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| **Policy Name** | Counterfeit & Part Marking Validation Policy | | | | |
| **Subject** | Unauthorized Products | | | | |
| **Revision** | C | **Effective date** | 06/15/2020 | **Revised date** | 07/15/2021 |
| **Responsible** | Director of Quality & Process Improvement | **Contact** | Reuben.quintanilla@abracon.com | | |

1. **Purpose**

Abracon and its associated brands; ILSI, MMD, Oscilent, Ecliptek, FOX, AEL, recognize the growing severe issue that counterfeiting of components represents and causing a negative impact on the worldwide electronics industry and jeopardizing the end customer’s product expectation. As such, Abracon is committed to preventing the introduction of counterfeit electronic components to the supply chain by implementing measures listed in this policy.

**Scope**

1. Abracon provides this counterfeit policy and guidelines to help mitigate the customer risks of inadvertently purchasing and installing counterfeit parts.
2. **Policy Standard**

Abracon maintains a counterfeit electronic parts prevention and mitigation plan with the focus on preventing the use of unlawful or unauthorized reproduction, substitution, or alteration that has been knowingly mismarked, misidentified, or otherwise misrepresented to be an authentic Abracon finished product. Unlawful or unauthorized substitution includes counterfeit part marking, part label, used parts represented as new, or the false identification of grade, serial number, lot number, date code, or performance characteristics.

## SAE AS5553A Counterfeit Standard

Abracon counterfeit component practices and procedures are derived using guidance from

SAE AS5553A - *Counterfeit Electronics Parts; Avoidance Detection, Mitigation, and Disposition.*

The key points from this standard are outlined below.

* Maximize the availability of authentic components
* Purchase components from reliable sources
* Assure authenticity and conformance of purchased components
* Control components identified as counterfeit
* Report counterfeit components

Abracon’s implementation of these points is detailed in the following sections.

1. **Customer Prevention & Detection**

Abracon strongly advises customers to take the following precautions:

1. Use data sheets from the Abracon website, to retrieve the most current product information. A data sheet will indicate if a part has been obsoleted ( End of Life). If it is not watermarked as EOL, then the part is Active for the life cycle of the part.

1. Only purchase from Abracon authorized distributors and resellers, listed in the Abracon website. If you need assistance in finding an authorized reseller, near your region, please send a request through the Support tab in the Abracon website. All confirmed counterfeit cases can be attributed to unauthorized sellers / brokers.
2. Abracon will not provide warranty or support any products determined to be purchased from an unauthorized reseller or distributor.
3. Ensure your products have a Certificate of Compliance in the packing slip. All Abracon products are shipped with a Certicate of Compliance.
4. **Confirmation of a part to be authentic Abracon or authentic Abracon brands**

There are two types of inquires, highlighted below:

Customer must make the requests through their distributor. The distributor will provide pertinent information to Abracon Customer Service. If parts are purchased through an unauthorized broker, then Abracon cannot support any inquiries pertaining to the part authenticity.

**Part marking validation & translation.** A customer has purchased from an Abracon authorized distributor, however, they would like to understand why there is a difference in a part marking from another part marking from other purchases.

* 1. The authorized distributor will provide lot code,date code, Sales Order information.
  2. Customer Service Rep will research to confirm that the parts have a valid part marking.
  3. Almost all of these types of requests are easily explained. Abracon strives towards having redundancy in high demand parts, by implementing multiple production lines. Our different production lines will have a different part marking format.
  4. Due to potential counterfeit attempts, Abracon will not provide any part marking translation.

**Suspect counterfeit part.** One or more of the counterfeit indicators, listed in section 3 Policy Standard are suspicous. Please email Abracon Customer Service Representative if you want to confirm if reseller is an authorized seller. If it is determined that parts were purchased through an unauthorized broker, then Abracon cannot support any inquiries pertaining to the part authenticity.

1. **Abracon Detection Method**
2. Visual identification of labels to determine if they meet the criteria used in Abracon’s labels, whether new or outdated.
3. Visual part inspection, measurement, and verification of part markings.
4. Traceability of Sales Orders will be used to clarify whether the suspect counterfeit part has a receipt in Abracon’s ERP system.
5. Supplier confirmation, purchasing history, inspection and test reports.

1. **Abracon Prevention Processes**

Abracon implements processes for the prevention of shipping counterfeit electronic parts in the following areas:

a. Product Design – engineering design specifications are well documented and verified.

b. Manufacturing – assuring comprehensive testing is performed to meet component specifications.

c. Inspection – Inspection of labels and specified packaging and paperwork prior to shipping.

d. Purchasing – requir supplier flow down of raw materials. A PCN requirement for any component changes.

e. Sales – providing policy information and adhering to contract requirements.

1. **Material Control of Components**

Prior to production release, all products are fully characterized and qualified per our controlled internal standards. All products are designed and brought into production using our qualified and validated processes and materials. Abracon implements Acceptance Testing and Quality Conformance Inspection (QCI) for each production lot.

Abracon operates using a traditional manufacturing model with supplier management and sourcing as a cornerstone of our success. Abracon performs initial and ongoing assessments of our critical supply partners using stringent criteria, qualification and continuous monitoring processes. All of our supply partners are certified to ISO 9001, ISO 14001 or IATF 16949 standards.

Abracon has documented processes and procedures to verify that product returned from the supply chain is not counterfeit and prevent potential counterfeits from re-entering the supply chain.

1. **Documentation**

Abracon provides product datasheets and other controlled company documents that our customers need to qualify and use Abracon’s many products, including but not limited to material declarations, RoHS certifications, REACH compliance statements, conflict mineral declarations, and reliability reports.

1. **Counterfeit Definition**

A part for which credible evidence (including, but not limited to, visual/inspection or testing) that the part is not

authentic. A counterfeit component is a part that has been confirmed to be a copy, imitation, or substitute

that has been represented, identified, or marked as genuine, and/or altered by a source without legal right with

intent to mislead, deceive, or defraud.