

## Prevention of Counterfeit Materials Policy

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### Policy Statement

Brigitflex does not purchase or use *Electrical, Electronic and Electromechanical (EEE)* parts in our raw printed circuit boards, but we are committed to preventing the introduction of any counterfeit materials into our products. Brigitflex will plan, implement, and control processes appropriate to the organization and the product, for the prevention of counterfeit or suspect counterfeit materials use and their inclusion in product(s) delivered to the customer. The objective of this policy is to avoid counterfeit material (Laminate) entering Brigitflex' supply chain and products, using recommendations and guidelines of SAE Standard AS5553. This control plan shall be maintained, updated, and sustained based on evolving counterfeiting techniques and trends.

### Definition

- Counterfeit Parts/Materials: Electrical, Electronic and Electromechanical (EEE) parts that are an unauthorized copy, imitation, substitute, or modified part but are knowingly misrepresented as a specified genuine part of an original or authorized manufacturer with the intent to mislead or defraud by presenting the imitation as original or genuine.

### Purchasing

- Brigitflex will utilize purchasing controls to procure materials that are manufactured by the original component manufacturers or their authorized distributors. Controls include: surveys, audits, product inspections, qualification testing, and risk assessments. Such suppliers are identified in the Brigitflex Approved Vendor List.
- Laminate suppliers are asked to provide Certificate of Conformance (CoC) that includes Manufacturer name, address, part number and distributor if applicable, certifying that the parts supplied are new and original.

### Part Availability & Obsolescence

- Brigitflex Purchasing will maximize the use of available, authentic, originally designed, and qualified EEE materials throughout the product's life cycle.
- When availability or obsolescence risks are identified, the resolution process should consider: lifetime buys, alternate/multiple sources, adequate procurement lead time, development of new items or sources, redesign, or other appropriate mechanisms to proactively reduce the risk of exposure to suspect counterfeit or counterfeit EEE materials.
- Brigitflex will notify the customer for direction for any identified obsolescence risks and proposed actions.
- In the event that materials are not available due to allocation, obsolescence or other constraints, customer approval will be requested to purchase from non-OEM or non-authorized distributor sources.

### Training

- Brigitflex employees associated with Incoming Inspection and Production will be trained to visually identify laminate that might not be original / new parts and could be suspect for counterfeit parts.

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- Production employees will visually check a sample of materials before they are used in production. Any suspect observations will be brought to the attention of the Plant Manager.

### Quarantining & Reporting

- If it is suspected that there is a possibility of any material being Counterfeit, such material will be removed from Receiving Area, Stock Room or Production Floor and will be segregated in a separate area for investigation. Such parts will be clearly labeled with a Nonconformance Label for review for disposition.
- Purchasing & Quality Departments will be notified about the suspect material. Quality will further investigate the suspect parts and actions will be taken as warranted on a case-by-case basis.
- When suspect materials are either confirmed or have high probability of being counterfeit then the material supplier, material manufacturer and GIPED will be notified.
- In the event a customer has received products with counterfeit parts, the customer(s) will be notified of such incidents and arrangements will be made to recall such products for corrective action. Any products in stock with such counterfeit materials will be addressed as per the corrective action to remove counterfeit materials from finished goods.

### Auditing

- Brigiflex' Internal Audit program addresses the compliance of this control plan to AS5553 and to monitor and assess the effectiveness of the plan.

### Supplier Responsibilities

All Brigiflex Aerospace suppliers are required to take the following actions:

- Implement and enforce a written Counterfeit Parts Prevention and Control Plan designed to preclude, detect, and remove any counterfeit materials from all deliveries to Brigiflex.
- Brigiflex requires that suppliers review AS5553 - Counterfeit Electronic Parts; Avoidance, Detection, Mitigation and Disposition, for counterfeit component/parts avoidance, detection, migration and disposition, as a best practice review and confirm internal procedures are appropriate and effective.
- Actively cooperate with Brigiflex in the implementation of this policy to eliminate counterfeit materials from all products.
- Ensure this policy and the expected actions are communicated to quality and business leaders throughout the company and sub-suppliers.

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