This policy is applicable to Rhino Engineering Group Limited (REGL) and all subsidiary companies including Rhino Systems Limited (RSL), Rhino Site Systems Limited (RSSL) and Rhino HySafe.

POLICY

REGL policy is to comply with all applicable UK legislation regarding the prevention of supply of Counterfeit, Fraudulent and Suspect Items (CFSI) and to meet the requirements of DEF STAN 05-135, Issue 2, 'Avoidance of Counterfeit Material'. To meet these requirements REGL has an Anti-Counterfeiting Management Plan (ACMP) as defined below.

Safety is our overriding priority, and we regard the co-operation of our supply chain throughout the tiers as essential to maintain the highest standards for all the goods we supply.

We understand the potential risks concerning the supply of CFSI within the supply chain, and to this end we only choose suppliers that can demonstrate the quality and source of the goods that we require.

Employees involved in the purchasing of goods have made aware of the risks associated with CFSI materials and been trained in spotting warning signs to help identify potential CFSI products. They are informed that all goods must be purchased directly from the manufacturers or from agreed and official distribution channels. Records of training are retained.

ANTI-COUNTERFEITING MANAGEMENT PLAN

a) Management Responsibility

The SHEQ (Safety, Health, Environment and Quality) Manager shall be the management representative responsible for:

- Assessing and managing the risk of counterfeit material in the company and supply chain and implementing and maintaining necessary arrangements
- Reporting concerns to senior management
- Promoting awareness of the risk of counterfeit material in the organisation and throughout the supply chain

b) Risk Assessment

When assessing CFSI risk, the criticality of the material in relation to performance and safety shall be considered.

Where risk is identified, the extent of the risk shall be communicated through the supply chain by detailing applicable standard requirements, and criticality of the material. Traceability requirements shall be introduced as required and may be combined with approval testing if risks are high, or the source of supply cannot be confirmed.

c) Non-Conforming Material

If non-conforming material is found it shall be quarantined and not re-enter the supply chain unless its validity can be confirmed. Samples from a suspect delivery may be returned to the supplier under controlled circumstances for validation or testing.

In all cases where non-conforming material is found the customer, supplier and Trading Standards shall be informed. Where material is confirmed as Counterfeit or Fraudulent the Police and appropriate data gathering organisations (e.g. BEAMA, Anti-Counterfeiting Forum) shall be informed. CFSI material shall normally be destroyed, but may alternatively be disposed of as advised by the Police and / or Trading Standards.

d) Other Considerations

Rhino products are bespoke, individually designed, and supplied directly from RSL to the client. As such there is no risk of counterfeit goods reaching the market by being supplied through a forward supply chain distribution system.

Each manufactured door is permanently marked with a unique project reference to confirm identity and traceability.

e) Obsolescence

Rhino door designs generally incorporate simple components that are included in the door structure. As such they are designed for long life and not for regular parts replacement so component obsolescence is not considered an issue.

Some doors are electrically operated by simple motor and control systems. These systems can be adapted as motor and electrical technology develops, keeping risks of obsolescence low.

Stuart Lawrence

Group Managing Director