



EEE Parts Policy

Scope: Miraco, being aware of the potential risks associated with using counterfeit Electrical, Electronic and Electromechanical (EEE) parts, has established a Standard Operating Procedure to reasonably ensure that all EEE parts are authentic, that is, genuinely manufactured by or for the designated Manufacturer of said part.

Requirements: All parts purchased, used on, and/or used to build customer product shall be authentic, OEM product or tooling, and shall be sourced in a way to reasonably ensure this. Records of traceability shall be submitted to Miraco by its suppliers to verify authenticity. If this is not possible, Miraco will take reasonable steps to independently verify authenticity.

Practice: Miraco has a 3 tier purchasing methodology which is used to purchase EEE parts. Strict adherence to this method is the best way to ensure that all EEE parts are as specified, and therefore authentic. This consists of:

1. When possible, EEE parts shall be sourced directly from the manufacturer.
2. When circumstances prohibit purchase directly from the manufacturer, EEE parts may be purchased from Factory Authorized (Franchised) Distributors on the Miraco Approved Vendor List.
3. Occasionally, the need may arise to purchase EEE parts from a Non Franchised Distributor, or from another electronics manufacturer who has inventory that they are willing to sell. When this option is exercised, Miraco shall require the following:
 - a. Seller shall submit to Miraco the Manufacturers Certificate of Conformance (C of C) for the parts, in addition to the seller's C of C.

- b. Miraco shall contact the manufacturer and shall verify that the lot numbers on the C of C are legitimate. Additionally, photographs of the Certificate and or labels on the product can and should be sent to the manufacturer to further verify authenticity. Goods not verified through the manufacturer shall not be used. All communication with the manufacture shall be documented and saved with the incoming inspection report.

Any parts suspected to be fraudulent, shall be reported to at least one of the following agencies:

1. Government Industry Data Exchange Program (GIDEP) (www.gidep.org)
2. ERAI (www.era.com)
3. Independent Distributors of Electronics Association (IDEA) (www.idofea.org)

Communication between the above agency(s) and Miraco shall be documented and save with the incoming inspection report

Suppliers of Assemblies to Miraco: Suppliers of EEE components or assemblies/sub-assemblies shall be required to follow similar guidelines to ensure only authentic parts are sourced and used on Miraco product. Suppliers shall provide Miraco with supporting documentation from Franchised Distribution or the Manufacturer to support this. Any exceptions must be authorized by Miraco Management, in writing prior to receipt at Miraco. Failure to obtain authorization will be immediate grounds for refusal/rejection of the product.

Conclusion: Following 'Common Sense' purchasing methods, and due diligence in the inspection and documentation of EEE parts will reasonably reduce or eliminate the introduction of counterfeit parts to the manufacturing process. It is Miraco's intention that zero counterfeit parts are ever received, let alone used to manufacture goods, and we will take any and all steps necessary to ensure this. Any questions pertaining to the Miraco EEE parts policy may be directed to bpfingerston@miracoinc.com or jmichaud@miracoinc.com .