

## **Photonis USA PA, Inc. Anti-Counterfeit Policy**

1. **PURPOSE.** Photonis USA PA, Inc. (Photonis) is committed to preventing the introduction of counterfeit electronic and material components into our products. Clients may purchase Photonis products with the confidence and knowledge that any products are authentic with component parts sourced from reputable manufacturers with which Photonis has had a long relationship. Photonis designs its requirements, practices, and methods related to parts management, supplier management, procurement, and response strategies to adhere to the intent of counterfeit electronics parts standard SAE AS5553 and counterfeit material standard SAE AS6174. It is Photonis' policy to:

- Not knowingly accept counterfeit materiel.
- Prohibit the sale of counterfeit products, including any products that have been illegally replicated, reproduced, or manufactured and/or incorporated into Photonis product line(s).
- Employ a risk-based approach to reduce the likelihood of counterfeit materiel within our acquisition system and life cycle sustainment processes by:
  - Applying oversight to verify that our supplier's prevention and early detection procedures are followed to minimize counterfeit materiel within their own supply chain as the primary strategy in eliminating counterfeit materiel.
  - Strengthening the oversight and surveillance procedures for critical materiel.
  - Validating all occurrences of suspect and confirmed counterfeit parts or end items, components, parts, or assemblies and ensure they are documented in the appropriate reporting systems and the Government-Industry Data Exchange Program (GIDEP) (or a similar program as designated by the Secretary of Defense).

As Photonis sells customized products developed, in part, for the Department of Defense (DoD), this Policy and our risk mitigation plans are also based upon the authorities contained within DoD directives, instructions and policies.

2. **APPLICABILITY.** This policy applies to all Photonis personnel involved in the production, manufacture and sales of Photonis products.

4. **TRACEABILITY.** Photonis maintains traceability to the OEM for purchases from Authorized Suppliers, retaining the original purchase orders and other receiving documentation, including Manufacturers' Certificate of Conformance, for the required document retention periods.

5. **REPORTING.** Photonis reports all occurrences of counterfeit parts, as appropriate, to internal organizations, manufacturers, customers, Government Industry Data Exchange Program (GIDEP - <http://www.gidep.org>), and criminal investigative authorities as necessary.