



Justin Electronics

Counterfeit Component Avoidance Plan (CCAP)

1 Purpose

To describe Justin's Counterfeit Component Avoidance Plan.

2 Scope

All Employees.

3 Responsibilities

The CEO is responsible for final review and approval of the CCAP. Purchasing and receiving shall be responsible for compliance to this program.

4 Detailed Procedures

4.1 JUSTIN issues to an approved vendor a computer generated purchase order.

4.2 Receiving checks all pertinent paperwork received to verify against the JUSTIN purchase order.

4.3 The Manufacturers Cert is checked for the correct Part Number-Date Code and Lot Code.

4.4 Resistors are visually checked for the following before entering all pertinent information into computer system.

- Correct Part Number
- Correct Quantity
- Correct Date Code
- Correct Lot Code

4.5 Computer will only accept correct information entered to coincide with the JUSTIN purchase order

5 Authorized Distribution

Justin only purchases parts from the following.

- Direct from our franchised manufacturers
- Direct from manufacturers without a franchise agreement
- From franchised distributors

Justin shall pass on all applicable warranties and support in accordance with the manufacturer's distribution agreements. All of Justin's franchised manufacturer agreements are stored in a locked safe and are considered proprietary. These contracts are not subject to review by third parties unless mutually agreed upon by Justin and the manufacturer.

Justin has on file letters from all franchised manufacturers attesting to the existence of a distribution agreement between Justin and the manufacturer.

6 Register of suppliers

Justin maintains a list of approved vendor in accordance with AS9120.

7 Purchasing

Justin will only purchase for resale from our approved vendor list which includes franchised manufacturers, non-franchised manufacturers (direct), and franchised distributors.

Justin will keep on record authorization letters from all franchised distributors on our approved vendor list

Justin's purchasing preference is as follows.

- 1) Franchised manufacturers
- 2) Direct from manufacturers non franchised
- 3) Franchised distributors

8 Traceability and record retention

All product sold by Justin is available with full traceability to the original manufacture including manufacturer certificate of conformance upon request.

Justin maintains records of product origin indefinitely.

9 Military parts

Military parts are shipped with the following information.

- Part number
- Customer part number (if applicable)
- Manufacturer's CAGE code
- Date code
- Lot code

Justin's certificate of conformance is included with every shipment.

10 Commercial parts

Commercial parts are shipped with a packing slip and Justin's certificate of conformance.

11 Control of suspect parts

Justin's processes evaluate and minimize the risk of potential suspect product entering Justin's inventory.

12 Customer returns

Product returned to Justin from a customer with the correct RMA# is checked for the following.

- Correct part number originally shipped from Justin
- Correct quantity originally shipped from Justin
- Correct Manufacturer originally shipped from Justin
- Correct Date Code originally shipped from Justin
- Correct Lot Code originally shipped from Justin

If all data doesn't match exactly parts are returned to the customer immediately.

13 Disposition of parts deemed suspect

In the event parts fail visual inspection or the data doesn't match the Justin purchase order the parts are transferred to a segregated Non-Conforming marked cabinet for return to the manufacturer.

A Non-Conformance report is issued immediately to the manufacturer and after receiving RMA # the parts are returned directly back to the manufacturer.

Suspect parts shall not be re-introduced into the supply chain or re-stocked. Nor shall they be returned to the manufacturer for a stock rotation.

14 Inventory control plan

Justin has an inventory control system which provides for traceability of all product movements. Customer returns shall be traceable per the same system.

15 Reporting

Reporting of suspect parts shall be authorized by the quality manager. The quality manager shall make appropriate reports to the executive management, affected customer, and affected manufacturer. Suspect parts can only be confirmed by the manufacturer. If necessary the manufacturer will report confirmed suspect parts through GIDEP.

16 Audits

This CCAP and referenced processes are listed and scheduled for internal audit.

17 GIDEP

Justin is notified by its franchised manufacturers of any GIDEP alerts pending and/or issued to them. Justin is also notified of any internal problems or if a re-call of their products is pending internally.

18 Packaging and re-packaging

Justin shall send product in original manufacturer sealed packaging when available. When original packaging cannot be sent Justin shall use standard commercial packaging. When special packaging is required by customer or military specification Justin will package accordingly. Traceability of re-packaged parts is maintained by Justin's internal system and shall be printed on labels and packing slips as available from the manufacturer.

19 Training

Justin's warehouse employees shall be trained on the processes to detect and prevent suspect product.

20 Scrap control

All suspect parts are returned to the manufacturer under an RMA# Justin does not scrap suspect parts.

21 Destruction of scrap parts

See section 20 (Scrap control)

22 Inventory control plan

See section 12 (Customer returns)

23 Segregation of product

See section 13 (Disposition of parts deemed suspect)

24 Inventory access

Only Justin employees are permitted in the warehouse unescorted. Visitors must be escorted by a Justin employee.

25 Traceability of returned parts

See section 14 (Inventory control plan)

26 Upgrading processes

Per AS9120, Justin continuously looks to improve all processes whenever possible.

27 Distributor services

See section 7 (Purchasing)