



Purpose:

The purpose of this Work Instruction is to provide practices and methods to mitigate the risks of purchasing and supplying counterfeit parts to our customers.

This procedure was developed in support of customer requirements according to, SAE AS5553 Counterfeit Electronic Parts; Avoidance, Detection, Mitigation, and Disposition.

Scope:

This Work Instruction is applicable to all purchased parts and materials that are used to manufacture customer's parts.

Responsibility

The Quality Manager is responsible for informing employees involved in purchasing, receiving and inspection activities that they are responsible to comply with the requirements and instructions in this document.

Purchasing is responsible for buying the correct part/material according to the requirements stated on the customer's drawing, specification or other information provided.

Receiving and Inspection are responsible for examining/inspecting the purchased part/material and ensuring it meets all customer requirements.

Definitions:

Counterfeit parts and materials: A part or material that has been confirmed to be a copy, imitation or substitute that has been represented, identified, or marked as genuine, and/or altered by a source without legal right, with intent to mislead, deceive, or defraud.

Process

1. Purchasing is responsible for examining a potential supplier to assess the risk of receiving counterfeit parts. The suppliers are evaluated and selected based on their ability to supply parts/material that meets our customer's requirements. These parts/materials are to be purchased directly from Original Component Manufacturers (OCM's), an authorized distributor, or authorized reseller. The suppliers Certificate of Conformance (C of C) shall confirm that the parts/material are authentic and not counterfeit.
2. Occasionally on an exception basis and with approval from Empire Senior Management, purchasing may buy from an independent distributor. The distributor must be certified to either AS 9100 or ISO 9001, and the procured parts must have original part markings, accompanied by OCM's paperwork, along with CoC from the distributor. If the distributor does not have the original paperwork, and cannot certify that the parts are authentic, then the distributor must have



the parts tested by an independent test lab to verify authenticity, by before Empire can procure the parts. Once the verification/validation testing confirms the parts to be genuine, a copy of the test report along with the CoC must be sent with the parts for Empire's records.

3. Purchasing and Receiving maintains a list of approved suppliers, along with their scope of approval, in order to minimize the risk associated with the receipt of counterfeit parts/material.

Note: Empire uses customer approved sources when a customer's print/specifications/Purchase Order requires us to do so.

4. The Purchase Order to the supplier must document customer requirement to ensure the procurement of the correct material. require packing slips and C of C's with all of our purchased parts/material.
5. Receiving will verify the parts/material against the packing slip and C of C to ensure it matches what is stated on our supplier Purchase Order, and will also visually inspect the products upon receipt. If Receiving has any question about a part/material we received, they will bring it to the attention of Purchasing, the Quality Control Inspector and/or the Quality Manager for further inspection.
6. When parts/material does not meet customer requirements and we believe they are to be counterfeit, Purchasing and/or the Quality Manager will contact the supplier. The parts/material is labeled and segregated in a cage until disposition from the supplier. The Quality Manager will then initiate a Supplier Corrective Action using the Corrective Action form (Form: 852-1. This form is sent to the supplier. The Quality Manager will follow up with the supplier after 30 days if we have not received a response.
7. If the parts/material is confirmed to be counterfeit, the Quality Manager will initiate an investigation and ensure all incidents of counterfeit parts are reported, as appropriate, to internal organizations, customers, government reporting organizations such as the Federal Aviation Administration (FAA) or Government Industry Data Exchange Program (GIDEP), industry supported reporting programs such as ERAI, and criminal investigative authorities, and the material destroyed or rendered unusable by Empire.



Revision History

Date Changed	Description	Approval Name	Approval Date	Revision Level	Approval Initials
N/A	Initial release	Danielle Szelega	08/24/2016	A	
5/22/2018	Updated WI number to correlate to AS9100 Rev D	Danielle Szelega	5/22/2018	B	
04/27/2020	Sections 2 rewritten, 1,4,6, and 7 updated.	Sylvia Asante	04/27/2020	C	
12/16/2021	Updated the work instruction number to be in accordance with AS9100D 8.1.4	Danielle Szelega	12/16/2021	D	