

Anti-Counterfeit and Product Authenticity Policy

Dataco Global, Inc.

1. Purpose and Scope

This Anti-Counterfeit and Product Authenticity Policy establishes Dataco Global's commitment to preventing counterfeit products from entering our supply chain and reaching our customers. The policy applies to all employees, contractors, vendors, suppliers, and business partners associated with Dataco Global.

2. Policy Statement

Dataco Global is committed to providing authentic, high-quality products to our customers. We maintain a zero-tolerance approach to counterfeit products and components within our supply chain. This policy outlines our comprehensive measures to detect, prevent, and mitigate the risks associated with counterfeit products.

3. Definitions

Counterfeit Product: Any unauthorized copy, imitation, substitute, or modified part (e.g., material, part, component), which is knowingly misrepresented as a specified genuine item from an authorized manufacturer.

Authorized Supplier: Original Equipment Manufacturers (OEMs), Original Component Manufacturers (OCMs), and their authorized distributors or resellers.

Suspect Product: Any product that exhibits questionable or suspicious characteristics that would indicate it might be counterfeit.

4. Supplier Management Requirements

Approved Supplier List

- Dataco Global shall maintain an Approved Supplier List (ASL) that must be reviewed and updated quarterly.
- 100% of parts and components must be sourced from authorized suppliers on the ASL.
- Exceptions to the ASL require executive approval and must not exceed 2% of total procurement volume.

Supplier Verification

- All new suppliers must undergo a comprehensive verification process before being added to the ASL.
- Supplier audits must be conducted for 100% of critical component suppliers annually and 50% of non-critical suppliers bi-annually.
- Suppliers must provide certificates of conformance for all products with 100% traceability to the original manufacturer.

5. Product Authentication Procedures

Testing and Verification

- 100% of incoming critical components must undergo authenticity verification through at least two distinct testing methods.
- Random sampling of 10% of all non-critical components must be performed for authenticity verification.
- All test results must be documented and maintained for a minimum of 7 years.

Documentation Requirements

- Complete documentation for all components must include:
 - Certificates of Conformance from OEM/OCM
 - Supply chain traceability documentation
 - Date and lot codes
 - Test and inspection results

6. Detection and Reporting Procedures

Counterfeit Detection

- Employees must report suspected counterfeit products within 24 hours of detection.
- The Quality Control department must respond to reports within 48 hours.
- Detailed visual inspection must be conducted on 100% of high-risk components.

Quarantine Procedures

- All suspected counterfeit products must be immediately quarantined in a secure location with restricted access.
- Quarantined products must be clearly labeled and segregated from authentic inventory.
- A detailed investigation must be initiated within 72 hours of quarantine.

7. Verification and Investigation

Investigation Process

- The Quality Control department must complete investigations within 10 business days.
- All investigations must follow a standardized procedure with at least 5 verification steps.
- Investigation results must be documented with photographic evidence and test reports.

Confirmed Counterfeit Handling

- 100% of confirmed counterfeit products must be permanently marked as "COUNTERFEIT" and securely stored for evidence.
- Legal department must be notified within 24 hours of confirmation.
- All payments for counterfeit products must be immediately suspended.

8. Reporting and Notification

Internal Reporting

- Quarterly reports detailing counterfeit incidents must be provided to executive management.
- Reports must include metrics on:
 - Number of detected incidents
 - Financial impact (must be quantified in USD)
 - Supplier performance data
 - Remediation actions taken

External Notification

- Government Authorities: Notify relevant authorities within 72 hours of confirmed counterfeit detection.
- Industry Partners: Share information with industry partners within 10 business days through established information-sharing networks.
- Customers: Notify affected customers within 48 hours if counterfeit products may have reached them.

9. Prevention Measures

Training Requirements

- 100% of supply chain, procurement, and quality control staff must complete anti-counterfeit training annually.

- All other employees must complete awareness training bi-annually.
- Training effectiveness must be measured through assessments with a minimum passing score of 85%.

Technology and Tools

- Implement at least 3 different authentication technologies (e.g., RFID, blockchain, serialization) for all products.
- Conduct quarterly reviews of authentication technologies to ensure effectiveness.
- Maintain a database of known counterfeit indicators that is updated monthly.

10. Compliance and Enforcement

Audit Requirements

- Internal audits of anti-counterfeit procedures must be conducted quarterly.
- External audits must be performed annually by certified third parties.
- 100% compliance with this policy is required; any deviations must be documented and addressed within 30 days.

Penalties for Non-Compliance

- Employee violations may result in disciplinary action up to and including termination.
- Supplier violations will result in immediate suspension from the ASL and potential permanent removal.
- Financial penalties for suppliers may be assessed at 200% of the value of counterfeit components.

11. Continuous Improvement

- The Anti-Counterfeit Policy must be reviewed and updated annually.
- Key performance indicators must show a minimum 10% year-over-year improvement in prevention metrics.
- Lessons learned from each counterfeit incident must be incorporated into procedure updates within 60 days.

12. Disposal Procedures

- Confirmed counterfeit products must be disposed of according to environmental regulations after a retention period of 3 years.
- 100% of disposals must be documented with certificates of destruction.

- No counterfeit products may be returned to the supply chain under any circumstances.

13. Policy Review and Updates

This policy will be reviewed annually by the Quality Control Director and the Chief Compliance Officer. Updates will be communicated to all stakeholders within 10 business days of approval.

Note: This policy has been generated specially for hackathon. It has no relation with Syngenta or any other company.