

# **SWAGELOK CENTRAL UK**

# **Counterfeit Material Policy**

#### **Swagelok's Quality System and Culture**

At Swagelok Central UK, Quality is an integral part of our Organisation's Values. These values guide our actions to anticipate the needs of existing and potential customers and react accordingly in order to deliver fluid system products and services that are faultless, safe, of the highest quality and therefore fulfill customer's requirements. This will only be achieved if Swagelok and Swagelok Bristol take a risk-based approach to counterfeit avoidance. Performance, reliability and safety are paramount aspects of all Swagelok Products and as such the following controls are in place.

#### **Procurement Controls**

- Procurement from melting mill for code-compliant products
- Engineering-approved specifications for all raw materials, services, and components
- Raw materials supplied to manufacturers of code-compliant products

#### **Acceptance of Items**

As part of our standard receiving inspections, Swagelok checks for indicators of CFSI in the materials and parts we purchase:

- Altered manufacturer's name, logo, serial number, date markings
- Items differing in configuration, dimensions, fit, finish, colour
- Missing, unusual, altered markings on items or documentation
- Discrepancy in country of origin of items or documentation from that of the supplier
- Lack of traceability of items or documentation
- Performance inconsistent with specifications, certifications or test data

#### **Supplier Approval**

- Onsite audits of critical suppliers every three years
- Ongoing audits of key performance factors
- Comprehensive sub-supplier audits
- Preferred supplier profile for quality, delivery performance, flexibility, and technical capabilities



## **Product Compliance**

Commercial Dedication program ensures our products meet nuclear industry requirements.

#### **Raw Materials**

- Forgings and bar stock instead of castings for code-compliant pressure retaining items
- 100% ultrasonic examination
- Random sampling for independent lab testing
- Third-party, nuclear-certified ISO 17025-accredited lab
- 10CFR50 Appendix B quality program

### **Training**

Swagelok receiving inspectors and specifications engineers receive annual training on CFSI detection, prevention, and control.

Material bar stock is inspected to ensure compliance Inspection and testing ensure material and product compliance

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