



## **Counterfeit Parts Policy**

Counterfeit electronic parts are becoming an increasing concern for military electronic devices and the US military and government has enacted standards and laws to eliminate counterfeit electronic parts. In order to comply with these standards and laws, Communication & Power Industries Canada Inc. (CPI Canada) Power Electronics Division has enacted a policy that no counterfeit parts can be used in the assemblies supplied for integration into its products sold. This policy does not apply when a supplier purchases electronic components from OCM/OEMs, authorized distributors, and franchised suppliers exclusively.

This requirement is flowed to suppliers of PWBA/CCAs and a Certificate of Conformance is required for each shipment certifying that the component(s) integrated into the assemblies were procured from an OEM/OCM or Franchised/Authorized Distributor. If a Certificate of Conformance cannot be obtained, then the supplier must have a documented electronic components traceability process that shall demonstrate, with proper records, the origin of said components received into their facility and subsequently integrated into PWBA/CCAs. This Certificate of Conformance must also establish traceability to the original manufacturer. CPI Canada also requires that their vendors inspect all electronic components used in the PWBA/CCAs per IDEA-STD-1010 if purchased from a non-Franchised/Authorized Distributor.

If components are to be purchased from a non-Franchised/Authorized source (broker), then this source must meet the same Certificate of Conformance requirements as those required from an OEM or Franchised/Authorized Distributor. If the certification requirement cannot be met, CPI Canada must be informed. CPI Canada shall verify the process to qualify the non-Franchised/Authorized source is suitable and written approval shall be obtained to purchase and use these components. A Certificate of Analysis is required from a reputable and qualified laboratory confirming that the parts are not counterfeit, particularly for end-of-life and complex IC procurements.

If counterfeit components are suspected to have been procured at the supplier's facility, the offending parts will be segregated to prevent use and CPI Canada will be informed immediately. The supplier will initiate an investigation to confirm whether the components are counterfeit and immediately try to procure the authentic part or material directly from the OEM or their franchised/authorized distributor. CPI Canada requires their PWBA/CCA suppliers' quality management system to have adequate documented processes to prevent the purchase, acceptance, use, and delivery of fraudulent/counterfeit parts prior to purchasing components. CPI Canada will audit the supplier's quality management system at intervals sufficient to determine that the supplier's incorporated counterfeit parts program prevents the use of counterfeit parts in CPI Canada's PWBA/CCAs. A Risk Management and Mitigation Analysis will be conducted by the supplier for all non-Franchised/Authorized sources (brokers).

CPI Canada is committed to preventing the use of counterfeit components in assemblies incorporated into their finished products.