Compliance Statement

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.

AS5553 and DEF STAN 05-135 are key standards used to prevent counterfeit, fraudulent, and suspect items from entering supply chains, particularly in aerospace and defence. AS5553 (SAE) focuses on electronic components, while DEF STAN 05-135 (UK MOD) requires a broader risk-based approach for all materials. Being an ISO9001 /AS 9100 accredited company AS5553 /DEF STAN 05-135 sits within our core process of procurement.

In simple terms, Glenair operates a Quality Management System (QMS) which seeks to prevent counterfeit parts from entering the supply chain, not just as a 'bolt-on', but as an embedded process.

AS5553 (SAE):	A globally recognized aerospace standard designed to keep **counterfeit electronic parts** out of the supply chain. It requires strict procedures for avoiding, detecting, mitigating, and disposing of fake electrical, electronic, and electromechanical (EEE) parts.
DEF STAN 05-135 (UK MOD):	A strict Defence Standard mandated by the UK Ministry of Defence. Unlike AS5553, which is specific to electronics, DEF STAN 05-135 demands a **risk-based management approach for all materials**—ensuring every physical item purchased is authentic and safe.
ISO 9001 / AS 9100 Accredited:	These are the gold-standard Quality Management Systems. ISO 9001 is for general quality, while **AS 9100 is tailored specifically to Aviation, Space, and Defence (ASD) organizations**.

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.

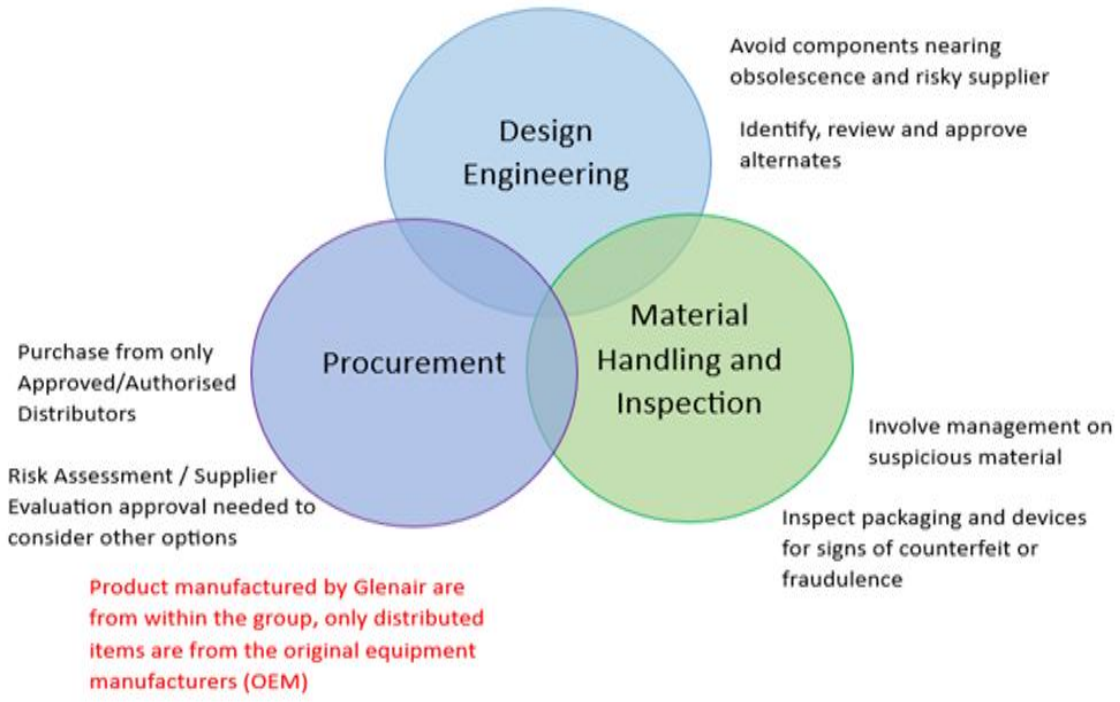
If there is no satisfactory explanation then the approved supplier status would be removed. If product has been delivered to our customer then we shall have no choice but to recall the product/material and they in turn may seek remedial actions and flow down the costs which we would have to pass on.

Competence, Training and awareness have been fully identified for specific staff related to their activities, functions and processes, which is reflected in departmental training Matrix.

A Counterfeit avoidance maturity model has been produced to highlight our position (Appendix A&B.)

Appendix A

Counterfeit Avoidance Model



Compliance Statement

Appendix B

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.

Policy								
Requirement		*Level 0 (immature)*		*Level 1 (minimal)*		*Level 2 (Improving)*		*Level 3 (Mature)*	
1.1	How has Management Intent or Policy on Counterfeit Avoidance been defined?	Information has not been considered or defined	☐	Information has been considered, defined, and articulated at a draft level	☐	Information has been defined and published as a coherent document.	☒	Evidence exists demonstrating that published information has improved over time, incorporating industry good practice	☐
1.2	How is Management Intent or Policy made available to customers upon request?	Information is not available	☐	Information is available but only when requested	☐	Information is freely available and easy to access (e.g. via website no request necessary). Policies are approved and published and feely available to relevant stakeholders	☒	Information is freely available, easy to access, with links to other relevant information and standards. Approved policy published and deployed to all relevant stakeholders and there is evidence of assurance, along with continuous improvements to the policy.	☐
1.3	How often is the organizations Counterfeit Policy updated?	The counterfeit Policy not updated within a 2-year period	☐	Counterfeit Policy updated within 2 years	☐	Evidence of Counterfeit policy regularly updated, published and circulated for input from other functions	☒	Evidence of counterfeit policy regularly updated, published, circulate and communicated to stakeholders / other function for input and working practices changed as appropriate	☐
1.4	What controls are in place to manage the risk of counterfeit material in the supply chain?	The risk has not been recognised	☐	A simple risk assessment exists but it has not been clearly linked to internal or external Supply chain arrangements	☐	Risk assessments have been used to influence internal policy only. The approach has not been fully extended to cover the whole supply chain	☒	Active management of the risk in the supply chain is proactively used to inform the periodic review of the organisation's policy including internal and external arrangements across the whole Supply chain.	☐

Policy									
Requirement		*Level 0 (immature)*		*Level 1 (minimal)*		*Level 2 (Improving)*		*Level 3 (Mature)*	
Roles and Responsibilities									
2.1	Have your Top Management ensured that the Policy for the avoidance of counterfeit materiel is available, communicated?	Policy has not been articulated or communicated within the organisation at any level.	☐	Policy has been articulated and communicated within the Organisation, but its understanding and implementation is insufficient.	☐	Policy is understood within the Organisation and is being implemented consistently by management level.	☒	Policy implementation is supported by Top Management. For example, records of meetings, the appointment of a management representative, active risk management, allocation of funding to manage counterfeit, etc	☐
2.2	Management Representative. Has the organisation 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?	No management representative has been appointed	☐	Management representative has been appointed but has yet to address the full range of responsibilities regarding risks within the supply chain.	☐	Management representative is involved with reviewing internal arrangements to manage the risk of counterfeit material, reporting internal concerns to Management and working with the supply chain to raise awareness and understanding of the risk within the supply chain.	☒	Management representative has a clear understanding of the multifunctional processes that constitute counterfeit avoidance arrangements, is aware of wider Supply Chain interactions and arrangements including performance metrics. Reports to Top Management reflecting wider Supply Chain concerns and actively participates and collaborates in supply chain activities including sharing of good practice and championing improvement.	☐
Competence, Training and Awareness									
3.1	How often is Counterfeit Avoidance training performed?	No training in place	☐	Minimal Training been delivered but infrequent	☐	Training delivered and given on regular basis	☐	Training delivered, updated and given on regular basis and working practices monitored and updated to see if training has been effective. Training records available.	☒
3.2	How are new employees inducted within Counterfeit Avoidance Training?	No induction in place for new employees	☐	Basic Induction been delivered to new employees.	☐	Induction delivered and given on regular basis to new employees	☒	Induction delivered, updated and given on regular basis and working practices monitored and updated to see if induction has been effective	☐
3.3	How has the Organisation determined the awareness level requirements appropriate to each functional role, individual staff competence level, and how the training needs will be met?	Organisation has seen No evidence of actions in place to determine the awareness level requirements appropriate to each functional role, individual staff competence level or how the training needs will be met	☐	Organisation has determined initial training requirements and competence levels within a coherent document. No implementation of training plan or development plan.	☐	Organisation has fully identified training and competence levels for specific staff related to their activities, functions and processes. Requirements are reflected in a training and development plan.	☒	Organisation has identified processes that contribute to the avoidance of counterfeit material and relevant staff within these functional areas are able to demonstrate appropriate levels of awareness and competence.	☐

Policy									
Requirement		*Level 0 (immature)*		*Level 1 (minimal)*		*Level 2 (Improving)*		*Level 3 (Mature)*	
3.4	How are records of training, skills and competence maintained for Counterfeit awareness?	There are no records of counterfeit material training, Skills or competence	☐	Records relating only to general counterfeit material awareness training are maintained,	☐	Records related to counterfeit material training, skills and competence levels for specific staff related to their activities, functions and processes are maintained.	☐	Records related to counterfeit material training, skills and competence levels for specific staff related to their activities, functions and processes are maintained and are actively used to match the right resource to deliver the requirement.	☒
Purchasing									
4.1	How are the terms “Counterfeit and Suspect” relating to purchased components referenced in your sourcing process?	Terms have not been considered or defined and no purchasing policy in place	☐	Policy in place and Terms have been considered, defined, and articulated at a draft level	☐	Policy and terms have been defined and published as a coherent document.	☐	Evidence exists demonstrating that published information has improved over time, incorporating industry good practice.	☒
4.2	How does the organisation maintain an Approved Supplier(s) list?	No supplier list	☐	Approved supplier list available but not flowed down to all staff.	☐	Approved supplier list available and evidence communicated to all staff	☐	Approved supplier list available, evidence communicated to all staff, supplier onboarding process in place to approve and is updated on regular basis	☒
4.3	How does your Organisation ensure parts are only procured from the OCM, approved Supplier, OEM or authorized franchised distributor?	No process in place or Information has **not** been considered or defined	☐	Process has been considered, defined, and articulated at a draft level	☐	Process has been clearly defined and published as a coherent document, clarifying that parts are only purchased from the OEM, (Original Equipment Manufacturer) approved Suppliers, or OEM authorized franchised distributors.	☐	Evidence exists demonstrating that published information has improved over time, incorporating industry good practices for purchasing parts only parts only from the OEM, (Original Equipment Manufacturer) approved Suppliers, or OEM authorized franchised distributor.	☒
4.4	How are Counterfeit and obsolescence included as part of a new supplier approval and ongoing supplier approvals?	Counterfeit and Obsolescence have **not** been considered or defined within the supplier approval process.	☐	Counterfeit and Obsolescence have been considered, defined within supplier approval process at a draft.	☐	Counterfeit and Obsolescence have been considered, defined within supplier approval process in a coherent document. In addition, checks are in place to prove the supplier has this in place.	☒	Counterfeit and Obsolescence have been considered, defined within supplier approval process. In addition, checks and regular audits are in place to prove the supplier has this in place.	☐

Policy									
Requirement		**Level 0 (immature)**		**Level 1 (minimal)**		**Level 2 (Improving)**		**Level 3 (Mature)**	
4.5	How has the organisation assessed the risk of procuring counterfeit materiel taking into account the criticality of the materiel in relation to performance and safety?	The risk of counterfeit material is not specifically considered within the Procurement process.	☐	The risk of counterfeit material assessment is based on generic commodity type with no consideration to criticality of end use.	☐	The risk of counterfeit material assessment is based on counterfeit incidents of counterfeit material in the supply chain. Procurement processes direct staff to utilise tools i.e. dynamic in-house or online databases to specifically address counterfeit avoidance	☒	The risk of counterfeit material assessment is influenced by final use scenarios including potential working environments and extremes. In the context of final use, the risk assessment recognises criticality of the material, and this influences sourcing and verification activity accordingly.	☐
4.6	Where risk has been identified, how do you ensure that counterfeit avoidance requirements / counterfeit mitigation requirements are flowed down to your Suppliers?	No evidence of counterfeit avoidance requirements being flowed down the supply chain e.g. on purchase orders, contracts, or instructions.	☐	Evidence that ad-hoc counterfeit avoidance requirements being flowed down the supply chain. Activity is reactive and is not established or documented.	☐	Evidence that a process or procedure is in place to ensure that counterfeit avoidance requirements are being flowed down the supply chain in a consistent repeatable manner.	☒	Evidence that a systematic risk-based process is established with measures to ensure that counterfeit avoidance requirements are being flowed down the supply chain in a consistent repeatable manner and are verified for effectiveness	☐
Traceability									
5.1	Does the organization have a Policy / process about traceability?	No policy / process in place	☐	Traceability policy / process has been considered, defined, and articulated at a draft level.	☐	Traceability policy / process has been defined and published as a coherent document.	☐	Evidence exists demonstrating that published information has improved over time, Incorporating industry good practice	☒
5.2	How are Traceability requirements flowed down to Suppliers?	Traceability has not been considered or flowed down to Supplier(s)	☐	Traceability has been considered defined and flowed down to Supplier(s)	☐	Traceability has been defined published as a coherent document and supplier(s) has given acknowledgement to this.	☐	Evidence exists demonstrating that the traceability policy has been flowed down, evidence of supplier acknowledgement and Supplier(s) has been audited to check that the supplier is meeting traceability flow downs	☒
5.3	Where traceability of material cannot be established, how does the organisation demonstrate that the material fulfils the acquirer's specified requirements?	Traceability problems are not recognised as an additional risk, and additional material qualification testing is not considered during the Procurement process.	☐	Traceability problems are recognised as an issue, and additional material qualification testing is sometimes considered at during the Procurement Process.	☐	Traceability problems are managed via a risk based procedure with specific material qualification test requirements defined so that they are considered and used consistently during Procurement process.	☐	Traceability problems are managed via a systematic risk-based process. Specific material qualification test requirements are defined and integrated to the extent that requirements and expectations are clearly identified up-front and are applied consistently during the Procurement process.	☒

Policy									
Requirement		Level 0 (immature)		Level 1 (minimal)		Level 2 (Improving)		Level 3 (Mature)	
5.4	How is Traceability recorded and maintained through goods inwards through to manufacture and to product shipment?	No traceability recorded and maintained	☐	Traceability recorded and maintained only at goods inwards	☐	Traceability recorded and maintained. Evidence of records showing from purchase order to goods inwards through to manufacture and to shipment.	☒	Traceability records defined and maintained. Evidence of records showing from purchase order to goods inwards through to manufacture to shipment. Well established Quality Management system to track material history and traceability	☐
5.5	How does the organisation inspect/review all incoming paperwork for all incoming parts / material to make sure it is all correct and valid? E.g. CoC, company logos etc.	No established process in place for paperwork	☐	Minimal Paperwork reviewed at Good inwards	☐	Evidence of a published written process or criteria checklist for reviewing paperwork and CoC. Incorrect paperwork highlighted to Supplier	☐	Evidence of a published written process or criteria checklist for reviewing paperwork. Also challenging and working with supplier to put preventative actions in place if paperwork is incorrect.	☒
5.6	How are incoming parts checked against the Purchase Order to make sure it meets all the PO requirements?	No evidence of parts being checked against Purchase Order and no discrepancies highlighted.	☐	Evidence of parts being checked against Purchase Order and discrepancies are highlighted but no actions in place to mitigate discrepancies	☐	Evidence of parts being checked against Purchase Order. Purchase Order requirements updated to changes in specifications, regulations or customer requirements and actions in place to meet discrepancies highlighted.	☒	Evidence of parts being checked against Purchase Order. Purchase Order requirements updated to changes in specifications, regulations or customer requirements and improvements been implemented. Actions relating to discrepancies highlighted are monitored.	☐
5.7	How does the organisation inspect / review supplied parts that have traceability markings are correct and clearly marked? Evidence of traceability back to the OCM manufacturing control reference. I.e. date / serial number / part number etc.	No established process in place for inspection	☐	Established process in place for inspection	☐	Established process in place for inspection and training provided	☒	Established process in place for inspection and training provided. Competency and experience of personnel verified. In addition, evidence of inspection checklists filled out or inspection plans	☐
5.8	Where final product integrity is considered critical in relation to performance and safety, does the organisation trace the source of supply of the materiel through the supply chain to the manufacturer?	Final product integrity and criticality requirements are not considered or recognised as a supply chain risk, and no traceability mechanisms exist.	☐	Final product integrity and criticality requirements are recorded but not in the context of supply chain risk. Traceability mechanisms take a broad-brush approach not necessarily focusing on the traceability of critical components through the supply chain.	☐	Final product integrity and criticality requirements are controlled via a risk-based supply chain management plan. Traceability mechanisms focus on the critical components requiring authentic documentation that identifies the provenance of the material through the supply chain to the manufacturer	☒	Final product integrity and criticality requirements across the supply chain are managed using a systematic risk-based process. Traceability mechanisms are measurable and proportionate to the risk. All critical components requiring authentic documentation that identifies the provenance of the material through the supply chain to the manufacturer are available to the customer on request.	☐

Policy									
	Requirement	**Level 0 (immature)**		**Level 1 (minimal)**		**Level 2 (Improving)**		**Level 3 (Mature)**	
5.9	What is the retention period for all quality, purchasing and part traceability records?	No retention period defined	☐	Retention period Defined (minimum of 6 years)	☐	Retention defined (minimum of 6 years) and process in place.	☐	Retention period defined (minimum of 6 years) and process in place. Evidence available for long term storage of these records.	☒
Test and Verification									
6.1	How does the organisation determine the rigour of verification and test requirements for the acceptance of material?	Counterfeit material not recognised as an issue. No supply chain intelligence is available to inform a risk assessment, and no enhanced on-receipt inspection methods are available	☐	Counterfeit material recognised as an issue. Personnel have received counterfeit awareness training but the rigour of enhanced acceptance checks are limited to visual inspection of material and paperwork (e.g. certificate of conformity). Enhanced methods are ad-hoc and variable	☐	Counterfeit material recognised as a risk determined through supply chain intelligence. On-receipt procedures make use of reference information and are tailored to address the risk level determined. Personnel are trained to use an array of appropriate in-house enhanced repeatable methods	☐	Systems and processes use an array of joined up information to determine the counterfeit risk and test or verification assessment levels based on criticality of material and supply chain intelligence. Predetermined on-receipt inspection routines and verification processes are in place. Suitably qualified and experienced personnel are deployed and use enhanced repeatable methods (including in-house or external) appropriate to risk identified.	☒
Control and Reporting of Counterfeit & Non-Conforming Material									
7.1	How is suspect and confirmed counterfeit materiel (including associated documentation / packaging) handled?	No procedures in place for handling suspect and confirmed counterfeit materiel	☐	Limited Controls are in place to quarantine suspected or confirmed counterfeit material (including Documentation and packaging).	☐	Procedure explains segregation and management of suspected and confirmed counterfeit material to prevent re-entry to the supply chain. This includes the management of returns to the sub-supplier for validation or Testing purposes.	☒	Systems and processes are in place so that suspected or confirmed counterfeit material is dealt with using secure and reliable arrangements to prevent re-entry to the supply chain. **Suspected** material that is nonconforming is thoroughly investigated in a controlled environment using appropriate tests and experts to determine if it is counterfeit. **Confirmed** counterfeit material (including evidence, documentation, packaging etc.), is clearly identified and securely segregated. Disposal arrangements are unambiguous and linked to feedback from the counterfeit material reporting process.	☐
7.2	How are parts adequately segregated and labelled appropriately so non-conforming material or counterfeit material is not delivered to Leonardo?	Parts are not adequately segregated and labelled appropriately so non-conforming material or counterfeit material delivered to Leonardo	☐	Parts are adequately segregated and labelled appropriately so non-conforming material or counterfeit material is not delivered to Leonardo.	☐	Parts are adequately segregated and labelled appropriately so non-conforming material or counterfeit material is not delivered to Leonardo. This is an established	☐	Parts are adequately segregated and labelled appropriately so non-conforming material or counterfeit material is not delivered to Leonardo. There is an established process in place, published,	☒

Policy									
Requirement		**Level 0 (immature)**		**Level 1 (minimal)**		**Level 2 (Improving)**		**Level 3 (Mature)**	
						process in place and staff made aware.		communicated and monitored. The process is audited on a regular basis.	
7.3	How are occurrences of Counterfeit material reported and investigated?	No reporting arrangements are in place specific to counterfeit material.	☐	Arrangements are ad-hoc and limited to internal, supplier, and customer communications and records.	☐	Procedure explains the steps and reporting arrangements relevant to suspected and confirmed counterfeit material. Reporting of confirmed counterfeit material meets the requirements of Leonardo General Conditions of Purchase.	☐	Systems and processes are in place so that suspected or confirmed counterfeit material is reported appropriately (internally and externally).	☒
7.4	How does the organisation receive current industry alerts on counterfeit?	No system in place to receive industry alerts.	☐	System in place to monitor industry alerts relating to counterfeit and no consideration of updating processes.	☐	System in place to monitor industry alerts and internal processes updated in accordance	☒	System in place to monitor industry alerts, and internal processes updates in accordance and continuous improvements are made.	☐
Additional Requirements for Suppliers Who Are Manufacturers									
8.1	How do organisations who are original equipment manufacturers manage and implement measures to avoid the misrepresentation of their materiel by others?	Other than secure premises there are no additional arrangements in place.	☐	Registered trademarks and designs are recorded on customs and law enforcement databases. There are no additional specific controls in place to manage the counterfeit risk within the manufacturing environment	☐	Registered trademarks and designs are recorded on customs and law enforcement databases. There are additional specific controls in place to manage the counterfeit risk within the manufacturing environment	☐	Based on the counterfeit risk in the marketplace systematic processes and procedures are in place to manage all aspects of manufacturing and distribution. Where appropriate, measures may include the use of indelible, encrypted or covert marks on material, documentation and packaging. There are measures in place for active enforcement of trademark and design rights infringements against manufacturers and suppliers of counterfeit material. Where obsolescence is a known risk e.g. long in service periods, plans and designs are proportionate and appropriate to customer needs so that material is less prone to obsolescence and the risk of counterfeit alternatives.	☐

Policy								
Requirement		*Level 0 (immature)*		*Level 1 (minimal)*		*Level 2 (Improving)*		*Level 3 (Mature)*	
Obsolescence Management									
9.1	Does the organisation have a Policy / process about Obsolescence?	No policy / process in place	☐	Obsolescence policy / process has been considered, defined, and articulated at a draft level.	☐	Obsolescence policy / process has been defined and published as a coherent document.	☐	Evidence exists demonstrating that published information has improved over time, incorporating Industry good practice.	☒
9.2	How is Obsolescence management process / procedure undertaken within the organisation as part of the internal review process?	Obsolescence Management are not undertaken and Customers only made aware at time of placing an order for additional items or a repair order	☐	Obsolescence Management addressed and procurement decisions take into account the threat of counterfeits particularly if buying from non –franchised suppliers. Customers only advised of obsolescence as they arise issue as communication of last time buy notice.	☐	Supplier proactively monitors external information sources for indications of pending obsolescence. Procurement decisions take account of counterfeit risk and increased incoming inspection tests are invoked to check component authenticity. Provides Obsolescence Management report to customer for their consideration,	☐	A pro-active obsolescence management policy is effectively implemented throughout the Supplier. Obsolescence management Preventative measures are used i.e. new design device / item selection takes device life into consideration during product design stages and is a critical element of aftermarket solutions. Original Component Manufacturer notifications are obtained on a regular basis through a variety of means. Obsolescence requirements are cascaded to sub tier suppliers as appropriate	☒
Internal Assessment - AS5553 Requirement									
10.1	Does the organisation carryout out internal audits or self-assessment activities to verify compliance applicable to ASS553 requirements?	Internal audits or self-assessments take place and has not been considered or defined.	☐	Internal audits or self-assessments have been considered, defined, and articulated at a draft level	☒	Internal audits or self-assessment have been defined and published as a coherent document and are carried out regularly.	☐	Evidence exists demonstrating that internal audits and self-assessment are carried out, findings and actions are documented and show improvements over time, incorporating industry good practice to organisational internal processes	☐