

COUNTERFEIT, FRAUDULENT AND SUSPECT ITEMS POLICY

Policy Statement

At Larkshill Engineering, safety is our overriding priority and we believe that the co-operation of our supply chain throughout the tiers is essential to maintaining the highest standards for all of the goods / services 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 use suppliers that can demonstrate the quality and source of the goods that we require.

Counterfeit / fraudulent material is material whose origin, age, composition, configuration, certification status or other characteristic (including whether or not the material has been used previously) has been falsely misrepresented in the following ways:

- Misleading marking of the material, labelling or packaging
- Misleading documentation
- Any other means, including failing to disclose information.

In keeping with international requirements relating to conflict minerals, Larkshill Engineering strives to ensure that gold, tin, tantalum, tungsten, cobalt and their derivatives contained within products are sourced responsibly and in accordance with applicable legislation and customer requirements. This is in accordance with our Conflict Minerals Statement, document: LH Conflict Minerals Statement 001 which can be viewed at www.larkshill.com.

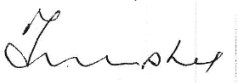
Larkshill Engineering is committed to preventing such items from getting into the Larkshill Engineering facilities and processes.

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

If any CFSI items are discovered within the Larkshill Engineering supply chain and/or have been released to the customer, Larkshill Engineering will notify affected customers without undue delay and, where practicable, within 24 hours of confirmation of a CFSI occurrence so that they may cease the use of this item and inform any other parties which may be using them. This CFSI policy should be read in conjunction with Larkshill's Product Safety Policy, ref. LHProductSafetyPolicy001.

These items shall be quarantined, investigated and, where appropriate, disposed of in a controlled manner to prevent re-entry into the supply chain.

The Managing Director of Larkshill Engineering Ltd or their nominee are responsible for the development and effective implementation of this policy and for ensuring that the necessary resources are provided for its implementation through our processes.



Frank Murphy
Managing Director
Larkshill Engineering Limited

Risk Mitigation Statement

Larkshill Engineering employs a number of processes during manufacture of our products and services that help prevent, detect and dispose of CFSI. Authorised persons carry out these actions as required.

Purchasing

- Suppliers evaluated and approved in line with a documented process
- Raw materials are purchased to agreed specifications
- Material traceability and supporting certification shall be maintained throughout receipt, storage, manufacture and dispatch, as applicable.

Good Inwards

- Incoming products are accompanied by certification, which is checked against original Purchase Order
- Incoming products are inspected for suspect items and validated against purchasing specification in line with a documented process
- Any non-conformance is raised with the supplier and rejected, if necessary

Storage, stock, holding

- Products used for manufacture are stored in accordance with manufacturer's recommendations, or, where such recommendations do not exist, in accordance with best practice

Manufacture

- All products are manufactured on-site using materials from approved suppliers, to approved processes and under closely-monitored conditions
- Products are inspected and any non-conformance is reviewed and material / components rejected, if necessary. Example points for inspection are appearance, inclusions / foreign objects and defects.

Testing

- Where appropriate, products are inspected to meet the requirements of international standards.
- Products identified as non-conforming are isolated, quarantined, investigated and disposed of accordingly.

Goods Outwards

- All documentation is checked and approved prior to despatch, and products, where appropriate are certified in line with our ISO 9001 / 14001 certification.

Communication

- All interested parties will be made aware of this statement.
- This policy shall be reviewed at least annually, or sooner if required by changes to legislation, customer requirements or business processes.

Related policies and documents:

LHProductSafetyPolicy001

LHNuclearSafetyPolicy001

LH Conflict Minerals Statement 001