



OP 1006-7

## COUNTERFEIT PARTS PREVENTION PLAN Rev: H

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### 1.0 PURPOSE

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- 1.1 The purpose of this document is to describe the process and due diligence performed at EMS Development Corporation, trading as ESCO Maritime Solution, herein known and referred to as the Company to detect and prevent the purchase and/or use of counterfeit parts, and meet, as necessary, the requirements of the **AS5553C Standard for Counterfeit Electronic Parts Avoidance, Detection, Mitigation and Disposition** and the **AS6081A-2023 for Counterfeit Electrical, Electronic, and Electromechanical (EEE) Parts: Avoidance, Detection, Mitigation, and Disposition - Independent Distribution**.
- 1.2 This document addresses Clause 8.1.4 Prevention of Counterfeit Parts of the **AS9100 Standard**.
- 1.3 This document covers Electrical Parts and Non-Electrical Parts.
- 1.4 Electrical Parts:
  - 1.4.1 All electrical, electronic and electro-mechanical parts delivered and/or used in the manufacture of deliverable products shall be from the Original Component Manufacturer (OCM)/Original Equipment Manufacturer (OEM) or their franchised distributor. Parts shall not be used or reclaimed and misrepresented as new. Parts acquired from independent distributors or brokers must have a certification from the OCM/ OEM or ISO-17025 test reports, which shall be delivered with each lot/ shipment. Companies that procure electrical, electronic and electro-mechanical parts need to have a Counterfeit Avoidance Policy and Program to ensure it does not receive counterfeit parts into inventory, use them in manufacturing, or inadvertently sell them to other parties.
  - 1.4.2 The supplier shall have a counterfeit avoidance process that meets the intent of SAE standard AS5553, Counterfeit Electronic Parts, Avoidance, Detection, Mitigation, and Disposition. Suppliers that deliver next higher assemblies shall flow this requirement down to all their sub-tier suppliers to prevent the inadvertent use of counterfeit materials and equipment. Suppliers of next higher assemblies shall specify on their purchase order to their sub-tier suppliers that they shall only procure electrical, electronic and electro-mechanical parts from the original manufacturer of the part or the original manufacturer's franchised distributor only.

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1.5 Non-Electrical Parts:

1.5.1 Companies that procure non-electrical standard parts need to have a Counterfeit Avoidance Policy and Program to ensure it does not receive counterfeit parts into inventory, use them in manufacturing, or inadvertently sell them to other parties. The supplier shall have a counterfeit avoidance process that is similar to, and meets the intent of, SAE standard AS6174, Counterfeit Non-Electronic Parts, Avoidance, Detection, Mitigation, and Disposition. Suppliers of next higher assemblies shall flow this requirement down to all their sub-tier suppliers to prevent the inadvertent use of counterfeit materials and equipment. Distributors or brokers that supply non-electrical standard parts, like fasteners, nuts, washers, springs, o-rings, inserts, and pins, must have a certification from the Original Component Manufacturer (OCM)/Original Equipment Manufacturer (OEM), and that certification shall be delivered with each lot/ shipment. Parts shall not be used or reclaimed and misrepresented as new.

**2.0 RESPONSIBILITIES**

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- 2.1 Top Management shall be responsible for ensuring that the Company's product's QMS conforms to the requirements of AS 9100 and is established, implemented and maintained in a planned and systematic manner.
- 2.2 Purchasing Department shall be responsible for evaluating, selecting, and monitoring suppliers using sources of counterfeiting information to avoid purchase or use of counterfeit and counterfeit EE parts.
- 2.3 Purchasing Department shall be responsible for procurement of the correct electronic part using the applicable drawing, specification, description, or any other information to meet the intended use. Purchasing is responsible for referencing and implementing this procedure.
- 2.4 Purchasing Department shall be responsible for maintaining objective that the EEE parts supplier is an authorized source or an exclusive supplier.
- 2.5 Engineering Department shall be responsible to ensure the drawing, specification, process, or other description identifies the applicable type, class, style, part number, manufacturer, or other related information so the correct part or product is identified.
- 2.6 Quality's Incoming Inspection is responsible for examining, inspecting the parts to identify and mitigate the receipt and/or use of counterfeit parts.
- 2.7 All personnel are responsible for reporting counterfeit or suspect counterfeit electronic parts, and/or products containing such parts.

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- 2.8 Quality Department shall be responsible for training of this procedure. This includes the awareness, avoidance, detection, mitigation, and disposition of suspect counterfeit or counterfeit EEE parts, if relevant to the Company.

Note: Relevant personnel may include those involved with customer interface, management, program and project management, procurement, quality assurance, inspection, receiving, manufacturing, and engineering activities.

### **3.0 DEFINITIONS**

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- 3.1 **Aftermarket Manufacturer:** A manufacturer meeting one or more of these criteria:
- 3.1.1 A manufacturer authorized by the OCM to produce or provide replacement parts. The parts supplied originate from the OCM to the aftermarket manufacturer or an aftermarket manufacturer using the OCM tooling, or intellectual property to produce the parts.
  - 3.1.2 The manufacturer produces parts using OCM tooling and/or intellectual property (IP). The parts are subsequently assembled, tested, and qualified using processes meeting the technical specifications without violating the intellectual property rights, patents, or copyrights of the OCM.
  - 3.1.3 The manufacturer produces parts by emulation, reverse engineering, or redesign using processes matching the OCM specification. The parts must meet the Customer requirements without violating the OCM intellectual property rights, patents, or copyrights.
  - 3.1.4 **NOTE:** The Aftermarket Manufacturer must mark and identify the part to ensure the product shipped is not mistaken for the product manufactured by the OCM.
- 3.2 **Approved Supplier:** Suppliers who are formally assessed and determined to have a low risk of providing counterfeit products.
- 3.3 **Authorized Franchised Distributor:** A distributor with which the OCM has a contractual agreement to buy, stock, repackage, sell, and distribute its product lines. When a distributor does not provide products, for the purpose of AS5553, the distributor is considered an independent distributor for those products. Franchised distributors normally offer the product for sale with full manufacturer warranty. Franchised contracts may include clauses that provide for the OCM's marketing and technical support inclusive of, but not limited to, failure analysis and corrective actions, exclusivity of inventory, and competitive limiters. Franchised Distributors must provide a C of C from the part OCM's. A distributor who complies with all the requirements of this document is considered a

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Counterfeit Electronic Parts Avoidance Approved Supplier. Allowance to depart from the requirements within this document is at the sole discretion of company's products.

- 3.4 **Authorized Source:** Original component manufacturers and OCM-authorized sources of supply for an EEE part (i.e., franchised distributors, authorized distributors), and authorized aftermarket manufacturers.
- 3.5 **Broker:** In the independent distribution market, brokers are referred to (professionally) as "Independent Distributors".
- 3.6 **Certificate of Conformance (C of C):** A document provided by the supplier formally declaring the purchase order requirements are met. The document may include information related to the manufacturer, distributor, quantity, date code, inspection date that is signed by a responsible associate for the supplier.
- 3.7 **Certificate of Conformance and Traceability (C of CT):** A certificate of conformance applicable to some military specifications requiring documented traceability of the product from the Qualified Parts List / Qualified Materials manufacturer through the product delivery to the Government.
- 3.8 **Counterfeit Part:** An unauthorized part identified as a copy, imitation, or substitute without the legal right or authority to do so or a part whose material, performance, or characteristics are knowingly misrepresented by a supplier in the supply chain. The counterfeit parts include but are not limited to:
  - 3.8.1 Parts not containing the proper internal construction (die, manufacturer, wire bonding, etc.) consistent with the ordered part.
  - 3.8.2 Used, refurbished, or reclaimed parts represented as a new product.
  - 3.8.3 Parts with a different package style, type, or surface plating/finish than required.
  - 3.8.4 Parts not successfully completing the full production and/or test flow of the OCM that are represented as completed product.
  - 3.8.5 Parts sold or delivered as upscreened products that have not successfully completed the upscreening process.
  - 3.8.6 Parts sold or delivered with modified labeling or marking intended to misrepresent the form, fit, function, or grade of the intended product.
  - 3.8.7 A part whose identity has been deliberately altered, misrepresented, or falsified such as false identification of grade, serial number, date code, or performance characteristics.

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**Note:** A part is not considered counterfeit if it has been refinished, upscreened, or uprated parts have been identified accordingly.

- 3.9 **Design Authority:** An organization with formal authority for the design, validation, and service support of a product.
- 3.10 **Distributor-Approved Supplier:** A supplier that has been formally assessed, is determined to use acceptable counterfeit EEE parts risk mitigation and quality management processes and is entered on the procuring entity's register of approved suppliers for that item.
- 3.11 **Distribution Agreement:** A specific, written contract between the manufacturer and the distributor that authorizes the distributor to resell the manufacturer's parts. Contractual terms include, but are not limited to, distribution region, distribution products or lines, and warranty flow down from the manufacturer. These agreements often include failure analysis support, return privileges and product change notifications.
- 3.12 **Electrical, Electronic, and Electromechanical (EEE) Part:** For the purposes of this document, electronic' represents Electrical, Electronic, and Electromechanical (EEE) components hereinafter referred to as electronic parts or EEE. Components designed and built to perform specific functions using electric power and/or an electric or electromagnetic signal to demonstrate functionality. As used in this document, the term "electronic part" refers to any integrated circuit, discrete electronic component (including, but not limited to, a transistor, capacitor, resistor or diode), or circuit assembly.
- 3.13 **ERAI (Electronic Resellers Association International):** A privately held global trade associate who monitors, investigates, reports, and mediates issues affecting the global supply chain of electronics including the supply of counterfeit and substandard parts.
- 3.14 **GIDEP (Government Industry Data Exchange Program):** A cooperative activity between Government and Industry chartered to share technical information essential during all phases of the life cycle of systems, facilities, and equipment.
- 3.15 **Independent Distributor:** A distributor that purchases new parts with the intention to sell and redistribute them back into the market. Purchased parts may be obtained from the Original Equipment Manufacturers (OEM's) or contract manufacturers (typical from excess inventories), or from other independent distributors. Resale of the purchased parts (redistribution) may be to OEM's, contract manufacturers, or other independent distributors. Independent distributors do not have contractual agreements or obligations with OCMs. Any parts procured from a broker must be inspected in accordance with Appendix A of this document. In addition, customer approval must be received by the Company to authorize a broker. Independent Distributors must provide a C of C from

the part OEMs.

- 3.16 **Master Distributor:** A master distributor, also known as a wholesale distributor, is a distributor whose primary business is to sell to other distributors. A master distributor may or may not be an authorized distributor.
- 3.17 **Original Component Manufacturer (OCM):** An entity that designs and/or engineers a part and is entitled to any intellectual property rights of that part.
  - 3.17.1 The part and/or its packaging are typically identified with the OCM's trademark, logo, and/or name.
  - 3.17.2 OCMs may contract, license, or authorize the manufacturing of their product.
  - 3.17.3 OCMs may also authorize distribution of their products.
  - 3.17.4 More than one OCM may produce a part to a common specification.
- 3.18 **Original Equipment Manufacturer (OEM):** A company with design authority that sells products manufactured and assembled from EEE parts under the company's brand name.
- 3.19 **Packaging:** Component packaging refers to the manner the electronic parts are packaged in preparation for use. There are four basic types of packaging: (A) bulk, (B) tray, (C) tube, and (D) reel.
- 3.20 **Refinishing:** Using a plating process method after manufacture to alter the original plating composition on a parts lead or lead wire.
- 3.21 **Refurbished:** Subjecting parts to a process to brighten, polish, or renovate the item to restore the item to a "like new" condition. Refurbished parts may have the leads realigned and re-tinned.
- 3.22 **Supplier:** Within the context of this document, a blanket description of all sources of supply for a part.
- 3.23 **Suspect Part:** A suspect part is an indication established by inspection, testing, or other means that its authenticity may have been misrepresented by the supplier and may be counterfeit. A copy or substitute created without benefit of legal right or authority to do so or one whose material, performance, or characteristics have been knowingly misrepresented by a supplier. Examples of counterfeit electronic parts include, but are not limited to:
  - 3.23.1 Electronic parts that do not exhibit the proper internal construction consistent with that ordered e.g., incorrect die, multiple die sizes with one date code, wrong manufacturer, wire bonding, etc.;

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- 3.23.2 Used, refurbished or reclaimed electronic parts represented as new product;
- 3.23.3 Electronic parts with different package or surface plating/finish than those ordered e.g., blacktopped components with evidence of sanding and remarking; wrong lead finish; marking for tin finish, actual gold finish.
- 3.23.4 Electronic parts which have not completed the OCM's full production and test flow but are represented as such.
- 3.24 **Upscreened:** Additional part testing performed to produce parts verified beyond the specification parameters of the manufacturer.
- 3.25 **Used:** Electrically charged parts removed from a prior application. Parts should be examined for nonstandard packaging, mixed lots, dates, parts from various sites, scratches, bends, test dots, faded marking, chemical residue, or other signs of use. Used parts may be sold with a limited warranty. Programmable products still contain partial or complete programming capabilities that may affect part functionality. Used parts marketed as such should be identified accordingly.

**Note:** Other definitions are available for review in **Section 3.3 of the AS5553, Counterfeit Electronic Parts: Avoidance, Detection, Mitigation, and Disposition Standard.**

#### **4.0 EQUIPMENT/SOFTWARE**

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N/A

#### **5.0 PROCEDURES**

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- 5.1 Part Availability: The process shall maximize availability of authentic, originally designed and/or qualified parts throughout the product's life cycle, including management of parts obsolescence.
  - 5.1.1 Purchasing Department must examine a potential source of supply to assess the risk of receiving counterfeit parts. Assessment may be a survey, audit, product alert review, or a review of the supplier quality data to determine performance.
  - 5.1.2 Refer to **OP 1006 Purchasing Procedure** for detailed purchasing requirements.
- 5.2 GIDEP reports and other creditable reports shall be continuously reviewed for parts which are viewed as counterfeit. This process is continuous and on-going.

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- 5.3 Purchasing Department maintains the **Approved Suppliers (ASL) SQAP 1006-2, F2**, to minimize the risk associated with the supply and/or receipt of counterfeit parts.
- 5.4 Purchasing Department shall focus buying efforts to obtain parts directly from an OCM, approved distributor, authorized resale organization, or franchised aftermarket supplier if available.
- 5.5 Purchasing Department shall ensure that the approved/ongoing sources of supply are maintaining effective process for mitigating the risks of supplying counterfeit parts. Assurance actions may include surveys, audits, signed agreements (see Appendix B), review of product alerts, and review of supplier quality data to determine part performance.
  - 5.5.1 The OCM distributor or the aftermarket manufacturer shall be required to provide certificates of conformance and acquisition traceability. These certification requirements must be clearly identified on the purchase document as deliverable data.
  - 5.5.2 Products with electronic components destined for the Government or military may require original manufacturer certification. Products with electronic components destined for commercial use may not require certification or traceability documents.
  - 5.5.3 The electronic component requirements for the product may be identified from a review of the customer purchase order, specification, or flow down requirements. It is always practical for purchasing to request certification and traceability data as a deliverable item.
- 5.6 Purchasing Department must use the flow-down requirements from the **DFARS 252.246-7007-Contractor Counterfeit Electronic Part Detection and DFARS 252.246-7008-Sourced of Electronic Parts requirements** to be compliant by the customer. Purchasing shall perform some level of risk assessment if the supplier or subcontractor does not maintain a documented counterfeit part control plan compliant to the **AS5553 Standard**, and the Navy/EB/NNS of compliance with DFARS mentioned above.
- 5.7 The purchase document must specify the applicable requirements of the Counterfeit Part procedure to the supplier to minimize the risk of receiving counterfeit parts. To minimize the risk of procuring counterfeit parts, the purchasing document should include requirements to ensure conforming, original, and authentic parts are provided. The purchasing document may list certification or traceability requirements, test, and/or inspection results and Quality System requirements for the supplier.

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- 5.7.1 The program site, ERAI, will be used to monitor new trends in counterfeit part information by continually monitoring this information provided. This will be completed on a regular basis.
- 5.8 Quality Control inspecting or processing parts must examine the product to ensure the drawing, specification, type, class, style, part number, manufacturer, Certificate of Conformance, or other related information is present to detect or identify suspect or counterfeit parts. Record suspect or counterfeit parts on a non-conformity form so the items may be identified and dispositioned.
- 5.9 Test Department test parts as per the drawing, specification, type, class, style, part number, manufacturer, or other related information that is presented to detect or identify suspect or counterfeit parts. Record suspect or counterfeit parts on a non-conformity form so the items may be identified and dispositioned.
- 5.10 Control suspect counterfeit or counterfeit EEE parts to preclude their use or reentry into the supply chain by physically identifying and segregating the EEE parts from acceptable non-suspect EEE parts and place them in quarantine until dispositioned. Quarantine shall consist of controlled access space.
- 5.11 If a part is found to be counterfeited after the final product has been delivered to the customer, the customer shall be informed of the incident. An RMA number shall be issued and sent to the customer to have the counterfeited product returned. The incident shall be investigated, and a report generated for the customer. The product shall be repaired or replaced, whichever is more economical.
- 5.12 **VERIFICATION:**
- 5.12.1 The Company considers the due diligence applied to the material purchase successful when this procedure is followed and when the finished product meets the test or inspection requirements identified for the product or the standard work established for the product. A failed assembly does not mean the instance was caused by a counterfeit part. The Company must verify the cause of the nonconformance and disposition of the defect. This procedure will apply if the deficiency is suspected or attributed to a counterfeit part.
- 5.12.2 When a part of the Company's product becomes unavailable and is obsolete, procedure ***OP-1004-7 Obsolescence Mitigation Plan*** shall be used to locate a suitable replacement.

**5.13 REPORTING**

5.13.1 All occurrences of counterfeit parts are reported, as appropriate, to internal organizations, customers, government reporting organizations (GIDEP), industry supported reporting programs (ERAI), and criminal investigative authorities.

5.13.2 The Company shall report incidents of suspect counterfeit or counterfeit EEE part(s) to the following distribution listed below as a minimum:

5.13.1.1 Internal management.

5.13.1.2 Legal counsel (when applicable to the organization).

5.13.1.3 All customers that suspect counterfeit or counterfeit EEE part(s) may have been provided to within the last 10 years, if the parts are the same part number and procured from the same supplier or are the same lot or date code as previously delivered parts.

5.13.1.3.1 NOTE: The 10-year time period is intended to capture any previous transactions unless the organization can bind the incident to a specified time period.

5.13.1.4 Government contracting officer, or their designee, when the contract was placed under terms of the government (e.g., government funding; design agency is the government).

5.13.1.5 Data reporting agencies as mandated by government and/or legal contractual requirements.

**5.14 DISPOSITION** - the company will follow the disposition based on the standard as follows:

5.14.1 As per AS5553 standard, permanently render as unusable all suspect parts counterfeit or counterfeit EEE parts dispositioned for scrap, including the internal elements.

5.14.2 As per AS6081 standard, retain suspect counterfeit or counterfeit EEE parts in accordance with customer, statutory, and regulatory requirements. Destroy parts once retention requirements have been met or surrender parts to requesting Authorities Having Jurisdiction.

5.14.3 Assure all production EEE parts inventories affected by suspect counterfeit or counterfeit EEE parts are contained for disposition.

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**5.15 TRAINING:**

- 5.15.1 Documented training for this procedure shall occur within ninety (90) days of the new employee start date. It shall be performed by the representative of the Quality Department.
- 5.15.2 Documented training on the Prevention of Counterfeit Parts will be conducted once every two (2) years at a minimum.
- 5.15.3 Knowledge of the Prevention of Counterfeit Parts is applicable to everyone, and training will be a requirement for all personnel.

**5.16 RECORDS:**

- 5.16.1 Records of counterfeit or suspect counterfeit electronic parts, and/or products containing such parts and any actions taken to disposition such parts or products, are Quality Records and shall be maintained in accordance with ***OP 1016 Control of Records.***

**6.0 FORMS**

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- 6.1 Approved Suppliers (ASL) SQAP 1006-2, F2

**7.0 ATTACHMENTS**

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- 7.1 Appendix A Counterfeit Part Risk Mitigation Inspection Guidelines
- 7.2 Appendix B Counterfeit Letter to Suppliers

**8.0 REFERENCED DOCUMENTS**

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- 8.1 AS5553 Counterfeit Electronic Parts: Avoidance, Detection, Mitigation, & Disposition
- 8.2 AS6081A-2023 for Counterfeit Electrical, Electronic, and Electromechanical (EEE) Parts: Avoidance, Detection, Mitigation, and Disposition - Independent Distribution.
- 8.3 AS9100 Standard
- 8.4 DFARS 252.246-7007-Contractor Counterfeit Electronic Part Detection and DFARS 252.246-7008-Sourced of Electronic Parts
- 8.5 OP 1004-7 Obsolescence Mitigation Plan
- 8.6 OP 1006 Purchasing Procedure
- 8.7 OP 1016 Control of Records.

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**APPENDIX A**

**COUNTERFEIT PART RISK MITIGATION INSPECTION GUIDELINES**

The following is a checklist to be used in cases where procurements are made from sources other than OCMs or authorized (franchised) suppliers, or there is a reason to doubt a parts' authenticity, tests and inspections shall be performed to detect fraudulent / counterfeit parts. The following methods shall be performed as a minimum.

**A. Documentation and Packaging Inspection**

- Lot and/or date codes on the package do not match the lot and/or date codes on the parts, or are inconsistent with OCM Product Discontinuation Notices (PDN)
- The manufacturer's logo or label is absent or does not match that shown on their website or on previous shipments.
- Poor use of English, misspelled words, alterations, or changes to the document.
- Barcode symbols do not match human-readable printed part data.
- Package material is inconsistent with the description on the data sheet or otherwise indicates that the parts may not be new and authentic. Wrong military packaging/labeling

**B. Physical Part Inspection**

- Different marking styles for parts with the same date/lot code
- Different country of origin for parts with the same date/lot code
- Previous markings are partially visible on the surface
- Excessive glue or mismatched components
- Manufacturer's name or cage code is missing on military part.
- Signs of poor workmanship, wrong, or mismatched hardware
- Surface of parts appear to have been sanded.
- Deep holes in laser etching (lettering on part)
- Bluish-green discoloration presents between lead(s) and body of component.
- Signs of re-tinning of leads
- If practical, perform electrical testing on a sample of the parts received.
- Certify the following is correct against the military specification or manufacturer's datasheet: number of pins/contacts per part, packaging type, part dimensions, verify connector rotation/polarization.

Note: if there is any suspicion that a part might be counterfeit, notify your supervisor/manager, and segregate the part (bag, tag, etc. to prevent the parts from being placed in stock.

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APENDIX B



EMS Development Corp.  
95 Horseblock Road, Unit 2  
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New York 11980  
USA  
Tel: +1 631 3456200  
Fax: +1 631 3456216

To all EMS suppliers:

As part of the EMS Counterfeit Parts Prevention Program, you are hereby notified that the delivery of suspect/counterfeit parts is prohibited to EMS. If suspect/counterfeit parts are provided against any order or are found in any of the goods delivered hereunder, such items will be impounded by EMS. You, the supplier, shall promptly replace such suspect/counterfeit parts with parts acceptable to EMS and you shall be liable for all costs relating to the removal and replacement of said parts. EMS reserves all contractual rights and remedies to address grievances and detrimental impacts caused by suspect/counterfeit parts. To further mitigate the possibility of the inadvertent use of counterfeit parts, you shall only purchase components and parts procured directly from the Original Component Manufacturer (OCM) / Original Equipment Manufacturer (OEM), or through the OCM authorized distributor chain. Procurement through an Independent Distributor or purchase through Brokers is not authorized, unless first approved in writing by EMS. Upon request, you must provide OCM/OEM documentation that authenticates traceability of the components to the applicable OCM/OEM.

Your signature below indicates your agreement to all the terms and conditions.

\_\_\_\_\_  
Company Name

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Electronic Signature

\_\_\_\_\_  
Title

\_\_\_\_\_  
Date

APENDIX B

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**9.0 REVISION HISTORY**

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Revision Date:	Rev:	Description of changes	Author(s):
5-4-2021	A	-	T. Vintimilla
5-10-2021	B	-	C. Metaxas
5-17-2021	C	Updated CCI Monitoring	C. Metaxas
6-1-2021	D	Remove ref. to Appendices	C. Metaxas
6-3-2021	E	Update to include DFARS	C. Metaxas
1-11-2024	F	Added OEM/OCM C of C statement to 3.7 and 3.8. Grammar and spelling fixes	A. Adhyatman
5-28-2024	G	Updated logo, Added Appendix B	L. Pena
01-26-2026	H	<ol style="list-style-type: none"> <li>1. Updated company name and logo.</li> <li>2. Updated Purpose, Responsibilities, and Definitions sections.</li> <li>3. Added Training section and updated training to be performed from 30 days to occur within 90 days of the new employee start date. Added training details for all personnel.</li> <li>4. Added Record section.</li> <li>5. Added reference to Approved Suppliers (ASL) SQAP 1006-2, F2.</li> <li>6. Removed Related Document section.</li> <li>7. Revised and updated Reference Documents section.</li> <li>8. Removed the responsibility of the Quality Engineer for this procedure.</li> <li>9. Editorial changes.</li> </ol>	C. Hubbard J. Fitzgerald