



Triumph Actuation Systems, LLC

Quality Procedure

QP-0059

Rev F

Date:

Document Title	Counterfeit Parts Control Procedure	
Reviewed By: Kristi Rich	Reviewed By: David Martin	Reviewed By: David Weisensel
Reviewed By: Steve Johnson	Reviewed By: Michael Nix	Reviewed By: Reggie Burks
Reviewed By: Joel Bowman	Reviewed By: Angelic Van den Berg	Approved By: Sean Wood

Printed documents shall be considered for reference only

TABLE OF CONTENTS

1.0	Scope.....	2
2.0	Purpose.....	2
3.0	Associated Documents.....	2
4.0	Definitions.....	2 - 3
5.0	Implementation.....	3 - 5
6.0	Training.....	5
7.0	General Visual Inspection.....	5 - 7
8.0	Quality requirements.....	7

1.0 Scope:

This procedure applies to Triumph Actuation Systems, LLC Counterfeit Parts Control.

2.0 Purpose:

This procedure defines Triumph Actuation Systems, LLC process for Counterfeit Parts and Suspected Unapproved Parts Control Process.

3.0 Associated Documents:

AS5553	Counterfeit Electrical, Electronic, and electromechanical Parts: Parts; Avoidance, Detection, Mitigation, and Disposition
AS6081	Counterfeit Electrical, Electronic, and Electromechanical (EEE) Parts: Avoidance Detection, Mitigation and Disposition- Independent Distribution
AS6174	Counterfeit Material; Assuring Acquisition of Authentic and Conforming Material
AS6171	
AS6496	Fraudulent/Counterfeit Electronic Parts: Avoidance, Detection, Mitigation, and Disposition – Authorized/Franchised Distribution (DOD)
FAA	Advisory Circular No. 21-29D Detecting and Reporting Suspected Unapproved Parts
ATP	Acceptance Test Procedure
EP_0.1	Request for Engineering Review
EP_1.1	Engineering Change Notice
GIDEP	Government Industry Data Exchange Program
POTC	Purchase Order Terms and Conditions
QP-0020	Supplier Inspection Delegation Authority
QP-0024	Receiving Inspection
QP-0025	Periodic Sampling of Raw Material
QP-0029	Non-Conforming Material Control
QP-0057	Customer Returns
SQAM001	Triumph's Supplier Quality Assurance Manual
QAM	Internal Audits
Title 14 CFR Part 21.303	Replacement and Modification Parts
Title 14 CFR Part 43.13	Performance Rules
SD-25	Government-Industry Data Exchange Program (GIDEP) Operating Policies and Procedures

4.0 Definitions:

Counterfeit Part(s) – an unauthorized copy, imitation, substitute or modified part, which is knowingly misrepresented as a specified genuine part of an original or authorized manufacturer.

Note: Examples of counterfeit parts can include, but are not limited to, false identification of marking, labeling, grade, serial number, date code, documentation, or performance characteristics.

Approved Supplier – Suppliers who are formally assessed and meet the necessary requirements of Triumph.

OEM – Original Equipment Manufacturer– an organization that designs and/or engineers a part and is pursuing or has obtained the intellectual property rights to the part.

Certificate of Conformance – a document provided by a supplier formally declaring that all buyer purchase order requirements have been met. The document may include information such as manufacturer, distributor, quantity, lot and/or date code, inspection date, etc., and is signed by a responsible party for the supplier.

Approved Parts – Parts which are produced in accordance with the means outlined in FAA Part 21, maintained in accordance with FAA parts 43 and 91, and meet applicable design standards. (Reference www.bluetunadocs.com)

Suspected Unapproved Parts – A part, component, or material that does not meet the requirements of an Approved Part. (Reference www.bluetunadocs.com)

Fraudulent Activity - Fraudulent Activity is an act of intentional deception, dishonest practice, or breach of confidence, intentionally perpetrated for some unfair or dishonest advantage. This includes but is not limited to falsification of information, misuse of Acceptance Authority Media (AAM), intentional omission, false pretenses, and deliberate misuse of qualified resources or certification / qualification / authorization.

5.0 Implementation:

5.1 Purchasing is responsible to:

- Procure the correct parts using the applicable drawing, specification, description, or other information to meet the intended use while assessing the risk of receiving counterfeit or suspected unapproved parts.
- Flow down requirements to suppliers for Counterfeit Parts are controlled through the PO referencing the Purchase Order Terms and Conditions (POTCs) and the SQAM001-Triumph's Supplier Quality Assurance Manual
- Focus buying efforts to obtain parts directly from approved suppliers, OEM's, and authorized distributors. Procurement should raise suspicion if parts are:
 - Exceptionally low priced
 - Exceptionally short delivery schedules

Printed documents shall be considered for reference only

- Access to an unlimited supply of parts
- Lack of documentation that will be provided
- A concern of fraudulent activity and or paperwork

- 5.2** Engineering is responsible to ensure the drawing, specification, process, or other description identifies the applicable type, class, style, part number, manufacturer, or other related information so the correct part or product is identified.
- 5.3** A list of approved suppliers, which contains OEM's and authorized distributors, is maintained and monitored on Triumph's Supplier web portal to minimize the risk associated with the supply and/or receipt of counterfeit and/or suspected unapproved parts.
- 5.4** Shipping/Receiving is responsible for inspecting packaging and paperwork to ensure it is consistent with past shipments, and that English is properly used without misspellings and alterations.
- 5.5** Receiving inspection examines the product to ensure the drawing, specification, type, class, style, part number, manufacturer, certificate or conformance, test report or other related paperwork/information is present to detect or identify counterfeit and/or suspected unapproved parts. Ref QP-0024. Product quality audits are performed for SIDA items. Ref QP-0020.
- 5.6** Subsequent testing of raw materials is monitored, Ref QP-0025, and all parts are tested, whether individually or in complete assemblies, as required. Ref QP-0024 and ATP's.
- 5.7** Customer Returned Goods are also reviewed for counterfeit parts. Ref QP-0057
- 5.8** Internal part obsolescence is monitored and handle through Engineering procedure, EP_1.1.
- 5.9** Triumph Actuation Systems, Clemmons, is a member of the Government Industry Data Exchange Program (GIDEP). The GIDEP Representative and its Users understand and are compliant to their membership responsibilities according to SD-25. Triumph checks regularly for any issues and determines if action should be taken. Obsolete parts and counterfeit parts are a particular concern and will be handled as listed below.
- 5.9.1 Obsolete issues shall be addressed with Engineering through submission on the Request for Engineering Review (RER). Reference EP_0.1.
- 5.9.2 Suspected unapproved or counterfeit parts are placed on a nonconforming material document so the items may be identified and segregated to a nonconforming location. Ref. QP-0029. Triumph shall

Printed documents shall be considered for reference only

scrap the parts to ensure parts are not allowed reentry into the supply chain.

5.9.3 Upon identification of suspected or confirmed unapproved or counterfeit parts, Triumph shall report the occurrences, in a timely notification, to internal organizations, their suppliers, customers, government reporting organizations (GIDEP), industry supported programs and authorities having jurisdictions, as applicable.

5.9.4 A Quality Alert may be issued internally and/or externally and Triumph's sharepoint site For Triumph Management Alert System (TMAS) may be utilized.

6.0 Training

Relevant personnel, including Program Managers, Procurement, Quality, Manufacturing, Operations, Engineering and etc. shall be trained as appropriate to their function, in the awareness, avoidance, detection, mitigation and disposition of suspected unapproved and counterfeit parts. All new hires shall be trained and additional trainings shall be performed when this procedure is revised.

7.0 General Visual Inspection

The General Visual Inspection of incoming parts shall be sampled and at a magnification appropriate to the attribute under magnification. A minimum of 3x for Detailed Criteria Inspections shall apply with 75 ft.-candle minimum lighting.

External Visual Inspection is considered non-destructive and consists of 2 examinations:

7.1 First Examination

- Ensures that all parts in the lot meet the **General Criteria**.
- Appears in good condition to the unaided eye.

General Criteria – verify the following

- Parts are received in a single shipment
- Parts are marked or otherwise identified with identical lot, batch, run and identification information
- All parts are identical in appearance to the unaided eye (parts and packaging)
- Parts appear to have been subjected to the same handling, packaging, and/or storage conditions.
- Parts have maintained their physical placement relative to each other (have never been separated based on evidence such as source, packaging, labeling)

7.2 Second Examination

Samples are selected from the lot to undergo the **Detailed Criteria**

Detailed Criteria

- A.** Verify the following against the device specification or manufactures data sheet.
- # of pins per part
 - Package type
 - Part dimensions
 - Verify pin 1 placement in tape and reel (if applicable)
- B.** Lead Condition
- Non-Uniform in color
 - No tooling marks
 - No exposed copper on the ends of the leads
 - Bent or non-planar leads
 - Excessive or uneven plating
 - Missing pins
 - Discoloration, dirt or residues on the leads
 - Scratches on the inside and outside faces of the leads
 - Gross oxidation
 - Excessive solder on the leads
 - Non-uniform thickness
- C.** Discrepant Markings can be signs of Counterfeiting. Look for:
- Different marking styles for parts with the same date/lot code
 - Different country of origin for parts with the same date/lot code
 - Different body molds for parts with the same date/lot code
 - Different backside markings for parts with the same date/lot code
 - Previous marking partially visible on the surface
 - Company part logo (if applicable)
- D.** Device Packaging Irregularities
- Uneven thickness of the packaging
 - Dimples with uneven depth
 - Visible scratch marks or unidirectional abrasions
 - Significant package variation for parts with the same date/lot code
 - Differences in the corner radius between the top and bottom surfaces
 - Cracks or visible damage such as burn marks
 - Color discrepancy between the top and bottom of the part

Printed documents shall be considered for reference only

- Glue, adhesives or residues on the surface of the package
- Evidence of color fade on the body of the part
- Signs of corrosion on body of part or exposed areas of the lead-frame.

8.0 Quality Requirements:

It shall be the responsibility of the Director of Quality Assurance, the Director of Procurement and the Director of Repair and Overhaul or designee to assure compliance to this procedure is maintained at all times.

All records as a result of this procedure shall be maintained in accordance with QP-0003.

Monitoring shall be accomplished IAW QP-0049 Internal Audits.

REVISION RECORD CHANGES

Reason for change:

Date/Rev: 6/14/12 Rev. NC	- New procedure
Date/ Rev: 1/18/16 Rev. A	<p>Section 3.0 Associated Documents added: AS6174 and SQAM, QP-0024 and QAM 8.2.2 Removed AS9100, QP-0006, QP-0021 Section 5.6 was to flow down Counterfeit parts through Triumph's POTC's now it is thru SQAM Removed Supplier's performance is monitored per QP-0006. Removed supplier is required to adhere to POTC's Clause QA18 Section 5.8 added, In addition, Triumph will scrap the parts in house to ensure parts are not allowed reentry into the supply chain. Changed section 6.0 to Training Added Section 7.0 General Visual Inspection Original Section 6.0 became Section 8.0 and added record control</p>
Date/Rev: 1/31/18 Rev. B	<p>Changed Triumph Actuation Systems to Triumph Integrated Section 3.0 Associated Documents added: ATP - Acceptance Test Procedure EP_1.1 Engineering Change Notice GIDEP Government Industry Data Exchange Program POTC Purchase Order Terms and Conditions QP-0020 Supplier Inspection Delegation Authority QP-0025 Periodic Sampling of Raw Material QP-0057 Customer Returns Removed: PRF-0004 Supplier Optimization Assessment Revised definitions for Counterfeit Part and Approved Supplier Section 5.3 Removed PRF-0004 Section 5.8 added test reports and Product quality audits are performed for SIDA items. Ref QP-0020 Added Sections 5.7, 5.9, 5.10 and 5.11: Section 5.7 Shipping/Receiving is responsible for inspecting packaging and ensuring that it is consistent with past shipments, and that English is properly used without misspellings and alterations.</p>

Printed documents shall be considered for reference only

5.9 Subsequent testing of raw materials is monitored, Ref QP-0025, and all parts are tested, whether individually or in complete assemblies, as required. Ref QP-0024 and ATP's.

5.10 Customer Returned Goods are also reviewed for counterfeit parts. Ref QP-0057

5.11 Internal part obsolescence is monitored and handle through Engineering procedure, EP_1.1. In addition, Triumph Integrated Systems, Clemmons, is a member of the Government Industry Data Exchange Program (GIDEP) and receives alerts associated with part obsolescence and counterfeit parts.

Section 5.9 was notification statement. The Customer and the FAA, if PMA part, will be notified if part(s) is determined to be counterfeit. Is now 5.12 Section 6.1 (changed to 6.0) was Relevant personnel, including Program Managers, Procurement, Quality Assurance, Manufacturing and Engineering activities shall be trained as appropriate to their function, in the awareness, avoidance, detection, mitigation and disposition of counterfeit parts.

Date/Rev. 7/11/22 Rev. C

Changed name to Triumph Actuation Systems, LLC throughout as needed.

Section 2.0 added Suspected approved parts

Section 3.0 Added FAA Advisory Circular. 21-29D, Title CFR 14 Part 21.303 and Title 14 CFR Part 43.13

Added Approved Part and Suspect Unapproved Parts

Section 5.3 and 5.4 added Suspected unproved parts

Section 5.5 added items to look for or suspected unapproved parts

Section 5.12 and 5.13 added suspected unapproved

Section 5.8 Added or suspected unapproved parts

Section 6.0 Added - All new hires shall be trained and additional trainings shall be performed when this procedure is revised.

Section 8.0 Added Director of Procurement and the Director of Repair and Overhaul.

And added QP-0049.

Date/Rev. 4/1/24 Rev D.
Carole Sagraves

Section 3.0 added AS6081, AS6174, AS6496

Removed QF-0076 and PRP-0004

Section 4.0 Added Fraudulent Activity

Section 5.1 Purchasing: Reworded and combined section 5.3, 5.5 and 5.6

Section into 5.4 and added paperwork to ensure it is consistent

Section 5.5 added paperwork

Date/Rev. 2/5/25 Rev E.
Carole Sagraves

Section 3.0 added EP_0.1 Request for Engineering Review

Added Title 14 CFR Part 21.303 Replacement and Modification Parts

Changed OCM to OEM throughout

Added 5.9 GIDEP Representative and its Users check regularly for any issues and determines if action should be taken. Obsolete parts and counterfeit parts are a particular concern and will be handled as listed below.

Obsolete issues shall be addressed with Engineering through submission on the Request for Engineering Review (RER). Reference EP_0.1

Items found on the GIDEP site for reason of counterfeit, shall follow 5.10 and 5.11.

A Quality Alert may be issued and/or Triumph's sharepoint site For Triumph Management Alert System (TMAS).

Printed documents shall be considered for reference only

Date/Rev. 5/17/25 Rev. F
Carole Sagraves

Section 3.0 added Industry Data Exchange Program (GIDEP) Operating Policies and Procedures
Section 5.9 added The GIDEP Representative and its Users understand and are compliant to their membership responsibilities according to SD-25.
Renumbered Section 5.10 and 5.11 as 5.9.2 and 5.9.3 and added suppliers for notification and a Quality Alert may be issued internally and externally.