

Anti-Counterfeit Policy

Saitroc Ltd., trading as Osmyum · Oradea, Romania

DOCUMENT Anti-Counterfeit Policy	VERSION 2.0
EFFECTIVE DATE 2 August 2026	NEXT REVIEW 2 August 2027
SCOPE All components handled at our Bors facility and every shipment we release for sale.	APPROVED BY Zoltan Bartha, Founder & General Manager

1. Purpose and scope

This policy describes how Saitroc Ltd., trading as Osmyum, sources, inspects, and validates electronic components offered for resale. It applies to every lot handled at our Oradea facility and to every shipment we release for sale. It works together with our Seller Inquiry SOP, which sets the per-line-item risk classification (HIGH / MEDIUM / LOW) referenced throughout Section 3 below.

The standards below are enforced unconditionally. Where a lot does not meet them, we reject it at our own cost — we neither return it to the seller nor release it for resale.

2. Sourcing standards

We buy outright from primary manufacturers — OEM and EMS plants in the European Union and adjacent jurisdictions. We do not buy from secondary brokers. Every lot must meet the following criteria before we issue an offer:

- **MSL-sealed packaging** — moisture barrier bag intact, humidity indicator card visible, vacuum integrity verifiable.
- **Original OEM markings** — laser etch or ink stamp undisturbed; country of origin matching the declared manufacturer.
- **Verifiable date code** — within the manufacturer's published shelf-life window, batch traceable to a single production run.
- **Documented chain of custody** — purchase order or delivery note from the original buyer, factory of origin named.
- **ERAI screening** — part number and source cross-referenced against the ERAI (Electronic Resellers Association International) suspect parts database before any offer is issued. Known suspect sources are excluded outright.

3. Inspection process

Every lot is inspected at our Oradea facility before being released for sale. The depth of inspection is calibrated to the risk tier assigned during intake, per our Seller Inquiry SOP:

RISK TIER	EXAMPLES	INSPECTION REQUIRED
LOW	Common passives, connectors, standard logic ICs.	Stage 1 + Stage 2. Documentation and packaging check only.
MEDIUM	Industrial-grade semiconductors, active parts.	Stage 1–3. Magnified visual verification on a statistical sample.
HIGH	FPGAs, automotive-grade MCUs (AEC-Q100/Q200), EOL/obsolete parts, or any lot > €2,000 without a Certificate of Conformance.	Stage 1–3 on 100% of units, plus Stage 4 third-party lab verification for lots > €5,000.

- **Stage 1 — Receiving.** Packaging integrity check, MBB seal verification, label and date code match against shipping documents.
- **Stage 2 — ESD-controlled handling.** Components leave the moisture barrier bag only inside our ESD-controlled workspace. We do not break seals for marketing photos or routine handling.
- **Stage 3 — Sample-based visual verification.** Under magnification, against published OEM reference images, before resale. Sample size is calibrated to lot size and risk tier per the table above.
- **Stage 4 — Third-party verification (HIGH-risk / high-value lots).** For HIGH-risk lots or any lot over €5,000, we commission X-ray, XRF, or decapsulation testing through an accredited external lab before payment is finalized or the lot is released for resale. A testing-lab partnership is in development — target Q4 2026. Until that partnership is active, we price this risk into the purchase offer and disclose the gap to affected buyers.

4. Automatic rejection criteria

If any of the following are present, we reject the lot at our own cost. We do not return it to the seller and we do not on-sell it.

- Disturbed, blacktopped, sanded, or relabelled components.
- Mismatched date codes within a single reel or tube.
- Broken or non-original moisture barrier packaging.
- Documentation gaps — no factory of origin, no chain of custody, no purchase order.
- Components from regions or suppliers under EU sanctions (EU Regulation 2021/821).
- **Part numbers or sources matching an ERAI suspect-parts alert.**
- **Documentation-fraud indicators** — certificates of conformance that do not match the declared manufacturer's format, or date codes/lot numbers with internal inconsistencies.

5. Certifications and memberships

CERTIFICATION / MEMBERSHIP	STATUS	NOTE
ISO 9001 (QMS)	CURRENT	Quality Management System.
ISO 14001 (EMS)	CURRENT	Environmental Management System.
AS6081 (Counterfeit Avoidance for Distributors)	IN PROGRESS	Target certification: Q4 2026.
ERAI Membership	IN PROGRESS	Application submitted; suspect-parts screening per §2 is already in effect ahead of formal membership.
EU Regulation 2021/821	COMPLIANCE MAINTAINED	Export controls. Screening applied against the EU consolidated dual-use list; monitoring the November 2025 update.

6. Customer remedy — if something goes wrong

We screen aggressively because we know the cost of failure. If a component supplied by Osmyum proves to be counterfeit or non-conforming, our remedy is unconditional:

- **Full refund** — within 5 working days of confirmed nonconformance.
- **Documented quarantine** — we trace the lot back to source, document the chain of custody, and notify any other buyers identified as receiving units from the same lot.
- **Root cause review** — we report the failure to the originating supplier, suspend further purchases from that source pending review, and update our internal supplier risk register.
- **Buyer provenance disclosure** — on request, and proactively for aerospace, defense, and medical buyers, we provide the full chain-of-custody record for any lot supplied.

7. Governance and review

This policy is reviewed annually or sooner when triggered by a confirmed nonconformance event, a change in applicable regulation, or the addition of new certifications. The current version supersedes all prior versions. The approving signatory below holds responsibility for the operational implementation of every standard described in this document.

Chain-of-custody and inspection records (Sections 2–4) are retained for a minimum of 5 years from date of sale.

8. Roles and responsibilities

Today, Zoltan Bartha (Founder & General Manager) personally performs or directly reviews every inspection stage described in Section 3. As volume grows, execution of Stage 1–2 inspection may be delegated to trained staff under this same protocol; Stage 3 sample verification and all Stage 4 escalation decisions remain subject to Zoltan Bartha's sign-off until a documented handover is approved.

Signature, Date

Zoltan Bartha

Founder & General Manager

Saitroc Ltd. · Romanian Trade Registry: RO3781728

*This document is the official Anti-Counterfeit Policy of Saitroc Ltd., trading as Osmyum. For the most current version, contact **buy@osmyum.com**.*