

Counterfeit, Fraudulent, and Suspect Items (CFSI) Policy

Andrews Fasteners Limited understands and recognises the risks associated with the supply of Counterfeit, Fraudulent, and Suspect Items (CFSI), which may be incorporated into products throughout the supply chain.



We acknowledge that our customers are increasingly concerned about this issue and require their external providers (suppliers) to demonstrate due care and diligence in the procurement and supply of goods and services, to mitigate and eliminate the risk of CFSI being placed on the market.

Counterfeit or fraudulent material refers to items whose origin, age, composition, configuration, certification status, or other characteristics have been subject to false representation (being untrue or misleading) in any of the following ways:

- Imitation of Andrews Fasteners Limited products or unauthorised use of the Andrews Fasteners trademark by third parties
- Misleading marking, labelling, or packaging of materials
- Falsified or misleading documentation, including electronic records.
- Any other form of misrepresentation, including failure to disclose information where there is a legal duty to do so.

To mitigate and minimise the risk of CFSI, Andrews Fasteners Limited has implemented robust processes within our business management systems.

We procure goods and services **only from Approved Suppliers** who:

- Have undergone initial assessments and approvals by Andrews Fasteners Limited
- Are subject to continuous evaluation through assessments and audits.
- Are listed on our Approved List of Suppliers (ALS)
- Are regularly monitored, reviewed, and analysed for pricing, performance, quality, and conformity.
- Operate in accordance with our purchase orders, specifications, and relevant product standards, including voluntary national standards.

To prevent CFSI from entering our supply chain and reaching our customers, we conduct rigorous incoming inspections and verification processes, including:

- **Visual inspections** upon receipt
- **Item-specific checks** against delivery/consignment notes and purchase orders
- **Verification of packaging and labelling** to ensure markings are not misleading or false in a material particular
- **Documentation and certification checks**, including **traceability of the origin of the product**.
- **Non-destructive testing**, such as dimensional analysis, gauge inspections, and coating/plating checks in accordance with relevant standards
- **Destructive testing**, to evaluate mechanical properties and ensure conformance with applicable product standards.
- **Suitability testing**, to verify declared performance and compliance with CE and UKCA marking requirements.

Any identified non-conformities are subject to immediate withdrawal, segregation, and quarantine procedures. A full investigation is conducted to determine the root cause, followed by the implementation of appropriate corrective and preventive actions. All non-conforming items, including any identified Counterfeit, Fraudulent, or Suspect Items (CFSI), are rejected and removed from the supply chain.



Should any CFSI be subsequently identified or discovered within the Andrews Fasteners Limited supply chain, we will notify the affected customer immediately and maintain internal records of such notifications. This enables them to initiate their own internal processes to assess potential impact, take appropriate action, including the implementation of a recall process, and inform their own customers and/or end users where affected items may have been used.

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