



ABC Metals, Inc.

NONFERROUS METALS – PRECISION SLITTING

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Business Policy Manual

Revision Date: 10/2005



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Introduction

ABC Metals, Inc. is a service center specializing in distribution of catalog and custom precision slitting of ferrous & nonferrous metals. It is our mission to demonstrate our commitment to integrity and service in every relationship. With over 32 years in the metals industry, ABC Metals, Inc., is committed to providing consistent product that meets our customer's needs. ABC Metals Inc. consists of facilities in Logansport, In. Pharr and EL Paso Texas.

Scope & Purpose - Quality Management Systems Integration

ABC Metals Inc. -, has a strategically planned quality management system that conforms to ISO/TS 16949:2002. We have integrated our Quality Management System as part of our business. We are committed to excellence in quality and strive to maintain customer satisfaction as a foundation of our business. Our Quality Policy, Quality Manual, operating procedures, documents & forms are written in an easy-to-use manner to be a useful and relevant guide to our process integrated approach to conducting our business. Operating procedures are referenced in their relevant section as “(QOP-xx-xx)”, to give a more detail, definition, and clarify responsibilities for a process or procedure.

Throughout this manual, as well as other documents, the QMS is termed as a business management system or business system to encourage the integration of our QMS into day-to-day life of the business with no notable separation of the systems. This matured system provides the foundation to address our customer's expectations. However, we understand that it takes more than a foundation to demonstrate an ability to provide a level of excellence and consistent results that lead to overall customer satisfaction. That is why everyone at ABC Metals, Inc. is committed to skillful execution and continual improvement of our manufacturing processes including product, customer, corporate, and regulatory requirements.

This business policy manual gives our employees, customer, suppliers, subcontractors, and any other interested parties, an overview and outline of our business and the framework for the requirements, as discussed above. Our senior management team is dedicated to communicate the importance of meeting these requirements, as well as regulatory and legal requirements. Throughout this manual and our procedures, the terms *Senior Management* and *Top Management* are used interchangeably. We define our Senior /Top Management team from the President and C.O.O., to managers whom are responsible for all aspects of ABC Metals, Inc. including respects to financial, quality, & production (Figure 2)

Exclusions - Product Design & Development Activities

While ABC Metals, Inc. is focused on customer expectations, needs, and strives to excel beyond average service and provide exceptional products, we do not design or develop products. All product characteristics are specified by customers. We are committed to comprehension and delivering product that meets our customer requirements and understanding that our expertise and engineering activities are focused on best practices of the design and development of our manufacturing processes. Thus, in relationship to ISO/TS 16949:2002, ABC Metals, Inc. is excluded from product design & development as defined in clause 7.3 and any sub-clauses 7.3.1, 7.3.2, 7.3.2.1, 7.3.3, 7.3.3.1 or portion thereof, that defines requirements applicable to the design of products, including product design and verification and validation activities.

Process Approach - Flow & Interactions

Our system is defined in terms of a process approach, flowing from the primary processes, or those that impact our customers: Sales, Advance Planning, Production, & Delivery, to those activities and processes



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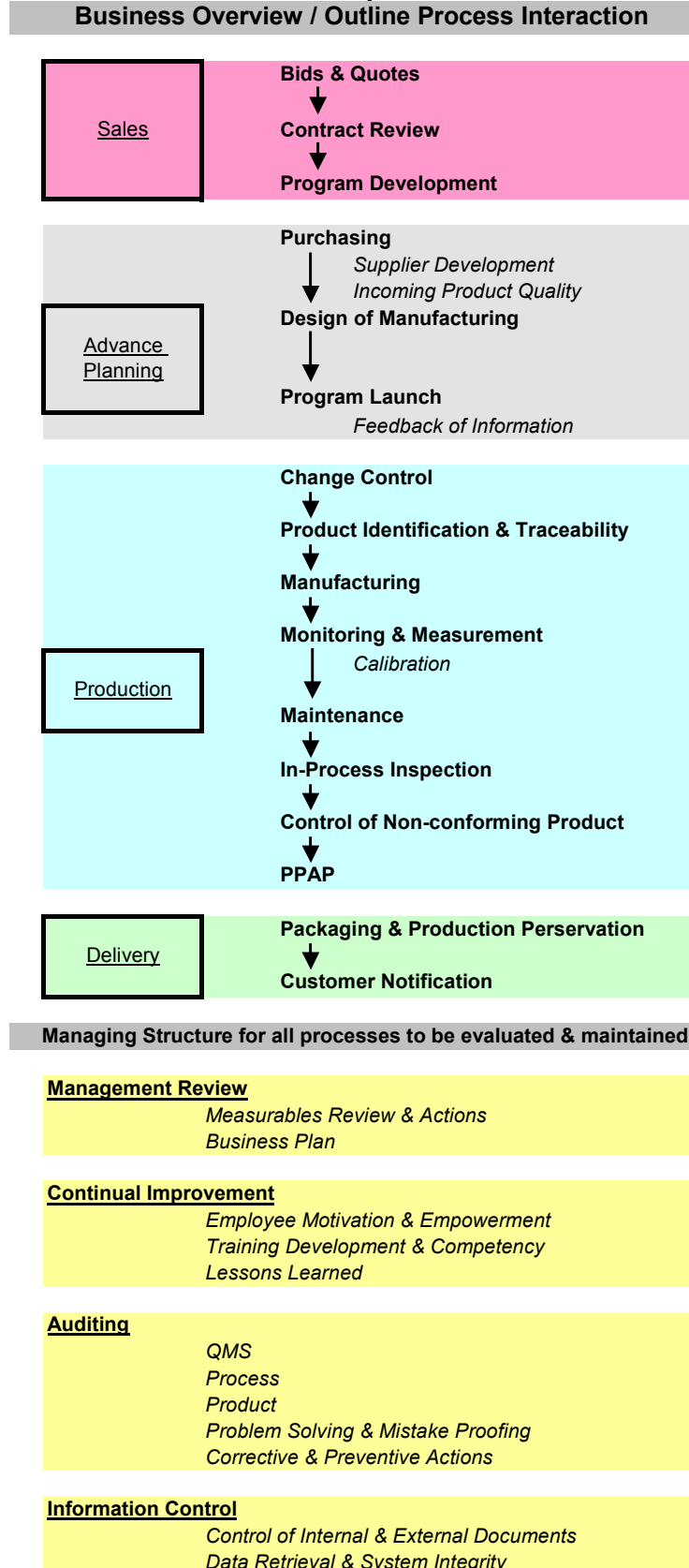
that support or are used to manage effectively. For simplicity, the inter-relationships of our system is illustrated in Figure 1.



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Figure 1 - Business Process Flow / Interaction Overview

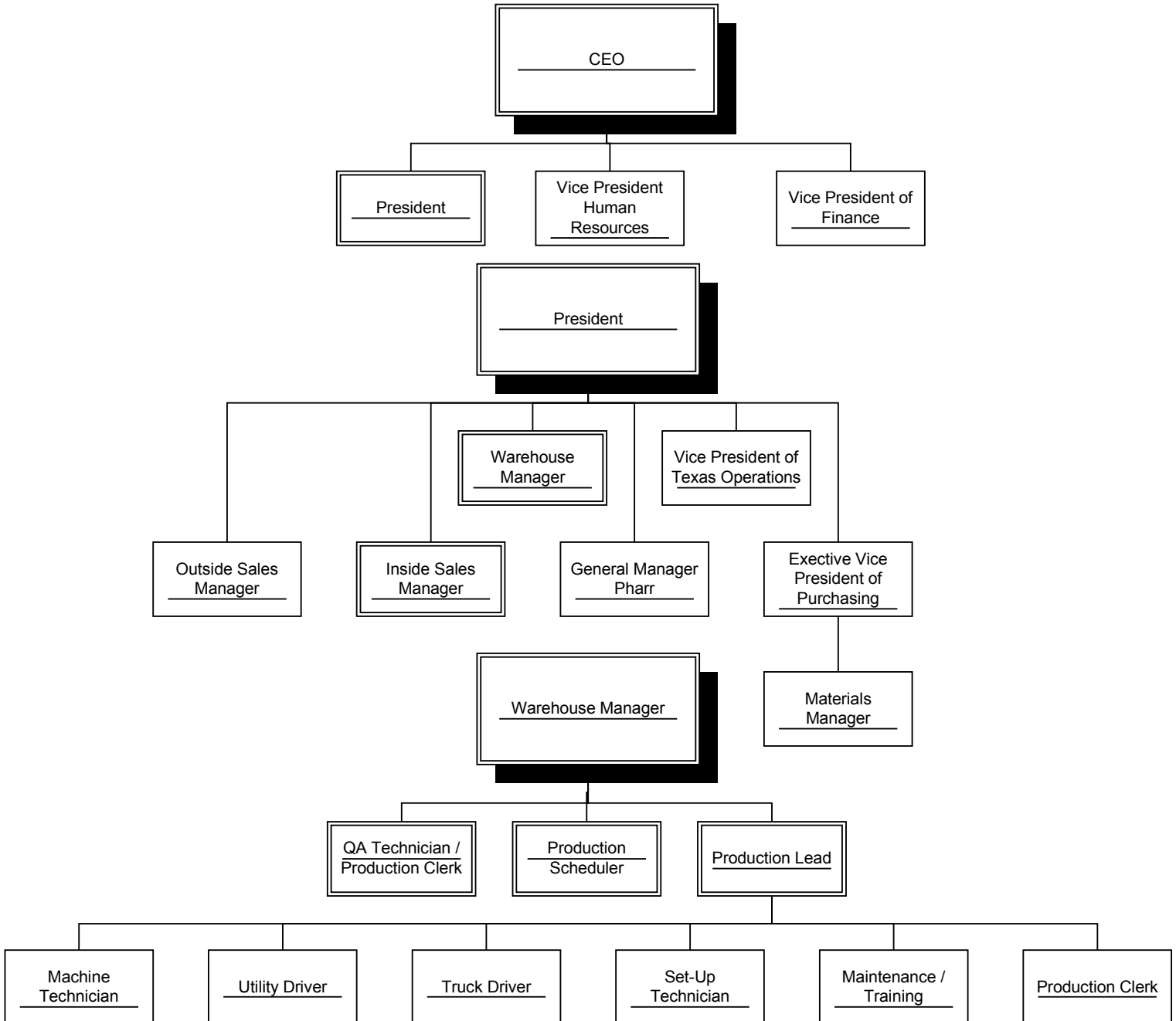




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Figure 2 - Organizational Structure





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Our Commitment to Excellence: Business Policy & Objectives

Meeting or surpassing customer requirements 100% of the time

Our objectives are to continually improve our products, processes, services, and business management system.

The main role of our business policy is to define the principal goal for our business in our pursuit for excellence. Senior management communicates the company's commitment and dedication to delivering a quality product to its customers. The policy is posted throughout the company, posted on the internet, explained during orientation training provided to all employees, and communicated to customers, suppliers, and other interested parties. In order to achieve our policy, ABC Metals, Inc. has established specific objectives.

Key indicators to continually monitor the company's stability & trends on meeting our objectives to enhance our customer's satisfaction include, but are not limited to:

- Results from Internal Audit program
- Customer Feedback
- Process & Product Conformity
- Status of Preventive & Corrective Actions
- Continual Improvement activities
- Delivery Performance
- Supplier Performance

Additional information on our procedures for planning and detailed indicators are outlined and maintained as part of the management review process. Senior management reviews the continued suitability of our policy statement, objectives, as well as the key indicators during our management review process.

Our Vision

Through the development and application of our core values of *integrity, commitment, and service*, ABC Metals, Inc. will be the preeminent service center in our market, providing superior value in our relationships with our customers, employees, owners and others.

What do our values mean to our customers?

Integrity

- doing the right thing

Commitment

- doing things right

Service

- doing things with the right attitude



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Responsibility & Authority

Departments, groups and functions within the company, and their interrelations, are defined in the organizational chart. Responsibilities and authorities for specific processes and activities are defined in each process map, flow and/or procedure.

Irrespective of their other specific responsibilities, all departments and functions in the company are responsible for implementing, maintaining, and improving the quality of our products, services, & systems.

Specific guidance on the direction for the business is the responsibility of senior management. Senior management is responsible for formulating, reviewing, & revising the policy statement and objectives that guide the company. To sustain the expectations defined for the organization, senior management is also responsible for the review and consideration of resources necessary to maintain and provide continual improvement of the business systems. Additional responsibilities for the business system are defined as:

- Reviewing the product realization processes,
- Monitoring support processes for effectiveness and efficiency, and
- Conducting annual management reviews of the business system to ensure its continuing suitability, adequacy, and effectiveness.

Management & Customer Representatives

The Quality Technician is appointed as Customer Representative for ABC Metals, Inc. with responsibility to ensure customer requirements are addressed and met in our business system. ABC Metals, Inc.'s appoints the President as Management Representative, in cooperation with the Customer Representative, and as a part of our top management team, this team has the authority to implement changes to address our business needs. Irregardless of other responsibilities, the Management Representative has the authority and responsibility to:

- Ensure that the business management system is implemented, maintained and continually improved;
- Promote awareness of customer requirements throughout the organization;
- Report to the top management on the performance of the system, including opportunities for improvement and effectiveness; and
- Coordinate communication with external parties on matters relating to our system including ISO/TS-16949:2002.
- Ensure that customer requirements are addressed.
- Leads or participates in such activities as product manufacturing process review, and corrective and preventive actions.

Internal Communication

In any organization, an effective communication process is a key component to its success. For this reason, ABC uses both hardcopy and electronic media to communicate requirements to our workforce consistently. To maintain a consistent message, we document requirements (i.e.: corporate, customer, & regulatory) via manuals, procedures, instructions, drawings, specifications, records, reports, etc.. We also value our greatest resource, our people, and share information through training, coaching, mentoring, on-the-job instruction, and meetings.



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Management Review

Management review is a process which key activities of our business are reviewed on a regular basis to ensure the business is growing and developing in a manner that is suitable, effective and adequate. Each year (or more frequently if business or industry shifts are detected) the President chairs a business review with each department, function, or area reporting on their responsible areas. To ensure a thorough business review, we:

- Verify that our systems are effective and suitable for our current state. It is important to ensure our systems are continually improving and develop action plans to keep our business moving forward.
- Review our Business plans – short term (1 – 2 years) & long term (3 – 5 years) so we understand our company's direction in the future and can plan accordingly.
- Monitor the progress of timelines for planned activities to ensure they are carried out and the integrity of our system is not compromised when changes are planned and implemented.
- Review Key Indicators & Issues as defined on the Management Review Checklist.
- Track our prioritized plan for continual improvement activities. The senior management team empowers the workforce to participate and take an active role in developing improvements in our business. However, we also recognize that we can not tackle all projects at once. As a result, senior management reviews & prioritizes projects to be worked on.

Review and analysis of data and trends that are reviewed along with key business indicators are conducted every other month, at a minimum with a goal of monthly ([QOP-84-01](#))

Resource Management & Training Program

Our workforce is our greatest resource and asset to the overall success of our business. We strive to continually educate, train, coach, and mentor our employees to be experts. Empowering our workforce to provide feedback and suggestions to continually improve our business is crucial to enhancing our customer satisfaction. Each employee whose work affects the product quality is trained, coached, and/or mentored until competency is achieved in pre-determined skills sets that are necessary to be successful on the job.

This process of training-review-coaching-evaluation of effectiveness of our training program ensures that the workforce is successful in meeting our business objectives and are able to move ABC Metals forward and on target with our policy statement. Reinforcement of new products or processes, unique or different from current process is provided through On-the-Job training.

We recognize that it is equally crucial that the workforce understand the impact of their work, the relevance to the customer's success, and their contributions to our overall business success in meeting our stated objectives & policy. Training is a continual feedback process, and we, provide feedback to our employees by documenting their progress and improvement plans, if needed and reviewing their progress to their training plans as well as their effective execution of their learned skills during their performance reviews conducted at least annually. More information on our training & competency programs and procedures are available for review ([QOP-62-01](#)).



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Customer Property & Proprietary Protection

Any customer-owned tools and equipment, provided to ABC Metals, Inc. are permanently marked so that the ownership of each item is apparent and readily traceable. Any lost, damaged, deteriorated, or otherwise unsuitable customer-owned property is reported back, in writing, to the customer.

We also recognize that intellectual property needs protection as well. Documents, samples, data and other media that may contain customer's intellectual property are controlled following the same procedures that apply to similar documents and other media owned by our company. ([QOP-42-02](#))

Customer Feedback & Complaints Processing

ABC Metals, Inc. takes feedback from our customers very seriously and we follow specific procedures to process customer feedback & complaints in the event an unfortunate issue arises. Customer Service receives customer feedback and complaints. All such communication is tracked through to closure, including verbal complaints.

We use a disciplined problem-solving method to investigate causes of nonconformities and implement corrective actions. Error proofing is the preferred method to use. Corrective actions are evaluated for their applicability to other similar processes and products as well. More detailed information about our complaints & resolution process is defined in ([QOP-85-03](#)), Corrective and Preventive Action. Controlling product that does not meet customer requirements is defined in detail ([QOP 83-01](#)).

Documentation & Recordkeeping

Ensuring we are using the most current documentation is key to providing products that meet our customer's requirements. Control, identification, indexing, access, filing, storage, & maintenance are defined in our operating procedure ([QOP 42-02](#)). We maintain records to demonstrate conformance to specified requirements and the effective operation of the quality system, preferably in electronic media. Records from subcontractors & supply base, needed to demonstrate conformances are readily available upon request from our subcontractors & supply base.

The resulting quality records as well as their collection and retention periods are defined in ([QOP-42-03](#)). Unless agreed contractually, record retention periods as defined in our procedure are used. These records are available for evaluation by the customer or the customer's representative for an agreed period prior to their destruction. All stated retention periods do not supersede any governmental or customer requirements.

Each operating procedure is written to provide more detailed information on sustaining our system and the instructions and to assign responsibilities for

Monitoring and Measurement planning

Measurement and monitoring activities to verify products and manufacturing processes are planned in the course, of the manufacturing processes ([QOP-73-01 & QOP-73-02](#)). Appropriate statistical tools for evaluating and monitoring manufacturing processes are defined in control plans ([QOP-75-03](#)). The implementation of these activities is addressed in ([QOP-82-03](#)), Monitoring and Measurement of Processes, and ([QOP-82-04](#)), Monitoring and Measurement of Product.

The effectiveness of the quality system is monitored by internal audits and by measuring quality performance and customer satisfaction. Results of these activities are reported to the top management



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and are used to identify opportunities for improvement. Activities related to internal audits and to measuring are further defined in Operational Procedure ([QOP-82-02](#)), Internal Quality Audits.

Auditing

We conduct annual audits of our management systems to ensure that our processes are still effective and relevant measurements of the health of our business. Some processes are audited more frequently to ensure greater response to the needs of our business and our customer's concerns, as fluctuations arise.

Our Management Representative is responsible for our audit program which includes reporting results and maintaining all records, however auditors are chosen to conduct the audits. These auditors are impartial to the process they are auditing to ensure an objective review and unbiased analysis of the process. ([QOP-82-02](#))

ABC also conducts audits of our manufacturing processes to determine the effectiveness of our processes used to produce our products. Product audits are conducted throughout the manufacturing processes to ensure product meets our customer requirements. ([QOP-75-01 through QOP-75-12](#)).

Statistical techniques and concepts

Operators of manufacturing processes are familiar with basic statistical concepts, such as variation, stability, process capability, and over-adjustment. Where applicable, explanation and discussion of these concepts is included in the process operator training ([QOP-62-01](#))

Purchasing & Supplier Development

Purchasing documents are prepared to clearly and completely describe ordered products, including product identification and quality requirements. All new suppliers are evaluated with regard to their quality and process capability. All suppliers and sub-contractors are expected to comply with ABC's [Supplier Requirements Manual \(PUR008\)](#). (Purchasing and Quality Assurance establish the criteria for selection of suppliers, and conduct a supplier evaluation. The Approved and Provisional suppliers are entered on the approved supplier list. Existing suppliers with a satisfactory quality performance history may be exempted from the initial evaluation and be initially rated as Approved or Provisional. Records of the initial supplier evaluation as well as the supplier evaluation process, is explained in more detail in [QOP-74-01](#))

To ensure that our orders specifications are met, ABC Metals requires certification of all received product. We require all suppliers to achieve a Dock to Stock status. We verify our incoming product's quality according to

Production & Process Controls

Production processes are controlled through variety of approaches, activities and techniques. The system is designed to control the information, material and human (operator) input into the process; the technology, tools and equipment used; the implementation of process performance and product characteristics monitoring and measurement; and the release of the finished product. ([QOP-75-01 through QOP-75-12](#)).

The Lead has the responsibility for ensuring product quality, and the authority to stop production to correct quality problems.



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Controlling Suspect / Non-Conforming Product

Product that is suspect of not meeting customer / ABC requirements is segregated from normal production flow to prevent its unintended use and / or shipment to customer. Product is identified as to the suspect condition and reviewed by Quality representatives. After review, disposition is recorded as to follow-up activities including: rework instructions, re-inspection, customer concessions received, and/or corrective actions required. ([QOP-83-01](#)).

The Lead has the responsibility for ensuring product quality, and the authority to stop production to correct quality problems.

Work Environment

Human factors

ABC Metals has a zero tolerance policy for harassment. Human Resources and departmental managers are responsible for ensuring that the workplace that is harassment-free. Human Resources and our department managers are responsible for aspects of workplace that include interaction and communication between employees, employee harassment, conflict resolution, and so forth. Relevant workplace policies are communicated in the [Employee Handbook](#), that is given to all newly hired employees, training and awareness programs and, where necessary, disciplinary actions. ([QOP-62-01](#))

Physical factors

Production and Quality Assurance are responsible for identifying those operations where extreme environmental conditions could impact quality performance of personnel and result in product nonconformities. Where appropriate, limits of exposure and/or mitigating measures are defined and implemented for these operations.

Personnel safety

Potential risks to employees are considered in product design and in development of manufacturing processes. Where applicable, safety requirements are defined in the design input, and their fulfillment in the design is evaluated by design reviews. Operational Procedures ([QOP-73-02](#))

In day-to-day operations frontline supervisors and their supervisors manage personnel safety. Periodic inspections by Governmental or appropriate entities are used

Cleanliness of premises

Facilities are maintained in a state of order, cleanliness, and repair. Process operators are responsible for maintaining order at, and around process equipment and their work stations. General housekeeping for the facility is the responsibility of the employee who works in the area. ABC is working towards a goal of a fully integrated 5S philosophy as part of day to day operations.

The state of order, cleanliness and repair are periodically assessed within the scope of internal audits of the quality system. ([QOP-82-02](#))

Facilities & Maintenance Programs

Plant, facility and equipment planning

Top Management and Production Management are the ones responsible for planning of production facilities and equipment as well as for defining methods for measuring the effectiveness of production



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operations. These activities are integrated with the development and validation of the manufacturing processes. Operational Procedure ([QOP-73-02](#))

Initial evaluation of the production system is conducted in conjunction with the production run. The focus is on such issues as overall work plan, equipment and labor requirements, material requirements, appropriate automation, operator and line balance, storage and buffer inventory levels, value-added labor content, human factors, and so forth. The initial evaluation and acceptance of production system effectiveness is recorded by the QP Team in the quality planning sign-off ([QOP-73-02](#)). In addition to the initial evaluation, manufacturing capabilities and effectiveness are assessed regularly by internal quality audits Operational Procedure ([QOP-82-02](#)).

Supporting services and maintenance of facilities

Supporting services include transportation, communication, and IT services:

Transportation services are usually purchased from parcel delivery and courier services, and from trucking or other transportation companies or consolidators. Purchasing of these services are managed by warehouse personnel. ([QOP-74-02](#)).

Communication services are provided by various telephone, wireless, and internet access companies. Purchasing is responsible for administrating and coordinating these contracts.

IT systems are designed and implemented by external subcontractors within the corporation. Maintenance of buildings and facilities is performed by external contractors. This includes regularly scheduled maintenance of lighting systems, air conditioning and heating systems, landscaping, and cleaning. Repairs of buildings and other such facilities are contracted as needed. Warehouse Manager is responsible for coordinating and managing maintenance contracts.

Maintenance of manufacturing equipment is carried out by Maintenance personnel in accordance with Operational Procedure ([QOP-75-09](#))

Contingency plans

Warehouse Manager is responsible for preparing contingency plans to satisfy customer requirements in the event of an emergency, such as utility interruptions, labor shortages, key equipment failure, and field returns.

Contingency plans consider:

- Types of emergencies that could disrupt or stop production,
- Estimated duration (production loss), frequency and probability of occurrence for each type of emergency, and
- Recovery plans and other mitigating actions for those types of emergencies that are reasonably likely to occur and could cause significant disruption to delivery schedule.

Contingency plans are reviewed and updated in response to plant and/or contract (volume) changes.

Subcontracted Products & Process Controls

Where ABC Metals, Inc., subcontracts work, we accept responsibility for the products produced as if it were our own. We recognize that control over our outsourced products doe not absolve ABC Metals, Inc. of the responsibility of providing product that meets all customer requirements. Our subcontractor's maintain process controls to ensure that products meet specified requirements.



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PPAP – Production Parts Approval Process

We have the capability to provide PPAP documentation in accordance with AIAG PPAP manual requirements as is a service that is available upon request. We use a PPAP checklist that is derived from Table I.3.1, to ensure accuracy and completeness in our submission packages.

Since our products are primarily raw material metals, the PPAP package does require some clarification.

- 1) Where no PPAP is required, customer expected dock date is used as timing plan with a C of C as sole documentation for evidence of compliance to customer stated requirements.
- 2) Control Plans, Process Flow, PFMEA, and Capabilities indices are process-specific. Our metals are run within the stated parameters of our processes (Facility Capability Resource Matrix)
- 3) Product specific documentation include: PSW, dimensional records, order verification, mill certification for physical, chemical, & mechanical properties, as well as plating certifications for plated materials.
- 4) Sample material is typically 11” - 15” unless otherwise specific requirement from the customer and one is sent with the customer’s first production order. ABC maintains a sample strip with package.

Due to the nature of our business, when a PPAP package is required, documentation can only be submitted with first production run. Product can not be pre-slit to width for the sole purpose of PPAP submission. Any non-conforming material as a result, is processed in accordance with our complaint process.

Advance Planning Process – Customer Focused

Our Product realization process is streamlined to make the review process needed, effectively focused on out customer’s needs during the quote to advance planning process. We have pre-defined the capabilities of our processes / equipment, their controls and tolerances, enabling us to quickly respond to inquiries from potential new customers or new business. If a request for business is received the ABC determines to pursue, and is outside of our current capabilities, a cross functional team is assembled and our APQP process is completed. Our APQP process reviews are conducted when a product or program exceeds our known capabilities as defined in our Facility Resource Capability Matrix, or when required by our customer.

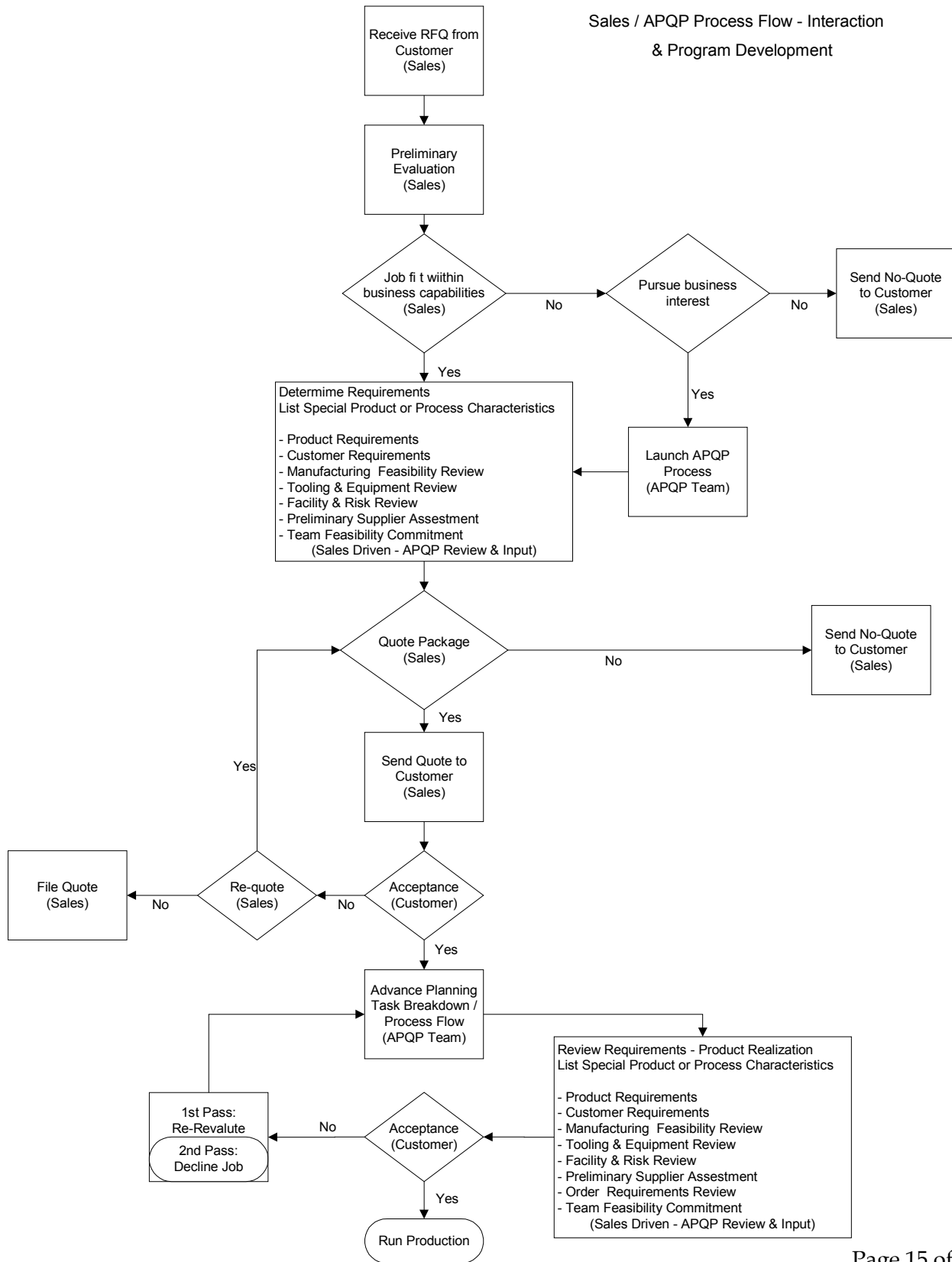
Manufacturing process design activities are carried out by a Multidisciplinary Quality Planning (QP) Team. Senior management monitors effectiveness and efficiency of the Advance Planning Process and key measurable used to determine process performance is managed in the Management Review process.



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Sales / APQP Process Flow - Interaction & Program Development





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Continual Improvement

Our philosophies and policies on continual improvement are defined as a whole process to ensure our efforts to seek out improvement projects are reviewed. It is an integral part of our management review process as well as our encouragement of our employee's empowerment process.

The business system itself is designed to incorporate processes, activities, and systems necessary to identify opportunities for improvement and to implement improvement projects. Quality Assurance is responsible for coordinating and monitoring the continual improvement effort. Opportunities for improvement are identified from:

- Analysis and evaluation of data regarding product conformity, manufacturing process performance, customer satisfaction, effectiveness of the quality system, and other such quality performance indicators;
- Employee suggestions for improving their processes, procedures, and work environment; and
- Immediate need to address specific problems and new or changing requirements.

Additional information, as well as specific operational performance indicators that are monitored to identify opportunities for improvement are recorded and maintained as part of our management review process.

Manufacturing process improvement focuses upon control and reduction in variation of product characteristics and process parameters. The priority is on product characteristics where further manufacturing process improvement benefits the customer, i.e., when reduction of variation around target value is demonstrably beneficial to product safety, appearance, durability, etc.

The following is the various methods and / or techniques for continual improvement are used where appropriate however error proofing is the preferred technique, and is used whenever applicable.

- Control Charts
- Design of Experiments
- Analysis of motion/ergonomics
- Theory of Constraints
- Overall Equipment Effectiveness
- Parts Per Million Analysis
- Value Analysis
- Benchmarking
- FMEAs
- Error Proofing



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