

COUNTERFEIT, FRAUDULENT & SUSPECT ITEMS (CFSI) POLICY

At Berry & Escott Engineering Services, safety is our overriding priority. We recognise that the risk of Counterfeit, Fraudulent and Suspect Items entering the supply chain is an important concern, especially within the Nuclear Industry. To this end, we are committed to reducing this risk through awareness training and embedded controls, throughout our entire operational process from early supplier evaluation through to final documentation review & delivery.

“Items” are not just limited to materials or goods, but also services that require qualifications or expertise. “Counterfeit” items are intentionally manufactured or altered to imitate a legitimate product, while “Fraudulent” items are misrepresented with the intention to deceive, usually with either vague or false identifications or certifications. Whenever there is a concern or a lack of clarity about a good or service being genuine, it is classified as “Suspect” and further investigation shall be undertaken to verify it.

All Berry & Escott employees undertake training to ensure they are aware of the risks that CFSI pose. Our procedures ensure that goods and services are purchased only from suppliers who have been evaluated and approved. Not only are CFSI requirements flowed down with any orders, but awareness training & materials are also provided to any suppliers prior to placing orders related to Nuclear supply chain work.

Goods and services are always ordered to clear specifications, and upon receipt all products are checked to ensure both documentation and goods match this specification. A questioning attitude with no fear of recrimination is encouraged, which not only helps to catch CFSI before it enters our processes, but also encourages continuous improvement of our processes' clarity and effectiveness.

Whenever CFSI are discovered, they are quarantined to ensure any effects are contained pending investigation. All stakeholders are notified (including the customer, supplier, relevant authorities, etc.) and the items are destroyed (or otherwise rendered unusable) to prevent them from re-entering the supply chain.

The Managing Directors will ensure the effective implementation of this Policy. This policy is freely available to all interested parties.

L. Berry
Director



C. Escott
Director



Reviewed and Signed: 7th January 2026