

**COUNTERFEIT, FRAUDULENT & SUSPECT ITEMS POLICY**

Torishima Service Solutions Europe Ltd (TSSE) recognises that counterfeiting is a problem that affects companies worldwide and that there are unscrupulous parties who may seek to substitute Counterfeit, Fraudulent and Suspect Items (CFSI) for genuine items or services for their commercial gain. TSSE endeavours to make all employees and suppliers aware of the risks of CFSI.

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

- A counterfeit item is deemed to be an item confirmed to be a copy, imitation or substitute that has been represented, identified, or marked as genuine, and/or altered without legal right with intent to deceive or defraud.
- A fraudulent item is any item misrepresented to the customer as meeting the customer’s requirements.

To protect our customers and ourselves, all our employees involved in the purchasing of goods and services have been informed about the potential for CFSI and to help prevent the purchase of counterfeit, suspect or unapproved products, we only purchase materials directly from the following primary sources:

- Original Equipment Manufacturer
- Franchised Distributors
- Manufacturer or Agent

Suppliers to TSSE are required to adopt this policy and this applies to all Purchase Orders that TSSE place upon its supply chain. Some typical signs to be aware of include:

1	Identification Markings	Alterations, wrong size, location, marking method incorrect, smudged or blurred, lot or batch numbers missing, incorrect supplier’s logo
2	Product Condition	Resurfaced / refinished, evidence of re-work, wrong colour, shape or size, evidence of 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	Serialisation Information	Unusual serialisation or reference numbers, serial or batch 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 OEM certification or uncertified OEM
10	Unfamiliar Supplier	Supplier or agent / stockist not known or previously used

It is recognised however, that certain hard-to-find or obsolete products cannot always be obtained from these primary sources. In such instances, it may be necessary to source components through brokers or independent distributors. In these cases, TSS shall exercise all due care and attention over the choice of supplier and upon receipt of good, services and their supporting paperwork.

We carefully review the ongoing performance of all suppliers utilising a variety of criteria, which includes monitoring our suppliers for Counterfeit, Fraudulent and Suspect Items.

Dated: February 2018



Andrew Ferrie  
Managing Director

To be reviewed February 2019

UNCONTROLLED IF PRINTED