

European Springs & Pressings **Counterfeit Goods Policy**

It is European Springs and Pressings Policy to eliminate counterfeit products in our supply chain through mitigation, monitoring and disposition processes.

Product Purchases

European Springs and Pressings is committed to supplying high quality products to our customers. With counterfeit products becoming a growing concern in the supply chain, as distributors secure low cost alternative sources, European Springs & Pressings only sources products from authorised manufacturers and suppliers. This ensures that the purchased products are new, authentic and warrantable under the direct supplier. European Springs & Pressings does not source products from sources other than authorised manufacturers and suppliers, neither will refurbished products be purchased for manufacturing. The authorised manufacturers and suppliers are monitored continuously by product alerts and supplier quality data to verify past performance.

Product Traceability

Traceability for purchase orders is maintained from authorised suppliers by way of retaining the purchase orders and receiving documentation. This includes supplier and manufacturer certificate of conformance and any accompanying test data and analysis for set retention periods.

Product Returns

European Springs and Pressings follows a strict returns policy:

- The traceability of the product from European Springs & Pressings to the customer is confirmed, including the original purchase order date, part number and quantity.
- Good inwards inspection of incoming goods to check parts are undamaged and in the original packaging.
- All products and materials to conform to the relevant British or International Standards.
- Complete supplier product traceability and certification.

Parts are not allowed to be returned to stock unless they meet the above requirements.

Reporting

European Springs & Pressings are continually checking incoming products and materials for evidence of counterfeit products by the following.


- **Identification and Markings:** Alterations, wrong size, location, marking method incorrect, smudged or blurred, lot or batch numbers missing, incorrect supplier's logo.
- **Product Condition:** Re-surfaced wrong colour, shape or size, evidence of previous use.
- **Paperwork/Certificate of Conformity:** Paperwork not relating to the delivered product, missing information, delivery paperwork has poor spelling or grammar and evidence of tampering.
- **Batch/Lot information:** Batch information missing and unusual reference numbers.

- **Chain of Ownership:** Unverifiable traceability to source.
- **Low Price:** A price significantly lower than historical pricing data or market norm.
- **Unusual Location:** Items delivered from a location differing from previous or from prohibited countries.
- **Availability:** Obsolete or scarce items suddenly becoming available.
- **Unfamiliar Supplier:** Supplier or agent/ stockist not known or previously used.

Any suppliers who provide counterfeit or fraudulent products to European Springs & Pressings will be removed from the approved supplier register and appropriate actions will be taken, with the relevant authorities contacted.



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