



Compliance statement: 004 rev 1

Counterfeit/Bogus Products/Materials

Glenair is very much aware of the risks and availability/opportunity for unscrupulous suppliers to supply products classed as either bogus or counterfeit to Glenair.

We are also aware of AS5553 created to provide uniform requirements, practices and methods to mitigate the risks of receiving counterfeit parts. Being an AS 9100 accredited company AS5553 sits within our core process of procurement.

The products that Glenair market are, in the main (80%) from within group where full traceability back to the raw material is normal practice, and as such this issue does not arise.

Those products that are not produced within group (15%) are those associated with our business partners where we act as their primary distributors.

For other products/processes brought into the company which are an integral part of our product range, this is managed through our procurement requirements. These products are for example: wire & cable, second source for contacts, surface finishing, and flexi circuits all of which are purchased from respectable and Glenair approved sources.

All our suppliers sign up to our Quality Requirements for Suppliers, an extract from section 23 of this, and states:

As an approved supplier to Glenair we do not expect to receive any product that has originated from a suspect source. Your Purchasing controls are expected to identify all untraceable products/materials back to source with that source being an approved supplier to you.

Any bogus products/materials that have been found to be delivered to Glenair these will be Quarantined and we would assess the costs to our business and pass these on. They will be scrapped to remove the potential of others receiving them.

In addition your supplier status would be temporarily suspended pending the outcome as to why bogus product/materials were supplied.

If there is no satisfactory explanation then the approved supplier status would be removed. If product has been delivered to our customer then we shall have no choice but to recall the product/material and they in turn may seek remedial actions and flow down the costs which we would have to pass on.

A Counterfeit avoidance maturity model has been produced to highlight our position (Attachment 1&2.)

This statement is periodically reviewed to ensure that it remains as accurate as it can be.

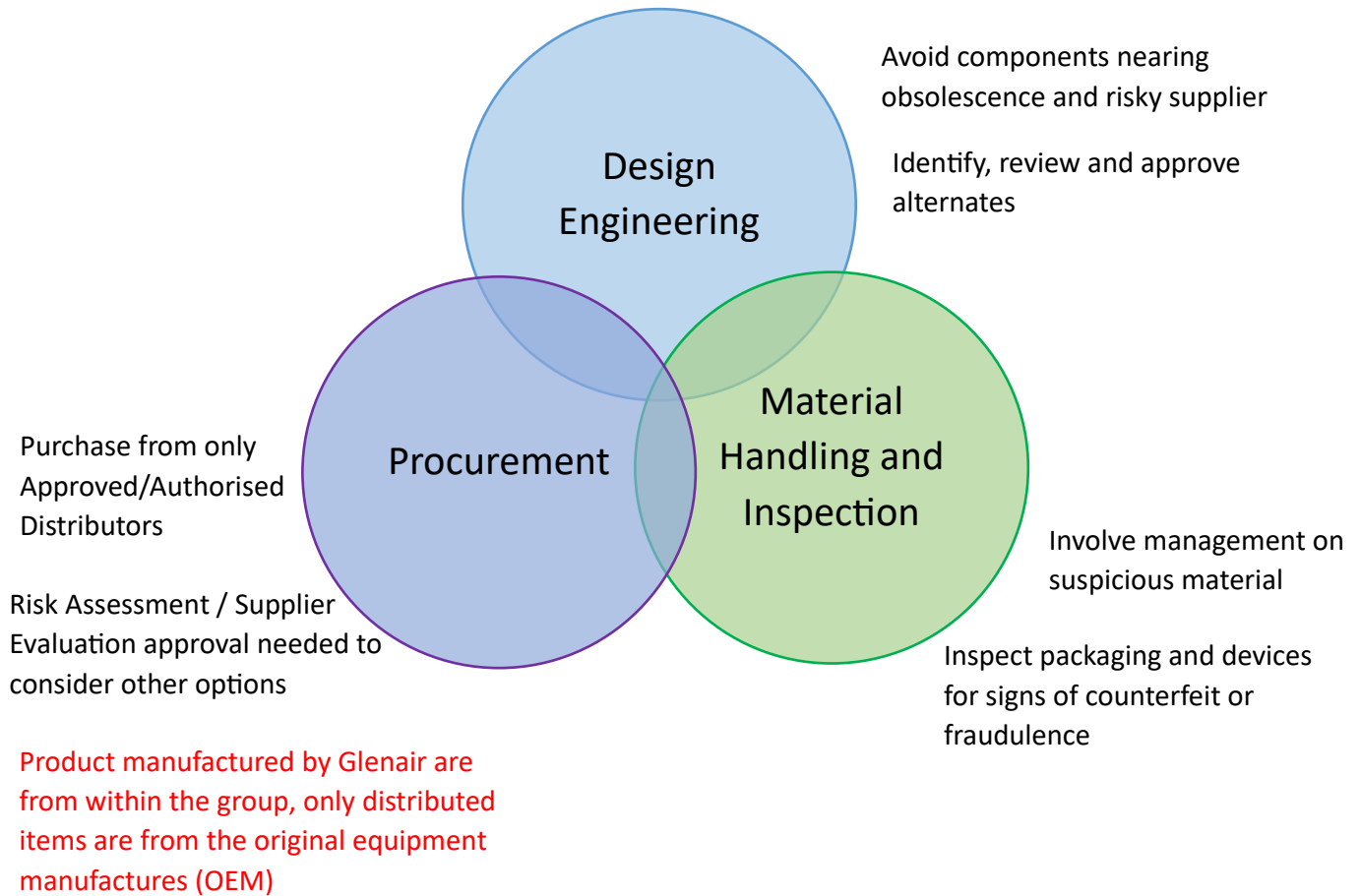
<i>Date</i>	<i>History change</i>
October 2023	C001, C010, C012, C014, C032



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Attachment 1.

Counterfeit Avoidance Model





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Attachment 2.

Counterfeit Avoidance Maturity Model Matrix (Glenair UK Ltd)

Defence Standard 05-135 ISO 9001;2015 AS 9100 Rev D	Note: The maturity level highlighted is representative of the low level risk to Glenair, from its suppliers and in turn our customers. The risk of counterfeit material being used or procured is extremely low as most products are of Glenair Design and manufacture. The shaded areas below reflect appropriate levels of understanding.			
Level	Level 0 (immature)	Level 1 (minimal)	Level 2 (improving)	Level 3 (mature)
Policy Statement				
How has Management Intent or Policy on Counterfeit Avoidance been defined?			X	
How Management Intent or Policy is made available to customers upon request?			X	
What controls are in place to manage the risk of counterfeit materiel in the supply chain?			X	
Roles and Responsibility				
How have Top Management ensured that Management Intent or Policy for the avoidance of counterfeit Materiel is available, communicated, understood and implemented by relevant staff at all levels?			X	
Management Representative. Has the supplier appointed a management representative, and do they have responsibility and authority within the organisation for managing the risk, reporting concerns internally and for promoting supply chain awareness?			X	
Competence, training and awareness				
How has the supplier determined the awareness level requirements appropriate to each functional role, individual staff competence level, and how the training needs will be met?		X		
How are records of training, skills and competence maintained?			X	

This compliance statement relates to Glenair UK Limited only



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Purchasing				
How has the supplier assessed the risk of procuring counterfeit materiel taking into account the criticality of the materiel in relation to performance and safety?			X	
Where risk has been identified, how has the supplier ensured that counterfeit avoidance requirements are flowed down the supply chain?			X	
As part of the risk based evaluation of sub suppliers where final product integrity is considered critical in relation to performance and safety, how does the supplier trace the source of supply of the materiel through the supply chain to the manufacturer?			X	
Where traceability of materiel cannot be established, how does the supplier demonstrate that the materiel fulfils the acquirer's specified requirements?		X		
Test and Verification How does the supplier determine the rigour of inspection and test requirements for the acceptance of materiel?		X		
Control of Nonconforming Materiel. How is suspect or confirmed counterfeit materiel (including associated documentation / packaging) handled?			X	
Reporting of Counterfeit Materiel. How are employees guided to report occurrences of counterfeit materiel?			X	
Additional Requirements for Suppliers who are Manufacturers . How do suppliers who are original manufacturers manage and implement measures to avoid the misrepresentation of their materiel by others?		X		
Additional Requirements for Obsolescence Management. Within the contract framework and counterfeit materiel criticality, how does a supplier address Obsolescence Management that reduce the risk of receiving counterfeit materiel?			X	