

QS-PR-024 Anti-Counterfeit Control Plan

Approved by: Chuck Amsden **Approved** 06/11/19

This procedure is current and approved when viewed on-line. The procedure becomes uncontrolled when printed. Uncontrolled procedures can not be used for production or performance of duties. See Procedure [QS-PR-004](#) Document Control Process for instructions on changing this procedure. Consult section 5.0 Document History for changes. Minor changes are indicated in red.

1.0 Purpose:

This procedure describes the Anti-Counterfeit Control Plan at Mouser Electronics in compliance with AS6496 Fraudulent/Counterfeit Electronic Parts; Avoidance, Detection, Mitigation, and Disposition.

2.0 Scope:

This procedure applies to all employees, product purchases and customer returns.

3.0 Responsibility

The Vice President of Quality is responsible for the final review and approval of this procedure. Employees with responsibilities for purchasing, receiving or verifying parts shall also be responsible for compliance to this plan.

4.0 Detailed Procedure:

4.1 Anti-Counterfeit Policy

The following policy has been reviewed and approved by executive management.

Anti-Counterfeit Policy

Mouser has adopted this Anti-Counterfeit Policy to eliminate the impact of counterfeit products on Mouser and its customers.

This is a zero tolerance Policy against knowingly and intentionally trafficking in counterfeit goods.

To support this policy of ensuring that there is a low risk of counterfeit products entering our supply chain, Mouser maintains processes to ensure purchases are only made directly from the Manufacturer or Manufacturer approved sources. This is accomplished through compliance with SAE AS6496 Fraudulent/Counterfeit Electronic Parts: Avoidance, Detection, Mitigation, and Disposition – Authorized/Franchised Distribution.

Should a suspect counterfeit or counterfeit product be found, Mouser shall quarantine such material and report the finding to the supplier and appropriate authorities. This policy shall be communicated, understood, implemented, and maintained at all levels within Mouser.

This policy shall be posted on [Mouser's Anti-Counterfeit Web Site](#). It is also contained in this plan where it shall be available for the customer's records. This Policy shall also be communicated to all employees through meetings, Quality Awareness Training and postings.

4.2 Anti-Counterfeit Control Plan

This plan has been developed to address all the requirements of AS6496 and give sufficient detail and/or references to other plans, procedures or records. This plan is for customers and Mouser employees. It shall be posted on [Mouser's Anti-Counterfeit Web Site](#). It is Mouser's plan to only perform Authorized Distribution.

4.3 Customer Related Processes

4.3.1 Disclosure of Non-Authorization

It is Mouser's plan to only perform Authorized Distribution. If this plan is changed and Mouser agrees to perform unauthorized distribution, Mouser shall notify the customer at the time of quote. When authorization is terminated, customers with outstanding orders shall be contacted.

4.3.2 Provision of Manufacturer's Warranty

In accordance with Manufacturer distribution agreements, Mouser shall pass on applicable warranty and support such warranty. Found in Mouser's Sale Terms and Conditions section (6.) Mouser Limited Warranty:

www.mouser.com/saleterms.

4.3.3 Distribution Agreements

Mouser shall have a documented distribution agreement with the Manufacturers Mouser distributes. Such agreements are considered proprietary and not subject to review by third parties unless mutually agreed upon by both Mouser and Manufacturer. Mouser shall have a letter from the manufacturer that attests to the existence of a distribution agreement between Mouser and the Manufacturer. See [PTOP-PR-042](#) Supplier Contracts and [PTOP-PR-046](#) New Supplier Evaluation and Approval.

4.4 Register of Suppliers

Mouser maintains a register of suppliers in compliance with AS9100. Creation of new supplier numbers in Mouser's register of suppliers per [PTOP-PR-046](#) New Supplier Evaluation and Approval. Updating Mouser's register of supplier's when authorization changes per [PTO-PR-002](#) Supplier Termination – Product Operations.

4.4.1 Purchase Restrictions

Mouser shall only purchase parts for resale from the Manufacturer or from the Manufacturer's Authorized Distributor. When Mouser purchases from an Authorized Distributor the distributor's authorization with the manufacturer shall be verified and documented. See [PTAM-PR-002](#) Product Purchasing.

4.4.2 Purchasing Preference

Mouser has a preference to purchase Parts for resale directly from the Manufacturer. See [PTAM-PR-002](#) Product Purchasing.

4.4.3 Purchases Outside of a Distribution Agreement

It is Mouser's plan to only perform Authorized Distribution.

4.4.4 Counterfeit Electronic Part Control Plan Requirement

The Vice President of Quality shall maintain records of other Authorized Distributors in the Master Distributor Records in adherence to AS6496. Records are maintained per [QS-PR-008](#) Record Control.

4.5 Traceability, Record Retention and Retrievability

Mouser retains and maintains records of product origin per AS9100. They are maintained for 10 years per [QS-PR-008](#) Record Control.

4.5.1 Military Parts

When Mouser distributes Military Parts the documentation required by MIL-STD-790 and JESD31 shall be provided to the customer with each order. Military Parts at Mouser are the Parts authorized by the Manufacturer through MIL-STD-790 and authorized through the Defense Logistics Agency (DLA). See [WHSH-PR-061](#) QML Paperwork.

4.5.2 Commercial and Industrial Parts

Commercial and Industrial Parts delivered by Mouser shall have a Certificate of Conformance on the Mouser Packing List. See [WHSH-PR-004](#) Shipping, [WHSH-PR-029](#) IPACK and [WHSH-PR-030](#) Autoship.

4.5.3 Provision of Traceability

Under normal circumstances Manufacturer provided records of product origin are not provided to customers on Commercial and Industrial Parts. When warranted by special circumstances or contract, Manufacturer provided records of product origin shall be provided to customers.

4.5.4 Retention Period

Manufacturer provided records of product origin are maintained for 10 years per [QS-PR-008](#) Record Control.

4.5.4.1 Records from Manufacturers and other Authorized Distributors shall be maintained as received. Scanning programs shall be suitable to produce readable copies of original forms. If any scanned document is not readable, the original documents shall be retrieved or reproductions from the Manufacturer shall be used. See [WHRV-PR-018](#) Kofax Scanning Validation.

4.5.4.2 When record retention times required by customers exceeds 10 years, Mouser shall be able to accommodate reasonable request for extended retention. Types of records and medium of storage shall be negotiated between the Customer and Mouser. The Vice President of Quality shall have the final acceptance for extended retention requests.

4.5.5 Certificate of Conformance

Mouser's Certificate of Compliance is printed on every packing list.

- (a) The Aerospace Certificate of Compliance contains language as follows:

CERTIFICATE OF COMPLIANCE – Mouser Electronics, Inc. is an authorized distributor of the products furnished on this shipment and hereby certifies that the products are new, unused and were purchased solely from the original manufacturer or through the manufacturer's authorized distribution. The original manufacturer warrants and certifies that the products they produce meet their specifications. Evidence of this warranty and certification is maintained at the manufacturer and/or at Mouser. This pack list is the Evidence of Conformity that this shipment meets the requirements of Mouser's Quality Management System and/or Customer Purchase Order requirements agreed on between Mouser and Customer. Environmental compliance per producer documentation. Mouser certifies that this shipment is part of a shipment covered by the manufacturer's documentation. Products in this order have been handled in accordance with MFR's requirements, JESD625, ANSI/ESD S20.20, JEDEC 31 and MIL-STD-790. QML/QPL qualified products are indicated by the presence of a QML/QPL standard number.

- (b) The Commercial Certificate of Compliance contains language as follows:

CERTIFICATE OF COMPLIANCE – Mouser Electronics, Inc. hereby certifies that the products furnished on this shipment were purchased solely from the original manufacturer or through the manufacturer's authorized distribution. The original manufacturer warrants and certifies that the products they produce meet their specifications. Evidence of this warranty and certification is maintained at the manufacturer and/or at Mouser. This pack list is the Evidence of Conformity that this shipment meets the requirements of Mouser's Quality Management System and/or Customer Purchase Order requirements agreed on between Mouser and Customer. Environmental compliance per producer documentation.

4.5.5.1 The packing list with the Certificate of Compliance as a unit is considered the whole Certificate of Conformance. This Packing List with Certificate of Compliance includes the follow data:

- a. The name and address of both Mouser and the Customer
- b. The Manufacturer's name
- c. Manufacturer's part number
- d. Quantity
- e. Date code (if provided by the Manufacturer and required by the Customer)
- f. Lot code (if provided by the Manufacturer and required by the Customer)
- g. Customer purchase order number
- h. Ship date to Customer
- i. Authorized Distributor Statement of Conformance
- j. Signature of Responsible Party (Electronic Signature is acceptable)
- k. Country of Origin
- l. Customer part number (if known and required)

4.6 Control of Suspect, Fraudulent and Confirmed Counterfeit Parts

Mouser has several processes imbedded into the QMS that evaluate and minimize the risk associated with potential counterfeit product infiltrating into Mouser's inventory.

4.6.1 Customer Returns

4.6.1.1 Return Policy

a. Mouser's Return Policy is described in our Terms and Conditions section 1a. Returns and section 6. Mouser's Limited Warranty.

Section 1a Returns:

Returns are normally accepted when completed within 30 days of the ship date. If Mouser agrees to accept a return, return freight charges must be prepaid by customer. Mouser shall not accept COD shipments. Some products may require return directly to the manufacturer. All items must be in the original packaging and in resalable condition. Contact a sales representative for a Return Materials Authorization Number and addressing instructions prior to returning product. Any ESD sensitive product returned that has not been handled properly will not be eligible for credit. The foregoing statements concerning Returns do not apply to NON-CANCELABLE/NON-RETURNABLE PRODUCTS. (See the NON-CANCELABLE/NON-RETURNABLE PRODUCTS section in these terms.)

Section 6. Mouser's Limited Warranty.

Customer must notify Mouser within 90 days from date of shipment of any defective product. (See MOUSER'S LIMITED WARRANTY for further information.)

b. Mouser shall issue an RMA to a customer when a Return is authorized. See [SASV-PR-026](#) Returns, [SASS-PR-002](#) Returns - International and [WHRV-PR-046](#) Authorized Returns. Only products originally shipped from Mouser can be returned to Mouser. See [SASV-PR-026](#) Returns and [SASS-PR-002](#) Returns - International.

c. Per Mouser Sales Terms and Conditions section 1.b **Counterfeit Product Prevention Clause:**

Only products originally shipped from Mouser or from a supplier at Mouser's direction (drop-ship) will be returned to Mouser. All others shall be promptly quarantined and disposed of or returned to the customer. By a Customer returning products to Mouser, the Customer certifies that the products were purchased from Mouser and there has been no substitution in whole or part of same product from another supplier, distributor or other such source of the product. The return should be in the original packaging (manufacturer or Mouser), in unused condition (except defective). ESD sensitive products should not be opened except under controlled conditions.

d. Returns from known Independent Distributors or Brokers are not allowed and when found shall be scrapped. See [SASV-PR-008](#) Distributor Policy.

4.6.1.2 Return Verification

The majority of customer returns are scrapped. They are scrapped per internal controls that limit risks based on the customer, the cost of the parts, packaging issues and signs of use or alteration. They are scrapped instead of being verified for economic reasons. See [WHRV-PR-046](#) Authorized Returns and [WHRV-PR-045](#) Carrier Returns / Unauthorized Returns.

a. Parts that are not scrapped automatically shall be verified against traceability records. This can include lot and/or date code when available from the Manufacturer. See [WHRV-PR-043](#) Part Identification.

b. For further information on Returns processes, see [Returns procedures](#) or contact the Vice President of Quality.

4.6.2 Supplier Shipments

Manufacturers and other Authorized distributors are very low risk for counterfeit. Therefore inspection shall consist of count, kind, condition and documentation. The Vice President of Quality shall monitor this risk and revise this plan when warranted. Mouser shall review documents supplied from the supplier with the shipment and ensure the shipment is from the intended supplier per the Purchase Order. See [WHRV-PR-070](#) Receiving.

4.6.3 Disposition of Parts Deemed Suspect, Fraudulent or Counterfeit

Suspect, Fraudulent and Counterfeit parts are treated as non-conforming product per AS9100 and dispositioned per non-conformity procedures listed in [QS-PR-007](#) Nonconforming Product Control. The [Counterfeit Investigation Tool](#) aids Products in their investigation of previously return products per [PTOP-PR-133](#) Service Orders

a. Records of the dispositions shall be maintained.

b. The Vice President of Quality may return suspect Parts to the Manufacturer for analysis and disposition to confirm their status as counterfeit or not counterfeit.

c. Confirmed Counterfeit Parts shall not be returned to the Customer and may be retained for investigative or training purposes. The Vice President of Quality shall quarantine the Confirmed Counterfeit Parts for 5 years, or longer, if required by legal requirements.

d. After 5 years or when legal requirements allow, the confirmed Counterfeit Parts shall be taken to be scrapped by the Vice President of Quality. Scrapped per [WHSA-PR-063](#) Warehouse Scrap Disposition as referenced below in section 4.8 below.

4.6.4 Re-stocking Prohibition

Suspect, Fraudulent or confirmed Counterfeit Parts shall not be reintroduced into the supply chain, restocked nor returned to the Manufacturer in a stock rotation.

Mouser shall not restock product into its Authorized Inventory that was not purchased from the Authorized Distribution Channel.

4.6.5 Packaging and Repackaging Parts Sold to Customers

4.6.5.1 Mouser shall send part in Manufacturer sealed packaging when the quantity ordered is closer to standard manufacturer package quantity.

4.6.5.2 When Manufacturer packaging cannot be sent, Mouser shall package the product in standard commercial packaging or when required by manufacturer, the manufacturer's specified packaging. Traceability on the repackaged parts is maintained by the System. The traceability shall be printed on labels and packing list as available from the Manufacturer and requested by the Customer. See [WHMG-PR-018](#) Preservation of Product and [WHOD-PR-006](#) Packaging Quidelines.

4.7 Training

Employee in Asset Management, Products and Warehouse shall be trained on their processes to prevent counterfeit. This training shall be documented in training requirements per applicable position

4.8 Scrap Control in Authorized Distribution

Scrap Control is documented in internal scrap procedures, [WHRV-PR-026](#) Stock Rotation Scrap and [WHSA-PR-063](#) Warehouse Scrap Disposition.

4.9 Inventory Control Plan

Mouser has an inventory control system which provides for traceability of all stock movements. Customer Returns shall be traceable per section 4.6.1.2.

4.9.1 Segregation of Product

Mouser intention is to only be authorized, if unauthorized stock is received by Mouser, Mouser shall treat it as suspect and scrap appropriately. See [WHRV-PR-070](#) Receiving.

4.9.2 Inventory Access

Warehouses where inventory is kept shall have ID card access. Visitors shall be escorted. See HR's [ID Badge Agreement](#) and the [Mouser Security Survey](#).

4.9.3 Traceability of Returned Parts

Customer returns are traced in the inventory control system. Customer Returns are not commingled with new and unused parts. There is sufficient capacity to exclude customer returns, when customers request. Records of customer returns are maintained.

4.10 Reporting

Reporting on confirmed counterfeit parts shall be authorized by the Vice President of Quality. The Vice President of Quality shall make appropriate reports to executive management, affected Customers, affected Manufacturer and authority having jurisdiction. Confirmed counterfeit can only be determined by the Manufacturer. The Vice President of Quality will report confirmed counterfeit incidents through GIDEP, following the current revision of [Appendix E](#) Instructions for Reporting Suspect Counterfeit Parts Using [ALERT/SAFE-ALERT/PROBLEM ADVISORY forms](#). When provided, the Manufacturer's response shall be included in external reports.

4.11 Audits

This anti-counterfeiting plan and referenced processes are listed and scheduled for internal audit. This also makes the plan part of Mouser's QMS and subject to our third party registrar to AS9100. See [QS-PR-005](#) Audit Procedure and the Internal Audit Schedule.

4.12 Counterfeit Awareness

The Vice President of Quality is responsible for keeping informed on current counterfeiting information and trends, including detection and avoidance techniques contained in appropriate industry standards, and using such information and techniques for continuously upgrading internal processes.

4.13 GIDEP Participation

The Vice President of Quality shall ensure Mouser is a member of GIDEP. The Vice President of Quality shall screen GIDEP reports and other credible sources of counterfeiting information to avoid the purchase or use of counterfeit electronic parts. **The Vice President of Quality shall review the GIDEP Failure Summary for possible non-conforming product that Mouser distributes.**

4.14 Obsolete Parts

In the context of this plan "Obsolete electronic part" means an electronic part that is no longer in production by the original manufacturer or an aftermarket manufacturer that has been provided express written authorization from the current design activity or original manufacturer. It is Mouser's plan to only perform Authorized Distribution. Therefore obsolete parts are not processed by Mouser. See [PTOP-PR-035](#) Part Number Lifecycle and Discontinuation regarding Suppliers providing Mouser with information on negative lifecycles.

4.15 SAE G-19 Committee

Mouser is a contributing member of the SAE G-19 Committee. This committee wrote AS5553 Counterfeit Electronic Parts; Avoidance, Detection, Mitigation, and Disposition, AS6081 Fraudulent/Counterfeit Electronic Parts Avoidance – Distributors and AS6496 Fraudulent/Counterfeit Electronic Parts: Avoidance, Detection, Mitigation, and Disposition – Authorized/Franchised Distribution.

5.0 Document History

Effective Date	Description of Change	Approved by
06/11/19	Added the following statement to Section 4.13 GIDEP Participation - "The Vice President of Quality shall review the GIDEP Failure Summary for possible non-conforming product that Mouser distributes."	Chuck Amsden
10/01/18	Added link to Appendix E Instructions for Reporting Suspect Counterfeit Parts Using ALERT/SAFE-ALERT/PROBLEM ADVISORY forms and link to the forms in section 4.10 Reporting.	Chuck Amsden
8/24/18	Added in section 4.4: Creation of new supplier numbers in Mouser's register of suppliers per PTO-PR-046 New Supplier Evaluation and Approval. Updating Mouser's register of supplier's when authorization changes per PTO-PR-002 Supplier Termination – Product Operations. Added in section 4.6.1.1. (b.): SASS-PR-002 Returns – International and Only products originally shipped from Mouser can be returned to Mouser. See SASV-PR-026 Returns and SASS-PR-002 Returns - International. For AS6496 CA-3063, added in section 4.10: When provided, the Manufacturer's response shall be included in external reports.	Chuck Amsden
8/16/18	Added product purchases and customer returns in section 2.0. Changed to "within Mouser" and Quality Awareness Training as a way of communicating the Anti-Counterfeit Policy in section 4.1. Added Found in Mouser's Sale Terms and Conditions section (6.) Mouser Limited Warranty: www.mouser.com/saleterms in section 4.3.2. Added See PTO-PR-042 Supplier Contracts and PTO-PR-046 New Supplier Evaluation and Approval. In section 4.3.3. Added The Register of Suppliers is maintained by the Products Process	Chuck Amsden

	<p>Manager and/or the Product Operations team in section 4.4. Added See PTAM-PR-002 Product Purchasing to section 4.4.1 and changed resell to resale. Added in the Master Distributor Records and Records are maintained per QS-PR-008 Record Control in section 4.4.4. Added See WSHH-PR-061 QML Paperwork in section 4.5.1. Added See WSHH-PR-004 Shipping, WSHH-PR-029 IPACK and WSHH-PR-030 Autoship to section 4.5.2. Added See WHRV-PR-018 Kofax Scanning Validation. In section 4.5.4.1. Added The Vice President of Quality shall have the final acceptance for extended retention requests and changed Organization to Mouser in section 4.5.4.2. Changed conformance to compliance, added aerospace to (a.) added the commercial CoC statement in (b.) in section 4.5.5. In section 4.5.5.1 changed to Compliance, Comformance, Compliance, and in (a.) changed from Organization to Mouser. In section 4.6.1.1 (a.) added and section 6. Mouser's Limited Warranty, Section 1a Returns:, All items must be in the original packaging and in resalable condition, Any ESD sensitive product returned that has not been handled properly will not be eligible for credit, Section 6. Mouser's Limited Warranty, in (b.) See SASV-PR-026 Returns and WHRV-PR-046 Authorized Returns, in (c.) sales, in (d.) See SASV-PR-008 Distributor Policy. In section 4.6.1.2 added See WHRV-PR-046 Authorized Returns and WHRV-PR-045 Carrier Returns / Unauthorized Returns, in (a.) added See WHRV-PR-043 Part Identification, in (b.) added see Returns procedures. Added See WHRV-PR-070 Receiving. In section 4.6.2. Added listed in QS-PR-007 Nonconforming Product Control. The Counterfeit Investigation Tool aids Products in their investigation of previously return products per PTO-PR-133 Service Orders in section 4.6.3. Added The Vice President of Quality may return in 4.6.3 (b.). Added Vice President of Quality and Confirmed Counterfeit in section 4.6.3 (c.). Added shall be taken to be scrapped by the Vice President of Quality. Scrapped per WHSA-PR-063 Warehouse Scrap Disposition as referenced below in section 4.8 below in section 4.6.3 (c.). In section 4.6.4 changed Organization to Mouser. Added See WHMG-PR-018 Preservation of Product and WHOD-PR-006 Packaging Quidelines in section 4.6.5.2. Added See WHRV-PR-070 Receiving in 4.9.1. Added See HR's ID Badge Agreement and the Mouser Security Survey in 4.9.2. Added when customers request in 4.9.3. Added authority having jurisdiction in 4.10. Added See QS-PR-005 Audit Procedure and the Internal Audit Schedule and corrected word "party" in 4.11. Added See PTO-PR-035 Part Number Lifecycle and Discontinuation regarding Suppliers providing Mouser with information on negative lifecycles in 4.14.</p>	
11/27/17	<p>Changed Director of Quality to Vice President of Quality throughout the procedure. Changed word "organization" to Mouser in section 4.5.4.2. Added "and requested by the Customer" in section 4.6.5.2. Removed revision level C in sections 4.4, 4.5 and 4.6.3. Removed the word Fraudulent in the title of AS5553 in section 4.15. In section 4.8, changed AS9100 to internal procedures. Update the CoC statement in section 4.5.5 and deleted the wording "each and," then added "aerospace" packlist.</p>	Chuck Amsden
11/7/16	<p>Section 4.9.3, changed word from used to unused. Section 4.10, added: The Director of Quality will report confirmed counterfeit incidents through GIDEP.</p>	Chuck Amsden
10/21/16	<p>Added JEDEC 31 and DLA to 4.5.1. Added "Customer Returns are not commingled with new and used parts." to section 4.9.3.</p>	Chuck Amsden

8/25/16	Updated section 4.8 – Procedure numbers mentioned have been changed WHLG-PR-026 to WHRV-PR-026 and WHLG-PR-063 to WHSA-PR-063.	Chuck Amsden
1/19/15	Corrected numbering. Minor corrections.	Chuck Amsden
11/18/14	Corrected section numbering.	Chuck Amsden
11/17/14	Total revision to AS6496	Chuck Amsden
10/3/13	Revised G-19 activities	Chuck Amsden
4/10/12	Added clause 4.1.6.1 for Customer Returns	Chuck Amsden
1/31/12	Revised Q-19 activities	Chuck Amsden
11/1/11	Added procedure references	Chuck Amsden
10/20/11	Added monitoring of GIDEP and keeping records	Chuck Amsden
4/30/11	Initial release of procedure	Chuck Amsden