

# Counterfeit, Fraudulent and Suspect Items (CFSI) Policy

PL-012 Counterfeit, Fraudulent and Suspect Items (CFSI) Policy

Date:	Changed by	Change/Amendment	Version
Apr 2021	P. Lindley	First issue	v1.0

---

## Counterfeit, Fraudulent and Suspect Items (CFSI) Policy

At SigTech Rail Consultancy, we recognise that there may be risks concerning the supply of Counterfeit, Fraudulent and Suspect Items which are subsequently incorporated into our services and/or products. We believe that the co-operation of our supply chain through our process is essential to maintaining the highest standards for all of the goods/services we supply.

To mitigate any risks, wherever possible, we purchase direct from the manufacturers. Where this is not possible we only use suppliers who are able to demonstrate the quality and source of the goods they supply to this company.

Employees involved with purchasing goods for the company are instructed to only purchase goods direct from the manufacturers or from our agreed list of suppliers.

Counterfeit/fraudulent material is material whose origin, age, composition, configuration, certification status or other characteristic (including whether the material has been used previously or not) has been falsely represented in any of the following ways:

- Misleading marking of the material, labelling or packaging.
- Misleading documentation.
- Any other means, including failing to disclose information

We understand the potential risks concerning the supply of Counterfeit, Fraudulent and Suspect Items (CFSI) within the supply chain, and to this end we only use suppliers that can demonstrate the quality and source of the products and goods that we require.

All SigTech Rail employees who are involved in the purchasing of goods have been informed of the potential for CFSI and advised that all goods must be purchased directly from the manufacturers or from agreed and official distribution channels.

If any CFSI items are discovered within the SigTech Rail supply chain, we will notify our customers immediately so that they may cease the use of this item and inform any other parties which may be using them.

These items should then be quarantined and destroyed, and not returned to the supplier to prevent them from re-entering the supply chain.

This policy is owned and implemented by the Managing Director who has ultimate responsibility for its success, but all SigTech Rail's senior management accept their responsibility in implementing the organisation's CFSI policy.

This policy will be reviewed on an annual basis to ensure the intended outcomes are achieved or where additional factors require action and for ensuring that the necessary resources are provided for its implementation through our processes.

Signed:



Pete Lindley  
Managing Director  
April 2021