

**Happy Energy Solutions Ltd.**  
**Counterfeit, Fraudulent and Suspect Items Policy**  
**11<sup>th</sup> January 2022**

1. We Happy Energy Solutions Ltd. recognise that there may be risks concerning the supply of Counterfeit, Fraudulent and Suspect Items (CFSI) which are subsequently incorporated into our installed product(s)
2. To mitigate any risks, wherever possible, we purchase direct from the manufacturers.
3. Where this is not possible, we only use suppliers who are able to demonstrate the quality and source of the goods they supply to this company.
4. Employees involved with purchasing goods for the company are instructed to only purchase goods direct from the manufacturers or from our agreed list of suppliers.
5. Employees receive training on the risks of CFSI, understand support the company's mitigation methods.
6. Actions take place to raise awareness (on-boarding, newsletters, email bulletins etc.) throughout all levels of our supply chain that there are parties who might wish to substitute CFSI for genuine items or services for commercial gain;
7. All suppliers undergo a rigorous assessment process to ensure material and component traceability back to source suppliers, including positive material identification, destruction testing methods by third party specialist organisations, including sampling of proprietary high risk items.
8. This Policy is implemented within our Purchasing and Procurement Procedure, during Supplier and Contractor Evaluation and within our on-going Internal Audit process.

This Counterfeit, Fraudulent and Suspect Items Policy will be regularly reviewed and updated as necessary. The management team endorses this policy and is fully committed to their implementation.

This Counterfeit, Fraudulent and Suspect Items Policy has been approved & authorised by:

**Signed by:**     **Adrian Wright**  
**Position:**     **Chief Operating Officer**  
**Date:**         **11<sup>th</sup> January 2022**

**Signed:**



**Review:**       **10<sup>th</sup> January 2023**