

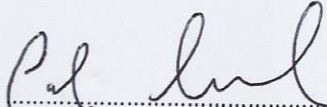
## Counterfeit, Fraudulent and Suspect Items (CFSI) Policy

### *Policy*

At Atlantix Construction Limited safety and honesty are our overriding priorities and we regard the co-operation of our supply chain throughout the tiers as essential to maintain the highest standards for all the goods we supply.

We understand the potential risks concerning the supply of Counterfeit, Fraudulent and Suspect Items (CFSI) within the supply chain, and to this end we only choose suppliers that we can trust and who can demonstrate the quality and source of the goods that we require.

All our employees involved in the purchasing of goods have been informed about the potential for CFSI and advised that all goods must be purchased directly from the manufacturers or from agreed and official distribution channels.

Signed:  .....  
(P Tolan – Managing Director)

Date: 09 12 16 .....

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### *Arrangements*

All products and services purchased by the company must be procured from approved and trustworthy suppliers. Checks shall be made on the background to the suppliers ensuring that they are operating legally from registered premises. Wherever possible, the company will prevent the receipt of fraudulent or counterfeit items by the use suppliers of with established, satisfactory historical performance.

In the event that items are suspected of being fraudulent or counterfeit (incorrect supporting documentation, visual appearance, unexpected markings, inappropriate packaging, unusual delivery route, etc – see table below) then the items shall be identified as non-conforming product, segregated from the standard stock storage and quarantined. They will not be returned to the supplier – not allowed to re-enter the supply chain.

Management shall be informed of the suspicion and shall instigate investigative action to check the source and authenticity of the items. In particular, items must not be used when there is the possibility that such use would lead to dangerous situations, e.g. suspect lifting equipment, substances, protective equipment, etc.

If suppliers are found to be providing fraudulent, counterfeit or suspect items, they will be informed of the findings (so that they can inform other customers), requested to replace them with genuine items and they will be re-assessed by the company to consider whether or not to keep using their services.

The company may inform relevant authorities about the supplier and the items identified in order to prevent such items causing serious harm to others.

*Definitions:*

**Counterfeit**

Items intentionally manufactured, or altered to imitate a legitimate product in order to pass themselves off as genuine. Counterfeit product can be deficient materially or inability to reliably function to the specified conditions

**Fraudulent**

Fraudulent items are misrepresented with intent to deceive, including items with incorrect identification or false certifications. They may also include items sold by entities that have acquired the legal right to manufacture a specified quantity of an item but produce a larger quantity than authorised and sell the excess as legitimate inventory

**Suspect**

An item about which there is an indication by visual inspection, testing, or other preliminary information that it may not conform to accepted standards, specifications and/or technical requirements and there is a suspicion that the item may be counterfeit, fraudulent or nonconforming. Additional information or investigation is needed to determine whether the suspect item is acceptable, non-conforming, counterfeit or fraudulent

**Item**

Can be a product or a service.

**Warning Signs**

Be suspicious of counterfeit and fraudulent items if you encounter any of the following warning signs:

1	Identification Markings	Alterations, wrong size, location, marking method incorrect, smudged or blurred, lot or batch numbers missing, incorrect suppliers logo
2	Product Condition	Resurfaced / refinished, evidence of re-work, wrong colour, shape or size, evidence or previous use (used item)
3	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
4	Lot Information	Unusual serialisation or reference numbers, lot information missing
5	Chain of Ownership	Unverifiable traceability to source
6	Unusual Location	Items delivered from a location differing from previous or from prohibited countries
7	Low Price	A price significantly lower than historical pricing data or market norm
8	Availability	Obsolete or scarce items suddenly becoming available
9	OEM Certification	Unavailable certification or uncertified product
10	Unfamiliar Supplier	Supplier or agent / stockist not known or previously used