



Counterfeit Electrical, Electronic, and Electromechanical (EEE) Parts Plan

Subject: COUNTERFEIT PARTS PREVENTION PLAN

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References /Quality standards used

AS5553B, ISO-9001

BAE Policy ESRF5501.1.2 – Rev 01

BAE Section26_BAECPP

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1.0 Purpose:

The purpose of this document is to describe the procedure for preventing the purchase and/or use of counterfeit parts and to meet the requirements of AS5553 Standard and related customer requirements.

2.0 Scope:

This document applies to the procurement activities at RF-Lambda USA LLC.

3.0 Definitions/Acronyms:

Suspect Part- A part in which there is an indication by visual inspection, testing, or other information that the item may have been misrepresented by the external provider or manufacturer and may meet the definition of a counterfeit Part.

Counterfeit Part- An unauthorized copy, imitation, substitute, or modified part, which is knowingly misrepresented as a specified genuine part of the manufacturer.

Or a previously used EEE Part which has been modified and is knowingly misrepresented as new without disclosure to the customer that it has been previously used.

Aftermarket Manufacture- A manufacturer that meets one or more of the following criteria:

1) The manufacturer is authorized by the OCM (Original Component Manufacture) to produce and sell replacement parts, usually due to an OCM decision to discontinue production of a part. Parts supplied are produced from materials that have been

i. transferred from the OCM to the Aftermarket Manufacturer, or

ii. produced by the Aftermarket Manufacturer using OCM tooling and intellectual property (IP).

2) The manufacturer produces parts through emulation, reverse-engineering, or redesign, that match the OCM's specifications and satisfy customer needs without violating the OCM's Intellectual Property Rights (IPR).

Independent Distributors- Are those persons and/or entities that are not part of an Authorized Distribution Chain. They also may be referred to as un-franchised distributors, unauthorized distributors, or brokers, and they can include U.S. Government sources (e.g., DoD EMALL) where applicable.

Obsolete Electronic Part – An Electronic Part that is no longer in production by the original manufacturer or an aftermarket manufacturer that has been provided express written authorization from the current design activity or original manufacturer.

Original Component Manufacturer (OCM)- Person or entity that designs, engineers, and/or makes an Electronic Part and has obtained (or is lawfully pursuing) the intellectual property rights to make or have made such Electronic Part.

Original Equipment Manufacturer (OEM)- Person or entity that designs, engineers, and/or makes an Electronic Equipment and has obtained (or is lawfully pursuing) the intellectual property rights to make or have made such Electronic Equipment.

Approved Supplier- External providers who are formally assessed and determined to have a minimal risk of providing counterfeit product.

Approved Distributor- A distributor, approved by document from OEM/OCM, that provides OEM/OCM products to customer.

Authorized Supplier- Aftermarket manufacturers and OCM / OEM authorized sources of supply for a specific part.

Certificate of Conformance (C of C)- A document provided by the external provider formally declaring the purchase order requirements are met. The document may include information relative to the manufacturer, distributor, Quantity, date code, inspection date that is signed by a responsible associate for the external provider.

Electrical, Electronic, and electromechanical (EEE) Part- Electrical, electronic, and electromechanical parts are components designed and built to perform specific functions using electricity and are not subject to disassembly without destruction or impairment of design use.

NOTE: Examples of electrical parts include resistors, capacitors, inductors, transformers, and connectors. Electronic parts include active devices, such as monolithic microcircuits, hybrid microcircuits, diodes, and transistors. Electromechanical parts are devices that have electrical inputs with mechanical outputs, or mechanical inputs with electrical

outputs, or combinations of each. Examples of electromechanical parts are motors, synchros, servos, and relays.

Manufacturer: An organization that produces and sells products with legal right or authority under the organization's name or contracts with another to do so; includes Original Component Manufacturer (OCM) and Original Equipment Manufacturer (OEM).

4.0 Responsibilities

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

4.1 Purchasing shall specify on all contracts and/or purchase orders for electrical/electronic parts per paragraph 5.6 below, the requirements for supply chain traceability.

4.2 Purchasing shall document risk assessment for any external provider or subcontractor that does not maintain a documented counterfeit part control plan compliant to the AS5553 Standard. In the event the external provider or subcontractor cannot/will not provide a documented counterfeit part control plan, they will be considered for exclusion from providing parts.

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

4.4 Quality is responsible for inspecting parts to identify whether they are counterfeit and for ensuring parts delivered under contract are not and/or do not contain counterfeit parts.

5.0 Procedure

Planning, Engineering, and Purchasing shall assess the availability of original or authentic product in support of manufacturing. To reduce the risk associated with counterfeit parts lifetime buys, multiple supply sources, and part substitutions may be considered

5.1 Purchasing shall exclusively procure EEE Parts directly from authorized sources, OEM/OCM or authorized OEM/OCM distribution chains and ensure traceability.

5.2 Document and retain objective evidence that the EEE parts supplier is an OEM/OCM or authorized OEM/OCM source.

5.3 Purchasing shall maintain a list of approved suppliers and impose flow down requirements.

5.4 Purchasing shall document risk assessment for any external provider or subcontractor that does not maintain a documented counterfeit part control plan compliant to the AS5553 Standard.

5.5 Planning, Engineering, Quality and Purchasing shall assess and disposition supplied electrical or electronic parts that may be/are determined to be obsolete.

5.6 Purchasing shall specify that the OCM / OEM or aftermarket manufacturer provide traceability requirements (identify the name / location of all supply chain intermediaries from the part manufacturer to the direct source of the product to the seller) when required. At a minimum, a certificate of conformance and acquisition traceability is required back to OCM/OEM.

5.7 Manage and mitigate EEE parts obsolescence. RF-Lambda will monitor end of life notification and consider lifetime buys, alternative/multiple sources, development of new items or sources, redesigns or other appropriate mechanisms to proactively reduce the risk of exposure to suspect or confirmed counterfeit parts.

5.8 Report and quarantine any Suspect Counterfeit Electronic Parts and Counterfeit Electronic Parts and taking corrective action.

6.0 Training

Relevant personnel, including those involved with program management, projects, procurement, quality assurance, inspection, receiving, manufacturing and engineering activities shall be trained as appropriate to their function, in the awareness, avoidance, detection, mitigation and disposition of suspect or confirmed counterfeit EEE parts. Training shall be updated periodically to address changes in counterfeit information and trends