

## Counterfeit Materials Policy

Beldam Crossley Ltd (BCL) recognizes that the counterfeiting of components is a serious problem worldwide. To meet our statutory and regulatory requirements, help protect our company and our customers from the threat of counterfeit or suspect materials, unapproved products or raw materials, BCL shall only purchase directly from the following sources.

- Manufacturer direct (Original Component / Equipment Manufacturer OCM/OEM)
- Manufacturers approved distributor
- Manufacturers approved agent / representatives
- BCL approved vendor

BCL has long term agreements and relationships with trusted suppliers with proven history, in terms of compliance and performance. All our suppliers have been risk evaluated prior to inclusion on our approved supplier listing.

The supplier's risk evaluation is based upon evidence of compliance that support a submission from a new supplier, or the ongoing periodical evaluation and monitoring of an existing supplier. The required evidence relates to topics such as counterfeit materials, ethics, human rights, anti-bribery, conflict minerals, REACH, HSE, quality and delivery performance and also financial stability. The evaluation, ongoing monitoring and control of our suppliers is managed in accordance with our internal processes / procedures.

All supplier quality requirements including diligence with regards to counterfeit materials, are flowed down to our suppliers.

Raw materials or bought in products requiring full traceability are verified upon receipt through review of supplied documentation against batch, heat or cast number. The relating documentation including material certification, inspection or test reports and certificate of conformities are verified by authorised personnel, against British Standards and customer specifications. The identification and labelling on the package and product, are also checked for defects or evidence of being tampered with.

If material or products are identified as suspect or counterfeit, they will be immediately tagged, segregated and quarantined. The details of the suspect or confirmed counterfeit materials, shall be reported to the supplier in order for them to begin their investigation. Our customers who may be affected will also be informed within 24 hours of notification, including the relevant detail of any previously supplied product linked to the material batch in question.

If after investigation it is confirmed that materials or products are indeed counterfeit, the details of the infringement will be passed to our customers, industry specific trading standards and or governing bodies, as applicable.

Dave Haxton  
Managing Director

Gareth Holt  
Commercial Director

Chris Partington  
Financial Director



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