



COUNTERFEIT PARTS POLICY



October 29, 2015

It is our policy to purchase only new and authentic materials from authorized suppliers.

Independent distributors will only be utilized after a reasonable search for material from franchised/authorized sources has been exhausted and after due consideration of an alternative part from an authorized source. The use of independent distributors requires the approval of the customer or the approval of the President of our company. When independent distributors are used, they should be certified to AS6081 or CCAP-101.

Materials (Purchasing) and Quality Management perform periodic evaluations of ITC suppliers to assure that approved/ongoing sources of supply are maintaining effective processes for mitigating the risks of supplying counterfeit electronic parts and to evaluate overall performance.

ITC attempts to verify purchased product prior to use in an effort to assure detection of counterfeit parts prior to formal acceptance. The rigor of the verification process shall be commensurate with product risk. Product risk is determined by the criticality of the part and the assessed likelihood of receiving a counterfeit part. ITC Receiving checks the order against purchasing documents to verify the identification, quantity and condition of the items in the order. Verification may include: obtaining objective evidence of the quality of the product from suppliers through documentation, certificate(s) of conformity, test reports, review of required documentation, visual inspection of products upon receipt, non-destructive evaluation and destructive testing.

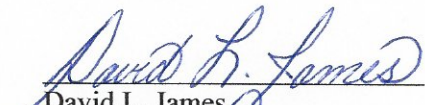
If material is identified as suspect or counterfeit, it will immediately be identified as such, segregated and quarantined, and ITC's NCMR process will be followed.

The offending supplier will be contacted and provided with the data that supports the counterfeit nature of the material. If the vendor contests the determination that the parts are counterfeit, then they may request that the parts be sent to an agreed upon independent third party test house.

If the parts are confirmed to be counterfeit the material must be made unusable and documentary evidence provided to the supplier. Specifically, the parts should be physically destroyed (e.g. grinding, breaking or crushing) prior to disposal.

Counterfeit parts are to be reported to the applicable Government authorities, Government reporting organizations (GIDEP or equivalent), industry supported reporting programs (ERAI or equivalent), and other authorities having jurisdiction in order that other users at large may become aware of the existence of the material in question and review their own supply chain for any risks as applicable.

Authorized Signatory:


David L. James
Quality Systems Manager
Inside Track Cabling
djames@insidetrackcabling.com
603-886-8013 Ext. 203