



## Counterfeit Avoidance Policy

Golden Star Technology (GST) is committed to preventing the purchase, acceptance, and distribution of fraudulent and counterfeit electrical, electronic, and non-electronic parts. GST policy is to purchase only new and authentic commercial-off-the-shelf (COTS) from authorized suppliers/distributors or the original product manufacturer.

### Definition:

- Counterfeit Material - Material that has been confirmed to be a copy, imitation or substitute that has been represented, identified, or marked as genuine and/or altered without authority with intent to mislead, deceive or defraud.
- Counterfeit Part - Part made or altered to imitate or resemble an “approved part” without authority and is intended to mislead or defraud by passing as original or genuine.
- Fraudulent Material - Any suspect material misrepresented to the Customer as meeting the Customer’s requirements.
- Suspect Material - Any part with an indication that it may have been misrepresented by the Supplier or Manufacturer and may meet the definition of counterfeit material/part or fraudulent material.
- COTS - Commercial-off-the-Shelf (COTS) components and/or systems.

### GST’s Risk Mitigation

- GST will maintain a Counterfeit Item Risk Mitigation process internally, with its suppliers, and with its customers.
- GST will participate in the Government Industry Data Exchange Program (GIDEP) monitoring and will take action on GIDEP reports which could affect product delivered to the customer. When suspect or confirmed counterfeit item(s) associated the purchase order is discovered, GST will ensure suspect counterfeit item(s) is under containment and not delivered to GST’s customers. GST will immediately notify customer and supplier with the pertinent information.
- If GST’s supplier becomes aware or suspects that items delivered, in accordance with the GST purchase order, contain suspected or confirmed counterfeit items, the supplier will notify GST immediately.
- When requested by GST, the supplier shall provide OEM documentation that authenticates traceability of the affected item(s) to the applicable OEM.
- The supplier shall provide evidence of their risk mitigation process to GST upon request.
- The approved GST supplier shall purchase material directly from OEMs or from authorized OEM distributors.



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### **GST Control of Counterfeit or Suspected Parts**

Any items that are found to be counterfeit or suspected to be counterfeit, are identified, documented, quarantined, evaluated, and dispositioned to prevent unintended use or delivery. Necessary actions are taken to contain the presence of counterfeit items. The GST Quality Manager and GST Chief Operating Officer will make the final decision on the counterfeit item.

The Quality Manager will advise the Customer of any items that have shipped that could be counterfeit. GST Quality Manager will discuss with the Customer on containment, disposition, or next steps. The supplier will be contacted to contain any other items in the inventory supply.

If items are confirmed to be counterfeit, GST will report to GIDEP and wait for OEM/manufacture instructions.