

COUNTERFEIT GOODS POLICY



Purpose

This policy defines the manner in which the Company will conduct its operations to ensure compliance with (Counterfeit Goods) rules and regulations that are applicable to the industry in which it operates and laws of the countries in which it conducts its business.

This policy should be read in conjunction with:

- Supply Chain Management Policy
- Sustainable & Responsible Procurement Policy
- Ethical Trading Policy

In all cases, operations shall be conducted to the highest ethical standards.

The reputation of the Company is based upon customer service excellence as well as maintaining complete integrity within its operations and supply chain.

Commitment

The company is committed to:

- Conduct its operations to the highest ethical standards.
- Conduct its operations with complete integrity and in an open transparent manner.
- Adhere to all applicable legislation.
- Adhere to Government recognised trading practices.
- Not engage with suppliers who are unable to mirror the requirements set out in this policy (and connected policies).
- Develop close working relationships with its suppliers to ensure it uses a secure and compliant supply chain.

Legislation

Trademarks Act 1994

Copyright, Design & Patents Act 1988

Consumer Rights Act 2015

COUNTERFEIT GOODS POLICY

Policy Reference:	002.3.2021.PL
Revision No:	3
Date of 1 st Issue:	09/11/2021
Date of Revision:	17/11/2023
Reviewed by:	Roz Wankling
Approved by:	Kevin Smith

Scope

This policy applies to all SCCS personnel.

Definitions

“**Company**” shall mean SCCS Survey Equipment Ltd.

“**Management Team**” shall mean the Regional Director and such other senior personnel deemed appropriate.

What are fake or counterfeit goods?

There is no legal definition of counterfeiting, but it is understood as the imitation or faking of original goods to illegally produce and sell those goods without authorisation.

This might include reproducing imitation packaging and trademarks that would lead a buyer to believe they were purchasing a genuine product.

The counterfeited item may be of inferior quality and may use someone else’s trademark without their permission.

A trademark is most often a word, phrase or symbol that identifies the source or origin of particular goods.

By counterfeiting a trademark without permission, the counterfeiter is usually seeking to profit unfairly from the trademark owner’s reputation.

When buyers are under pressure to meet deadlines and genuine products are not available within a required lead time there can be a temptation to search the internet for alternative supply sources.

This can result in the purchase of products from a grey market.

A grey market is a market where goods are traded outside of a manufacturers’ authorised trading channel.

Buying from a grey market carries significant risk of allowing counterfeit goods to enter the supply chain, as well as supplying goods that lack integrity and/or safety.

Why are counterfeit goods a problem?

Counterfeit goods may pose a significant safety hazard.

Supply of counterfeit goods can result in damage to business reputation and hurt legitimate companies.

Legitimate manufacturers devote significant resources to researching and developing products; building a reputation based on that investment.

When counterfeiters profit unfairly off the good reputation of another it can cause substantial financial impact.

COUNTERFEIT GOODS POLICY

Policy Reference:	002.3.2021.PL
Revision No:	3
Date of 1 st Issue:	09/11/2021
Date of Revision:	17/11/2023
Reviewed by:	Roz Wankling
Approved by:	Kevin Smith

Counterfeiters may be supporting unethical practices including child or slave labour.

The profits of counterfeiting may be supporting organised crime activities.

Purchasers of illegal (fake or counterfeit) goods are legally entitled to a refund (within the time frames set out in current legislation).

If a purchaser has not made a request for refund within legal time frames, they can request a replacement of any fake/counterfeit item with a new genuine product (within the time frames set out in current legislation).

Purchasers of illegal (fake or counterfeit) goods are entitled to make a report to Trading Standards which will impact on the reputation of the Company.

Trading Standards look into criminal activity and prosecute both sellers and traders who break the law. Successful prosecutions can result in prison sentences and unlimited fines.

How do we avoid supplying counterfeit goods?

Look out for the 3 P's, Price, Packaging and Place:

- **Price:** if a price looks too good to be true it probably is.
- **Packaging:** Is the product being sold without its packaging, packing appears to be of low quality and/or including printing errors such as blurry pictures, typos, spelling or grammatical errors).
- **Place:** Consider where the product is being purchased from:

Store - Is the product what you would expect to find sold in that environment and is the merchant an established merchant?

Online - Look at the fine print in the any product description. Look for typos, spelling mistakes and grammatical errors. Is product information incomplete?

Look at available customer reviews and/or take appropriate references before committing to purchase goods. Is there full traceability of the transit of the goods (secure supply chain).

Where goods normally have an identifying serial number is that number present?

Where such a serial number is present can the serial number be verified as genuine?

Have goods been supplied with expected documentation such as technical specification documentation?

SCCS keeps full records of all goods received and all goods sold ensuring full traceability (including any identifying serial numbers) of all goods processed by the Company.

SCCS uses trusted suppliers with whom it has established working relationships.

COUNTERFEIT GOODS POLICY

Policy Reference:	002.3.2021.PL
Revision No:	3
Date of 1 st Issue:	09/11/2021
Date of Revision:	17/11/2023
Reviewed by:	Roz Wankling
Approved by:	Kevin Smith

New suppliers are subject to checks before use.

All goods received are thoroughly inspected and checked on receipt and all concerns flagged with the Management Team.

Purchasing is done strictly in accordance with all SCCS policies and in accordance with SCCS working practices.

What to do with potentially counterfeit/fake goods

Flag concerns with the Management Team detailing reasons for belief goods are counterfeit. The Management Team will investigate and resolve.

Goods of concern must be labelled and quarantined pending resolution by the Management Team. They must not be allowed to enter (further) into the supply chain.

The Management Team will contact the supplier of goods to resolve concerns and organise an appropriate replacement with genuine (new) goods.

Compliance & Review

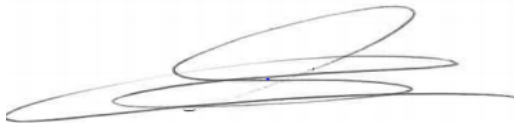
The Management Team will be responsible for managing the compliance of all personnel with the remit of this policy.

The Management Team are responsible for managing corrective action resolution.

The Management Team are responsible for the appropriate review of the remit of this policy and its appropriateness to meet Company objectives and legal obligations.

All SCCS personnel are responsible to working as trained and in accordance with Company policies and practices.

Signed:



Print name: Kevin Smith

Position:
Revision

Regional Director UK
3

Date: 17th November 2023
Next review: 16th November 2024