and/or Assuring Acquisition of Authentic and Conforming Material
Departments Responsible:	PURCHASING
Level II (ref)	PURWI 8.1.4 Prevention of Counterfeit Parts and Materials
Level III (ref)	ER 7.2 Training Record
Industry Reference	AS5553 Fraudulent/Counterfeit Parts AS6174 Counterfeit Material AS9120 QMS Requirements for Aviation, Space and Defense Distributors APPENDIX QX Supplier Quality Requirement

1.0 Purpose:

The purpose of this procedure is to document the necessary avoidance, detection, mitigation, and disposition processes to prevent counterfeit parts, and or materials from entering into our customer's supply stream, thereby enabling the fulfillment of our customers' requirements, and continued customer satisfaction.

This procedure establishes and documents counterfeit parts risk mitigation methods to enable:

- a. Maximizing the availability of authentic parts
- b. Procuring parts from reliable sources
- c. Avoiding \ mitigating the risks associated with procuring parts from independent distributors or brokers
- d. Assuring authenticity and conformance of procured parts
- e. Controlling parts identified as counterfeit
- f. Reporting counterfeit parts to other potential users and Government investigative authorities

This procedure was developed in support of customer requirements, AS5553 Section 4 (Counterfeit Electronic Parts; Avoidance, Detection, Mitigation, and Disposition), and AS6174 Section 3 (Counterfeit Materiel; Assuring Acquisition of Authentic and Conforming Materiel).

2.0 Scope:

This procedure is applicable to all procured parts and materials that are used to manufacture any Solidiform part, sub assembly, assembly, or finished unit. This procedure shall be flowed down to all applicable Solidiform suppliers.



Description: PREVENTION OF COUNTERFEIT PARTS		Level 2
Document: PURAP 8.1.4 COUNTERFEIT PARTS/MATERIALS	Revision: A	
COUNTERFEIT PARTS/MATERIALS	Date:1	0/23/23
Document owner:	Page	
Purchasing		2 of 5

3.0 Objective:

The Objective of this procedure is to document a process for counterfeit avoidance in accordance with AS6174 section 3, AS5553 section 4, and applicable customer requirements.

4.0 References:

AS5553 (Section 4) Fraudulent\Counterfeit Electronic Part; Avoidance, Detection, Mitigation, and Disposition AS6174 (Section 3) Counterfeit Material; Assuring Acquisition of Authentic and Conforming Materials Appendix QX (Section 1.3) Supplier Quality Requirements

5.0 Procedure:

For purposes of this procedure, the term "goods" consists of those commodities delivered that are the lowest level of separately identifiable items (e.g., articles, components, standard hardware, goods, raw materials, and assemblies). "Counterfeit goods" is defined as

- a). Goods that are, or contains, items misrepresented as having been designed and\or produced under an approved system or other acceptable method.
- b). Goods that are an unauthorized copy or substitute of an Original Component Manufacturer (OCM)\Original Equipment Manufacturer (OEM).
- c). Goods that are not traceable to an OCM\OEM sufficient to ensure authenticity in OCM\OEM design.
- d). Goods that do not contain proper external or internal materials or components required by the OCM\OEM or are not constructed in accordance with OCM\OEM design.
- e). Goods that have been re-worked, re-labeled, repaired, refurbished as OCM\OEM authentic or new.
- f). Goods that have not passed successfully all OCM\OEM required testing, verification, screening, and quality control processes.

The following instructions are the minimum requirements that shall be followed.

5.1 Requirements for Solidiform suppliers

- **5.1.1** Suppliers shall establish and maintain a Counterfeit Parts\Material Prevention and Control Plan using AS5553 (Reference elements of Section 4) and\or AS6174 (Reference elements of Section 3) to ensure that counterfeit goods are not delivered to Solidiform. The purpose of the control plan shall be to develop a robust process to prevent the delivery of counterfeit commodities and control commodities identified as counterfeit.
- **5.1.2** Suppliers shall only purchase products to be delivered or incorporated as goods to buyer directly from the Original Component Manufacturer (OCM)\Original Equipment Manufacturer (OEM), OCM\OEM authorized distributor chain, aftermarket manufacturer, or authorized reseller. These products shall have verification that goods are traceable to OCM\OEM; OCM\OEM authorized distributor chain, aftermarket manufacturer, or authorized reseller that identifies the name and location of all the supply chain intermediaries from the part manufacturer to the direct source of the product. If Goods can only be acquired from independent distributors or brokers in cases of diminishing material supply (DMS) or obsolescence, written notice shall be provided to the Solidiform Quality Manager and Purchasing Department prior to procurement of these goods. After written approval by Solidiform is received by supplier, goods shall be subjected to testing and screening process appropriate to the commodity (in



Description: PREVENTION OF COUNTERFEIT PARTS		Level 2
Document: PURAP 8.1.4 COUNTERFEIT PARTS/MATERIALS	Revisi	on: A
COUNTERFEIT PARTS/MATERIALS		0/23/23
Document owner:	Page) :
Purchasing		3 of 5

accordance with AS5553 and AS6174) using a Solidiform approved third party laboratory. Records of evidentiary tests and inspections performed that ensure verification of the goods shall be provided to Solidiform for review and approval by Solidiform Quality Manager and Purchasing Department prior to delivery. Written notice is not required for raw material and standard hardware purchased from independent distributors or brokers, but products must be able to provide commodity level traceability to the OCM\OEM.

Note: As part of Solidiform's review of written requests to use independent distributors or brokers Solidiform's Quality Department shall review customer requirements plan to ensure compliance prior to providing approval.

- **5.1.3** Supplier shall provide written notification to Solidiform Quality Manager and Purchasing Department if supplier becomes aware or suspects that it has furnished Counterfeit Goods within 24 hours. Supplier shall provide to Solidiform Quality Manager and Purchasing Department upon request, the supply chain traceability to an Original Manufacturer or authorized distributor chain that identifies the name and location of all the supply chain intermediaries from the part manufacturer to the direct source of the product. Supplier shall have a documented process in place to ensure Counterfeit goods are contained and do not reenter the supplier chain.
- **5.1.4** Supplier shall include this clause or equivalent provisions in lower tier subcontracts for the delivery of items that will be included in or furnished as goods to Solidiform as applicable.
- **5.1.5** Suppliers eligible for utilization of the Government-Industry Data Exchange Program ("GIDEP") shall utilize the GIDEP process to alert the industry of encountered counterfeit parts.
- **5.1.6** Supplier shall ensure their Counterfeit Avoidance program includes training of applicable personnel to the requirements within this procedure.

5.2 Requirements for Solidiform

- **5.2.1** Solidiform shall establish and maintain Counterfeit Part Risk Mitigation Control plan using AS5553 (Reference elements of Section 4) and\or AS6174 (Reference elements of Section 3) to ensure that counterfeit goods are not delivered to Solidiform customers. The purpose of the control plan shall be to develop and maintain a robust process to prevent the delivery of counterfeit commodities and control commodities identified as counterfeit.
- **5.2.2** Solidiform shall only purchase products to be delivered or incorporated as goods to buyer or customer directly from the Original Component Manufacturer (OCM)\Original Equipment Manufacturer (OEM), OCM\OEM authorized distributor chain, aftermarket manufacturer, or authorized reseller. These products shall have verification that goods are traceable to OCM\OEM; OCM\OEM authorized distributor chain, aftermarket manufacturer, or authorized reseller that identifies the name and location of all the supply chain intermediaries from the part manufacturer to the direct source of the product. If Goods can only be acquired from independent distributors or brokers in cases of diminishing material supply (DMS) or obsolescence, written notice shall be provided to the Solidiform Quality Manager prior to procurement of these goods by the Purchasing Department. Quality Manager/Quality department shall review applicable customer requirements to ensure compliance. After written approval by Quality Manager is received by the Purchasing Department goods shall be subjected to a testing and screening process appropriate to the commodity (in accordance with AS5553 and AS6174) using a Solidiform approved third party laboratory. Records of evidentiary tests and inspections performed that ensure verification of the goods shall be provided to Quality Manager/Quality Department for review and approval prior to delivery. Written notice is not required for raw material and standard hardware purchased from independent



Description: PREVENTION OF COUNTERFEIT PARTS		Level 2
Document: PURAP 8.1.4 COUNTERFEIT PARTS/MATERIALS	Revisi	on: A
COUNTERFEIT PARTS/MATERIALS		0/23/23
Document owner:	Page) :
Purchasing		4 of 5

distributors or brokers, but products must be able to provide commodity level traceability to the Original Manufacturer.

- **5.2.3** Solidiform Quality Manager shall notify customer within 24 hours if Solidiform becomes aware or suspects that it has furnished counterfeit goods. Format and method of communication shall be based on customer requirements.
- **5.2.4** Solidiform purchasing department shall include this clause or equivalent provisions in supplier contracts or purchase orders for the delivery of items that will be included in or furnished as goods.
- **5.2.5** Solidiform shall utilize the Government-Industry Data Exchange Program ("GIDEP") process to alert the industry of encountered counterfeit parts.
- **5.2.6** If counterfeit goods are discovered by Solidiform counterfeit goods shall be contained and dispositioned in accordance with QAP 10.2 Nonconforming Material.
- **5.2.7** Counterfeit Avoidance program includes training of applicable personnel to this procedure.

End of Procedure



D	Pescription: PREVENTION OF COUNTERFEIT PARTS	3	Level 2	
D	ocument: PURAP 8.1.4 COUNTERFEIT PARTS/MATERIALS	Revisi	on: A	
	COUNTERFEIT PARTS/MATERIALS		Date:10/23/23	
D	ocument owner:	Page):	
	Purchasing		5 of 5	

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NC	AS9100D changed 7.4 to 8.1.4	09/17/17
A	Header format revised, and Added History revision page.	10/23/23