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COUNTERFEIT, FRAUDULENT & SUSPECT ITEMS DECLARATION		

Definitions

Counterfeit Products

Counterfeit products is material whose origin, age, composition, configuration, certification status or other characteristics have been falsely represented by

- a) Misleading marking of the material, labelling or packaging
- b) Misleading documentation or
- c) Any other means, including failing to disclose information, except where it has been demonstrated that the misrepresentation was not the result of dishonesty by a supplier or sub-supplier within the supply chain

Fraudulent Activity

Fraudulent activity may be defined as deceit, trickery, dishonest practice or breach of confidence, intentionally perpetrated for profit or to gain some unfair or dishonest advantage. This includes but is not limited to falsification of information, intentional omission, false pretences and deliberate misuse of qualified resources or certification, qualification or authorisation.

Such practice can potentially have catastrophic effects on products that are in quality or safety critical applications. Pro-Roll's management therefore treat any fraudulent activity with the utmost seriousness and may take disciplinary action against any persons found to be involved in such activity.


Responsibilities

The Pro-Roll Quality Manager with the support of the company directors and other senior staff are responsible for the implementation of CSFI training and management.

Risk Mitigation

There is a significant risk to product quality from Counterfeit, Fraudulent and Substandard Items (CFSI). To help mitigate this risk, many customers are now requiring suppliers of materials and components to implement processes that aim to prevent, detect and dispose of CFSI.

Pro-Roll Ltd employs a number of processes during manufacture of materials and components that help prevent, detect and dispose of CFSI. Authorised persons carry out these actions as required. The steps below detail the mitigation of risk from each step of the process:

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Purchasing and Control of Suppliers

Suppliers are evaluated and approved in-line with a documented process which includes CFSI controls.

Raw materials are purchased to agreed specifications

Goods Inwards

Incoming product accompanied by certification, which is checked against original Purchase Order

Incoming product inspected for suspect/quarantinable items and validated against purchasing specification in-line with a documented process

Any non-conformance is raised with the supplier and material rejected if necessary

Storage/Stock holding

Product used for manufacture is stored in accordance with manufacturer's recommendations, or, where such recommendations do not exist, in accordance with identified best practice.

Manufacture

All products are manufactured on-site using materials from approved suppliers, to approved processes and under closely-monitored conditions

Product is inspected and any non-conformance is reviewed and material/components rejected if necessary.

Testing

Product is tested to meet the requirements of international standards

Product identified as non-conforming is isolated, quarantined and disposed of accordingly


Goods Outwards

All documentation is checked and approved prior to despatch, and product is certified in line with our ISO9001/AS9100 accreditation

Pro-Roll Ltd hereby declares that through the combination of a number of processes, some examples of which are shown in the above table, they mitigate any risk from CFSI to its customers.

CFSI Training

Pro-Roll Ltd have carried out training of appropriate personnel in the awareness and prevention of counterfeit parts.

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Monitoring of Counterfeit Parts Reporting

If members of staff become aware of any counterfeit issues relating to our industry through the media or other external sources, they shall immediately inform the Company Directors and Quality Manager so any necessary action can be taken to mitigate any potential impact on Pro-Roll and our customers.

If counterfeit material is suspected or confirmed in the Pro-Roll supply chain, the company directors or Quality Manager shall inform the following organisations as appropriate:

- Customers of the counterfeit material
- Suppliers of the counterfeit material
- The genuine product or material intellectual property rights owner
- Any relevant trade bodies
- Law Enforcement Authorities including Trading Standards
- Certification or accreditation bodies such as LRQA, UKAS or Nadcap

Signed:



Symon Havenhand
Managing Director



Nick Gravill
Quality Manager