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## Counterfeit & Fraudulent Goods Policy

**To eliminate counterfeit and fraudulent products into our supply chain through strict avoidance, mitigation, monitoring and disposition processes.**

### Purchase of Product

Counterfeit product has become a growing concern in customers' supply chains as customers or distributors secure low cost alternative sources. STEM Drive Ltd are committed to supplying only the highest quality products for our customers. STEM Drive purchases products only through Authorized Manufacturers and Suppliers, thereby ensuring that product is new, authentic, and fully warrantable under the direct supplier and that accurate up-to-date technical information is readily available. STEM Drive do not purchase products from sources other than authorized manufacturers and suppliers. STEM Drive do not purchase refurbished products for manufacturing. Authorized manufacturers and suppliers are continually assessed by product alerts and supplier quality data to determine past performance.

### Traceability of Product

STEM Drive maintain traceability 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.

### Return of Product

STEM Drive follows a strict returns policy that includes:

- Confirmation of the traceability of the product from STEM Drive to the customer including original purchase date, part number, and quantity.
- Incoming inspection to assure that all parts are undamaged and in original packaging.
- All products & Materials to conform to the relevant British or International Standards.
- Complete supplier product traceability and certification.

Only parts that meet these rigorous standards are allowed to be returned to inventory.

### Reporting

STEM Drive Ltd continually look for signs of counterfeit products by stringent checks on incoming products & raw materials by the following.

**Identification Markings**

- Alterations, wrong size, location, marking method incorrect, smudged or blurred, lot or batch numbers missing, incorrect suppliers logo

**Product Condition**

- Resurfaced/refinished evidence of re-work, wrong colour, shape or size, evidence of previous use (used item)

**Paperwork/Certificate of Conformity**

- Accompanying paperwork has poor spelling or grammar, errors or evidence of tampering, missing information or does not relate to the delivered product

**Lot Information**

- Unusual serialisation or reference numbers, lot information missing

**Chain of Ownership**

- Unverifiable traceability to source

**Unusual Location**

- Items delivered from a location differing from previous or from prohibited countries

**Low Price**

- A price significantly lower than historical pricing data or market norm

**Availability**

- Obsolete or scarce items suddenly becoming available

**O.E.M Certification**

- Unavailable O.E.M certification or uncertified O.E.M

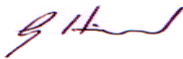
**Unfamiliar Supplier**

Supplier or agent/stockist not known or previously used

When procuring products and materials used our manufacturing process.

Any suppliers who provide counterfeit or fraudulent products to STEM Drive Ltd will be removed from our supplier approval database and appropriate actions will be taken.

**STEM Drive Ltd report all occurrences of counterfeit parts, as appropriate to manufactures, customers and to appropriate authorities.**



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**Managing Director**

**Reviewed 04<sup>th</sup> January 2024**