



COUNTERFEIT, FRAUDULENT & SUSPECT ITEMS (CFSI) POLICY

The BAPP Group of Companies organisations understand and recognise that there may be risks concerning the supply of Counterfeit, Fraudulent and Suspect Items (CFSI) which are subsequently incorporated into many products throughout supply chains.

We understand that many customers are now concerned and requiring their external providers to be able to demonstrate and show due care and diligence in procurement and supply of goods/services to eliminate potential risk of any Counterfeit, Fraudulent, or Suspect Items from being supplied.

Counterfeit/fraudulent material is material where origin, age, composition, configuration, certification status or other characteristics have been falsely represented in any of the following ways;

- imitation of BAPP products or use of the BAPP brand by third parties without permission.
- misleading marking of the material, labelling or packaging
- misleading documentation.
- any other means, including failing to disclose information.

To mitigate and do our best in combating and minimising potential Counterfeit, Fraudulent and Suspect Items (CFSI) risks, we have implemented a number of processes into our business management systems. BAPP Group Limited purchase goods/services direct from our partner factories who have;

- undergone BAPP initial engagement assessments
- continued evaluation assessments/audits
- are identified on an Approved External Provider List
- are continuously monitored, reviewed, and analysed for price, performance and conformity
- and work in accordance with our order requirements, Purchasing Specification and product standards specifications.

BAPP items undergo rigorous incoming inspections and various checking points throughout receipt of goods in order to eliminate any Counterfeit, Fraudulent, or Suspect Items (CFSI) making their way into our supply chain and been made available to customers, such as;

- incoming visual packaging checks
- item specific checks in conjunction with delivery/consignment notes, purchase orders, invoices.
- further packaging and labelling inspections and checks in accordance with our Purchasing Specification packaging requirements.
- coating/plating inspections/testing in accordance with product standards.
- gauging inspections/testing in accordance with product standards.
- mechanical testing in accordance with product standards.

Any identified non-conformities are subject to immediate segregation and quarantine processes with full investigation and evaluation of root cause, corrective and preventative measures, and rejection of any non-conforming items, Counterfeit, Fraudulent and Suspect Items (CFSI).

Should any Counterfeit, Fraudulent and Suspect Items (CFSI) be subsequently be identified or discovered within the BAPP supply chain, we will notify our customers immediately so that the same process can be carried out within their own business systems and also be able to inform their own customers and/or applications where any items have been subject to use.

This policy will be reviewed at regular planned intervals to ensure ongoing suitability.

SIGNED:



DATE: 13th March 2026

Dean G Cook - BAPP Group of Companies Chairman