

Counterfeit Product Prevention Policy

Policy Statement

Acal BFi is committed to acting with integrity, honesty and in an ethical manner in its business activities globally. We conduct all business activities to the highest standard of business practice and in compliance with the rules and regulations applicable to our industry.

About this policy

There is increased evidence that the number of counterfeit electronic components in the market is rising. Counterfeit electronic components are defined as being those that are misrepresented in their origins or quality. Although we are not aware of any specific manufacturers producing counterfeit parts and selling them on, Acal BFi is aware of the potential for this situation and the dangers of counterfeit products appearing in the supply chain.

The purpose of this policy is to define actions to be taken by Acal BFi for the avoidance of counterfeit material in the business supply chain.

Who does this policy apply to

This policy applies to all persons working for Acal BFi Holdings Limited, Acal BFi UK Limited, Acal BFi Central Procurement UK Limited, Acal BFi Netherlands BV, Acal BFi Holdings GmbH, Acal BFi Germany GmbH, Acal BFi Italy Srl, Acal BFi France SAS, Acal BFi Belgium NV/SA and Acal BFi Nordic AB (together the **Acal BFi Group**) or on our behalf in any capacity, including employees at all levels, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, business partners and casual workers (together referred to as staff).

This policy does not form part of any contract of employment or other contract to provide services, and we may amend it at any time.

Responsibility for this policy

The board of directors (the **Board**) has overall responsibility for the effective operation of this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

The Company Secretary has day-to-day operational responsibility for this policy and you should refer any questions about this policy to them in the first instance. This policy is reviewed at least annually by the Company Secretary and the Board.

Staff are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Company Secretary who will involve the Board where appropriate.

Counterfeit Prevention

To minimise the risk of counterfeit products being procured the Acal BFi Group undertakes and encourages the following processes:-

- We only use audited and proven suppliers that we represent for direct purchases of raw materials and components sold by the Acal BFi Group. The procurement of products through this authorised channel provides the Acal BFi Group with assured sources of supply.

- Certificate of Conformance from our suppliers provides traceability back to the point of origin.
- Validation of subcontractor's procurement methodology and sources of supply where procurement is outsourced to another entity as part of our Technology Centre's custom product manufacturing and assembly service.
- Suspect parts awareness training is carried out for all key staff in the supply chain. In the event of discovery of counterfeit materials, those materials will be quarantined, and an investigation will be undertaken to discover their source. Where applicable full details of the infringement will be reported to other potential users, customers and the appropriate government trading standards agency for criminal investigation.

Training and Communication

Training on this policy, and on the risk our business faces in its supply chains, forms part of the induction process for all key staff in the supply chain, and regular training will be provided as necessary.

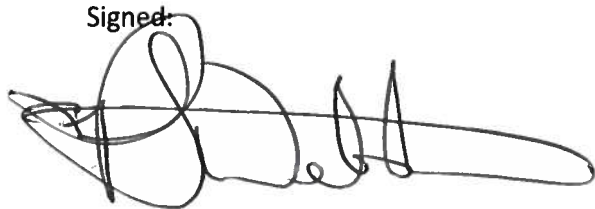
Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the impact in supply chains.

Our zero-tolerance approach to counterfeit products in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate on an ongoing basis.

Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

Signed:

A handwritten signature in black ink, appearing to read 'Paul Webster', written over a horizontal line.

Paul Webster

Group Chief Executive Officer, Acal BFi

Date: 28 June 2023



Change Control Summary

Version 2

Paragraph	Change
	The counterfeit product prevention policy was adopted in July 2021
	June 2023: Updates to the whole policy to bring it in line with new template.