



## Cell Pack Solutions Limited

6 West Walpole Street  
South Shields  
Tyne & Wear  
NE33 5BY  
United Kingdom  
Tel: 0191 496 9999

E-mail: [info@cellpacksolutions.co.uk](mailto:info@cellpacksolutions.co.uk)

[www.cellpacksolutions.co.uk](http://www.cellpacksolutions.co.uk)  
[www.tracerpower.com](http://www.tracerpower.com)

## Anti Counterfeit and Fraudulent Policy

Cell Pack Solutions Limited (The Company) is committed to ensuring that all products manufactured by the company are free of any counterfeit product, manufactured from conforming material, and ensuring that its supply chain is fully involved in the detection and avoidance of counterfeit parts and product. In support of these commitments, CPS has established this policy document to meet these requirements for non-electronic material. This establishes and documents counterfeit materials risk mitigation methods to enable CPS to:

- a. Maximise the availability of authentic materials.
- b. Assure the procurement of material from reliable sources.
- c. Assure authenticity and conformance of procured material.
- d. Control of material dispositioned as counterfeit.
- e. Reporting of suspect or confirmed fraudulent/counterfeit material to other potential users and the appropriate Authority Having Jurisdiction.

For the purposes of this document Fraudulent and/or Counterfeit Goods can be described as:

1. Goods that are, or contain, item(s) misrepresented as having been designed and/or produced under an approved system/process/technique or other acceptable method.
2. Goods that are an unauthorised copy of an Original Equipment Manufacturer (OEM) item, component, or other material.
3. Goods that are not adequately traceable to a designated OEM to ensure authenticity in OEM design and manufacture.
4. Goods that do not contain correct internal and/or external materials.
5. Material that has been repacked, relabelled, or furnished as authentic OEM.
6. Material falsely presented as authentic by way of altered documentation or certification.

All suppliers of material destined for CPS designed product shall be on the CPS approved supplier list and controlled and monitored and register. These state approval levels, audit requirements, certification held, special process capability with ISO9001 being the minimum if accompanied by an CPS QMS audit. AS9100 being the preferred option with the current revision of both ISO and AS mandating requirements to mitigate the risk of Fraudulent and Counterfeit Product. All materials used by subcontractors shall be purchased from CPS approved suppliers with regards to controlling their own supply chain via CPS audit.

All material destined for CPS designed product shall only be purchased by trained CPS purchasing staff using only CPS documentation. These documents shall be generated referencing our specific requirements relevant to their specific industry sector activities. Full copies of CPS T&Cs shall be available to suppliers through the CPS Supplier Portal. These shall document, and flow down, how the organisation shall meet its obligations regarding the requirements of both customer and regulatory authorities.

Upon receipt of purchased product, Inspection staff will commence inspection, the depth of verification/validation activities being commensurate with the criticality of the product. These activities shall always include a full documentation check to ensure that the PO/contract requirements have been met in full. Any proven counterfeit or suspect product shall not be returned to the supplier. The goods shall be processed immediately. CPS shall inform any customers and regulatory authorities as necessary as per CPS contractual protocols.

Counterfeit and Fraudulent Product awareness training shall be carried out for Goods Inwards staff.

Eddie Czestochowski  
Managing Director

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