



Counterfeit Parts Prevention Policy

1. Introduction and Purpose

At Cwm Engineering Ltd, we recognise that the integrity and safety of aerospace components are paramount. Our Counterfeit Parts Prevention Policy is designed to prevent the entry and use of counterfeit parts within our supply chain and manufacturing processes. This policy demonstrates our commitment to quality, safety, and regulatory compliance, and it outlines the processes and controls we have implemented to safeguard against counterfeit parts.

2. Scope

This policy applies to:

- **All parts and materials** used in our manufacturing processes.
- **All employees, contractors, and suppliers** involved in the design, sourcing, inspection, and production of aerospace components.
- **All stages** of our supply chain—from initial procurement to final assembly and delivery.

3. Policy Objectives

Our objectives are to:

- **Prevent** counterfeit parts from entering our production environment.
- **Identify and control** the risk of counterfeit parts at every stage of the supply chain.
- **Ensure traceability** of parts and materials.
- **Maintain transparency** and accountability in our procurement and manufacturing processes.
- **Comply** with all relevant aerospace industry standards and customer requirements.

4. Policy Statement

Cwm Engineering Ltd is committed to using only genuine parts that meet all applicable quality, safety, and regulatory requirements. We enforce strict controls on our supply chain and conduct thorough inspections to verify the authenticity of parts. Any suspected counterfeit parts will be immediately isolated, investigated, and reported in accordance with this policy.

5. Roles and Responsibilities

5.1 Management and Quality Assurance

- **Senior Management** is responsible for ensuring that this policy is implemented and maintained.
- **Quality Assurance (QA) Teams** are charged with:
 - Developing and overseeing the counterfeit prevention process.
 - Coordinating audits, inspections, and corrective actions.
 - Reporting to senior management on compliance and any issues related to counterfeit parts.

5.2 Procurement and Supply Chain Management

- **Procurement Teams** must:
 - Source parts only from approved and verified suppliers.
 - Obtain proper certification and documentation (e.g., material certificates, traceability records) from suppliers.
 - Perform regular reviews of supplier performance and compliance.

5.3 Production and Inspection Teams



- **Production Teams and Incoming Quality Control (IQC)** personnel are responsible for:
 - Inspecting and verifying all received parts against documentation and approved specifications.
 - Using established inspection techniques and verification methods to detect anomalies.
 - Isolating any parts suspected of being counterfeit for further analysis.

5.4 Employees and Contractors

- **All Staff** must:
 - Adhere to this policy and attend relevant training sessions.
 - Immediately report any suspicions or evidence of counterfeit parts to their supervisor or QA team.

6. Supplier Qualification and Evaluation

- **Approved Suppliers:**
Cwm Engineering Ltd maintains a list of pre-qualified suppliers who have undergone rigorous evaluation. Suppliers must provide:
 - Valid certificates of conformity.
 - Full traceability documentation for all parts.
 - Evidence of adherence to aerospace standards and regulations.
- **Supplier Audits:**
Regular audits and evaluations are performed to ensure continued compliance with our quality and counterfeit prevention requirements. Any supplier failing to meet these criteria will be subject to review or removal from our approved list.

7. Incoming Material Inspection and Verification

- **Documentation Review:**
All incoming parts must be accompanied by proper documentation, including:
 - Material certificates.
 - Certificates of conformity.
 - Traceability records and audit trails.
- **Physical Inspection:**
Parts are subject to detailed visual and dimensional inspection using standardised procedures. Nonconforming parts are immediately segregated and investigated.
- **Testing and Verification:**
Where necessary, additional testing (e.g., chemical composition analysis, non-destructive testing) is performed to confirm authenticity. Any discrepancies trigger a full investigation.

8. Traceability and Record Keeping

- **Record Maintenance:**
We maintain comprehensive records for all parts received, including supplier documentation, inspection results, and test reports. These records are stored securely and are available for review during internal and external audits.
- **Serialisation and Marking:**
Wherever possible, parts are serialised or uniquely marked to enhance traceability and ease of verification throughout the production lifecycle.

9. Reporting and Handling Suspected Counterfeit Parts

- **Immediate Isolation:**
Any part suspected of being counterfeit is to be immediately isolated from production. No further processing of such parts is permitted until a full investigation is completed.
- **Investigation Procedures:**
An investigation is initiated promptly by the QA team, including:
 - Reviewing supplier documentation.
 - Performing additional tests or inspections.
 - Documenting findings and implementing corrective actions as necessary.
- **Notification:**
If counterfeit parts are confirmed, affected customers and relevant authorities will be notified in accordance with regulatory requirements and contractual obligations.



10. Employee Training and Awareness

- **Training Programs:**
Regular training is provided to all employees, particularly those in procurement, inspection, and production roles, to ensure they are knowledgeable about counterfeit risks and the proper procedures to mitigate them.
- **Continuous Improvement:**
Feedback from audits, investigations, and employee suggestions is used to continually improve our counterfeit prevention processes.

11. Audits and Continuous Monitoring

- **Internal Audits:**
Regular internal audits are conducted to ensure compliance with this policy. Audit findings are reviewed by senior management, and corrective actions are implemented promptly.
- **Continuous Improvement:**
We continually assess our processes, supplier performance, and the overall effectiveness of our counterfeit prevention measures, making improvements where necessary to mitigate risks.

12. Communication and Coordination

- **Customer Collaboration:**
We work closely with our aerospace customers to ensure that our counterfeit prevention measures meet or exceed their expectations. We are committed to providing transparency and full documentation upon request.
- **Supplier Engagement:**
Open and ongoing communication with our suppliers ensures that they understand our requirements and are equally committed to preventing counterfeit parts.

13. Policy Review and Revision

This policy is reviewed at least annually or whenever significant changes occur in regulations, industry standards, or business processes. All updates are communicated to relevant personnel and stakeholders.

Cwm Engineering Ltd remains dedicated to safeguarding the integrity of aerospace components through robust counterfeit prevention measures. For any questions or further details regarding this policy, please contact our Quality Assurance Department.

A handwritten signature in black ink, appearing to read "M Walters", with a stylized flourish at the end.

Malcolm Walters
Managing Director
On behalf of Cwm Engineering Ltd.