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<td>07-21-09</td>
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<td>UPDATED LANGUAGE TO TS 16949</td>
<td>J.E. SHAIEB</td>
<td>01-15-10</td>
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<td>4</td>
<td>CHANGED MANAGEMENT REVIEW FREQUENCY FROM QUARTERLY TO MONTHLY.</td>
<td>J.E. SHAIEB</td>
<td>08-15-11</td>
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<td>5</td>
<td>7.4.1.2 added 2nd party audit information</td>
<td>J.E. SHAIEB</td>
<td>12-04-14</td>
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<td>6</td>
<td>Updated to new IATF 16949 Standard</td>
<td>J.E. SHAIEB</td>
<td>08-15-17</td>
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<td>7</td>
<td>Updated to include Instruction Numbers</td>
<td>J.E. SHAIEB</td>
<td>01-03-18</td>
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INTRODUCTION:


COMPANY OVERVIEW:

The name of our organization is WHITLAM GROUP, INC.
The site location is 24800 SHERWOOD AVENUE, CENTER LINE, MICHIGAN, and 48015, U.S.A.

WHITLAM GROUP was founded in 1957. The company is classified under SIC Code 2700, 3700. We ship directly to Chrysler and General Motors. We ship to Tier 1 suppliers that supply assemblies to Chrysler, Ford, and GM.

PROCESS APPROACH:

WHITLAM GROUP has adopted a process approach to our Quality Management System to emphasize the importance of:
- Understanding and meeting customer requirements.
- The need to consider processes in terms of added value.
- Obtaining results of process performance and effectiveness.
- Continual improvement of processes based on objective measurement.

COMPANY STRUCTURE:

WHITLAM GROUP operates its IATF 16949 manufacturing facility at one location in CENTER LINE, MICHIGAN, USA. The Senior Executive responsible for this manufacturing operation is the company President.

WHITLAM GROUP maintains a written Organizational Chart designating positions and responsibilities of company executives, managers, and other employees.

MISSION STATEMENT:

It is our mission to be a leading provider of pressure sensitive labels and related products across North America. Whitlam has been a significant quality provider to the automotive industry in the last half of the 20th century.

In the 21st century, Whitlam will continue to provide exceptional quality and on-time deliveries to businesses and organizations across North America. We will continue to maintain a leadership position in automotive labels.

Whitlam strives to provide a safe and environmentally friendly work area for our employees and a profitable result for the shareholders.
CONTINUAL IMPROVEMENT STATEMENT:

WHITLAM GROUP is committed to Continual Improvement in quality of products, services, cost and productivity.

The process of Continual Improvement is achieved by creating an atmosphere for knowledge, innovation, training and team effort throughout the organization.

CODE OF ETHICS and CONDUCT:

WHITLAM GROUP is committed to conducting its business in a way that is open and accountable to all. It is with serious consideration that we agree to embrace and support, within our sphere of influence, a set of core values in the areas of:

- Human Rights
- Labor Standards
- The Environment, and
- Anti-Corruption

It is within the framework of the United Nations Global Compact that we enact this policy.

CORPORATE QUALITY POLICY STATEMENT:

WHITLAM GROUP is dedicated to a total Quality Management System that recognizes quality as Conformance to Requirements. Our performance standard is zero defects and our goal is to achieve this standard at all levels of operation.

OUR QUALITY SYSTEM is designed to prevent defects and we will measure our success through Customer Satisfaction.

CORPORATE QUALITY OBJECTIVES:

Enhance Customer Satisfaction by Meeting Customer Requirements.
Enhance Customer Satisfaction by Maintaining a World Class Quality Management System.
To Provide Zero Defect Products and Services.
To Train and Continually Educate Employees in the Quality Function.
To Continually Improve our Products and Processes.

DISTRIBUTION LIST:

WLC Sharepoint Drive
WLC Website
4. QUALITY MANAGEMENT SYSTEM

4.1 UNDERSTANDING THE ORGANIZATION AND ITS CONTEXT

• Our organization has determined external and internal issues that are relevant to the strategic direction of the company and its ability to achieve the intended results.

4.2 UNDERSTANDING THE NEEDS AND EXPECTATIONS OF INTERESTED PARTIES

• Whitlam Group determined all interested parties relevant to our Quality Management System (QMS) and their requirements.

4.3 SCOPE

Whitlam Group took into consideration the external and internal issues referred to in 4.1, requirements of interested parties referred to in 4.2 and the products and services of the organization.

SCOPE: Manufacturer of Printed Labels for the Automotive and Commercial Industries complying with applicable regulatory requirements.

4.3.1 EXCLUSIONS:

Sections (Note: Reference to Product Design Only):
8.3.1 - Design and Development Inputs
8.3.2 - Design and Development Planning
8.3.2.1 - Design and Development Planning - Supplemental
8.3.3.2 - Product Design Skills
8.3.2.3 - Development of Products with Embedded Software
8.3.5 - Design and Development Outputs
8.3.5.1 - Design and Development Outputs - Supplemental

Reasoning: Customers supply the design outputs required to plan for product realization.

4.4.1 QUALITY MANAGEMENT SYSTEM AND ITS PROCESSES

• Our organization has established a Quality Management System (QMS). It is documented in the Quality Policy Manual (QMS-PO-01). The Quality Management System has been implemented and is maintained with specific responsibility by our Top Management Representative.

• The effectiveness of the Quality Management System is continually improved in accordance to the IATF 16949 Standard.

• Our organization has determined the processes needed for the Quality Management System and their application throughout the organization. They have also determined:

a) The inputs required and outputs expected;
b) The sequence and interaction of these processes;
c) The criteria and methods (including monitoring, measuring and related performance indicators) that ensure the effective operation and control of these processes;
d) Resources and information are available to support the Quality Management System processes;
e) Responsibilities and authorities for these processes;
f) Risks and opportunities for these processes (See 6.1);
g) Evaluation and actions implemented to achieve our planned results;
h) continual improvement of these processes.
4.4.1.1 CONFORMANCE OF PRODUCTS AND PROCESSES

Processes affecting our conformance of all products are managed in accordance to the IATF 16949 Standard. In the event that we choose to outsource any processes, we will ensure and identify such control within the Quality Management System.

4.4.1.2 PRODUCT SAFETY

Product safety is addressed in the APQP design of manufacturing activities. Customer drawings specified as regulatory or safety are processed through Whitlam’s Regulatory system.

4.4.2 CONFORMANCE OF PRODUCTS AND PROCESSES

The Quality Policy Manual is established and maintained. It includes:

a) The scope of the Quality Management System and details of any stated exclusions;
b) A reference to our procedures;
c) A description of the interaction between the processes of the Quality Management System.

5.1.1 LEADERSHIP AND COMMITMENT

TOP MANAGEMENT IS COMMITTED to the development and implementation of the Quality Management System. Top Management will ensure that this commitment is maintained and continually improves the effectiveness of the Quality Management System by:

a) Taking accountability for the effectiveness of the quality management system;
b) Establishing a Quality Policy and Objectives;
c) Ensuring the integration of the QMS requirements into Whitlam’s business processes;
d) Promoting the use of process approach and risk based thinking;
e) Ensuring the availability of resources;
f) Communicating our commitment to meet customer requirements, including statutory and regulatory requirements;
g) Conducting management review to ensure that the Quality Management System achieves its intended results;
h) Directing, Supporting and engaging support people who contribute to the effectiveness of QMS;
i) Promoting improvement;
j) Supporting Department Managers.

5.1.1.1 CORPORATE RESPONSIBILITY

WHITLAM GROUP is committed to conducting its business in a way that is open and accountable to all. It is with serious consideration that we agree to embrace and support, within our sphere of influence, a set of core values in the areas of:

• Human Rights
• Labor Standards
• The Environment, and
• Anti-Corruption

It is within the framework of the United Nations Global Compact that we enact this policy.
5.1.1.2 PROCESS EFFECTIVENESS AND EFFICIENCY

During Management Review, top management of Whitlam will review processes to evaluate and improve their effectiveness and efficiency.

5.1.1.3 PROCESS OWNERS

Top management of Whitlam will identify the process owners and the related outputs to those processes. Top management will ensure the process owners understand their roles and that they are competent to perform them.

5.1.2 CUSTOMER FOCUS

Whitlam Top management is focused on enhancing customer satisfaction. Whitlam Top Management determines, understands and ensures that customer and applicable statutory and regulatory requirements are consistently met by determining risks and opportunities that can affect conformity of our products.

5.2.1 DEVELOPING THE QUALITY POLICY

Top Management ensures that the Quality Policy:

a) Is appropriate for our organization and supports the company’s strategic direction;
b) Provides the framework for setting quality objectives;
c) Includes a commitment to comply with applicable requirements and continually improve the Quality Management System;

5.2.2 COMMUNICATING THE QUALITY POLICY

Top management ensures that Whitlam’s Quality Policy is communicated, understood, applied within the organization and available to relevant interested parties.

5.3 ORGANIZATIONAL ROLES, RESPONSIBILITIES AND AUTHORITIES

Top management ensures that the responsibilities and authorities are assigned, communicated and understood. A chart of Responsibilities and Authorities is maintained in addition to our organization chart.

Top management assigns the responsibility and authority for:

a. Ensuring that Whitlam’s quality management system conforms to the requirements of ISO 9001 and IATF 16949
b. Ensuring that Whitlam’s processes are delivering their intended outputs
c. Reporting on the performance of Whitlam’s quality management system and on opportunities for improvement to top management.
d. Ensuring the promotion of customer focus throughout the organization
e. Ensuring the integrity of Whitlam’s quality management system is being maintained.
5.3.1 ORGANIZATIONAL ROLES, RESPONSIBILITIES, AND AUTHORITIES - SUPPLEMENTAL

Top management has documented and assigned personnel with the responsibility and authority to ensure conformity to requirements. This includes but is not limited to:

a. Selection of special characteristics
b. Setting quality objectives and related training
c. Corrective and preventive actions
d. Capacity analysis
e. Logistics Information
f. Customer Scorecards
g. Customer Portals

If required, any changes to top management will be communicated to the customer.

5.3.2 RESPONSIBILITY AND AUTHORITY FOR PRODUCT REQUIREMENTS AND CORRECTIVE ACTIONS

All personnel responsible for conformity to product requirements have the authority to stop production to correct problems. This is stated in job descriptions and work instructions where applicable.

Top management ensures that procedures are documented and maintained to allow for the prompt reporting of non-conformity of products or processes to personnel on all shifts. These personnel have authority and are responsible for ensuring conformity to product requirements.

6.1.1 PLANNING - ACTIONS TO ADDRESS RISKS AND OPPORTUNITIES

In planning the Quality Management System, Whitlam has considered the internal and external issues referred to in Section 4.1 and the requirements of interested parties in section 4.2 and has determined the risks and opportunities. The risks and opportunities will be addressed to:

a. give assurance that the quality management system can achieve its intended results
b. enhance desirable effects
c. prevent or reduce the undesired effects
d. achieve improvement

6.1.2 ACTIONS TO ADDRESS RISKS AND OPPORTUNITIES

Whitlam acted to address the risks and opportunities identified in 6.1.1 and decided how to integrate and implement them into Whitlam’s Quality Management System. Top Management evaluates the effectiveness of these actions in Management Review.

6.1.2.1 RISK ANALYSIS

When conducting a risk analysis, Whitlam includes lessons learned from product recalls, product audits, field returns, complaints and scrap.
6.1.2.2 PREVENTIVE ACTION

Whitlam determines and implements actions to eliminate the causes of potential nonconformities in order to prevent their occurrence. These actions are appropriate to the severity of the potential issue.

Whitlam established a process to lessen the impact of negative effects of risk including the following:

a. Determining potential nonconformities and their causes;
b. Evaluating the need for action to prevent occurrence of nonconformities;
c. Determining and implementing action needed;
d. Documented information of action taken;
e. Management Review of action taken;
f. Utilizing lessons learned to prevent recurrence in similar processes (see ISO 9001, Section 7.1.6).

6.1.2.3 CONTINGENCY PLANS

To ensure that customer requirements are met, Whitlam has:

a. Identified and evaluated internal and external risks to all manufacturing processes and infrastructure equipment essential to maintain production output.
b. Defined contingency plans according to risk and impact to our customers.
c. Prepared a Disaster Recovery Plan for continuity of supply in the event of any of the following:
   1. Key Equipment Failures (Also see Section 8.5.6.1.1);
   2. Interruption from externally provided products, processes, and services;
   3. Recurring Natural Disasters
   4. Fire
   5. Utility interruptions
   6. Labor shortages
   7. Infrastructure disruptions
d. Included a notification process to the customer and other interested parties for the extent and duration of any situation impacting customer operations.
e. Tested the plan for effectiveness
f. Conducted annual plan reviews using a multidisciplinary team including top management and updated plan, if required.
g. Documented the plan and retained information regarding any revisions, including who authorized the change.

6.2.1 QUALITY OBJECTIVES

Top Management ensures that the company’s Quality Objectives, Key Criteria measures and customer requirements are established, documented, monitored, communicated, updated (if needed), consistent with the Quality Policy and take into account applicable requirements to enhance customer satisfaction. These objectives will be reviewed annually.
6.2.2 PLANNING ON ACHIEVING QUALITY OBJECTIVES

When planning the objectives, Top Management at Whitlam have determined:

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

6.3 PLANNING OF CHANGES

When Whitlam determines the need for changes to the quality management system, the changes will be carried out in a planned manner and shall consider:

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

7.1.1 RESOURCES

Whitlam has determined and provided the resources needed for the establishment, implementation, maintenance and continual improvement of the quality management system. Top management considered the capabilities of and constraints on existing internal resources and what is needed from external providers. Whitlam will determine and provide:

7.1.2 RESOURCES - PEOPLE

Whitlam has determined and provided persons necessary for the effective implementation and maintenance of the Quality Management System and for the operation and control of its processes.

7.1.3 RESOURCES - INFRASTRUCTURE

Whitlam has determined, provided and maintained the infrastructure (buildings, IT, equipment, etc.) necessary for the operation of our processes and to achieve conformity to our products.

Whitlam used a multidisciplinary approach that identified risk and risk mitigation for the development and improvement on the infrastructure. The plant layout has been designed to optimize material flow, including control of non-conforming product. (7.1.3.1)

Methods of evaluating manufacturing feasibility have been implemented and include capacity planning. These methods will be used to evaluate any proposed changes to existing operations.

Existing operation effectiveness is evaluated through key criteria measurements of the Quality Management System and financial results reporting.
Whitlam maintains process effectiveness and includes, at a minimum, an annual review relative to the risk and will incorporate any changes made during process approval, control plan maintenance and verification of job set-ups. Assessments of manufacturing feasibility and evaluation of capacity planning is an input to management review.

7.1.4   ENVIRONMENT FOR THE OPERATION OF PROCESSES

Work environment is managed by department managers and top management personnel to ensure conformance to product requirements and operation of our processes. Manager responsibilities are defined in job descriptions and addressed in training agendas for each manager.

All areas within the facility and external grounds are maintained for order and cleanliness and repair. Environmental Management System Internal Auditors conduct regularly scheduled cycle audits of the premises to assure compliance to this standard and to the environmental standard (ISO 14001). (7.1.4.1)

Section (6) Reference Procedure: QMS-PR-03 - “Resource Management”

7.1.5.1   MONITORING AND MEASURING RESOURCES

Whitlam has determined and provided the resources to verify the conformity of products. The resources are determined based on external/internal requirements and are suitable for the activities being undertaken. These resources are maintained to ensure the continued fitness for their purpose.

7.1.5.1.1 MEASUREMENT SYSTEMS ANALYSIS

Appropriate statistical studies are performed on measuring and testing equipment as referenced in the control plans. Analytical methods conform to customer specific reference manuals. Alternative methods can be used with customer approval.

7.1.5.2 MEASUREMENT TRACEABILITY

The measuring equipment is:

a) Calibrated or verified at specific intervals against standards traceable to NIST measurement standards. If not available, the basis for other traceability is recorded as needed.

b) Adjusted as necessary;

c) Identified to calibration status;

d) Safeguarded from unauthorized adjustments;

e) Protected from damage during handling and maintenance.

If equipment is found to be nonconforming, there is a process that allows reporting of the nonconformity and assessment of appropriate action on the equipment or products that are affected.

Records are maintained and computer software is confirmed for appropriate use in measurement devices prior to initial use and reconfirmed by outside calibration sources as needed.
7.1.5.2.1 CALIBRATION/VERIFICATION RECORDS

Whitlam has a documented process for managing calibration / verification records. Records of calibration/verification are maintained and retained to provide evidence of conformity of product.

Records include:

a. Revisions to any engineering changes;
b. Out of specification readings
c. An assessment of the risk of intended use of the product caused by an out of spec condition.
d. Validation of previous measurement results
e. A notification process to the customer if suspect material was shipped.
f. A statement of conformity
g. Verification that the software version used for product/process control is as specified;
h. Records of the calibration and maintenance activities for all gauges, including employee-owned, customer-owned or on-site supplier-owned equipment.
i. Verification that the production related software used for product/process control is as specified.

7.1.5.3.1 INTERNAL LABORATORY REQUIREMENTS

Laboratory scope has been defined and it includes Whitlam’s capability to perform the required inspection, test or calibration service.

Internal laboratory minimum requirements include:

a. Technical requirements for the adequacy of laboratory procedures;
b. Competency of laboratory personnel;
c. Procedures to test product;
d. Capability to perform the testing correctly, traceable to the relevant process standard (such as ASTM, EN, etc.);
e. Customer Requirements, if any;
f. Review of related records

7.1.5.3.2 EXTERNAL LABORATORY REQUIREMENTS

External laboratories are required for testing and calibration services outside the scope of our internal laboratory. External laboratories have a documented scope and list of capabilities and are accredited to ISO/IEC 17025 (or a national equivalent). OEM services are allowed in lieu of the availability of an accredited laboratory if approved by the customer. Calibration may be performed by the equipment manufacturer when a qualified laboratory is not available for a given piece of equipment.

7.1.6 ORGANIZATIONAL KNOWLEDGE

Whitlam has determined the knowledge necessary for the operation of its processes. This knowledge is reviewed, updated as required with changing needs. Top management commit to acquiring any additional necessary knowledge.
7.2 COMPETENCE

All personnel affecting product conformity to requirements will be required to be competent through education, training, skills, and workplace experience.

Employees performing work that affects product conformity to requirements will have job descriptions that determine the necessary competency requirements to maintain product conformity. The Human Resource Manager will facilitate training agendas and training.

The Management Review Team, using key criteria measurements of the Quality Management System and Customer Satisfaction results, evaluates effectiveness of the training. Records are maintained. Training progress is reviewed at Management Review meetings.

Awareness regarding an employee’s work and how it affects our Quality Objectives is communicated through work instructions. Employee information/awareness boards are updated to give employees an awareness of Quality and Customer Satisfaction achievements. (7.2.1) - Reference Instruction #150

7.2.2 COMPETENCE - ON THE JOB TRAINING

On the job training is a requirement of all Training Agendas affecting conformity to product requirements. The training format addresses conformance to the requirements of interested parties. Non-conformances and resulting corrective actions are communicated back to the affected employees.

7.2.3 INTERNAL AUDITOR COMPETENCY

Lead Internal Auditor is trained by a qualified third party (e.g. AIAG, etc.) The Lead Internal Auditor is responsible for training additional Internal Auditors. All auditors are qualified to audit to this technical specification (IATF 16949) and a list of qualifications for each Auditor is maintained. - Reference Instruction #149

7.2.4 SECOND-PARTY AUDITOR COMPETENCY

Whitlam ensures that any internal auditor conducting a second-party is competent and meets all customer specific requirements.

7.3 AWARENESS

Whitlam ensures that all individuals doing work under its control is aware of our Quality Policy and Quality Objectives. They also will understand their contribution to the effectiveness of the Quality Management System, the benefits of improved performance and the implications of not conforming. This information will be documented (7.3.1)

7.3.2 EMPLOYEE MOTIVATION AND EMPOWERMENT

Top Management has implemented a process that allows employees to participate in changes and improvements to the quality and technology of our products. This is accomplished through employee participation in the APQP Team and In-Process Job Revision Requests. - Reference Instruction #150
Employee motivation is measured by training completion and attendance and top Management recognizes employee impact through an employee recognition program.

7.4 COMMUNICATION

Top Management ensures that appropriate internal and external communication takes place within the organization. The Quality Manager is responsible for ensuring that communication takes place regarding the effectiveness of the Quality Management System.

7.5.1 DOCUMENTED INFORMATION

Quality Management System documentation includes our Quality Policy Manual and Quality Objectives statements. Documented procedures, instructions and forms ensure the effective planning, operation, and control of the Quality Management System processes. Records are maintained in both written and electronic formats.

7.5.1.1 QUALITY MANAGEMENT SYSTEM DOCUMENTATION

The Quality Policy Manual is established and maintained. It includes:
- a. The scope of the Quality Management System and details of any stated exclusions;
- b. References to the documented processes;
- c. A description of the interaction between the processes of the Quality Management System.
- d. A matrix indicating where the Quality Management Systems addresses customer specific requirements.

7.5.2 CREATING AND UPDATING

Documents required by the Quality Management System are controlled. Specifically, the Management Systems Supervisor controls our Quality Policies, Procedures, Instructions and Forms. Records are controlled as described in documented procedures.

7.5.3 CONTROL OF DOCUMENTED INFORMATION.

Whitlam ensures that documents are available and suitable for use, where and when it is needed and adequately protected. (7.5.3.1)

A documented procedure has been established to define the controls needed for the identification, distribution, access, storage, protection, retrieval, change, retention time and disposition of records. (7.5.3.2)

A master log of the current revision or issue status is maintained by the Quality Department, which includes a record of the date change. All applicable documents are updated.

7.5.3.2.1 RECORD RETENTION

Whitlam has defined, documented and implemented a record retention policy. This policy satisfies regulatory, organizational and customer specific requirements.
Production Part Approvals, tooling records, design records, contracts and amendments are retained the length of production and service requirements plus one year (unless otherwise specified by the customer or regulatory agency.)

Reference Procedure: QMS-PR-01 - “Quality Management System Control”
Other Documentation: Appendix A - “Process Diagrams”
Appendix B - “Process Linkage Chart”
Appendix C - “Quality Management System Roles, Responsibilities, Authority”
Appendix D - “Reference Procedures”
Appendix E - “QMS Documentation Linkage Chart”
Instruction #152 - Quality Management System Control

7.5.3.2.2 ENGINEERING SPECIFICATIONS

Customer engineering standards/specifications are reviewed in a timely manner by the Quality Department, and are implemented and distributed within 2 weeks after receipt. Most of our notifications are electronic. When an engineering standard change results in a design change Reference Section 8.3.6 and when it results in a process change, refer to Section 8.5.6.1 - Reference Instruction #120

8.1 OPERATIONAL PLANNING AND CONTROL

The processes (4.4) needed for Product Realization are planned, implemented and controlled and are consistent with the requirements of the other Quality Management System processes. Actions determined in (6.0) have been implemented by:

a. Determining the requirements for the products and services;
b. Establishing the criteria for the processes and the acceptance of products;
c. Determining the resources needed to achieve conformity to the products;
d. Implementing control of the processes in accordance to the criteria;
e. Determining, maintaining and retaining documents to have confidence that the processes have been carried out as planned and demonstrate the conformity of product to requirements.

Planned changes are controlled and consequences of unintended changes are reviewed. Action is taken to mitigate any adverse effects, as needed. Outsourced processes, if any, are also controlled. (8.4)

The output of product planning is in a form suitable for the operation of the Quality Management System.

8.1.1 OPERATIONAL PLANNING AND CONTROL - SUPPLEMENTAL

The following topics are included in the planning process of product realization:

a. Customer requirements and technical specifications
b. Logistics Requirements
c. Manufacturing feasibility;
d. Project Planning (8.3.2)
e. Acceptance criteria
8.1.2 **CONFIDENTIALITY**

Customer products and programs are subject to a confidentiality policy that applies to all employees.

8.2.1 **CUSTOMER COMMUNICATION**

Customer communication for product, contract and changes in information is a function of the Sales process. Customer feedback, including customer complaints, is communicated as defined in our customer feedback process and problem-solving process. Handling or controlling customer supplied property is a documented procedure. Conformity of incoming customer supplied product is verified by receiving inspection procedures. Nonconforming, damaged or lost products are reported to the customer.

Written or verbal communication will be in the language agreed upon with the customer. This includes data in a customer-specified computer language/format. (8.2.1.1)

(Ref: SA-PR-01, “Sales Process: Control of Customer Supplied Product”.)

8.2.2 **DETERMINATION OF REQUIREMENTS RELATED TO PRODUCTS AND SERVICES**

Product Requirements includes determination of:

a) Customer requirements (Including delivery and post-delivery activities);

b) Non-customer requirements necessary for specified use;

c) Statutory and regulatory requirements;

d) Additional internal requirements defined by our organization.

e) Feasibility of our ability to meet the claims for the products

Product requirements include compliance to our Environmental Management System goals and objectives. (8.2.2.1)

8.2.3.1 **REVIEW OF REQUIREMENTS RELATED TO PRODUCTS AND SERVICES**

Review of customer product requirements takes place prior to commitment to supply product. The review of customer product requirements is conducted during the Sales Process, and will include:

a) Defining product requirements;

b) Requirements not stated by the customer but necessary for the specified or intended use.

c) Requirements specified by Whitlam;

d) Statutory and regulatory requirements applicable to the product.

e) Contract/order requirements differing from those previously expressed.

If no customer requirements are stated, acceptance by the customer will be confirmed through a formal document.

8.2.3.1.1 **REVIEW OF REQUIREMENTS TO PRODUCTS AND SERVICES - SUPPLEMENTAL**

Customer authorization is required for a waiver of the formal review of requirements related to the product.
8.2.3.1.2 CUSTOMER DESIGNATED SPECIAL CHARACTERISTICS

Customer special characteristics are designated, approved, controlled, and documented on appropriate documentation.

8.2.3.1.3 ORGANIZATION MANUFACTURING FEASIBILITY

The Sales Process is a multi-disciplinary review of customer requirements to determine if we are feasible/capable of consistently producing product and meeting requirements. A risk assessment (PFMEA) for each manufacturing process exists.

This analysis will also be for any manufacturing or product technology new or changed to the company.

8.2.3.2 ORGANIZATION MANUFACTURING FEASIBILITY

Records of the review are documented using appropriate forms or electronic media.

8.2.4 CHANGES TO REQUIREMENTS FOR PRODUCTS AND SERVICES

Any changes to product requirements will be amended on relevant documentation. Affected personnel will be updated.

8.3.3 DESIGN AND DEVELOPMENT INPUTS

The customer will provide us with the determined inputs to product requirements, including regulatory requirements, standards and specifications. Whitlam will review inputs for potential consequences of failure due to the nature of our product.

8.3.3.1 PRODUCT DESIGN INPUT

The customer will provide us with the determined inputs to product requirements. Whitlam completes a contract review of product design inputs to assess risks or potential risks and our ability to mitigate/manage the risks. We will utilize lessons learned from current projects of a similar nature.

8.3.3.2 MANUFACTURING PROCESS DESIGN INPUT

Manufacturing process design input requirements are identified and documented including:

a) Customer product design output data including special characteristics;
b) Targets for productivity (cost accounting defined), process capability (customer defined), timing (process defined) and cost (cost centers defined);
c) Manufacturing Technology Alternatives (if any);
d) Customer requirements, (if any);
e) Experience with related or previous designs.
f) New materials
g) Product handling and ergonomic requirements; and design for manufacturing and design for assembly

Whitlam includes the use of error-proofing methods to a degree appropriate to the size of the problem and the risks encountered.
8.3.3.3  SPECIAL CHARACTERISTICS

Whitlam uses a multidisciplinary approach to establish, document and implement our processes to identify special characteristics. Special Characteristics can be determined by the customer and the risk analysis that we perform. The process will include:

The documentation of all special characteristics by specific markings and are cascaded down through control plans, PFMEA, and operator instructions.

The development of control and monitoring strategies for special characteristics of products and production processes.

If required, customer specified approvals.

Compliance with customer-specified definitions and symbols or our own equivalent symbols or notations, as defined in a symbol conversion table. If required, the conversion table will be submitted to the customer.

8.3.4  DESIGN AND DEVELOPMENT CONTROLS

The APQP Team is responsible for the review of the basic manufacturing process design at appropriate stages to ensure that:

a) The results to be achieved are defined
b) Evaluate the results of the process design to meet requirements.
c) Verification activities are conducted to ensure that the design and development outputs meet the input requirements.
d) Validation activities are conducted to ensure that the resulting products and services meet the requirements for the specified application or intended use.
e) Any necessary actions are taken on problems determined during the reviews, or verification and validation activities;
f) Documents are retained of these activities

A review of the manufacturing processes that are currently established for product fabrication is conducted by Quality prior to PPAP submission. Customer part numbers (products) are categorized into one of the five pre-defined manufacturing processes (Family of Parts).

8.3.4.1  MONITORING

Process design measurements are defined and specified at different stages of the manufacturing process. If Required by the customer, measurements of the product development will be reported at stages specified or agreed to by the customer.

Summary results are an input to Management Review
8.3.4.2 DESIGN AND DEVELOPMENT VALIDATION

Manufacturing process design validation is performed per customer requirements, including applicable regulatory standards. The validation is planned and aligns with customer-specific timing, if applicable.

8.3.4.3 PROTOTYPE PROGRAMME

Prototypes are available for customers when required and follow the same manufacturing process and tooling as production. Prototype performance testing is monitored for timely completion and conformance to requirements. If outsourced services are required, Purchasing and Engineering are responsible for technical leadership. (See Clause 8.4)

8.3.4.4 PRODUCT APPROVAL PROCESS

The product part approval process (PPAP) and manufacturing process approval procedure conforms to customer specific requirements. The AIAG PPAP procedure is normally used for automotive production parts.

For suppliers that provide subcontracted production parts, the customer specific product and manufacturing approval procedure is applied where applicable.

8.3.5.2 MANUFACTURING PROCESS DESIGN OUTPUT

Whitlam documents the manufacturing process design output in a manner that enables verification against manufacturing process inputs and their requirements. The manufacturing process design output includes:

a. Specifications and drawings from customer.
b. Special characteristics for product and manufacturing process
c. Identification of process input variables that impact characteristics
d. Tooling and equipment for production and control, including capability studies on equipment.
e. Flow Charts, including linkage of product, process and tooling
f. Capacity analysis
g. PFMEA.
h. Maintenance Plans and Instructions
i. Control Plan.
j. Standard work (Job) instructions.
k. Acceptance Criteria (Conformance Card Criteria).
l. Quality Data.
m. Results of error proofing (as appropriate).
n. A method to detect and provide rapid detection and correction of nonconformities.

8.3.6 CONTROL OF DESIGN AND DEVELOPMENT CHANGES

Changes to the manufacturing process design are identified, reviewed, controlled, verified and approved (including PPAP, if required).

Document are retained on:

a. design and development changes
b. the results of reviews
c. the authorization of the changes
d. the actions taken to prevent adverse impacts

8.3.6.1 CONTROL OF DESIGN AND DEVELOPMENT CHANGES - SUPPLEMENTAL

Whitlam evaluates all design changes after initial product approval for potential impact on fit, form, function, performance and/or durability. Changes are validated against customer requirements and approved internally, prior to mass production. If required, Whitlam obtains approval or a waiver from the customer prior to mass production.

8.4.1 CONTROL OF EXTERNALLY PROVIDED PROCESSES, PRODUCTS AND SERVICES - GENERAL

Purchasing is a defined support process.

The purchasing process includes a method that ensures conformity to product requirements. Whitlam Group determines the controls to be applied to externally provided processes or products when:

a. Products or services from external suppliers that are intended to be incorporated into Whitlam’s products.
b. Products or services that are provided directly to our customers from the external suppliers.
c. A process or part of a process is provided by an external supplier based on a decision made by Whitlam and any products or services that affect customer requirements (i.e. Outsourced Calibration, etc.) (8.4.1.1)

Suppliers are evaluated and selected based on their abilities to meet specified requirements. Criteria for selection and evaluation is established and records are maintained.

8.4.1.2 SUPPLIER SELECTION PROCESS

Whitlam’s supplier selection process includes:

a. An assessment of the selected supplier’s risk to product conformity and uninterrupted supply of product to our customers.
b. Quality and Delivery performance.
c. An evaluation of the supplier’s quality management system.
d. Multi-disciplinary decision making.

Reference Instruction #153

8.4.1.3 CUSTOMER DIRECTED SOURCES

- Customer approved sources will be used where specified by customer drawings or specifications.
- Conformity of purchased products will remain the responsibility of Whitlam.

8.4.2 TYPE AND EXTENT OF CONTROL

Whitlam ensures that externally provided processes and products do not adversely affect our ability to consistently deliver products to customers by having a documented process (8.4.2.1) that:

a. Ensures that externally provided processes remain within the control of its quality management
system.

b. Defines both the controls be applied to the supplier and the controls applied to the product.
c. Considers the potential impact on our ability to consistently meet customer and applicable statutory and regulatory requirements.
d. Considers the effectiveness of the controls applied by the external provider.
e. Determines the verification necessary to ensure that externally provided processes/products meet requirements.

The documented process includes criteria to escalate or reduce controls based on supplier performance and assessment of product. (8.4.2.1) Reference Instruction #153

8.4.2.2 STATUTORY AND REGULATORY REQUIREMENTS

Whitlam has a documented process to ensure that purchased products or materials conform to applicable statutory and regulatory requirements. Statutory and regulatory conformity is a defined supplier requirement. Reference Instruction #120

8.4.2.3 SUPPLIER QUALITY MANAGEMENT SYSTEM DEVELOPMENT

• Supplier Quality Management System development is performed with a goal of supplier conformity to IATF-16949
• Suppliers are expected to demonstrate conformity to ISO 9001 by maintaining a third-party certification or through second-party audits, unless authorized by customer.
• Suppliers unable to conform to the minimum requirements are requested to submit a plan to achieve conformance or to request an exemption waiver.

8.4.2.4 SUPPLIER QUALITY MONITORING

• Supplier performance in quality and delivery is monitored.
• Customer disruptions/field incidents (supplier complaints) are monitored.
• Number of occurrences of premium freight
• Supplier’s special status related to a customer notification is monitored (e.g., “Containment Status”).
• WLC “General Guide for Supplier Requirements” outlines supplier requirements including a need to monitor performance of their manufacturing processes.

8.4.2.4.1 SECOND PARTY AUDITS

Based on risk analysis, suppliers can be chosen for 2\textsuperscript{nd} party audits.

8.4.2.5 SUPPLIER DEVELOPMENT

Suppliers chosen for development actions are determined by:

a. Performance issues identified through supplier monitoring (8.4.2.4)
b. 2\textsuperscript{nd} Party Audit Findings (8.4.2.4.1)
c. 3\textsuperscript{rd} Party Certification Status
d. Risk Analysis
8.4.3 INFORMATION FOR EXTERNAL PROVIDERS

Purchasing documentation will include (where applicable):

a. Description of product purchased;
b. Requirements for product approval;
c. Requirements for qualified personnel;
d. Supplier Quality Management System requirements.

Purchasing Department employees ensure the adequacy of specified purchase requirements prior to communication to suppliers.

If Whitlam or Customer verification is required at the supplier’s premises, verification requirements will be stated on purchasing information.

Incoming product conformity to requirements is assured by one of the following:
- Certificate of Conformance or Analysis
- Incoming inspection, if applicable

8.5.1 CONTROL OF PRODUCTION AND SERVICE PROVISION

- Production and service provision is provided under controlled conditions including:
  a) The availability of documented information that defines:
     1. Information describing the characteristics of the product (conformance criteria);
     2. The results to be achieved;
  b) The availability of monitoring and measuring equipment;
  c) Monitoring and measurement during appropriate stages of product realization, as planned;
  d) Equipment required;
  e) Competent persons;
  f) Actions to prevent human error;
  g) Release, delivery and post-delivery activities.

- Product characteristics are monitored and measured to verify conformity to requirements.
- Evidence of conformity of product is maintained along with records of approvals on process documents associated with the flow of the product. Records indicate the person authorizing acceptance of product.
- Product is released only after completion of all planned steps.

8.5.1.1 CONTROL PLAN

- Control plans are developed for product supplied using AIAG format or other customer specified format.
- Control plans are developed for pre-launch, prototype, and production and formatted to AIAG requirement. They incorporate information from the design risk analysis (if provided by customer), process flow diagram and PFMEA.
- If required by the customer, Whitlam will obtain customer approval after review or revision of the control plan.
- Control Plans include:
  - List of controls used for the manufacturing process;
  - first piece/last piece sign off
- Monitoring of control of special characteristics;
- Customer specific required information (if any);
- A reaction plan.

- Control plans are reviewed and updated (as needed) for the following reasons:
  - Shipment of nonconforming product to the customer.
  - Changes affecting product, manufacturing process, measurement, logistics, supply sources, production volume changes or risk analysis
  - After a customer complaint and implementation of the associated corrective action, if applicable.
  - A set frequency based on risk analysis

8.5.1.2 STANDARDIZED WORK INSTRUCTIONS

Whitlam ensures that standardized work documents are:

a. Communicated & understood by all employees having responsibility for product conformity to requirements.

b. Legible

c. In the appropriate language for the personnel responsible to follow them.

d. Accessible for use at appropriate workstations

Work documents include rules for operator safety.

8.5.1.3 VERIFICATION OF JOB SET-UPS

- Job setups are subject to verification (1st Piece Sign-off).
- Verification is applicable to part number changeovers that are fabricated during the same job setup.
- Work instructions are available for all job setups and include verification audits during the fabrication run-time.
- 1st Piece/Last Piece sign off are performed for parts, as applicable.

8.5.1.4 VERIFICATION AFTER PLANNED OR UNPLANNED SHUTDOWN

In the event of a planned or unplanned shutdown, Whitlam conducts another first piece sign off to confirm product compliance.

8.5.1.5 TOTAL PRODUCTIVE MAINTENANCE

A documented preventive maintenance program is a system that:

a. Identifies Key Process Equipment
b. Availability of replacement parts
c. Includes resources for machine, equipment, and facility maintenance; preservation of equipment;
d. Includes packaging and preservation of equipment, tooling and gauging;
e. Applies applicable customer-specific requirements;
f. Documents maintenance objectives which become an input into Management Review
g. Regularly reviews the maintenance plan and objectives and action items.
h. Uses preventive maintenance methods;
i. Uses predictive maintenance methods;
j. Completes Periodic Overhaul

Predictive maintenance activities are applied to production tooling to improve the effectiveness and efficiency of the tooling in order to avoid production interruptions.

8.5.1.6 MANAGEMENT OF PRODUCTION TOOLING

Resources are provided for the management of production tooling activities. Production tooling is outsourced and subject to verification activities by Engineering.

Management of production tooling includes:
- Maintenance (outsourced and monitored);
- Storage and recovery;
- Tool designation for job setups
- Method to determine if tools need to be replaced;
- Tool design changes
- Tool modifications (results in a PPAP requirement);
- Tool identification

8.5.1.7 PRODUCTION SCHEDULING

- Production Provision is a scheduled activity designed to meet customer requirements for on-time delivery.
- Schedule tracking is available at key stages of production.

8.5.2 IDENTIFICATION AND TRACEABILITY

- Product is identified throughout product realization.
- The status of product is identified with respect to monitoring and measurement requirements.
- Traceability is maintained using a unique lot number identification for each production part.
- Traceability is uniquely connected to raw materials, finished product, and customer specific deliveries.

8.5.2.1 IDENTIFICATION AND TRACEABILITY - SUPPLEMENTAL

Whitlam has implemented an identification and traceability process that:

- Enables the identify of nonconforming/suspect product;
- Enables the segregation of nonconforming/suspect product;
- Ensures the ability to meet customer/regulatory time requirements;
- Ensures that documented information is retained;
- Ensures that boxes of finished goods have serialized identification;
- Ensures that these requirements are extended to externally provided products with safety/regulatory characteristics.
8.5.3 PROPERTY BELONGING TO CUSTOMERS OR EXTERNAL PROVIDERS

Whitlam will exercise care with property belonging to customers/external providers and ensure they are identified, verified, protected and safeguarded.

Nonconforming, damaged or lost products are reported to the customer and documentation is retained. (Ref: SA-PR-01, “Sales Process: Control of Customer Supplied Product”.)

8.5.4 PRESERVATION

Conformity of product to customer requirements is preserved during internal process handling and delivery of product.

Product sensitive and customer specific packaging ensures conformity during delivery.

Preservation includes identification, handling, packaging, storage and protection.

Finished product is assessed to detect deterioration and obsolescence.

FIFO is used to optimize material movement using lot number assignments.

Obsolete product is controlled in a manner similar to that of nonconforming product.

8.5.5 POST DELIVERY ACTIVITIES

Production and service provision is provided for post-delivery activities including:

a) Information describing the characteristics of the product (conformance criteria);

b) Potential undesired consequences associated with products;

c) The nature, use and intended lifetime of products;

d) Customer requirements;

e) Customer feedback

8.5.5.1 FEEDBACK ON INFORMATION FROM SERVICE

Whitlam communicates customer non-conformances to the company. Feedback is documented and readily available for improvement of company-wide awareness of service or field problems arising from nonconformity of product requirements.

8.5.5.2 SERVICE AGREEMENT WITH CUSTOMER

When Customer Service Agreements exist, we will verify the effectiveness of:

a) Verify that relevant service centers comply with applicable requirements;

b) Verify the effectiveness of any special tools or measurement equipment;

c) Ensure that all service personnel are trained in applicable requirements.
8.5.6 CONTROL OF CHANGES
Changes to the manufacturing process design are identified and recorded. They are reviewed for any effects on related parts and products already delivered. They are approved by authorized personnel, verified and validated, as appropriate, and if required, customer approved (ex: PPAP). Revision records are maintained.

8.5.6.1 CONTROL OF CHANGES - SUPPLEMENTAL
Changes that impact product and manufacturing process realization (including those caused by supplier or the customer) are subject to defined verification and validation activities to ensure compliance to customer requirements. Reference Instruction #156

If required by the customer, Whitlam will:
- a) notify the customer of any planned product realization changes;
- b) obtain documented approval prior to the implementation of the change;
- c) complete additional verification or identification requirements.

8.5.6.1.1 TEMPORARY CHANGE OF PROCESS CONTROLS
A documented process is used to manage the use of alternate control methods. A list of process controls is maintained within the control plan. Customer approval of the alternate control plan is kept with PPAP approvals. Reference Instruction #156

8.6 RELEASE OF PRODUCTS AND SERVICES
Purchased product and materials are subject to adequate receiving inspection to ensure conformity to product requirements.

If Whitlam or Customer verification is required at the supplier’s premises, verification requirements will be stated on purchasing information.

Product characteristics are monitored and measured to verify conformity to requirements.

Monitoring and measurement of the product is conducted during appropriate stages of product realization as planned.

Evidence of conformity of product is maintained along with records of approvals on process documents associated with the flow of the product. This applies to products after changes following the initial release. Records indicate the person authorizing acceptance of product.

Product is released only after completion of all planned steps.

8.6.2 LAYOUT INSPECTION AND FUNCTION TESTING
A layout inspection and functional verification takes place at the onset of product fabrication. Records are maintained of the results and are available for customer review as needed. The frequency of layout inspection is determined by the customer.
8.6.3 APPEARANCE ITEMS

Appearance items that are designated by the customer are evaluated with the following criteria:

- Color masters as appropriate
- Maintenance and control of masters and evaluation equipment per our Testing Facility Manual.
- Verification that personnel are qualified to make appearance judgments.

8.6.4 VERIFICATION AND ACCEPTANCE OF CONFORMITY OF EXTERNALLY PROVIDED PRODUCTS

Incoming product conformity to requirements is assured by one of the following:

- Receiving inspection and/or testing of product or material
- Receipt and evaluation of product data by ISO certified suppliers with acceptable records of delivered product conformity to requirements.

8.6.5 STATUTORY AND REGULATORY CONFORMITY

Prior to release purchased products or materials conform to applicable statutory and regulatory requirements. Statutory and regulatory conformity is a defined supplier requirement.

8.6.6 ACCEPTANCE CRITERIA

Acceptance Criteria (Conformance Criteria) is defined and, if required or appropriate, approved by customer. Zero defects are the acceptance level for attribute data sampling.

8.7.1 CONTROL OF NON-CONFORMING PRODUCT

- Product that does not conform to requirements is identified and controlled to prevent unintended use or delivery.
- Controls and related responsibilities and authorities are defined in a documented procedure.
- Nonconforming product is addressed in the following manner:
  a) Action is taken to eliminate the nonconformity;
  b) Action is taken to avoid its intended use.
  c) Informing the customer
- Records are maintained regarding the nature of the nonconformity and any actions taken.
- If nonconforming product can be corrected, it is re-verified by using the production inspection process.
- If nonconforming product is detected after delivery has started, appropriate action is taken to address the impact on the customer. The Quality Manager and/or Quality Supervisor is responsible for control of nonconforming product.
- Unidentified product or suspect product is considered nonconforming and will be subject to re-verification.

8.7.1.1 CONTROL OF NON-CONFORMING PRODUCT
• Customer waiver is obtained per specific customer method if product or manufacturing process is different than what the customer approved (at PPAP or other approval method).
• Special customer waivers include a record of the expiration date or quantity authorized.
• After the waiver expires, compliance to original specifications is ensured.
• Waiver materials are properly identified when shipped.
• The waiver format is used with suppliers when it pertains to purchased product.

8.7.1.2 & 8.7.1.3  CONTROL OF NON-CONFORMING OR SUSPECT PRODUCT

• Unidentified product or suspect product is considered nonconforming and will be subject to re-verification by appropriately trained personnel and comply with applicable customer-specified controls.

8.7.1.4 & 8.7.1.5  CONTROL OF REWORKED AND REPAIRED PRODUCT

• Whitlam assess risks in the rework and repair process prior to deciding to rework or repair the product.
• If required, Whitlam will obtain approval from the customer prior to commencing the process.
• The process is documented and records are retained of the disposition of the reworked or repaired product.
• Instructions for rework and repair (including re-inspection) are available to authorized rework personnel. Reference Instruction #164

8.7.1.6  CUSTOMER NOTIFICATION

• Whitlam informs customers if nonconforming product is shipped and retains documentation of the event. Reference Instruction #164

8.7.1.7  NONCONFORMING PRODUCT DISPOSITION

• Any product defined as scrap and unable for any rework/repair process is rendered unusable with the use of the compactor. Reference Instruction #164

8.7.2  CONTROL OF NONCONFORMING OUTPUTS

• Whitlam retains information regarding the nonconformity, actions taken, approvals obtained and identifies the authority deciding the action in respect of the nonconformity.

9.1.1  MONITORING, MEASUREMENT, ANALYSIS AND EVALUATION

• Whitlam determines:
  o What needs to be monitored/measured and when;
  o The methods for monitoring/measurement, analysis and evaluation needed to ensure valid results;
  o When the results will be analyzed and evaluated.
• Whitlam evaluates the performance and effectiveness of the monitoring and measurement system. If planned results are not achieved, appropriate corrective action is taken.
• All documents of monitoring and measuring are retained.

9.1.1.1  MONITORING AND MEASUREMENT OF MANUFACTURING PROCESSES

• Process studies are conducted for all new manufacturing processes in order to verify process capability.
• Process studies results provide documented specifications as a means to achieve production.
• Process studies include objectives for manufacturing process capability and acceptance criteria.
• Manufacturing process performance is maintained per the PPAP requirements of all customers.
• Control plans and process flow diagrams have been implemented and adhere to specified measurement techniques, sampling plans, acceptance criteria, reaction plans and escalation process if acceptance criteria are not met.
• Significant process events are recorded (on the Conformance Card).
• The control plan incorporates a reaction plan when a process becomes unstable. The reaction plan includes 100% inspection and containment for our commodity per appropriate procedures.
• The reaction plan includes responsibility by the Quality Department to complete corrective action where the process is deemed to be unstable. If required, the customer may review and approve the corrective action plan.
• Records are maintained for effective dates of any process changes (revisions). (Job History File maintenance is controlled by Engineering)

9.1.1.2 IDENTIFICATION OF STATISTICAL TOOLS

• The APQP team determines the applicable statistical tools needed for each process and are documented on the appropriate control plan and other documents, as applicable.

9.1.1.3 APPLICATION OF STATISTICAL CONCEPTS

• Basic concepts of statistical tools that are applicable to our processes are understood and utilized in the manufacturing process and testing facility.

9.1.2 CUSTOMER SATISFACTION

• Customer Satisfaction is measured using multiple criteria that relates to key customer requirements. The customer satisfaction is monitored and reviewed at Management Review meetings.

9.1.2.1 CUSTOMER SATISFACTION - SUPPLEMENTAL

• Customer performance indicators are monitored monthly.
• Performance indicators include:
  - Quality Performance;
  - Customer Disruptions/Returns;
  - Field returns, recalls and warranty (where applicable);
  - Delivery Performance;
  - Number of customer complaints in Quality / Delivery, including special status.
• Internal manufacturing performance is monitored for customer requirements and measured in terms of scrap and/or rework.
• Cost of Poor Quality is monitored.

9.1.3 ANALYSIS AND EVALUATION

• Data appropriate to the Quality Management System is collected and analyzed to demonstrate the suitability and effectiveness of the Quality Management System.
• Collected data is the result of monitoring and measurement methods.
• Analysis of data is used to evaluate:
  - Customer Satisfaction
  - Product conformity to requirements
- Product and process characteristics and trends including opportunities for preventive action (Management Review).
- Suppliers (Quality and Delivery Data)
- Performance and effectiveness of the quality management system.
- The effectiveness of actions taken to address risks and opportunities
- Where Continual Improvement can be applied.

9.1.3.1 PRIORITIZATION

- Quality and operational performance trends are compared to documented progress toward objectives.
- Actions taken will support:
  - The development of priorities for prompt solutions to customer related problems.
  - Review of key customer-related trends and creation of processes for decision-making and long-term planning.
  - An information system for the timely reporting of product information after usage.
    (Customer Feedback Process)
- Analysis and use of data occurs during Management Review.

9.2.1 & 9.2.2 INTERNAL AUDIT

- Internal audits are planned and scheduled to determine if the Quality Management System:
  a) Conforms to our Quality Planning requirements;
  b) Conforms to IATF 16949 requirements;
  c) Conforms to our Quality Management System requirements;
  d) Is effectively implemented and maintained

- The internal audit program shall:
  - Be planned and prioritized by the status and importance of the processes and areas to be audited, changes effecting the organization and previous audit results.
  - Have the criteria for the audit, scope, and frequency and methods defined;
  - Ensure the Lead Auditor and trained internal auditors are assigned audit areas based on objectivity and impartiality.
  - Ensure that the results of the audit are reported during Management Review.
  - Take appropriate correction and corrective actions without undue delay.

- Audit procedure is documented with defined responsibilities.
- Documentation is retained as evidence of the implementation of the audit program and audit results.

9.2.2.1 INTERNAL AUDIT PROGRAM

- Internal audits are scheduled and cover all Quality Management processes and activities according to our internal audit plan.
- Audit frequency and priorities are based risk that includes internal non-conformances, customer non-conformances and/or complaints, performance trends and criticality of the process to the organization.
- The effectiveness of the internal auditor program is reviewed as part of management review.

9.2.2.2 QUALITY MANAGEMENT SYSTEM AUDIT
• The internal audit includes auditing the Quality Management System processes over a three-year calendar period, according to an annual program, using processing approach to ensure compliance to IATF 16949 and customer specific quality management systems requirements.

9.2.2.3 MANUFACTURING PROCESS AUDIT

• Manufacturing process audits are conducted to determine effectiveness.
• Audits are conducted at a defined frequency.
• Audits are planned and conducted to include both shifts.
• If applicable, customer defined approaches to process audits are used.

9.2.2.4 PRODUCT AUDIT

• Product audits are conducted and include stages of production, rewind inspection, packaging, labeling, and delivery requirements.
• Product audits are conducted at a defined frequency and if applicable, using customer-specific required approach.

9.3.1 & 9.3.1.1 MANAGEMENT REVIEW

• Top Management conducts regularly scheduled reviews of the Quality Management System to ensure suitability, adequacy, and effectiveness.
• The frequency of the reviews will be increased based on risk to compliance with customer requirements.
• The review is documented and includes assessing opportunities for improvement and identifying needed changes to the Quality Management System including the Quality Policy and Objectives.
• The review is used to keep the QMS system aligned with the strategic direction of the organization.
• Records are maintained.

9.3.2 MANAGEMENT REVIEW INPUTS

• Management Review input includes:
  o Status of actions from previous management reviews;
  o Changes in external and internal issues that are relevant to the quality management system;
  o The adequacy of resources
  o The effectiveness of actions taken to address risks and opportunities;
  o Information on the performance and effectiveness of the QMS system, including trends in:
    ▪ Customer Satisfaction and feedback from relevant interested parties
    ▪ The extent to which quality objectives have been met;
    ▪ Process Performance and Product Conformity
    ▪ Status of Preventive and Corrective Actions
    ▪ Monitoring and Measurement Results;
    ▪ Audit Results
    ▪ Performance of external suppliers

9.3.2.1 MANAGEMENT REVIEW INPUTS - SUPPLEMENTAL

• Management Review includes:
Quality Policy Manual

9.3.3 MANAGEMENT REVIEW OUTPUTS

- Management Review output includes any decisions and/or actions related to:
  a) Improve the effectiveness of the Quality Management System and its related processes;
  b) Any need for changes to the Quality Management System.
  c) Determine resources.
- Evidence of management review results are retained.

9.3.3.1 MANAGEMENT REVIEW OUTPUTS - SUPPLEMENTAL

- Top management will implement an action plan when customer performance targets are not met.

10.1 IMPROVEMENT - GENERAL

- Whitlam determines and selects opportunities for improvement and implements necessary actions to meet customer requirements and enhance customer satisfaction. This includes:
  o Improving products and services to meet current requirements and address future needs
  o Correcting, preventing or reducing undesired effects;
  o Improving the performance and effectiveness of the Quality Management System.

10.2.1 NONCONFORMANCE AND CORRECTIVE ACTION

- When an internal or external nonconformity occurs, Whitlam takes action to:
  o Control it and Correct it;
  o Deal with the consequences;
  o Evaluate the need for action to eliminate the cause(s) to prevent reoccurrence by:
    ▪ Reviewing and analyzing the nonconformity;
    ▪ Determining the cause of the nonconformity;
    ▪ Determining if similar non-conformities exist or could potentially occur;
- Implement any corrective action needed;
- Review the effectiveness of corrective action;
- Update risks and opportunities determined, if applicable
- Make any changes to the Quality Management System, if applicable
- Corrective actions are appropriate to the effects of the nonconformities

10.2.2 NONCONFORMANCE AND CORRECTIVE ACTION
Whitlam retains documented evidence of:
- The non-conformance and any subsequent actions taken;
- The results of any corrective actions;

10.2.3  PROBLEM SOLVING

Whitlam has a documented process for problem solving that includes:
- Defined approaches for various types and scales of problems;
- Containment, interim actions and related activities to control nonconforming outputs;
- Root Cause Analysis and results;
- Implementation of systemic corrective actions, including consideration of the impact on similar processes and products;
- Verification of the effectiveness of implemented corrective actions;
- Review and if applicable, updates to appropriate documentation

Customer prescribed problem-solving formats will be used as required.

10.2.4  ERROR PROOFING

Whitlam has a documented process for to determine appropriate error-proofing methodologies and these methods/test frequencies are documented in the control plan.

Error-proofing methods are tested for failure or simulated failure and records are maintained.

Error proofing device failures have a reaction plan.
*Reference Instruction #148*

10.2.5  WARRANTY MANAGEMENT SYSTEMS

If required by the customer, Whitlam will provide a warranty for products through a warranty management process. The process includes Warranty part analysis (including NTF “No Trouble Found”).

10.2.6  CUSTOMER COMPLAINTS AND FIELD FAILURE TEST ANALYSIS

- Reject parts are tested and/or analyzed in a timely fashion consistent with the time frame related to the problem-solving process. The time frame is kept to a minimum.
- Records are kept and available on request.
- Rejected product analysis will initiate corrective action to prevent recurrence.
- Results are communicated to the customer and any applicable members within the organization.

10.3  CONTINUAL IMPROVEMENT

Whitlam continually improves the suitability, adequacy and effectiveness of the quality management system. Consideration is given to results of analysis and evaluation, outputs from management review to determine needs or opportunities.
10.3.1 CONTINUAL IMPROVEMENT - SUPPLEMENTAL

The Continual Improvement process is defined and documented and includes:

- Identification of methodology used;
- Objectives;
- Measurement;
- Effectiveness;
- Documented information
- Manufacturing process improvement action plan with emphasis on the reduction of process variation and waste.
- Risk analysis