

# Beck Optronic Solutions Limited

## Counterfeit Avoidance Policy

### 1 PURPOSE

- 1.1 The spread of fraudulent (substandard) and counterfeit (imitation) material and intellectual property theft has increased across all industries and has proportionately increased the risk of such materials entering the supply chain. Beck Optronic Solutions (Beck) has therefore instigated anti-counterfeiting measures:
- (a) To ensure the safety of our customers, staff and end users;
  - (b) To maintain their continued confidence in Beck; and
  - (c) To safeguard Beck's revenue.
- 1.2 Individuals and organisations will be guilty of an offence if they trade in fraudulent and counterfeit material. Beck and its suppliers, subcontractors and distributors must be able to demonstrate that they have conducted due diligence when sourcing materials and have taken care to prevent fraudulent and counterfeit materials from entering the supply chain.
- 1.3 Beck achieves this by:
- (a) Using best practice to manage our communications and transactions efficiently;
  - (b) Vigilance in our supply chain to help protect against counterfeiting and piracy and other forms of theft to enable the early detection of criminal activity;
  - (c) Strengthening relationships with our business partners and striving to increase customer satisfaction; and
  - (d) Strict control of sales and distribution of Beck's products.

### 2 BECK PRODUCTS ANTI-COUNTERFEITING MEASURES

- 2.1 Beck protects its products:
- (a) By intellectual property registration (of patents, trademarks, trade names and copyright) and licensing;
  - (b) By use where appropriate of serial numbers, and maintenance of records of supply; and
  - (c) Through brand protection measures such as detailed packaging and product design which makes them difficult to counterfeit.
- 2.2 Beck destroys or recycles waste products to ensure they do not unintentionally enter the supply chain. Beck's quality assurance processes ensure that fraudulent material does not enter the market.

- 2.3 Beck will work upon request with the relevant authorities to educate them on its products and help them identify counterfeits.
- 2.4 Beck advises its customers to purchase Beck products directly from Beck or through authorised distributors. A list of authorised distributors is available at [www.beckoptronic.com](http://www.beckoptronic.com).
- 2.5 Only customers who purchase Beck products through its approved channels can receive the benefit of its quality assurances, technical support, warranty coverage and return privileges. If a customer has received defective, counterfeit, obsolete, remarked or repackaged products, in the first instance, the customer should contact the merchant who sold the products. Beck may investigate the allegation and work with the relevant authorities to check if the goods infringe Beck's intellectual property rights.

### **3 SECURING THE SUPPLY CHAIN**

- 3.1 At times, in the production of its products, Beck needs to procure goods from third party suppliers. To ensure that this does not introduce counterfeit or fraudulent material into its products it ensures that;
  - (a) Where possible parts are purchased from the original component manufacturer (OCM) or authorised suppliers from the Approved Suppliers list;
  - (b) Where parts cannot be sourced from OCMs or from approved suppliers or where other suppliers must be used, the risks of procuring counterfeit parts shall be assessed and documented. In such instances and where there is doubt over a party's authenticity, additional testing must be performed.
  - (c) The purchasing team checks the business information of suppliers, subcontractors and distributors to ensure that they are legitimate.
  - (d) It requires suppliers, subcontractors and distributors:
    - (I) To have rigorous quality assurance programmes in place;
    - (II) To sign up to a code of practice whereby, amongst other things, it has policies and procedures in place to ensure that it produces legitimate goods and sources its materials through legitimate channels;
    - (III) To follow Beck's guidelines on the packaging and marking of goods inwards;
    - (IV) to be aware that Beck does not accept supply of fraudulent or counterfeit products, will investigate the alleged supply of such products and will report such instances to the appropriate authority.
  - (e) Suppliers are made aware that Beck will not negotiate with counterfeiters and will pursue them to the full extent of the law.

### **4 BECK STANDARD TERMS AND CONDITIONS**

- 4.1 Beck's standard terms and conditions for purchase are available on [www.beckoptronic.com](http://www.beckoptronic.com). They include provisions to ensure that the goods supplied to Beck:
  - (a) Meet the required specification.

- (b) Do not infringe third party intellectual property rights; and
  - (c) Include warranties and indemnities which enable Beck to claim against suppliers in the event that Beck receives counterfeit or fraudulent material.
- 4.2 The Beck terms and conditions also include rights of audit and reporting on supplier quality data which enables Beck to monitor the supplier's compliance with these obligations.

## **5 BECK'S PURCHASE ORDER**

- 5.1 In order to assist with quality control and minimise the risk of being provided with fraudulent or counterfeit material, Beck's purchase orders require the supplier to include:
- (a) A list of the Original Component Manufacturers;
  - (b) Testing and inspection criteria;
  - (c) Quality management systems used;
- 5.1.1 Certificate of Conformity.

## **6 WHAT TO DO IF COUNTERFEITING IS SUSPECTED**

- 6.1 If you think that Beck's intellectual property rights have been infringed or suspect our products are being counterfeited, then contact Beck's Managing Director for further advice and assistance.
- 6.2 If you suspect that Beck has received counterfeit or fraudulent material, do not return the item to the supplier (as this will enable the item in question to re-enter the supply chain). Contact Beck's Operations Director for further advice and assistance.
- 6.3 The Directors will determine what action if any needs to be taken. Beck employees are not authorised to notify third parties of suspected counterfeit or fraudulent material.

**Approved by:**



Andy Hedges  
Managing Director – Operations

**Review Date:**

2<sup>nd</sup> September 2025

