Earle M. Jorgensen Company

QUALITY ASSURANCE MANUAL AS9120B / ISO 9001:2015*

*Reference Section 4.3 for individual EMJ Branch scope

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This manual was re-written for Transition to the AS9120B / ISO9001:2015 Standard. All manuals generated prior to the effective date of this manual are considered obsolete.

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1 Scope

This quality manual specifies requirements for the quality management system of EMJ:

a) To demonstrate its ability to consistently provide products and services that meet customer and applicable statutory and regulatory requirements.
b) To enhance customer satisfaction through the effective application of the system, including processes for improvement of the system and the assurance of conformity to customer and applicable statutory and regulatory requirements.
c) EMJ does not conduct any activities associated with Sub-clause 8.3, Design and development.

2 Normative references

The following documents, in whole or in part, are normatively referenced in this document and are indispensable for it application. For dated references, only the edition cited applies. For undated references, the latest edition of the referenced document (including any amendments) applies.

AS9120B / ISO 9001:2015, Quality management systems-*Requirements*

3 Terms and definitions

For the purposes of this document, the terms and definitions given in AS9120B / ISO 9000:2015 apply.

Defined Elements of the EMJ Quality Management System

Level I: *Quality Assurance Manual*
Quality Manual that describes the EMJ's approach to the requirements of AS9120B / ISO 9001:2015 issued and maintained by the EMJ Technical Directors.

Level II: *EMJ Corporate Work Instructions*
Corporate Work Instructions describing each critical process of EMJ's operation and the company's approach to meeting the requirements of the QAM. Corporate Level WIs are created and maintained by the Technical Directors and each EMJ/subsidiary branch is allowed creation of supplemental additions tailored to unique processes. Finalized Work Instructions will be approved at the branch level by Top Management.

Level III: *EMJ Quality Resources Website*
The Company-wide website consolidates the upkeep of documents and quality processes while increasing the visibility of quality objectives and performance. Implemented by EMJ Technical Directors and maintained, through controlled access, with input from all applicable branch level employees.

AS9120B Definitions

3.1 Article

Material, part, component, assembly, or appliance which is listed by the design organization as eligible for installation in/on the product or included in the design data approved by the authority.

3.2 Authorized Release Certificate

Document attesting that a product is released for use (e.g., release or return to service) and certifying that the activities performed, and the results achieved, conform to established organization, regulatory, and customer requirements.

3.3 Certificate of Conformity (commonly referred to as a 'Certificate of Conformance')

Documented information that attests to product conformity; conformance to defined process, design, and specification requirements.

3.4 Counterfeit Part

An unauthorized copy, imitation, substitute, or modified part (e.g., material, part, component), which is knowingly misrepresented as a specified genuine part of an original or authorized manufacturer.

NOTE: Examples of a counterfeit part can include, but are not limited to, the false identification of marking or labeling, grade, serial number, date code, documentation, or performance characteristics.

3.5 Distributor

An organization carrying out the purchase, storage, splitting, or sale of products without affecting product conformity. The term 'organization' in the context of this standard means a distributor.

3.6 Product Safety

Maintaining the state of product so that it is able to perform to its designed or intended purpose without causing unacceptable risk of harm to persons or damage to property.

3.7 Splitting

The division of product either physically or by batch qty, without affecting product characteristics or conformity.

3.8 Suspected Unapproved Part

A part for which there is objective and credible evidence indicating that the part is likely an unapproved or counterfeit part.

NOTE: This includes: articles shipped to an end user by a supplier who does not have direct delivery authorization from the approved production organization; new articles that do not conform to the approved design/data; articles that have not been manufactured or maintained by an approved source; articles intentionally misrepresented, including counterfeit parts; and articles with incomplete or inappropriate documentation.

3.9 Test Report

Documented information that shows objective evidence provided by either the manufacturer or a certified testing facility that the product conforms with specific design requirements, product or performance characteristics.

3.10 Unapproved Part

A part that was not produced or maintained in accordance with approved or acceptable data and applicable statutory, regulatory, and customer requirements.

4 Context of the organization

4.1 EMJ Context

Earle M Jorgensen Company (EMJ) has determined the following internal and external inputs to be relevant to the purpose and strategic direction of the company and the QMS:

Internal	External
Product and Service Offerings	Domestic and International Legislation
EMJ Management / Responsibilities / Organization	Global Issues Impacting Production Sectors
National Standards and Regulations	General Taxation issues
Capabilities – Processes and Systems	Seasonal Weather
IT Systems	Consumer Buying Patterns
Employee Morale and View of the Company	Replacement Technology / Solutions
Delivery and Safety Performance	Maturity of Technology

The issues stated above are reviewed during Management Review and evaluated for relevance with respect to the scope of the organization. Changes affecting any inputs are identified and considered as risks or opportunities.

The review of these issues is based upon an ongoing awareness of current events impacting political, economic, social and technological influences on the company.

4.2 Interested Parties

The following interested parties are relevant to the QMS of EMJ:

Interested Parties	Needs and Expectations
Customer	• Quality of product • Price • On-Time delivery of products and services • Technical support where needed
Owner/Shareholder	• Profitability • Return on investment • Continued growth in the market
Management	• Increased growth, sales and profitability • Efficiency and effectiveness of processes
Employees	• Suitable work environment • Health and safety • Proper training of job being performed • Availability of tools to complete required job
Suppliers	• Feedback on product/service performance • Increased scope and volume of purchases • Long-term contractual arrangements • Insight and information on future needs
Regulatory Bodies / Government	• Compliance with applicable requirements and industry standards • Submission of applicable forms and reports
Competitors	• Lead times, Pricing, Delivery Goals • Market knowledge • Capital Investments • Gaps in product or service offerings

EMJ monitors and reviews information about these interested parties and their relevant requirements and presents any developments during Management Review.

4.3 Scope of the QMS

The Earle M Jorgensen Company distributes and processes ferrous and non-ferrous metals to meet customer requirements. The design functions as defined by the International Standard are not applicable to EMJ and not performing these functions do not impact EMJ's ability or responsibility to provide product conforming to customer requirements. The Quality Management System and Quality Assurance Manual are in accordance with AS9120B / ISO 9001:2015.

EMJ Branches that this QAM applies to are Phoenix, Los Angeles, Seattle, St. Louis, Kansas City, Dallas, Salt Lake City, Denver, Twinsburg, Boston, Philadelphia, Wrightsville, Toronto and Montreal for AS9120B, and all other branches for ISO 9001:2015.

Note: requirements listed in this Quality Assurance Manual (QAM) from the AS9120B / ISO 9001:2015 Standard are for reference and guidance of applicable requirements for the given section of the standard addressed in the document. AS9120B requirements specifically will be in bold and italic type.

4.4 Quality Management System Processes

EMJ's quality management system addresses customer and applicable statutory and regulatory quality management system requirements.

EMJ has established, implemented, maintained and continually improves a QMS, based upon the following:

a) Inputs and outputs of processes;
b) The sequence and interaction of these processes;
c) The criteria and methods (including monitoring, measurements and related performance indicators) needed to ensure the effective operation and controls of these processes;
d) The resources needed for these processes and ensures their availability;
e) The responsibilities and authorities for these processes;
f) Relevant risks and opportunities as determined in accordance with the requirements of 6.1;

EMJ also evaluates these processes and implements any changes needed to improve the processes to ensure that these processes achieve their intended results.

4.4.2 Documented Information to support QMS Processes

EMJ maintains documented information to support the operation of its processes;
And retains documented information to have confidence that the processes are being carried out as planned.

EMJ established and maintains documented information that includes:

- ***a general description of relevant interested parties (see 4.2.a of the AS9120B Standard);***
- ***the scope of the quality management system, including boundaries and applicability (see 4.3 of AS9120B);***
- ***a description of the processes needed for the QMS and their application throughout the organization;***
- ***the sequence and interaction of these processes;***
- ***assignment of the responsibilities and authorities for these processes.***

General description of interested parties is found in section 4.2 of QAM and scope of QMS found in section 4.3 of QAM.

Interaction of processes for the QMS are shown in **Annex A.**

Process Maps for Key Processes found on the Quality Resources Website

5 Leadership

5.1 Leadership and commitment

5.1.1 General

The top management of EMJ demonstrates leadership and commitment to an effective QMS by:

a) Taking accountability for the effectiveness of the quality management system;
b) Establishing the context and strategic direction of the company and communicating an effective quality policy and relevant objectives.
c) Integrating the QMS into EMJ's business processes.
d) Promoting the use of the process approach and risk based thinking;
e) Ensuring that the resources needed for the QMS are available;
f) Communicating the importance of effective quality management and of conforming to the quality management system requirements;
g) Ensuring that the quality management system achieves its intended results;
h) Engaging, directing and supporting persons to contribute to the effectiveness of the QMS;
i) Promoting improvement;
j) Supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility.

5.1.2 Customer focus

The top management of EMJ is committed to enhancing customer satisfaction. The EMJ QMS is reviewed during the Management Review process to assure that customer requirements are met, and that customer satisfaction is enhanced. In addition, management reviews:

a) customer and applicable statutory and regulatory requirements;
b) relevant risks and opportunities;
c) the focus on enhancing customer satisfaction is maintained;
d) product and service conformity and on-time delivery performance are measured, and appropriate action is taken if planned results are not, or will not be, achieved.

EMJ determines and reviews customer and applicable statutory and regulatory requirements per corporate work instruction 4.1 "Sales Orders". Risk and Opportunities and focus for enhancing customer satisfaction including On Time Delivery (OTD) performance are reviewed, and actions taken as appropriate during various management meetings including management review meetings.

5.2 Policy

5.2.1 Establishing the quality policy

The following quality policy has been established, implemented and maintained:

The Earle M. Jorgensen Company is a provider of high quality, cost effective products and services.

EMJ is committed to maintaining and continuously improving its processes and systems in order to satisfy the applicable requirements of the parties interested in the Organization.

Our employees understand and implement this policy throughout the company to make sure that,

"At EMJ, *Quality is the Way We Work.*"

5.2.2 Communicating the quality policy

The quality policy is:

a) Communicated, understood and applied
b) Available online to all interested parties

5.3 Organizational roles, responsibilities and authorities

Roles, responsibilities and authorities in the EMJ QMS are defined in the relevant process work instructions and the organizational chart included in **Annex B.**

Top management assigns the responsibility and authority for:

a. ensuring that the QMS System conforms to requirements of the AS9120B / ISO 9001:2015 Standard;
b. ensuring that the processes are delivering their intended outputs;
c. report on performance of QMS and on OFI (see 10.1 of AS9120B), in particular to top management;
d. ensuring the promotion of customer focus throughout EMJ;
e. ensuring that the integrity of the QMS is maintained when changes are planned and implemented.

Top management has appointed a specific member of management, defined in the Authorization's Matrix, as the management representative(s), and he/she has the responsibility and authority for oversight of the above requirements.

The management representative has the organizational freedom and unrestricted access to top management to resolve quality management issues.

6 Planning

6.1 Actions to address risks and opportunities

6.1.1

When planning for the quality management system, EMJ considers the issues referred to in 4.1 and the requirements referred to in 4.2 and determines the risks and opportunities that need to be addressed in order to:

a) Give assurance that the quality management system can achieve its intended result(s);
b) Enhance desirable effects;
c) Prevent, or reduce, undesired effects;
d) Achieve improvement.

6.1.2

EMJ branches evaluate risk based on corporate work instruction 1.8 "Assessment of Risk". The top management of each branch is responsible for evaluating the risks that affect their locations and reviewing these risks at every Management Review.

6.2 Quality objectives and planning to achieve them

6.2.1

EMJ establishes quality objectives at relevant functions, levels and processes needed for the quality management system. These objectives are monitored through the EMJ Quality Website Statistics Section. Goals are set for the following metrics:

1) Inside Sales Errors*
2) Warehouse Errors*
3) On-Time Delivery from Branch Stock via EMJ Truck*

Each branch can also set additional goals within this module if additional metrics are determined to require improvement based on Management Review, risk analysis, or other findings.

6.2.2
EMJ plans to achieve its quality objectives and determines:

a) What will be done;
b) What resources will be required;
c) Who will be responsible;
d) When it will be done;
e) How will the results be evaluated.

These quality objectives are monitored, communicated and updated as deemed appropriate during Management Review. Documented information regarding Quality Objectives is sent out monthly for review and plans to achieve them are updated as necessary.

6.3 Planning of changes

When EMJ determines the need for changes to the quality management system, the changes shall be carried out in a planned manner.

EMJ considers:

a) The purpose of the changes and their potential consequences;
b) The integrity of the quality management system;
c) The availability of resources;
d) The allocation or reallocation of responsibilities and authorities.

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7 Support

7.1 Resources

7.1.1 General

EMJ will provide resources and personnel required to establish, implement, and maintain the QMS and continually improve its effectiveness.

EMJ will consider the capabilities and constraints of existing internal resources and utilize external providers as necessary.

7.1.2 People

EMJ determines and provides the persons necessary for the effective implementation of its quality management system and for the operation and control of its processes.

7.1.3 Infrastructure

EMJ determines, provides and maintains the infrastructure necessary for the operation of its processes and to achieve conformity of products and services.

Infrastructure includes:

a) Buildings, workspaces and associated utilities;
b) Process equipment, including hardware and software;
c) Supporting services such as transportation, communication or information systems.

Facilities and equipment maintained and verified through the internal audit program.

7.1.4 Environment for the operation of processes

EMJ determines, provides and maintains the environment necessary for the operation of its processes and to achieve conformity of products and services. Environment includes:

a) Social
b) Psychological
c) Physical

Work environment including lighting and cleanliness is maintained and verified through internal audit program.

7.1.5 Monitoring and measuring resources

7.1.5.1 General

EMJ determines and provides the resources needed to ensure valid and reliable results when monitoring or measuring is used to verify the conformity of products and services to requirements.

EMJ ensures that the resources provided:

a) Are suitable for the specific type of monitoring and measurement activities being undertaken; these resources may include but not be limited to: hardness testers, calipers, and reference gage blocks.
b) Are maintained to ensure their continuing fitness for their purpose.

7.1.5.2 Measurement traceability

When measurement traceability is a requirement, or is considered by EMJ to be an essential part of providing confidence in the validity of measurement results, measuring equipment shall be:

a) Calibrated or verified, or both, at specified intervals, or prior to use, against measurement standards traceable to NIST or equivalent international standards; when no such standards exist, the basis used for calibration shall be recorded.
b) Identified in order to determine their status.
c) Safeguarded from adjustments, damage or deterioration that would invalidate the calibration status and subsequent measurement results.

EMJ established, implemented, and maintains a process for the recall of monitoring and measuring equipment requiring calibration or verification.

EMJ maintains a register of the monitoring and measuring equipment. The register includes the equipment type, unique identification, location, and the calibration or verification method, frequency, and acceptance criteria.

Calibration or verification of monitoring and measuring equipment is be carried out under suitable environmental conditions (see 7.1.4 of the AS9120B Standard).

Records of the results of calibration and verification are maintained. When equipment is found that does not conform to requirements, EMJ assesses the validity of previously measurement results. Appropriate action is taken on the equipment and any products affected. If computer software or webpage is used in identification, calibration and validation of monitoring and measuring equipment it is recorded on the webpage as documented information.

Hand tools, inspection and measurement equipment that require calibration are identified with a unique number and records including certifications are retained.

7.1.6 Organizational knowledge

EMJ determines the knowledge necessary for the operation of its processes and to achieve conformity of products and services.

Organizational knowledge can be based on:
a) Internal sources (e.g. EMJ specifications, ‘tribal knowledge’)
b) External sources (e.g. obtaining ASTM/AMS specifications, technical seminars)

EMJ uses its Internal Audit and Risk Management Programs to identify areas where organizational knowledge or lack of is a potential risk and assign action to ensure it is shared or documented as necessary.

7.1.7 Use of Experience

EMJ has been in business since 1921 serving multiple industries. The experience gained over this period in industry standards, customer specific requirements and processing and distribution requirements have created a foundation for us to continue to be industry leaders in metals distribution and processing. Through the development of strong relationships with our customers and supply chain as well as through membership with various professional organizations, we remain involved and aware of industry trends. The continuous improvement mindset we strive to apply positions us well to achieve ongoing improvements in our business.

7.2 Competence

Training of each employee consists of:

a) Determining the necessary competence of person(s) doing work under its control that affects the performance and effectiveness of the quality management system;
b) Ensuring that they are competent on the basis of appropriate education, training, or experience;
c) Where applicable, taking actions to acquire the necessary competence, and evaluating the effectiveness of the actions taken. This can be achieved through training, mentoring, re-assignment, etc.
d) Maintaining records of education, training, skills and experience as evidence of competence.

Top Management maintains the job specific training documentation of all employees participating in training activities.

7.3 Awareness

The **Branch Quality Representative** ensures that persons doing work under EMJ's control are aware of:

a) The quality policy;
b) Relevant quality objectives;
c) Their contribution to the effectiveness of the quality management system, including the benefits of improved performance;
d) The implications of not conforming to the quality management system requirements.
e) relevant quality management system documented information and changes thereto;
f) their contribution to product or service conformity;
g) their contribution to product safety;
h) ***the importance of ethical behavior.***

7.4 Communication

The **Branch Quality Representative** will determine the internal and external communications relevant to the quality management system, including;

a) On what he/she will communicate;
b) When to communicate;
c) With whom to communicate;
d) How to communicate;
e) Who communicates;

The **Technical Directors** will be involved with communications concerning multiple EMJ locations.

7.5 Documented information

7.5.1 General

EMJ's QAM includes:

a) Documented information required by this International Standard;
b) Documented information determined by the EMJ as being necessary for the effectiveness of the QMS;

7.5.2 Creating and updating

When creating and updating documented information, EMJ ensures appropriate:

a) Identification and description;
b) Format and media;
c) Review and approval for suitability and adequacy.

7.5.3 Control of documented information

7.5.3.1 Documented information required by the quality management system and by this International Standard shall be controlled to ensure:

a) It is available and suitable for use, where and when it is needed;
b) It is adequately protected

7.5.3.2 For the control of documented information, EMJ addresses the following activities, as applicable:

a) Distribution, access, retrieval and use;
b) Storage and preservation, including preservation of legibility;
c) Control of changes (e.g. version control);
d) Retention and disposition;
e) prevention of the unintended use of obsolete documented information by removal or by application of suitable identification or controls if kept for any purpose.

Documents include QMS, documents, records, supplier evaluation, etc. are all protected on website.

Retention periods for documented information and records are defined within **Annex C**

Documented information of external origin determined by EMJ to be necessary for the planning and operation of the Quality Management System is identified as appropriate and controlled.

Distribution of documents including prints of external origin are maintained and controlled through Sales Representative.

Documented information retained as evidence of conformity is protected from unintended alterations.

When documented information is managed electronically, data protection processes are defined (e.g., protection from loss, unauthorized changes, unintended alteration, corruption, physical damage).

Documented information that provides evidence of product origin, conformity, and shipment shall be retained.

Documented information is available for review by employees electronically and/or hard copy

8 Operation

8.1 Operational planning and control

EMJ plans, implements and controls the processes (see 4.4) needed to meet the requirements for the provision of products and services, and to implement the actions determined in Clause 6, by:

a) Determining the requirements for the products and services;
b) Establishing criteria for:
    1) The processes;
    2) The acceptance of products and services;
c) Determining the resources needed to achieve conformity to the product and service requirements ***and to meet on-time delivery of products and services***;
d) Implementing control of the processes in accordance with the criteria;
e) Determining, maintaining and retaining documented information to the extent necessary:
    1) To have confidence that the processes have been carried out as planned;
    2) To demonstrate the conformity of products and services to their requirements.
f) ***engaging representatives of affected organization functions for operational planning and control;***
g) ***determining the products and services to be obtained from external providers;***
h) ***establishing the controls needed to prevent the delivery of nonconforming products and services to the customer.***

As appropriate to the organization, customer requirements, and products and services, EMJ plans and manages product and service provision in a structured and controlled manner including scheduled events performed in a planned sequence to meet requirements at acceptable risk, within resource and schedule constraints.

The output of this planning shall be suitable for the organization's operations.

EMJ shall control planned changed and review the consequences of unintended changes, taking action to mitigate any adverse effects, as necessary.

EMJ establishes, implements, and maintains a process to plan and control the temporary or permanent transfer of work, to ensure the continuing conformity of the work to requirements. The process ensures that work transfer impacts and risks are managed.

NOTE: For the control of work transfer from the organization to an external provider, or from an external provider to another external provider, see 8.4. For the control of work transfer from one organization facility to another, or from an external provider to the organization, see 8.5.

If EMJ temporarily or permanently transfers work to be performed at a location outside of our current address, the Shipping Packet (Manifest) would follow the job, and a note would be made on the shipping packet identifying the location of where the work was performed.

EMJ ensures that outsourced processes are controlled (see 8.4)

Planning process is the electronic or hard copy pick ticket that is generated from the sales order. Scheduling of sales orders is managed through the OMS.

8.1.1 Not Used

8.1.2 Configuration Management

EMJ plans, implements, and controls a process for configuration management as appropriate to our products and services in order to ensure the identification and control of physical and functional attributes throughout the product lifecycle. This process:

- ***a) controls product identity and traceability to requirements, including the implementation of identified changes;***
- ***b) ensures that the documented information (e.g., requirements, design, verification, validation and acceptance documentation) is consistent with the actual attributes of the products and services.***

Once customer PO is reviewed and accepted a sales order number is assigned. The sales order is the configuration record used for identification and traceability to requirements.

8.1.3 Not Used

8.1.4 Prevention of Counterfeit Parts

EMJ plans, implements, and controls processes, appropriate to our products, for the prevention of counterfeit or suspect counterfeit part use and their inclusion in product(s) delivered to the customer.

8.1.5 Prevention of Suspected Unapproved Parts

EMJ plans, implements, and controls a process appropriate to the organization and the product that identifies and prevents the release of unapproved and suspected unapproved parts.

See Work Instruction Counterfeit and Suspect Unapproved Parts Prevention

8.2 Requirements for products and services

8.2.1 Customer communication

Communication with customers shall include:

a) Providing information relating to products and services;
b) Handling inquiries, contracts or orders, including changes;
c) Obtaining customer feedback relating to products and services, including customer complaints;
d) Handling or controlling customer property;
e) Establishing specific requirements for contingency actions, when relevant.

8.2.2 Determining the requirements for products and services

When determining the requirements for the products and services to be offered to customers, EMJ ensures:

a) The requirements for the products and services are defined.
b) EMJ can meet the claims for the products and services it offers.

8.2.3 Review of the requirements for products and services

8.2.3.1 EMJ ensures:

That it has the ability to meet the requirements for products and services to be offered to customers. EMJ conducts a review before committing to supply products and services to a customer.

EMJ ensures that contract or order requirements differing from those previously defined are resolved.

When the customer does not provide a documented statement of their requirements, the customer's requirements shall be confirmed by EMJ before acceptance.

This review is coordinated with applicable functions of the organization.

If upon review EMJ determines that some customer requirements cannot be met or can only partially be met, the EMJ will negotiate a mutually acceptable requirement with the customer.

8.2.3.2 EMJ retains documented information, as applicable:

a) On the results of the review;
b) On any new requirements for the products and services.

8.2.4 Changes to requirements for products and services

EMJ ensures that relevant documented information is amended, and that relevant persons are made aware of the changed requirements, when the requirements for products and services are changed.

8.3 Design and development of products and services

Not Applicable, EMJ business practices do not involve design and development processes.

8.4 Control of externally provided processes, products and services

8.4.1 General

EMJ ensures that externally provided processes, products and services conform to requirements.

EMJ is responsible for the conformity of all externally provided processes, products, and services, including from sources defined by the customer.

EMJ ensures, when required, that customer-designated or approved external providers, including process sources (e.g., special processes), are used.

EMJ identifies and manage the risks associated with the external provision of processes, products, and services, as well as the selection and use of external providers.

EMJ requires that external providers apply appropriate controls to their external providers, to ensure that requirements are met.

EMJ determines the controls to be applied to externally provided processes, products and services when:

a) Products and services from external providers are intended for incorporation into the organization's own products and services;
b) Products and services are provided directly to the customer(s) by external providers on behalf of the organization;
c) A process, or part of a process, is provided by an external provider as a result of a decision by the organization;

EMJ determines and applies criteria for the evaluation, selection, monitoring of performance, and re-evaluation of external providers, based on their ability to provide processes or products and services in accordance with requirements. EMJ retains documented information of these activities and any necessary actions arising from the evaluations.

NOTE: During external provider evaluation and selection, the organization can use quality data from objective and reliable external sources, as evaluated by the organization (e.g., information from accredited quality management system or process certification bodies, external provider approvals from government authorities or customers). Use of such data would be only one element of an organization's external provider control process and the organization remains responsible for verifying that externally provided processes, products, and services meet specified requirements.

8.4.1.1 EMJ:

- ***a) defines the process, responsibilities, and authority for the approval status decision, changes of the approval status, and conditions for a controlled use of external providers depending on their approval status;***
- ***b) maintains a register of its external providers that includes approval status (e.g., approved, conditional, disapproved) and the scope of the approval (e.g., product type, process family, authorized approval to distribute);***
- ***c) periodically reviews external provider performance including process, product and service conformity, and on-time delivery performance;***
- ***d) defines the necessary actions to take when dealing with external providers that do not meet requirements;***
- ***e) defines the requirements for controlling documented information created by and/or retained by external providers.***

Supplier Management is performed per corporate work instruction 1.12 "Approved Suppliers"

8.4.2 Type and extent of control

EMJ ensures that externally provided processes, products and services do not adversely affect the EMJ's ability to consistently deliver conforming products and services to its customers.

EMJ:

a) Ensures that externally provided processes remain within the control of its QMS;
b) Defines both the controls that it intends to apply to an external provider and those it intends to apply to the resulting output;
c) Takes into consideration:
    1) The potential impact of the externally provided processes, products and services on EMJ's ability to consistently meet customer and applicable statutory and regulatory requirements;
    2) The effectiveness of the controls applied by the external provider;
    3) the results of the periodic review of external provider performance (see 8.4.1.1 c);
d) Determines the verification, or other activities, necessary to ensure that the externally provided processes, products and services meet requirements.

Verification activities of externally provided processes, products, and services shall be performed according to the risks identified by the organization. These shall include inspection or periodic testing, as applicable, when there is high risk of nonconformities including counterfeit parts.

NOTE 1: Customer verification activities performed at any level of the supply chain does not absolve the organization of its responsibility to provide acceptable processes, products, and services and to comply with all requirements.

NOTE 2: Verification activities can include:

- ***review of objective evidence of the conformity of the processes, products, and services from the external provider (e.g., accompanying documentation, certificate of conformity, test documentation, statistical documentation, process control documentation, results of production process verification and assessment of changes to the production process thereafter);***
- ***inspection and audit at the external provider's premises;***
- ***review of the required documentation;***
- ***review of production part approval process data;***
- ***inspection of products or verification of services upon receipt.***

When external provider test reports are utilized to verify externally provided products, the organization shall implement a process to evaluate the data in the test reports to confirm that the product meets requirements. When a customer or

organization has identified raw material as a significant risk, the organization shall implement a process to validate the accuracy of test reports.

8.4.3 Information for external providers

EMJ ensures the adequacy of requirements prior to the communication to the external provider.

EMJ communicates to external providers any applicable requirements for:

a) The processes, products and services to be provided ***including the identification of relevant technical data (e.g., specifications, drawings, process requirements, work instructions);***
b) The approval of:
    1) Products and services;
    2) Methods, processes and equipment;
    3) The release of products and services;
c) Competence, including any required qualification of persons;
d) The external providers' interactions with the organization;
e) Control and monitoring of the external providers' performance to be applied by the organization;
f) Verification or validation activities that the organization, or its customer, intends to perform at the external providers' premises.
g) test, inspection, and verification;
h) the use of statistical techniques for product acceptance and related instructions for acceptance by the organization;
i) the need to:
- ***implement a quality management system;***
- ***use customer-designated or approved external providers, including process sources (e.g., special processes);***
- ***notify the organization of nonconforming processes, products, or services and obtain approval for their disposition;***
- ***prevent the use of suspected unapproved, unapproved, and counterfeit parts (see 8.1.4 and 8.1.5);***
- ***notify the organization of changes to processes, products, or services, including changes of their external providers or location of manufacture;***
- ***flow down to external providers applicable requirements including customer requirements;***
- ***provide a certificate of conformity, test reports, or authorized release certificate, as applicable;***
- ***retain documented information, including retention periods and disposition requirements;***

j) the right of access by the organization, their customer, and regulatory authorities to the applicable areas of facilities and to applicable documented information, at any level of the supply chain;
k) ensuring that persons are aware of:
- ***their contribution to product or service conformity;***
- ***their contribution to product safety;***
- ***the importance of ethical behavior.***

8.5 Production and services provision

8.5.1 Control of production and service provision

EMJ implements production and service provision under controlled conditions which include:

a) Availability of documented information that defines:
    1. the characteristics of the products to be produced, the services to be provided, or the activities to be performed;
    2. the results to be achieved;
b) the availability and use of suitable monitoring and measuring resources;
c) the implementation of monitoring and measurement activities at appropriate stages to verify that criteria for control of processes or outputs, and acceptance criteria for products and services, have been met;

1. ***ensuring that documented information for monitoring and measurement activity for product acceptance includes:***
   - ***criteria for acceptance and rejection;***
   - ***where in the sequence verification operations are to be performed;***
   - ***measurement results to be retained (at a minimum an indication of acceptance or rejection);***
   - ***any specific monitoring and measurement equipment required and instructions associated with their use;***
2. ***ensuring that when sampling is used as a means of product acceptance, the sampling plan is justified on the basis of recognized statistical principles and appropriate for use.***

d) the use of suitable infrastructure and environment for the operation of processes;
e) the appointment of competent persons, including any required qualification;
f) the validation, and periodic revalidation, of the ability to achieve planned results of the processes for production and service provision, where the resulting output cannot be verified by subsequent monitoring or measurement;
g) the implementation of actions to prevent human error;
h) the implementation of release, delivery, and post-delivery activities***;***
i) ***The establishment of criteria for workmanship (e.g., written standards, representative samples, illustrations);***
j) the accountability for all products (e.g., parts quantities, split orders, nonconforming product);
k) the availability of evidence that all production and inspection/verification operations have been completed as planned, or as otherwise documented and authorized;
l) the provision for the prevention, detection, and removal of foreign objects;
m) the control and monitoring of utilities and supplies (e.g., water, compressed air, electricity, chemical products) to the extent they affect conformity to product requirements (see 7.1.3);
n) the consequences of obsolescence (e.g., materials, components, equipment, products).

The Sales Order / Pick Ticket controls warehouse operations.

8.5.1.1 Control of Equipment, Tools, and Software Programs

Equipment, tools, and software programs used to automate, control, monitor, or measure processes shall be validated and maintained.

Storage requirements shall be defined for production equipment or tooling in storage including any necessary periodic preservation or condition checks.

Material handling and processing warehouse equipment are validated and maintained through the preventive maintenance program.

8.5.2 Identification and traceability

EMJ controls traceability for all products and maintains documented information. Applicable work instructions establish procedures for identification and traceability of product from receipt through delivery to customer. The status of outputs with respect to monitoring and measurement requirements is identified electronically.

EMJ maintains the identification of the configuration of the products and services to identify any differences between the actual configuration and the required configuration.

When acceptance authority media are used (e.g., stamps, electronic signatures, passwords), we establish controls for the media.

If Stamps are used, they are to be controlled on the Quality Resources Website. *

Unserviceable product is controlled and physically segregated from serviceable product.

EMJ maintains product identification and traceability by suitable means (e.g., labels, bar codes) from receipt; during splitting, storage, packaging, and preservation operations and until delivery. This includes handling or packing operations outsourced to external providers.

When delivering split product, the following information is retained:
- ***amount delivered relative to amount received from external provider,***
- ***purchase order number(s),***
- ***customer's name(s).***

Product is identified by item #, heat # and receiver number.

8.5.3 Property belonging to customers and external providers

EMJ identifies, verifies, protects and safeguards customer property in the same manner as EMJ property. Customer property may include material, packaging supplies or containers, tooling, intellectual property and personal data. If any customer property is lost, damaged or otherwise determined to be unsuitable for use, the customer is advised and documented information is maintained of the notification and any applicable response for disposition of the property.

8.5.4 Preservation

EMJ preserves the outputs during production and service provision to the extent necessary to ensure conformity to requirements.

Preservation of outputs also include, when applicable in accordance with specifications and applicable statutory and regulatory requirements, provisions for:

a) ***cleaning;***
b) ***prevention, detection, and removal of foreign objects;***
c) ***special handling and storage for sensitive products;***
d) ***marking and labeling, including safety warnings and cautions;***
e) ***shelf life control and stock rotation;***
f) ***special handling and storage for hazardous materials.***

8.5.5 Post-delivery activities

EMJ considers requirements for post-delivery activities associated with all products. In determining the extent of post-delivery activities that are required, EMJ considers statutory and regulatory requirements, potential undesired consequences, the use and intended lifetime of its products, customer requirements, and customer feedback.

EMJ also considers product/customer support (e.g., queries, training, warranties, maintenance, replacement parts, resources, obsolescence).

When problems are detected after delivery (including warranty and non-warranty issues), EMJ takes appropriate action including investigation and reporting.

8.5.6 Control of changes

EMJ reviews and controls changes for production or service provision to ensure continuing conformity to requirements.

Work instructions establish procedures to ensure that changes and current revision status are identified for all necessary documented information.

Persons authorized to approve production or service provision changes are identified. *EMJ* retains documented information (records) describing the results of the review of changes, the person(s) authorizing the change, and any necessary actions arising from the review.

See Authorizations Matrix

8.6 Release of products

EMJ implements planned arrangements, at appropriate stages, to verify that the product and service requirements have been met.

The release of products and services to the customer shall not proceed until the planned arrangements have been satisfactorily completed, unless otherwise approved by a relevant authority and, as applicable by the customer.

EMJ ensures that all documented information required to accompany the products and services are present at delivery.

EMJ retains documented information on the release of products and services. The documented information shall include:

a) Evidence of conformity to the acceptance criteria, which may include but not limited to:
    i. Customer signed Proof of Delivery
    ii. Warehouse personnel sign-off upon process completion
    iii. Metrics of non-conformances
b) Traceability to the person(s) authorizing the release.

8.7 Control of nonconforming outputs

8.7.1

That outputs that do not conform to their requirements are identified and controlled to prevent their unintended use or delivery.

EMJ takes appropriate action based on the nature of the nonconformity and its effect on the conformity of products and services. This shall also apply to nonconforming products and services detected after delivery of products, during or after the provision of services.

EMJ's nonconformity control process is maintained as documented information including the provisions for:

- ***defining the responsibility and authority for the review and disposition of nonconforming outputs and the process for approving persons making these decisions;***
- ***taking actions necessary to contain the effect of the nonconformity on other processes, products, or services;***
- ***timely reporting of nonconformities affecting delivered products and services to the customer and to relevant interested parties;***
- ***defining corrective actions for nonconforming products and services detected after delivery, as appropriate to their impacts (see 10.2).***

EMJ deals with nonconforming outputs in one or more of the following ways, as defined by relevant work instructions:

a) Correction;
b) Segregation, containment, return or suspension of provision of products and services;
c) Informing the customer;
d) Obtaining authorization for acceptance under concession.

Dispositions of nonconforming product shall be limited to:

- ***scrap;***
- ***rejection for return to the external provider;***
- ***rejection for revalidation by the manufacturer;***
- ***submittal to either the customer or design authority for use-as-is disposition, as applicable.***

Product dispositioned for scrap shall be conspicuously and permanently marked, or positively controlled, until physically rendered unusable.

Counterfeit, or suspect counterfeit, parts shall be controlled to prevent reentry into the supply chain.

Conformity to the requirements shall be verified when nonconforming outputs are corrected.

8.7.2
EMJ retains documented information that:

a) Describes the nonconformity;
b) Describes the actions taken;
c) Describes any concessions obtained;
d) Identifies the authority deciding the action in respect of the nonconformity.

Nonconforming product is processed in accordance with corporate work instruction 1.13 "Control of Nonconforming Outputs."

9 Performance evaluation

9.1 Monitoring, measurement, analysis and evaluation

9.1.1 General

EMJ determines:
a) What needs to be monitored and measured;
b) The methods for monitoring, measurement, analysis and evaluation needed to ensure valid results;
c) When the monitoring and measuring shall be performed;
d) When the results from monitoring and measurement shall be analyzed and evaluated.

EMJ evaluates the performance and the effectiveness of the quality management system.

EMJ retains appropriate documented information as evidence of the results.

9.1.2 Customer satisfaction

EMJ monitors customers' perceptions of the degree to which their needs and expectations have been fulfilled and determines the methods for obtaining, monitoring and reviewing this information.

Information to be monitored and used for the evaluation of customer satisfaction shall include, but is not limited to, product and service conformity, on-time delivery performance, customer complaints, and corrective action requests. EMJ develops and implement plans for customer satisfaction improvement that address deficiencies identified by these evaluations and assess the effectiveness of the results.

See Management Review Records.

9.1.3 Analysis and evaluation

EMJ analyzes and evaluates appropriate data and information arising from monitoring and measurement. The results of analysis shall be used to evaluate:

a) Conformity of products and services;
b) The degree of customer satisfaction:
c) The performance and effectiveness of the quality management system;
d) If planning has been implemented effectively;
e) The effectiveness of actions taken to address risks and opportunities;
f) The performance of external providers;
g) The need for improvements to the quality management system.

See Management Review Records.

9.2 Internal audit

9.2.1

EMJ conducts internal audits at planned intervals to provide information on whether the quality management system:

a) Conforms to:
    1) EMJ's requirements for its QMS;
    2) The requirements of AS9120B / ISO 9001:2015;
b) Is effectively implemented and maintained.

9.2.2

EMJ:

a) Plans, establishes, implements and maintains an audit program including the frequency, methods, responsibilities, planning requirements and reporting, which shall take into consideration the importance of the processes concerned, changes affecting the organization, and the results of previous audits;
b) Defines the audit criteria and scope for each audit;
c) Selects auditors and conduct audits to ensure objectivity and the impartiality of the audit process;
d) Ensures that the results of the audits are reported to relevant management;
e) Takes appropriate correction and corrective actions without undue delay;
f) Retains documented information as evidence of the implementation of the audit program and the audit results

Internal Audits are performed in accordance with corporate work instruction 1.4 “Internal Audit”

9.3 Management review

9.3.1 General

EMJ performs Management Review at planned intervals as defined by work instructions. The review will ensure the continuing suitability, adequacy, effectiveness and the alignment of the QMS with the strategic direction of the organization.

9.3.2 Management review inputs

The management review considers:

a) Actions from previous management reviews
b) Changes in external and internal issues relevant to the QMS
c) Information on the performance and effectiveness of the QMS, including trends in:
    1) Customer satisfaction and relevant interested parties
    2) Process performance and product conformity
    3) Nonconformities and corrective actions
    4) Monitoring and measurement results
    5) Audit results
    6) The extent to which quality objectives have been met
    7) Performance of external providers
    8) on-time delivery performance
d) The adequacy of resources
e) Effectiveness of actions taken to address risks
f) Recommendations for improvements

9.3.3 Management review outputs

The outputs of the management review include decisions and actions related to:

a) Opportunities for improvement;
b) Any need for changes to the quality management system;
c) Resource needs;
d) risks identified.

Documented information is retained as evidence of the results of the management review.

Management Reviews are performed in accordance with corporate work instruction 1.5 “Management Review”

10 Improvement

10.1 General

EMJ determines and selects opportunities for improvement and implement any necessary actions to meet customer requirements and enhance customer satisfaction.

These include:

a) Improving products and services to meet requirements as well as to address future needs and expectations;
b) Correcting, preventing or reducing undesired effects;
c) Improving the performance and effectiveness of the quality management system.

10.2 Nonconformity and corrective action

10.2.1

When a nonconformity occurs, including any arising from complaints, EMJ:

a) Reacts to the nonconformity and, as applicable:
    1) Takes action to control and correct it;
    2) Deals with the consequences;
b) Evaluates the need for action to eliminate the cause(s) of the nonconformity, in order that it does not recur or occur elsewhere by:
    1) Reviewing and analyzing the nonconformity
    2) Determining the causes of the nonconformity, ***including, as applicable, those related to human factors****;*
    3) Determining if similar nonconformities exist, or could potentially occur;
c) Implements any action needed;
d) Reviews the effectiveness of any corrective action taken;
e) Updates risks and opportunities determined during planning, if necessary;
f) Makes changes to the quality management system, if necessary;
g) flow down corrective action requirements to an external provider when it is determined that the external provider is responsible for the nonconformity;
h) take specific actions when timely and effective corrective actions are not achieved.

Corrective actions shall be appropriate to the effects of the nonconformities encountered.

EMJ maintains documented information that define the nonconformity and corrective action management processes.

Corrective Actions are processed in accordance with corporate work instruction 1.2 “Corrective Action”

10.2.2

EMJ retains documented information as evidence of:

a) The nature of the nonconformities and any subsequent actions taken;
b) The results of any corrective action.

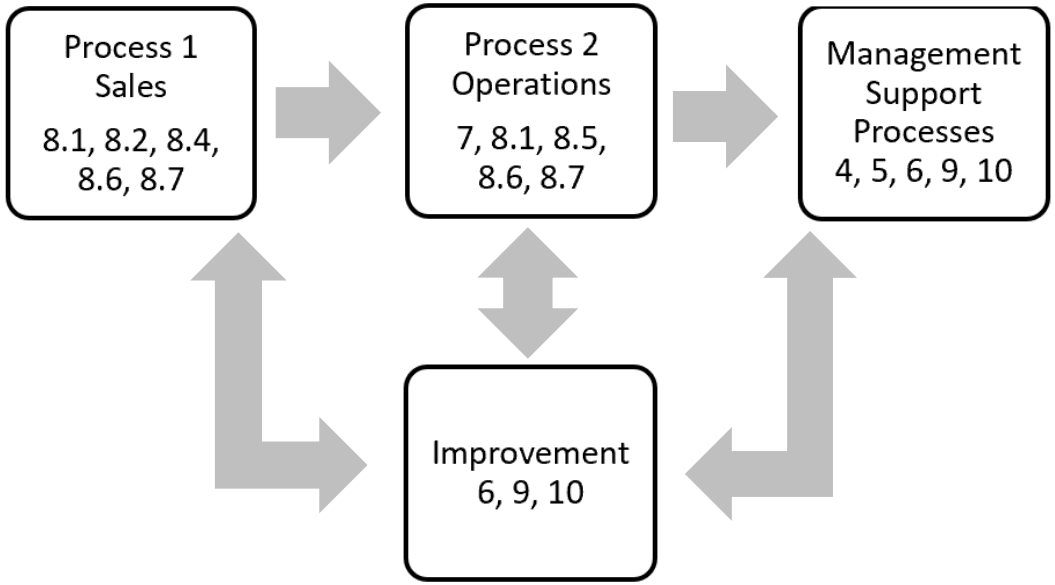
10.3 Continual improvement

EMJ continually improves the suitability, adequacy and effectiveness of the QMS. We consider the results of analysis and evaluation, and the outputs from management review, to determine if there are needs or opportunities that will be addressed as part of continual improvement.

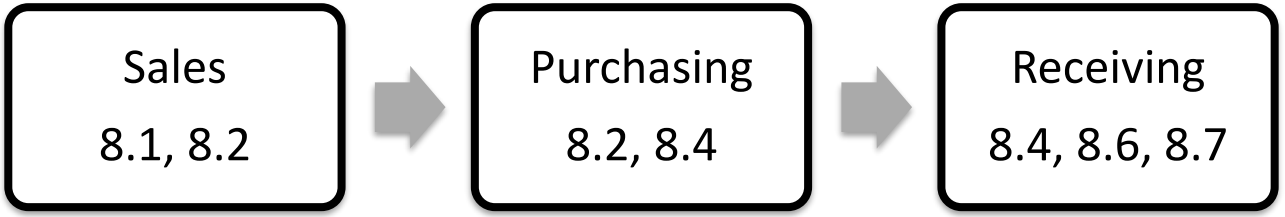
EMJ monitors the implementation of improvement activities and evaluate the effectiveness of the results.

INTERACTION OF PROCESSES

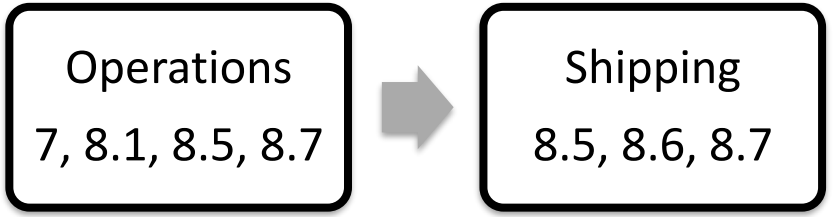
Controlled by: EMJ Technical Directors



Process 1 SALES

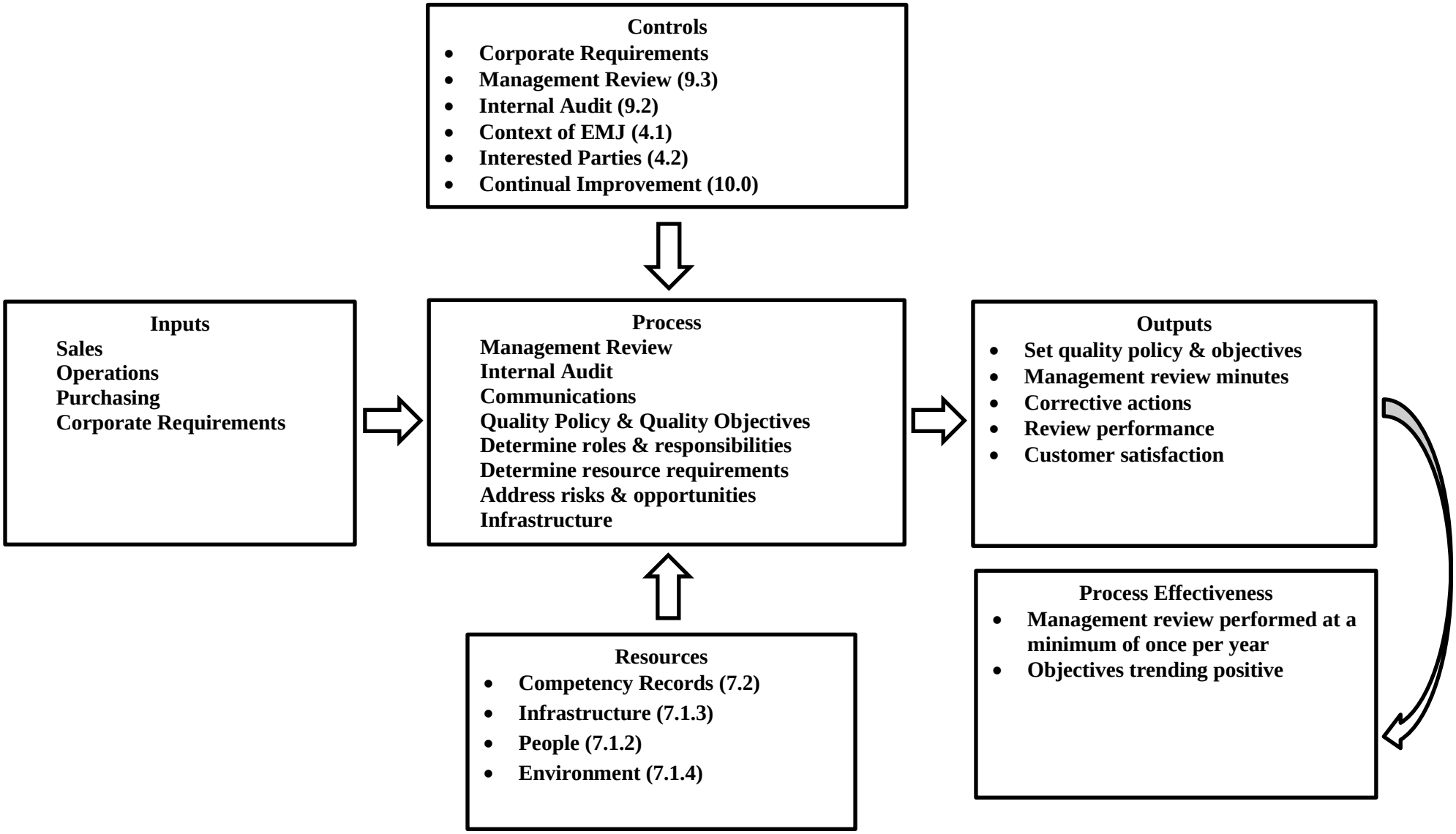


Process 2 OPERATIONS

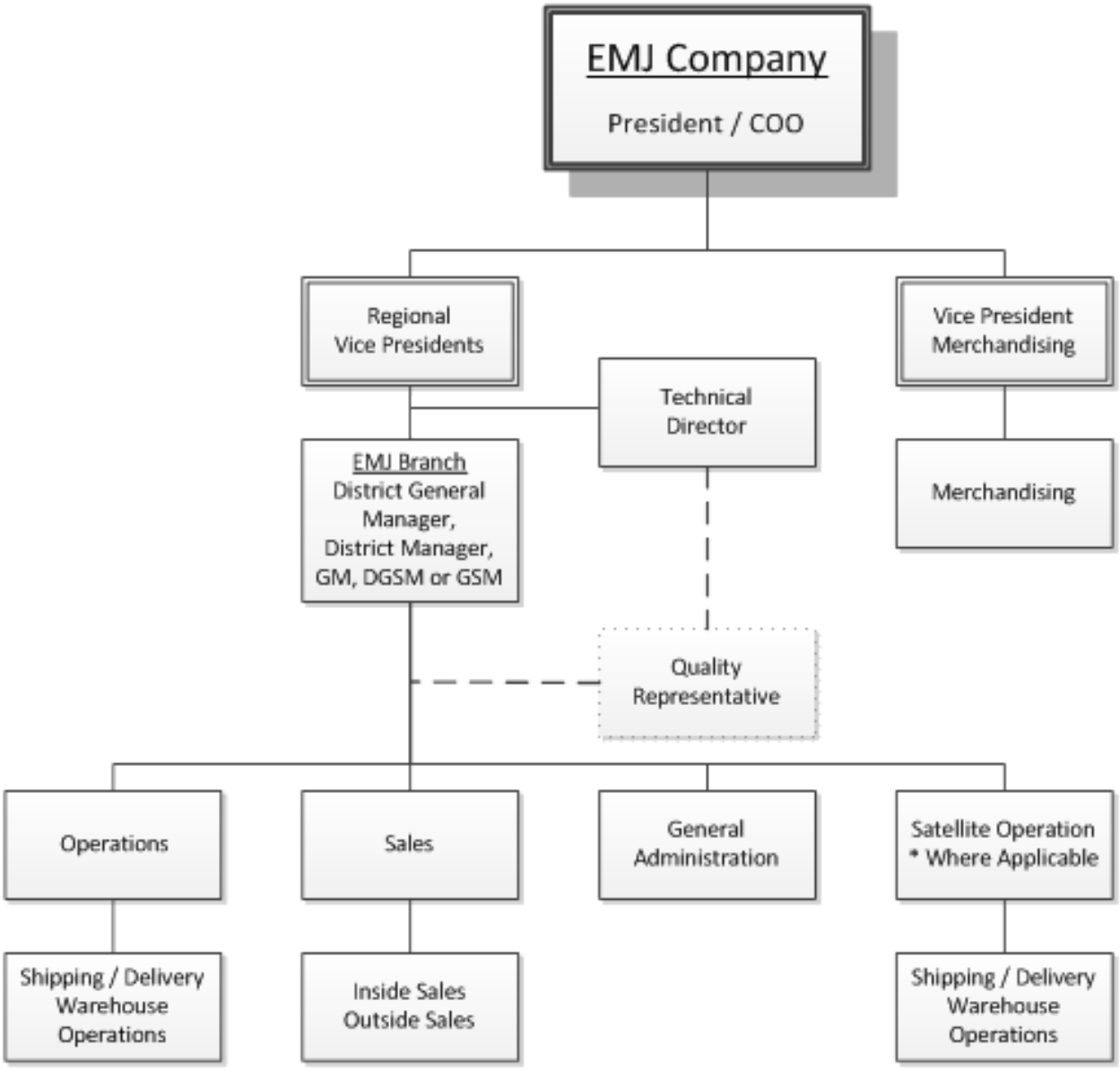


MANAGEMENT SUPPORT PROCESSES

Controlled by: EMJ Technical Directors



Annex B- EMJ Organizational Chart and Technical Director Signatures



David Weber
Technical Director

Richard Pavlik
Technical Director

Shane Lu
Technical Director

Annex C- EMJ Document Retention

Branch Level Records

Quality Documented Information	Minimum Duration
Management Review & Results of Review	5 Years
Competence, Training and Awareness	5 Years
Customer-related Processes (Express)	5 Years
Customer Purchase Orders & Results of Review	1 Month
Supplier Selection (Approved Supplier List)	Active
Corporate ASL and Local ASL	
Purchasing Information – EMJ Purchase Orders	5 Years
Verification of Purchased Product	5 Years
Receiving Inspection and Test Reports	
Validation of Processes for Production	5 Years
In-Process Inspection (WIN)	
Identification and Traceability	5 Years
Customer Property (If Lost/Damaged)	Active
Customer Drawings and Specifications	
Internal Audit Reports	5 Years
Monitoring and Measurement of Product	5 Years
Release of Product – Final Inspection (WIN)	
Control of Nonconforming Product	5 Years
Corrective Actions	5 Years
Supplier Actions	5 Years
Supplier CAR and Performance Evaluation	
Pick Tickets & Results to be Achieved	5 Years
Monitoring and Measurement Resources	Active
Shipping Manifests	5 Years

If necessary, documents are destroyed (i.e. shredding, incineration, etc.) once past storage date. Electronic records may be archived or deleted. Controlled documented information are reviewed every 3 (three) years by owner or Quality Assurance Representative for conformance to QMS. This task will be automated by the Quality Resources Website.

Documents are stored in a dry location. Cabinets or containers storing records are clearly labeled to display their contents. Electronic records are maintained with a backup copy in a remote location.

Documented information will be maintained in a manner to minimize deterioration or loss and will be retrievable during the retention period listed below.

Corporate Level Records

Quality Documented Information	Minimum Duration
Corporate QMS Evaluation	5 years
Corporate/Branch Management Reviews	5 years
Corporate/Branch Internal Audit Report	5 years
Corporate/Branch Corrective Action Logs	5 years
Corporate ASL	Active
EMJ Quality Assurance Manual	Active
Quality Scope/Policy Statement	Quality Manual
Quality Objectives	Management Review

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