

## **COUNTERFEIT, FRAUDULENT AND SUSPECT GOODS POLICY**

### **Introduction**

One of the AEC's core values is to uphold responsible and fair business practices.

We are committed to promoting and maintaining the highest level of ethical standards in relation to all of our business activities.

AEC therefore has a zero-tolerance policy towards counterfeit, fraudulent and suspect goods within its supply chain and is committed to acting fairly and with integrity in all of its business dealings and relationships.

### **Purpose and scope of policy**

This policy sets out the AEC's position on any form of possible counterfeit, fraudulent and suspect goods within our supply chain and has put together the following guidelines:

1. Working with our supply chain to ensure that we and the supplier complies with relevant standards, rules and regulations, not just within the UK but in any other country which AEC may carry out its business or in relation to which its business may be connected.
2. Enabling employees and people associated with AEC to understand the risks connected with purchasing counterfeit, fraudulent and suspect goods and to encourage them to be vigilant and effectively recognise, prevent and report any wrongdoing, whether by themselves or others.
3. Providing suitable and secure reporting and communication channels and ensuring that any information that is reported is properly and effectively dealt with.
4. Creating and maintaining a rigorous and effective framework for dealing with any suspected breaches of this policy.

This policy applies to all permanent and temporary/fixed term/casual employees of AEC.

All employees and associated persons are expected to adhere to the principles set out in this policy.

### **Policy statement**

AEC understand where CFSI risks may arise and what controls may be needed. With guidance from the Office for Nuclear Regulation (ONR) we understand that our services do not fall into high-risk categories as we do not supply physical products.

As a service provider, we are not considered to be a CFSI risk,

We mitigate any residual risk related to the services that we provide through the following;

Our own work delivery and any incoming work from subcontractors is reviewed in accordance with our ISO 9001 certified quality control procedures. Corrective and preventative actions are taken as necessary.

### Sanctions for breach

A breach of any of the provisions of this policy will constitute a disciplinary offence and will be dealt with in accordance with the AEC's disciplinary procedure. Depending on the gravity of the offence, it may be treated as gross misconduct and could render the employee liable to summary dismissal.

As far as associated persons are concerned, a breach of this policy could lead to the suspension or termination of any relevant contract, sub-contract or other agreement.

### Monitoring compliance

AEC has in place a supply chain team who have responsibility for ensuring compliance with this policy and will review its contents on an annual basis.

They will be responsible for monitoring its effectiveness and will provide regular reports in this regard to the directors of the company who have overall responsibility for ensuring this policy complies with the company's legal and ethical obligations.

### Training

AEC will provide training to all employees to help them understand their duties and responsibilities under this policy. AEC has a zero tolerance approach to the use of counterfeit, fraudulent and suspect goods within its supply chain and this will also be communicated to all business partners at the outset of the business relationship with them and as appropriate thereafter.

..... Director Signature

18/06/18..... Date