



## **Prevention of Counterfeit, Fraudulent and Suspect Items** **Policy Statement**

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, and suppliers.

At G R Carr we recognise the significant risk that is posed to product quality and safety by counterfeit, fraudulent and suspect items (CFSI), and we are committed to preventing, detecting, and disposing of CFSI within G R Carr and our supply chain.

To achieve this, we will:

- ◆ Ensure that all our employees who are involved in the purchasing of goods are informed about the potential for CFSI and advised that all goods must be purchased from the manufacturers or from agreed and official distribution channels who are approved by G R Carr for the supply of such goods.
- ◆ Carry out approval of our suppliers in accordance with G R Carr's Management Procedures as well as the best practices laid down in the Office of Nuclear Regulations 'ONR TAG 77' and the International Atomic Energy Associations 'IAEA 1165' standards.
- ◆ Purchase from approved suppliers to agreed specifications that are appropriate to the product and the risk that is posed by that product.
- ◆ Inspect all delivered goods for compliance with certification against original purchase orders and delivery documentation.
- ◆ Carry out tests to provide positive identification on delivered products where; the risk levels are highest, a client requests such tests, or where we have grounds to believe that materials are CFSI.
- ◆ Quarantine goods in secure identifiable areas to prevent their unintended use and will control their replacement using non-conformances in accordance with our ISO 9001:2015 Quality Management System.
- ◆ Communicate instances where CFSI goods are found with our clients, our supply chain, and where appropriate, bodies such as the Office for Nuclear Regulation (ONR) so that we can support industry wide learning and prevent the occurrence and use of such material.
- ◆ Store all materials in accordance with the manufacturer's recommendations or best practices as appropriate.

Signed

Dated 5<sup>th</sup> January 2024

Stephen Gilliland  
Director

John Riley  
Director

John Gilliland  
Director

Daniel Riley  
Director