

# COUNTERFEIT, FRAUDULENT AND SUSPECT ITEMS (CFSI) POLICY



Bilfinger UK Limited recognise the importance of preventing Counterfeit, Fraudulent and Suspect Items (CFSI) entering the company supply chain and being delivered to our customers.

In relation to supply to the Nuclear Energy sector, Bilfinger UK Limited understands that the use of Counterfeit, Fraudulent and Suspect Items (CFSI) can affect processes, operations and safety and are committed to preventing such items from entering into its customer operations.

The company aims to manage and mitigate these threats initially through robust procurement practices, and through subsequent inspection, checking and audit processes.

The company understands that CFSI are those that are illegally manufactured, labelled or represented as genuine goods.

The Bilfinger Nuclear Safety Culture Managers part of the suitably qualified and experienced person's program shall provide structured training to technical staff and procurement staff, covering:

- Awareness of CFSI and the applicability too commercially off the Shelf (COTS) items.
- The set of controls to be used.
- How to apply them.
- Checking and verification for the positive avoidance of CFSI.
- Action in the event of suspicions that CFSI has been encountered.

In order to provide assurance that the risk of CFSI is prevented, the Procurement Director shall ensure we only procure supplies from sources that meet the following criteria:

- Sourcing primarily in EU (verify location of manufacture).
- Direct sourcing from manufacturer preferred (confirm they are the manufacturer).
- Or via manufacturers accredited agents (check with manufacturer).

Purchase Orders, contracts, and quality clauses shall include specific clauses prohibiting CFSI.

The Procurement Director shall consider the best controls (normally combination of controls) for each type of purchase selected from, for example:

- Sealed original packaging, marking, etc.
- Review and if need be verification back to source of documentation and certificates.
- Inspection of items.
- Verification of selected components.
- Comparison to reference items.
- Review of documentation.
- May consider over ordering and test items.
- May consider GPS tracking of selected marked components.
- Verification of process by audit, or 3rd parties.

All personnel involved directly, or in-directly, with the Nuclear Energy sector shall, in the event of any suspected CFSI:

- Quarantine any suspected CFSI.
- Use the non-conformance process to investigate, identify the extent of the issue, and resolve.
- Remove any CFSI if found permanently from supply chain by demonstrable method.
- Cooperate with clients and regulators on managing such issues.

# COUNTERFEIT, FRAUDULENT AND SUSPECT ITEMS (CFSI) POLICY



Bilfinger UK Limited expects all of its employees, contractors and relevant suppliers to understand their responsibilities regarding preventing supply of CFSI to the Nuclear Energy sector and to familiarise themselves with the terms and requirements of this policy as well as the company's associated standards and procedures.

**Signed on behalf of Bilfinger UK by**

A handwritten signature in black ink, appearing to read "S Bonner", is positioned above the name and title.

Sandy Bonner  
*President*

A handwritten signature in black ink, appearing to read "D Marcus", is positioned above the name and title.

Derek Marcus  
*Chief Financial Officer*