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COUNTERFEIT COMPONENT CONTROL

PROCEDURE

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			/s/Blaine Perry **Sales/Purchasing Coordinator**
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			/s/Michael Perry **V.P./General Manager**

NOTE: A hardcopy of this document may not be the document currently in effect. The current version is always the version that resides in program data management.

Quality Instructions

1.0 SCOPE

This document defines the process by which Metal Processing Co., Inc. (MetProCo) prevents and the actions taken to mitigate the receipt of “counterfeit” component piece parts.

2.0 APPLICABLE DOCUMENTS.

2.1 MetProCo Documents

POCP-101	Purchase Order Control Procedure
CNP-101	Control of Nonconforming Product
SQR-101	Supplier Quality Requirement Listing

2.2 Additional Documents

IDEA-STD-1010	Acceptability of Electronic Components Distributed in the Open Market

3.0 TERMS AND DEFINITIONS.

3.1 Counterfeit components

A counterfeit component is a component whose material, performance, or characteristics are knowingly misrepresented by the vendor, supplier, distributor, or manufacturer.

3.2 Independent Distributor

An independent distributor is a person, business, or firm that is neither authorized nor franchised by an Original Equipment Manufacturer(OEM)/Original Component Manufacturer(OCM) to sell or distribute the OEM’s/OCM’s products, but claims to sell, broker, and/or distribute such OEM/OCM products. Independent distributors are also referred to as unfranchised distributors, unauthorized distributors, and/or brokers.

4.0 REQUIREMENTS

4.1 Procurement requirements

MetProCo shall purchase parts/components directly from the OEM/OCM or through the OEM’s/OCM’s authorized distribution chain. The documentation for these parts/components that authenticates the parts/components to that applicable OEM/OCM shall be provided with the parts/components (OCM / OEM original Certificate of Compliance / Traceability or Certificate of Origin preferred; an AUTHORIZED DISTRIBUTOR’S Certificate of Conformance in lieu of the manufacturer’s documentation is acceptable. This documentation shall include the OEM’s/OCM’s name, authorized distributor name (as applicable), part number, production lot number, serial number, and/or date code.

4.2 Alternatives to procurement requirements

If MetProCo cannot procure parts/components per the requirements of 4.1, MetProCo MAY procure the parts/components from an independent distributor after receiving written authorization to do so from the customer.
The independent distributor shall provide the same documentation as required in 4.1 above. Should the independent distributor be unable provide the documentation per 4.1 above, they shall perform their own counterfeit detection/authenticity analysis per IDEA-STD-1010 and this document. The independent distributor shall provide the results of their analysis to MetProCo with submittal of the request for quotation (RFQ) or if the analysis has not been accomplished, the independent distributor shall submit with the

RFQ their proposal and costs to accomplish counterfeit component evaluation in accordance with the requirements of the independent distributor's counterfeit component control plan, IDEA-STD-1010 and this document..

4.3 Responsibilities

4.3.1 Purchasing

Purchasing is responsible for forwarding this document including the "Counterfeit / Reclaimed Component Questionnaire" (Appendix 1) form to all prospective distributors with directions to the distributors to review and return a signed copy of Appendix 1 if the distributor is in agreement.
Failure of a distributor to return Appendix 1 will result in the MetProCo conclusion that the distributor does not agree with the requirements, will not provide a copy of their "Counterfeit Components Control Plan and / or has not / will not implement a counterfeit component detection/authenticity analysis policy. Failure to implement an effective Counterfeit Component Control Plan will prohibit Purchase Order award to applicable distributors.

4.3.2 Purchasing / Supplier Quality Assurance

Purchasing / Supplier Quality Assurance is responsible for assigning the applicable Purchase Order Quality Code for the specific purchase order requisition. SQR Code "SQR 11" in accordance with SQR-101 specifies that "Certificate of Conformance shall identify the Manufacturer and Manufacturer's Production Lot Number" within the description of the offeror's C of C as applicable for specific purchased material. SQR 11 requires that a distributor's Counterfeit Component Control Plan comply with this document (MetProCo SQR-101) and shall be provided to MetProCo Quality Assurance through the MetProCo buyer.

4.3.3 Receiving Inspection

Receiving Inspection is responsible for verifying that the purchased material complies with:

A. The item drawing requirements
B. The Purchase Order Quality Codes
C. The Receiving Inspection Part Number History Folder Inspection

Verification is accomplished by:

a. Reviewing the OCM / OEM's Certificate of Compliance / Traceability or Certificate of Origin (Franchised / Authorized Distributors only) and the offeror's C of C specifically verifying agreement between the manufacturer's lot identification and associated date codes etc. identified by the C of C to the piece part markings when so marked. E.G. lot and or date code agreement, poor use of English, misspelled words, alterations or changes to the documentation etc.

b. Visually inspecting in accordance with IDEA-STD-1010 for:
    * marking inconsistency compared to the manufacturer's data sheet marking information
    * Change of character font size
    * Uneven top and / or bottom coating of part, inconsistent texture or color between top and bottom / side coating (mold compound)
    * Bent leads / inconsistent plating coverage
    * Inconsistent physical dimensions

c. If necessary, when the original manufacturer's production lot is not able to be determined the following actions may be taken:

    1) The product is placed on an Inspection Discrepancy Report (IDR) and forwarded to MRB
    2) The buyer is notified via the IDR and a "Receiving Inspection Action Request" requesting the buyer to obtain from the supplier the manufacturer's lot traceability identification or

other documentation attesting to the origin of the product delivered.

3) Component Engineering is notified and research is accomplished via the manufacturer's internet database and or direct communications regarding the component coding as marked on the device.

d. Active Components failing any of the above and / or NOT purchased directly from an OCM / OEM or their franchised / authorized distribution network (a "suspect Device") shall be subject "Counterfeit Component Evaluation" possibly including in addition to the IDEA-STD-1010 visual inspection above

* Visual inspection is accomplished by comparing an internal product configuration to a:

(1) A "Known Good" product (procured from an authorized source) or

(2) To the Manufacturer's printed technical data package including the product drawing to determine the origin of the internal product.

* **NOTE:** The Counterfeit Component Evaluation of 4.3.3 in addition to being coordinated by MetProCo Receiving Inspection maybe accomplished by an authorized independent test laboratory or an independent distributor (reference 4.2) via purchase order after MetProCo receives procurement authorization from their customer.

Components ascertained to be authentic manufacturer's products are accepted and forwarded to stock with the appropriate disposition and investigation documentation entered into the part number history file.

Components determined not to be authentic manufacturer's products via methods in section 4.3.3 are identified as "Counterfeit Components" and forwarded to MRB in accordance with Quality Instruction MetProCo CNP-101, "Control of Nonconforming Product". Components identified as "Counterfeit" shall:

a. Be retained / not returned to the supplier to prevent counterfeit components from reentering the supply chain
b. Supplier invoices shall not be paid
c. The supplier shall be informed that the material provided has been identified as counterfeit and provided copies of any investigation / evaluation data.

When components cannot be authenticated as original manufacturer's product or identified as counterfeit product, after exhausting all avenues of verification, shall be retained in Receiving Inspection on Corrective Action Report (Discrepancy), withheld from acceptance and placed into MRB for senior level management disposition.

4.3.4 Supplier Flow Down

The supplier shall flow down SQR-101 clause SQR 11 in its entirety or equivalent down to all lower tier subcontractors to prevent the inadvertent use of Counterfeit Parts, Materials or Work. When an authorized Supplier is not utilized by the supplier's lower tier, the supplier shall provide a copy of the risk assessment and their written approval within the deliverable data package.

Metal Processing Co., Inc.
Specializing in Glass-to-Metal

Appendix 1

Counterfeit Components Prevention Certification

The Seller shall ensure that only new products are to be delivered to Metal Processing Co., Inc. (MetProCo) unless approved in advance in writing by Metal Processing Co., Inc. To further mitigate the possibility of the inadvertent use of counterfeit parts, the Seller may only purchase components and parts intended for delivery to Metal Processing Co., Inc. procured directly from the Original Component Manufacturers (OCMs) or through the OCM's authorized distribution chain. If product is procured though other distribution sources, Seller must make available to Metal Processing Co., Inc. OCM documentation that authenticates traceability of the components to that applicable OCM. If the required items cannot be procured from these sources, use of product without appropriate traceability documentation from independent distributors (brokers) or other sources is not authorized unless first approved in writing by the Program Management and Quality organizations of Metal Processing Co., Inc. The Seller must present complete and compelling support for its request and include in its request all actions to ensure the components procured and delivered to Metal Processing Co., Inc. are legitimate OCM components as specified within CCCP-101 and as follows:

1) Is your company aware of counterfeit component issues and do you have a policy / procedure implemented to mitigate such? Yes______ No_____

   Procedure Number: ________________________

2) Does your policy meet Metal Processing Co., Inc. document CCCP-101?

   Yes ______ No ______

3) Does your company accept the Metal Processing Co., Inc. Counterfeit Parts Prevention requirements?

   Yes ______ No ______

I____________________, an authorized representative of ____________________, certify on this date that only authentic components, will be delivered in response to purchase orders issued by Metal Processing Co., Inc. In addition, I certify that the company listed above has policies and procedures that prohibit shipment of Counterfeit Components and will make the relevant documents and investigative data available to Metal Processing Co., Inc. upon request.

Signed: ____

Name: ____
Typed / Printed

Title: ____
Typed / Printed

Company: ____
Typed / Printed

Address: ____

Date: ____