GENERAL DYNAMICS
Mission Systems

Castleham Road
St. Leonards on Sea
East Sussex TN38 9NJ
England
Tel: +44 (0)1424 853481
Fax: +44 (0)1424 851520
www.generaldynamics.uk.com

Counterfeit Avoidance Statement

Definitions taken from the SAE AS5553 – AIR6273 Standards:

Suspect Part

An EEE (Electrical, Electronic, Electro-Mechanical) part for which there is objective and credible evidence indicating that the part is likely a Counterfeit Part.

Counterfeit Part

(1) An unauthorized (a) copy, (b) imitation, (c) substitute, or (d) modified EEE part, which is knowingly, recklessly or negligently misrepresented as a specified genuine item from an original component manufacturer or authorized aftermarket manufacturer; or
(2) A previously used EEE part which has been modified and is knowingly, recklessly, or negligently misrepresented as new without disclosure to the customer that it has been previously used.

Definition of Counterfeit Materiel taken from the MoD DEF STAN 05-135:

Materiel whose origin, age, composition, configuration, certification status or other characteristic (including whether or not the materiel has been used previously) has been falsely represented by:

a) misleading marking of the materiel, 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.

Tainted Materiel

This is defined as Materiel or Counterfeit Materiel where there is reasonable cause to believe that that modifications have been made to composition, configuration or other characteristic with malicious purpose. This could impact on the confidentiality and/or Integrity and/or Availability-Reliability-Maintainability (ARM) of the materiel itself or any assembly in which it is planned to be used.

NOTE:

Counterfeit avoidance must be maintained on all materiel that includes EEE (Electrical, Electronic, Electro-Mechanical), Mechanical parts as well as Raw Materials and Certificates.

General Dynamics Mission Systems Limited (GD-MS) has a pro-active Counterfeit Fraudulent & Suspect Items (CFSI) avoidance policy and risk based control plan. The control plan is based upon SAE AS5553, IEC 62668 and AS/EN 9100 standards. Other documents have been used as references and are shown in the "Applicable Standards and Specifications" section. GD-MS has an internal Counterfeit Avoidance Team (CAT) that pro-actively investigates the latest counterfeits issues on a regular basis.
GD-MS is a member of industry recognised counterfeit avoidance committees including the Ministry of Defence Counterfeit Avoidance Working Group (MoD CAWG) and provides support to the Anti-Counterfeiting Forum: www.anticounterfeitingforum.org.uk

GD-MS personnel are trained in the awareness of avoidance, detection, mitigation and disposal of suspect counterfeit or counterfeit EEE parts if relevant to their organisational role or function.

GD-MS has a pro-active Obsolescence Management Plan (OMP) based upon IEC 62402 Obsolescence Management that monitors obsolescence on GD-MS supported Bill of Materials (BOMs) and new designs to ensure Life Cycle Codes (LCC), Years To End of Life (YTEOL) and Life Time Buys (LTB) are recorded and actioned. This reduces the risk of counterfeit parts being procured after a LTB has been issued. GD-MS is a member of International Institute of Obsolescence Management (IIOM).
Where the supplier notifies the GD-MS Supply Chain that parts to be ordered are obsolete from their approved sources, all data provided by the supplier shall be submitted to the internal Component Engineering department for verification.
If the part is still available from an alternative source, Component Engineering shall provide this information to Supply Chain to re-source the part.

GD-MS procures parts from approved Original Component Manufacturers (OCM), Original Equipment Manufacturers (OEM) and approved franchised distributors that are contracted to supply the parts used in the company's products to the timescales required.

If a part is identified as being obsolete or not available from the OCMs, OEMs or franchised distributors and only available from non-franchised distributor sources, then only GD-MS approved non-franchised distributors shall be used. These GD-MS approved non-franchised distributors have been audited by the Counterfeit Avoidance Team and have verified that they will only supply parts from known good sources with all part checking procedures in place and correct traceability documentation.

Any part that has been identified as having suspect documentation or missing traceability information shall be submitted to Component Engineering for evaluation with all data provided by the supplier. Component Engineering will check the information provided for any known counterfeit parts being available on the open market. If the parts could be suspect, fraudulent or counterfeit, Component Engineering will request photographs/sample of the actual part and specific marking information from the supplier. Component Engineering will then investigate the information provided by the supplier to validate it is a genuine part. Additional testing will be conducted by a certified Test House to AS6081 Level A (A1 to A6) or AS6081A/AS6171A. The results will be documented in a report and sent to Component Engineering for approval before the parts are delivered to GD-MS. Further testing may be required to AS6081 Level B, C, D, E, F and G or AS6081A/AS6171A as appropriate.
If Component Engineering is not satisfied that the part is genuine then Supply Chain will be instructed not to procure.

All parts are checked when they are received by GD-MS at Goods Inward Inspection (GII) to ensure that they are genuine parts. If there are any concerns then Component Engineering is notified to investigate further.

If GD-MS sub-contracts the manufacture of products then the sub-contractor will be audited to ensure an approved and valid counterfeit avoidance process is followed.

Further information on GD-MS counterfeit avoidance process is documented in the GD-MS reference documents:
PR073 : Supply Chain Management Process : Section 2.5 (Supply Chain)
PR089 - DOCID-2-2116 : Component Engineering : Section 3
G00413 - DOCID-23-7938 : Counterfeit Parts
D0333 - DOCID-23-2394 : Counterfeit Alert Notice :: M0266 - DOCID-23-8848 : Map
D0995 - DOCID-23-2423 : Internal GDUK Counterfeit Part Avoidance :: M0470 - DOCID-23-8898 : Map
D0827 - DOCID-23-2415 : Suspected Counterfeit Part Testing Process :: M0644 - DOCID-23-8857 : Map
G00536 - DOCID-23-4937 : Suspected Counterfeit External Test Requirements

D1467 - DOCID-23-9400 : Counterfeit Avoidance with Approved and Non Franchised Suppliers :: M0649 - DOCID-23-9401 : Map
D1468 - DOCID-23-8602 : Counterfeit Avoidance with Sub-Contractors :: M0650 - DOCID-23-8858 : Map
F00538 - DOCID-23-8645 : Counterfeit Avoidance with Sub-Contractor Questionnaire
F00540 - DOCID-23-8649 : Supplier Counterfeit Avoidance Audit External Questionnaire
F00561_- DOCID-23-9036 : Supplier Counterfeit Avoidance Audit Internal Questionnaire
G00518 - DOCID-23-2635 : Counterfeit Avoidance with Suppliers and Sub-Contractors
PR248 : Supplier Approval / Re-Approval Review Process (Supply Chain)
F10294 : Supplier 3-Year Declaration of Certifications and Representations (Supply Chain)

Applicable Standards and Specifications

- **SAE AS9100 :** Quality Management Systems - Requirements for Aviation, Space and Defense Organizations
- **SAE AS5553 :** Counterfeit Electrical, Electronic, and Electromechanical (EEE) Parts; Avoidance, Detection, Mitigation, and Disposition
- **SAE AS6081A :** Counterfeit Electronic Parts; Avoidance Protocol, Distributors
- **SAE AS6171 :** Test Methods Standard; Counterfeit Electronic Parts
- **SAE AS6174 :** Counterfeit Materiel; Assuring Acquisition of Authentic and Conforming Materiel
- **SAE AS6301 :** Fraudulent /Counterfeit Electronic Parts : Avoidance, Detection, Mitigation, and Disposition - Distributors Verification Criteria
- **SAE AS6462 :** AS5553 Counterfeit Electronic Parts; Avoidance, Detection, Mitigation, and Disposition Verification Criteria
- **SAE AS6496 :** Fraudulent /Counterfeit Electronic Parts : Avoidance, Detection, Mitigation, and Disposition - Authorized/Franchised Distribution
- **SAE AS6810 :** Requirements for Accreditation Bodies when Accrediting Test Laboratories Performing Detection of Suspect/Counterfeit in Accordance with AS6171 General Requirements and the Associated Test Methods
- **SAE AIR6273 :** Terms, Definitions and Acronyms Counterfeit Materiel or Electrical, Electronic and Electromechanical Parts.
- **SAE ARP6178 :** Counterfeit Electrical, Electronic, and Electromechanical (EEE) Parts: Tools for Risk Assessment of Other than an Authorized Source (e.g., Independent Distributors)
- **SAE ARP6328** : Guideline for Counterfeit Electrical, Electronic, and Electromechanical (EEE) Parts; Avoidance, Detection, Mitigation, and Disposition Systems
- **IEC 62402 :** Obsolescence Management
- **IEC 62668-1 :** Process management for avionics - Counterfeit prevention - Part 1: Avoiding the use of counterfeit, fraudulent and recycled electronic components
- **IEC 62668-2 :** Process management for avionics - Counterfeit prevention - Part 12: Managing electronic components from non-franchised sources
- **ISO/IEC 20243-1 :** Information technology - Open Trusted Technology ProviderTM Standard (O-TTPS) : Part 1 Requirements and recommendations for mitigating maliciously tainted and counterfeit products
- **ISO/IEC 20243-2:** Information technology - Open Trusted Technology ProviderTM Standard (O-TTPS) : Part 2: Assessment procedures for the O-TTPS
- **IDEA-STD-1010 :** Acceptability of Electronic Components Distributed in the Open Market
- **MoD KiD** : Knowledge In Defence/Quality in Acquisition/Requirements Preparation/Guidance for MoD Delivery Teams on the Avoidance of Counterfeit Material
- **DEF STAN 05-135** : Avoidance of Counterfeit Materiel
- **MoD Counterfeit Avoidance Maturity Model (CAMM)**
- **JESD243 :** Counterfeit Electronic Parts: Non Proliferation for Manufacturers

- **ISO 16678 :** Guidelines for interoperable object identification and related authentication systems to deter counterfeiting and illicit trade

Note: Latest revisions must be used.