

Counterfeit, Fraudulent And Suspect Items (CFSI) Policy

Barclay & Mathieson Ltd. recognises that there is a significant risk to quality from Counterfeit, Fraudulent and Suspect Items (CFSI).

All references, abbreviations and definitions that apply to this policy are as stated in the Defence Standard 05-135 Issue 2 dated 14th July 2019, Avoidance of Counterfeit Material.

Counterfeit/fraudulent material is material whose origin, age, composition, configuration, certification status or other characteristic (including whether or not the material has been used previously) has been falsely represented in any of the following ways:

- Misleading documentation.
- Misleading marking of the material, labelling or packaging.
- Any other means, including failing to disclose information.

STATEMENT OF POLICY

Barclay & Mathieson Ltd (or any of its subsidiaries) will not knowingly procure, use, or supply any counterfeit item or material. Barclay & Mathieson Ltd shall have arrangements in place as detailed below to manage the risk of counterfeit material in the supply chain.

It is the policy of Barclay & Mathieson Ltd to conduct all business activities in compliance with the rules and regulations applicable to our industry and the laws in the countries in which the company operates. In all cases, these business activities are conducted to the highest ethical standards. Barclay & Mathieson Ltd reputation is built on the integrity of our employees and their commitment to maintaining the highest standard of business practice.

ARRANGEMENTS FOR MANAGEMENT OF RISK

The risk of acquiring counterfeit material is managed by:

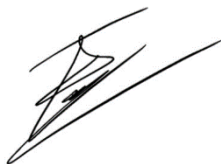
Assessment – of likelihood and criticality of encountering counterfeit material in the supply chain for a particular product, part, or application.

Avoidance – through application of the Supplier Selection Process and the Approved Vendor List. The business will only acquire products and services from known, reputable and traceable sources. The business policy is to purchase directly from the original manufacturer whenever possible and to flow down the requirement to manage counterfeit material where risk is identified.

Detection – by goods inward inspection of goods and materials. In addition, all goods inwards staff and technicians will be required to be vigilant for counterfeit material using their experience, training & awareness.

Elimination – any instances of counterfeit material or suspected counterfeit material will result in quarantine of the items and reporting of detected instances to the supplier, customer, industry, and the appropriate authorities. Counterfeit material will not be returned to the supplier. Instances of counterfeit material detection shall be communicated to the IPR holder as known, the supplier, the customer if in receipt, relevant organisations, the police, and Trading Standards.

Signed



Christophe Cluzel

Chief Operating Officer