

Anti-Counterfeit Policy



PURPOSE

The purpose of this Anti-Counterfeit Policy (this “Policy”) is to define actions to be taken by United Automation Limited (UAL) for the avoidance of the introduction of counterfeit materials into the supply chain for its finished products. This Policy also addresses measures that are taken to avoid the sale of counterfeit UAL products into the marketplace.

SCOPE

This Policy covers items acquired by UAL either directly or through its supply chain. It applies to the parts and components that comprise UAL’s end-products.

STATEMENT OF POLICY

UAL will not knowingly, and shall take all reasonable steps to ensure that it will not, procure, use, or supply any counterfeit item or material. UAL shall implement certain procedures as detailed below to manage the risk of counterfeit material in the supply chain. All UAL staff shall follow this Policy and associated anti-counterfeit management plans and promote awareness of the issues concerning counterfeit material in UAL’s supply chain.

ARRANGEMENTS FOR MANAGEMENT OF RISK

UAL shall mitigate the risk of acquiring counterfeit material by undertaking the following steps:

Approved Supplier List - UAL uses a list of preferred suppliers that it has pre-screened for quality purposes (the “Approved Supplier List”) and requires its purchase department to procure parts and components from vendors on this list.

Assessment – of the likelihood of encountering counterfeit material in the supply chain for a particular product, part, or application; taking into account the safety and the geo-political region from which it is sourced.

Avoidance – through the application of UAL’s supplier selection process and Approved Supplier List, UAL will acquire products and services from known, reputable and traceable sources.

Preference is to be given to Original Equipment Manufacturers (OEMs). Where this is not possible, or for new suppliers, parts are to be purchased from authorised distributors. Where this is not possible, parts are to be purchased with a traceable chain of supply directly to the manufacturer.

In the unlikely circumstances where this is not possible, and at the request of the customer, parts can be purchased from a supplier that cannot provide evidence the component is a genuine part, where the risk is identified, provided UAL has the full written agreement from the client, and that they will accept the risk of using an untraceable component.

Certification – by requiring our suppliers to certify on a regular basis that all parts, components and materials are only from traceable sources with anti-counterfeit policies in operation.

Detection – by inspection of goods and materials, any new or potentially risk-bearing suppliers will have their supplied goods inspected. In addition, all goods-inwards staff will be required to be vigilant for counterfeit material using their experience, training and awareness.

Elimination – any instances of counterfeit material will result in the quarantine of items and reporting of detected instances to UAL’s Quality Manager. Counterfeit material will not be returned to the supplier unless under controlled circumstances for validation or testing. Instances of counterfeit material detection shall be communicated to the intellectual property right holder as known, the supplier, the customer if in receipt, relevant organizations, and relevant authorities, including the Trading Standards Office in the UK.

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Testing - by requiring UAL's suppliers to test and verify suspected counterfeit material on a case-by-case basis in relation to safety and performance and report all instances of counterfeit materials to UAL.

ROLES & RESPONSIBILITIES

This Policy will be maintained by UAL's Quality Manager, or such other person as UAL's Managing Director (MD) may designate from time to time. The Quality Manager, or MD designated person, shall ensure that the Policy is available, communicated, understood, and implemented by relevant staff members. The Quality Manager, or MD designated person, has the responsibility and authority to ensure that the necessary measures required to manage the risk of counterfeit material in the supply chain are implemented and maintained by the company.

Any UAL Employee that becomes suspicious or aware of counterfeit parts or materials in the supply chain should report any concerns to the Quality Manager, or MD designated person. Reports are tracked through UAL's Quality Management System.

COMPETENCE, TRAINING, AWARENESS & COMMUNICATION

All staff that are involved in the procurement, design or manufacturing process shall receive Anti-Counterfeit Training that includes this Policy and its implications for UAL. The training shall be compulsory and records of training shall be maintained. This Policy shall be available to all staff through publication on the UAL Intranet. This Policy shall be made available to third parties on request and published on the Company website.

UAL BRAND PROTECTION

UAL takes measures to avoid the misrepresentation of its material by others. These measures include, among other things:

- UAL applies unique serial numbers on all manufactured products;
- UAL controls production, packaging, and documentation to avoid misrepresentation of its products in the supply chain;
- UAL controls the production processes to prevent the misappropriation of material or unauthorized production overruns;
- UAL's business-partner agreements strictly prohibit the sale or distribution of counterfeit UAL products;
- UAL actively enforces its registered trademarks against manufacturers and suppliers of counterfeit materials.

C Fashoni, Quality Manager

APPENDIX A: Standard referenced in this policy

- DEFSTAN 05-1352(2019):2019 Avoidance of Counterfeit Materiel



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