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LPA Channel Supplier Flow Down Requirements

INTRODUCTION

This document details the minimum Quality Management System requirements expected by LPA CHANNEL ELECTRIC (hereon-in referred to as LPA) of its Suppliers. These standards supplement any conditions of the LPA purchase order. In the event of conflict between the requirements of this document and the requirements of the Purchase order, the Purchase order requirement shall prevail.

Our Company supplies into high risk industries providing safety critical parts to the Aerospace, Defence and Rail markets. Our policy is to ensure that all suppliers are aware of the risk and incorporate quality as a priority into their day to day attitude and work ethic as people's lives may be reliant upon the product we supply.

GENERAL

Where LPA requires a product to be manufactured to drawing, the Supplier shall not use any Sub-tier Suppliers without the written approval from LPA. Where drawings make reference to parts, which are commercially available, LPA will not require Sub-tier written approval. All necessary information is to be provided to any Sub-tier supplier. It is the supplier's responsibility to ensure such information is understood and implemented by Sub-tier Suppliers prior to commencing any work.

Approved supplier status will be awarded to suppliers complying with these requirements for the scope of their products or services. Suppliers are monitored closely, and measures are established, in order to achieve the highest level of performance. This document details those requirements.

Non-conformances will adversely affect Vendor Performance Ratings. Any deviations to these requirements must be submitted to LPA for assessment/approval. It is essential that suppliers fully comply with Purchase Order conditions with particular emphasis on quality requirements concerning source Traceability and Certificate of Conformances.

QUALITY SYSTEM

The Supplier will provide and maintain an effective Quality Management / Inspection system that is compliant with this document.

LPA recognises national and international standards for Quality Management as meeting requirements for Approved Supplier Status. LPA requirements are that the supplier maintains a Quality Management System that complies with the ISO9001 standard as a minimum.

The Suppliers Quality Representative should have direct access to a senior executive of the company and have access to all purchase order requirements, drawings, specifications and other related

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documentation necessary to fulfil their duties. The Supplier will ensure that all such products and services conform to the full requirements of the specification/purchase order.

Documentation and records necessary to demonstrate compliance will be maintained and made available for auditing by LPA representatives upon request at all reasonable times. All documentation must remain legible, readily identifiable and retrievable.

SUPPLIER ASSESSMENT / EVALUATION

LPA approved suppliers will be continuously monitored to assess their on-going suitability by measurement of quality, cost and delivery performance and surveillance audits. Should a Suppliers performance fall below an acceptable standard, the Supplier will be notified in writing. If necessary, the supplier will be requested to submit a corrective action plan to rectify the problem. Approval may be suspended or withdrawn if performance is not improved within an agreed time-scale.

ACCESS

The Supplier will permit reasonable access to their company premises to LPA, customers (or their representative) of LPA and regulatory authorities whenever necessary.

SUPPLIER CONTROL

The Supplier must notify LPA Channel of any changes whether in part, or as a whole of any product, process, location or service. All relevant LPA quality requirements (including access & records) must be flowed down to lower tier suppliers.

All Suppliers will maintain their own approved Supplier / Sub-contractor database & ensure that all vendors maintain an approved Quality Assurance system. The Supplier will maintain records of all "on receipt" inspections and Approval Certificates covering materials and supplies.

MATERIAL SEGREGATION / QUARANTINE

The Supplier will provide secure facilities to ensure that material is not used until inspected or otherwise verified as conforming to specification. Materials will be stored and protected in such a manner to prevent damage and deterioration or loss of identification and traceability at all times.

TRACEABILITY

All raw material obtained by the Supplier to meet an order, and all parts incorporated into assemblies which are subsequently supplied to LPA must be traceable to the manufacturing source and identifiable to the manufactured item.

Traceability must be maintained through all stages of the Suppliers manufacturing process.



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In the event of certain processes being further sub-contracted, traceability to the 2nd stage control, inspection and / or test records must be maintained.

PREVENTION OF COUNTERFEIT PARTS

All suppliers shall implement a process for the prevention of Counterfeit parts & Suspect Un-approved parts in accordance with industry standard.

F.O.D. CONTROL

The supplier will establish and maintain a program to control FOD (Foreign Object Damage) and / or contamination during the suppliers manufacturing, assembly, and test & inspection operations.

TOOLING, GAUGING & MEASURING EQUIPMENT CONTROL

All equipment must be suitably maintained and subjected to an appropriate calibration process where applicable. All gauging and measuring equipment shall be identified by a unique serial number and a record maintained of the inspection examinations of such equipment.

The Supplier must ensure that environmental conditions are Suitable for all calibrations, inspections, measurements and tests being carried out.

NON-CONFORMING PRODUCT

The Supplier shall have a system for the control of non-conforming items which must include:

- Identification & Segregation of non-conforming material or parts.
- Documentation defining the nature of the defect and what remedial / corrective action has been authorized and undertaken. The document must clearly state the defective parts by number and serial / batch number and give a target date for the completion of actions.
- Evidence to demonstrate that appropriate action has been taken to prevent recurrence.
- Notification Of Escapement (NOE) process:

Supplier shall provide written notification to LPA when a non-conformance is determined to exist, or is suspected to exist, on product already delivered to LPA. Written notification shall include:

- Affected process(es) and product(s).
- Description of the nonconforming condition.
- Quantities, dates, purchase orders and destinations of delivered shipments.

Notification must occur within three (3) business days of knowing all the above.



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PRODUCTION PERMIT AND CONCESSION APPLICATION

Requests for permission to deviate from the purchase order, drawing or specification requirements in advance of manufacture (Production Permit) and requests to release items which do not conform to order, drawing or specification (Concession) are to be made in writing to LPA.

Any such Permit / Concession must be quoted on the release documentation, and the part duly identified. Failure to observe these requirements will result in rejection.

REJECTION

Products that do not conform to the requirements of the LPA purchase order or this document, are liable for rejection. The Supplier will be notified and payment will be delayed.

The Supplier will investigate the cause of non-conformance and instigate corrective action to prevent a reoccurrence. When no fault is found by the supplier for non-conforming product(s), the order will be accompanied by supplier's test and inspection data. Resubmitted parts will also be accompanied by a copy of, or reference to, the applicable LPA non-conformance document(s). The NCR must be completed within thirty (30) days of receipt.

CHANGE MANAGEMENT & FIRST ARTICLE INSPECTION

The supplier shall notify LPA for approval of ALL changes to manufacturing processes, engineering drawings and changes of raw material source prior to implementation. In the event of component obsolescence the supplier is requested to offer LPA a "last time buy" notification to ensure adequate materials are made available during the transition to an alternative source.

Suppliers are required to carry out First Article Inspections) when requested on the Purchase Order and in the following circumstances:

- Initial First Article Submission (Including drawing Issue changes)
- Change in manufacturing source or location, which Includes change in suppliers and suppliers moving production between sites within their organisation,
- Change in manufacturing method, including changes to manufacturing processes, production equipment and tools.
- Changes to the material(s) or specification(s) specified on the engineering drawing.
- A lapse in production for two (2) years.

CERTIFICATION RELEASE REQUIREMENTS

Ensure all release documentation including Certificate of Conformity are supplied prior to or with delivery of the goods and provides full traceability back to the original manufacturer / material source. The Release Note / Certificate of Conformity must carry the following information:

- Unique Document Identity (through which traceability to original materials, manufacturing sources and records can be achieved)

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- Supplier name and address
- Document Issued date
- LPA Order No
- Description of Product / Service supplied
- Part No. and / or Drawing No, and Issue
- Quantity Supplied
- Batch No / Serial No
- Inspection Report / Permit / Concession / Reject Note number (if applicable)
- Signed certified statement of conformance to the purchase requirements by approved personnel

DELIVERY

The Supplier will ensure that all parts are delivered correctly identified, as required by the drawing and the Purchase Order.

Deliveries shall be appropriately packaged to prevent damage, deterioration, corrosion and other risks during transportation.

Suppliers shall ensure that the maximum weight of shipments does not exceed 25kg per package.

Certification and documentation requirements of the LPA order accompany each delivery as appropriate.

LPA are able to accept standard deliveries up to 5 days early.

RECORD RETENTION

For the rail industry - The Supplier will retain all manufacturing and quality records associated with LPA orders for a minimum of ten (10) years after completion of the order (or at such time that the company ceases to trade, then ALL records MUST be passed to LPA). If the supplier's record retention period is shorter then written approval must be sought from LPA prior to destruction of records.

For the aerospace & defence industry - The Supplier will retain all manufacturing and quality records associated with LPA orders for a minimum of thirty (30) years after completion of the order or for the life of the aircraft, whichever is longer (or at such time that the company ceases to trade, then ALL records MUST be passed to LPA). If the supplier's record retention period is shorter then written approval must be sought from LPA prior to destruction of records.

No records will be disposed of without written authority from LPA.



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Instructions for disposal may provide for all records to be returned to LPA for archiving, in which case the records are to be collated together and fully identifiable to the appropriate LPA Purchase Order.

EXPORT CONTROL

LPA expects that suppliers clearly understand and work within the laws and practices of the country of export and ensure that they administer all relevant export controls. Suppliers must ensure that when delivering products to LPA they comply at all times with all export control requirements and customs regulations, as well as providing export control and foreign trade data in a professional and timely manner.

LPA also requests that suppliers:

- Take all necessary efforts to implement export control processes and procedures internally
- Notify us within five (5) working days of order receipt when there is product we are purchasing that is
- subject to export control policy (earlier if product is available for immediate shipment – i.e. ahead of shipment)
- Prepare all relevant and necessary information and liaise with LPA for any license or
- license exemption application

It is the supplier's obligation to take all necessary steps to prevent LPA from breaching any export control legislation.

ENVIRONMENTAL AND HEALTH & SAFETY PRACTICES

The supplier will establish & maintain an Environmental Management System, which if not qualified to, reflects the requirements identified in ISO 14001.

Suppliers should protect the health, safety and welfare of their employees, contractors, visitors and others who may be affected by their activities. Suppliers are responsible for the safety of products supplied to LPA and we expect all relevant personnel to be aware of their contribution to safety and product conformity.

RoHS / REACH and SVHC's

LPA is committed to provide customers with information regarding Substances of Very High Concern (SVHC's). In order to do this the supplier will ensure;

- They comply with regulations pertaining to both the Restriction of Hazardous Substances (RoHS) & the Registration, Evaluation, Authorisation & restriction of Chemicals (REACH).



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- They maintain & provide up-dated information regarding the compliance of products supplied.

CONFLICT MINERALS

In line with the legislation on the supply of Conflict Minerals, the supplier will undertake reasonable due diligence to ensure that specified metals are being sourced only from:

- Mines and smelters outside the 'Conflict Region';
- Mines and smelters which have been certified by an independent third party as 'Conflict Free' if sourced within the 'Conflict Region'.

This due diligence includes gathering & providing written evidence documenting that raw materials used to produce gold, tin, tantalum and tungsten, used in the materials to manufacture components and products supplied to LPA originate from sources that are certified as 'Conflict Free' by an independent third party.

If we discover the use of minerals produced in facilities that are considered to be 'Non-Conflict Free' we will take appropriate action to transition to 'Conflict Free' product.

ANTI-BRIBERY AND CORRUPTION (ABC)

LPA operates a zero tolerance policy in relation to bribery and corruption to ensure that all its business is conducted in an honest and ethical manner and to comply with applicable legislation. Bribery is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

The ABC policy applies worldwide to all individuals working at all levels throughout the business, including Directors, Management and employees. All forms of bribery (including bribing foreign public officials) are forbidden, whether direct or indirect through a third party. The policy prohibits offering or receiving bribes, facilitation payments and kickbacks.

SLAVERY, FORCED LABOUR & HUMAN TRAFFICKING

Suppliers must adhere to regulations prohibiting slavery, forced labour & human trafficking, complying with all applicable local laws in the country or countries in which they operate. Suppliers must ensure that workers are not being exploited, that they are safe and that relevant employment including wage and work hours, health & safety, human rights laws and international standards are adhered to, including freedom of movement and communications. Suppliers must carry out suitable due diligence and take appropriate action to ensure compliance within their own supply chains.



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CHILD LABOUR

Suppliers must ensure that illegal child labour is not used in the performance of work. The term “child” refers to any person under the minimum legal age for employment where the work is performed provided the legal age is consistent with the minimum working ages defined by the International Labour Organisation (ILO).

HUMAN RIGHTS

Suppliers are expected to treat people with respect and dignity, encourage diversity, promote equal opportunity for all, and foster an inclusive and ethical culture, in accordance with the relevant International Labour Organisation (ILO) conventions.

BUSINESS ETHICS

Suppliers are required to provide their employees with avenues for raising legal or ethical issues or concerns without fear of retaliation. Suppliers are also required to take action to prevent, detect, and correct any retaliatory actions. Commensurate with the size and nature of their business, suppliers are required to establish management systems to support compliance with laws and regulations, as well as the expectations expressed within this document. Suppliers are encouraged to implement their own written code of conduct and to flow down their principles to the entities that furnish them with goods and services.

CRIMINAL FINANCES ACT 2017

The Criminal Finances Act 2017 was introduced and became effective on 30th September 2017 to demonstrate the UK government’s commitment to preventing tax evasion in all its forms. The purpose of the legislation is to set out that companies and partnerships will be criminally liable where they fail to prevent those who act for them, or on their behalf, from criminally facilitating tax evasion.

We take our legal responsibilities seriously and take a zero-tolerance approach to all forms of tax evasion, whether under UK law or the law of foreign countries. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate. As a result, we expect our suppliers to show the same form of commitment to this policy whether it is under UK law or the law within your own jurisdiction.