



Counterfeit Detection & Mitigation Policy

Avant Electronics Ltd provides services for the distribution of electronic components incorporating sourcing and supplying of obsolete electronic components for manufacturers and distributors worldwide.

1. Purpose

The purpose of this policy is to establish guidelines for detecting, preventing, and managing counterfeit parts to ensure the integrity and reliability of products in accordance with the AS 9120B and ISO 9001:2015 standards.

2. Scope

This policy applies to all employees, suppliers, and subcontractors involved in the procurement, handling, and distribution of aerospace parts and materials.

3. Definitions

Counterfeit Part: A part that is a copy or substitute without legal right or authority or one whose material, performance, or characteristics are knowingly misrepresented by a supplier.

Suspect Part: A part for which there is an indication that it may be counterfeit.

4. Responsibilities

QA Manager: Ensures compliance with this policy and AS 9120B requirements, conducts regular audits, and oversees the training program.

Procurement Team: Ensures suppliers are evaluated and qualified, and that parts are sourced from approved sources.

Inspection Team: Conducts inspections and tests to verify the authenticity of parts received.

All Employees: Report any suspected counterfeit parts or activities.

5. Supplier Management

Supplier Evaluation: Suppliers are evaluated and approved based on their ability to provide authentic, conforming parts. The evaluation process includes a review of the supplier's counterfeit prevention policies.

Approved Supplier List (ASL): Maintain an up-to-date ASL. Procure parts only from suppliers on the ASL.

6. Incoming Inspection and Testing

Verification Process: All incoming parts are subject to inspection and testing. This includes visual inspection, documentation review.

Documentation Review: Verify the authenticity of certificates of conformance, traceability documentation, and test reports.

Marking and Packaging Inspection: Check for discrepancies in logos, markings, labels, and packaging that may indicate counterfeit parts.



7. Detection Methods

Visual Inspection: Inspect parts for signs of tampering, incorrect markings, and substandard workmanship.

X-ray Analysis: Use X-ray analysis to detect internal defects or discrepancies. (via 3rd party)

Electrical Testing: Conduct electrical tests to verify functionality and performance against specifications. (via 3rd Party)

De-capping: (Via 3rd party)

Component Logging: (via 3rd party)

8. Reporting and Quarantine

Suspected Counterfeit Parts: Immediately report any suspected counterfeit parts to the QA Manager and Operations Director.

Quarantine Procedure: Isolate suspected counterfeit parts in a designated quarantine area. Clearly label and document the parts.

Notification: Notify the supplier and relevant authorities about the suspected counterfeit parts.

9. Training and Awareness

Employee Training: Conduct regular training sessions for employees on counterfeit part detection and prevention.

Awareness Programs: Implement awareness programs to educate employees and suppliers about the risks and identification of counterfeit parts.

10. Corrective Actions

Root Cause Analysis: Perform a root cause analysis for any incidents involving counterfeit parts.

Corrective Action Plan: Develop and implement a corrective action plan to prevent recurrence.

11. Continuous Improvement

Audit and Review: Conduct regular audits of the counterfeit detection process and review the effectiveness of the policy.

Feedback Loop: Implement a feedback loop to capture lessons learned and improve the detection process.

12. Records and Documentation

Record Keeping: Maintain detailed records of inspections, test results, reports of suspected counterfeit parts, and corrective actions.

Retention Period: Retain records in accordance with regulatory and customer requirements.

This policy provides a structured approach to counterfeit detection, aligning with AS 9120B requirements to ensure product integrity and reliability in the aerospace supply chain. Regular review and updates to the policy will help in adapting to new threats and improving the effectiveness of counterfeit prevention measures.

Signed *Rebecca Tyler*

Rebecca Tyler
Managing Director
Avant Electronics Limited

Signed *James Tyler* Dated 27.03.2024

James Tyler
Operations Director
Avant Electronics Limited