

Fraudulent/Counterfeit Parts Mitigation Policy



It is the policy of TranSpec Fasteners, Inc. (“TSF”) to provide our customers with authentic products by using only approved sources of supply for all purchased product and to detect and prevent the presence of counterfeit and/or suspected unapproved products by requiring full traceability documentation and detailed inspection of purchased product. TSF will not knowingly purchase or sell any counterfeit and/or suspected unapproved product.

A counterfeit product is defined as an unauthorized copy, imitation, substitute, or modified part (e.g., material, part, component), which is knowingly misrepresented as a specified genuine part of an original or authorized manufacture. The misrepresentation can relate to the origin, material, source of manufacture, performance, or other characteristics in question. Examples of counterfeit products are:

- Product with modified markings or labeling intended to misrepresent the form, fit, or function of the product;
- Products that have been intentionally marked to disguise their true origin or to falsely represent the identity of the manufacturer;
- Products that have been used, refurbished or reclaimed but are falsely represented and passed off as “new”;
- Products that have been intentionally misrepresented as meeting third party testing standards, proprietary specifications, government regulations or independent certifications (e.g., UL, CSA, etc.).

Suspected unapproved product is defined as a part for which there is objective and credible evidence indicating that the part is likely an unapproved or counterfeit part.

In accordance with AS9100 and AS9120, TSF maintains a register of its approved suppliers and will only purchase product or services from its approved suppliers. Approval is based on several factors with the main factor being ISO/AS/NADCAP certification. All suppliers are reviewed periodically to maintain their “approved” status.

TSF will flow down all documentation requirements necessary to provide full traceability of the purchased product on the supplier’s purchase order. If full traceability is not available, TSF shall determine what additional testing may be necessary to prove authenticity and determine who will be responsible for such testing.

Upon receipt of all product, TSF will review all supplier-provided documentation and perform a physical inspection. In addition to ensuring that the drawing, specification, part number, manufacturer, and/or other related information is present, documentation will be examined for originality and applicability to the delivered material including:

- Lot and/or date codes on the packaging do not match the lot and/or date codes on the product;
- Manufacturer’s logo or label is absent or does not match that shown on their website or previous shipments;
- Poor use of English, misspelled words, alterations, or changes to the documentation;
- Package materials are inconsistent with the description on the shipment documentation.

Physical inspection will include checking for obvious damage, repackaging, labeling, marking, or other indicators of counterfeit product such as:

- Poor quality part ink laser marking;
- Presence of numerous date codes;
- Markings not consistent with standard marking content and format;
- Lot or date codes not consistent with OEM production records.

TSF is aware that defective or nonconforming product does not automatically mean that it is counterfeit or suspected unapproved product.

Should TSF suspect that the product could be counterfeit, the product will be rejected immediately and placed in the designated secured area that is segregated from other product. TSF will then notify the supplier to either:

- Provide further certifications that the product in question is indeed authentic, or
- Upon agreement with the supplier, TSF shall send a sample to an independent third-party test laboratory for additional testing.

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Should the supplier not be able to provide the necessary further certifications, not agree to the additional testing, or if the product fails such testing, the product will be destroyed at TSF at the supplier's cost and the supplier will be changed to disapproved status.

Under no circumstance will TSF return counterfeit or suspected unapproved product to the supplier or allow it to be shipped to the customer.

Further guidance on counterfeit parts avoidance can be found in the following standards:

- SAE AS6174 – Counterfeit Materiel; Assuring Acquisition of Authentic and Conforming Materiel
- SAE AS6081 – Fraudulent/Counterfeit Electronic Part: Avoidance, Detection, Mitigation, and Disposition - Distributors
- SAE AS5553 – Counterfeit Electrical, Electronic, and Electromechanical (EEE) Parts; Avoidance, Detection, Mitigation, and Disposition

Concerns regarding this policy, or violations, can be reported as follows:

By mail to the attention of Quality Manager at the following address:

TranSpec Fasteners, Inc.
2700 Handley Ederville Road
Fort Worth, TX 76118
(817) 462-9300

Or by email to qualitymgr@transpec.com

Suppliers are encouraged to first contact TranSpec if they have any questions concerning this policy. This policy will be reviewed and updated as needed.