Monroe WCL, LLC

Quality Procedure

QP-843

Information for External Providers

QP-843 Approval

On File

Holly McDaniel,
Branch Manager

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INFORMATION FOR EXTERNAL PROVIDERS – REQUIREMENTS

1. PURPOSE

1.1 General

Monroe WCL, LLC (WCL) established this Quality Procedure (QP) in order to document the flow down of additional requirements listed in the purchase order to external providers for products and/or services to be procured.

1.2 Application

This QP applies to all WCL's procurement documents issued to external providers that provide products and/or services that are either modified to achieve compliance to, or manufactured in accordance with drawings and specifications to be used in, or for the processing of products eventually sold by WCL.

1.3 Responsibility for Implementation

a) WCL Management Team

b) Purchasing Process

c) Inspection Process

d) Applicable External providers

1.4 Definitions

External Provider: Provider that is not part of the organization and provides a product and/or service to WCL. External providers were previously referred to as suppliers.

2. PROVISIONS

2.1 General

As applicable, the following numbered purchase order provisions (letter 'P' plus 'number) are a requirement of the procurement document.

In the event that a provision cannot be met, WCL shall be notified immediately prior to processing of the purchase order.

P1 Flow Down of Requirements

External provider shall flow down all applicable purchase order provisions to the supply chain, including its direct and sub-tier external providers, to ensure requirements are met.

P2 Quality Managements Systems (QMS)

External provider shall maintain a QMS in compliance with an International Organization for Standardization (ISO), Aerospace Standard (AS) or Military Standard-equivalent QMS acceptable to WCL for the items covered herein. Widely recognized government or industry quality management system standards should be used as guidelines.

P3 Changes Notification

External provider shall notify WCL of changes to processes, products, or services, including changes of their external providers or location of manufacture, and where required, obtain WCL approval.

P4 Quality Planning

External provider shall plan and develop the processes needed for product realization. As appropriate, the external provider shall determine, at a minimum, the requirements for approval of product, procedures and equipment.

P5 Qualification of Personnel

Personnel performing work affecting conformity to product requirements shall be competent on the basis of appropriate education, training, skills and experience, including awareness of the following:

- Their contribution to product or service conformity
- Their contribution to product safety
- The importance of ethical behavior

When applicable, external provider shall only use certified personnel. External provider shall maintain the expected level of competence, training and awareness for all work performed for WCL.

P6 Sampling Plans

When utilizing sampling inspection as a means of product acceptance, the sampling plan shall be justified on the basis of recognized statistical principles and appropriate for use (e.g.: matching the sampling plan to the criticality of the product and to the process capability). Acceptable Quality Levels (AQL) shall be Ac = 0; Re = 1

P7 Identification and Traceability

Where traceability is a requirement, the external provider shall control the unique identification of the product. Where appropriate, the external provider shall identify the product by suitable means throughout product realization maintain the identification of the configuration in order to identify any differences between the actual configuration and the procured configuration.

All items manufactured under the applicable purchase order shall be traceable to raw materials used. Traceability and inspection records shall be available upon request. Identification of raw materials used, shall include, as applicable, but not limited to, lot numbers, material types, specifications number, etc. In any case, external provider shall record sufficient identification information to adequately identify all material in such a manner that full traceability of raw materials used is included.

P8 Control of Monitoring and Measuring Resources

The external provider shall maintain a calibration system in compliance with ANSI/NCSL Z540, ISO 10012 or the equivalent.

WCL shall be notified when the equipment is found not to conform to requirements. The external provider shall assess and record the validity of the previous measuring results and shall take appropriate action on the equipment and any product affected.

P9 Preservation of Product

The external provider shall preserve the product during internal processing and when delivery to WCL in order to maintain conformity to requirements.

As applicable, preservation shall include identification, handling, packaging, storage and protection. Preservation of product shall also include, where applicable in accordance with product specifications and applicable statutory and regulatory requirements, provisions for:

- Cleaning
- Prevention, detection and removal of foreign objects
- Special handling for sensitive products
- Marking and labeling including safety warnings
- Shelf life control and stock rotation
- Special handling for hazardous materials

P10 External Provider Performance

External providers are reviewed periodically for both conformity (of product, process, and/or service) and on-time delivery. When applicable, external providers not meeting external provider performance will be issued a corrective action and may be relegated to “Disapproved” status.

P11 Nonconforming Product

External provider shall ensure that product which does not conform to product requirements is identified and controlled to prevent its unintended use or delivery. A documented procedure shall be established to define the controls and related responsibilities and authorities for dealing with nonconforming product.

P12 Nonconforming Product Disposition

External provider shall make certain that reworked product which does not conform to product requirements has no adverse effect on safety, performance, interchangeability or reliability, and within applicable requirements.

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

External provider shall not use dispositions of use-as-is or repair, unless specifically authorized by WCL’s Quality Department, if the nonconformity results in a departure from the contract requirements.

When applicable, upon disposition of nonconforming product, involved parties shall be notified within 72 hours. Involved parties can include WCL’s Quality Department, supply chain and regulatory authorities.

P13 Corrective Action

When applicable, the external provider shall eliminate the causes of nonconformities in order to prevent recurrence. External provider shall determine and implement actions needed, and reviewing the effectiveness of the corrective action taken.

P14 Certificate of Conformance

External provider shall provide a Certificate of Conformance with each shipment including, when applicable, certifications issued by sub-tier external providers. The certifications and test reports supplied as evidence of purchase order fulfillment must be in English and, at a minimum, shall contain:

- The products and/or services supplied
- WCL purchase order number
- Part number
- Configuration level (same as revision level) of product supplied and/or specifications/standards of special processes processed
    - The external provider may opt to not include the configuration level of the product and/or specifications/standards when the one utilized/processed is the latest revision at the time of production. However, WCL encourages all external providers to enter the applicable configuration levels on all certificates of conformance.
    - The external provider is required to include the configuration level of the product and/or specifications/standards processed when the one utilized is not the latest revision at the time of production.
- Quantity
- Traceability number (e.g., lot number, heat number, job number, etc.)
- When applicable, test/inspection parameters
- Signature and date from an authorized external provider representative acknowledging that supplied products and/or services met all applicable requirements

P15 Retention of Documented Information

Unless otherwise stated, external provider shall control the established documented information to provide evidence of conformity to requirements and retain them for a minimum period of thirty (30) years. The external provider shall address the following activities, as applicable, for the control of documented information:

- Distribution, access, retrieval, and use
- Storage and preservation, including preservation of legibility
- Control of changes (e.g., version control)
- Disposition
    - WCL shall be notified prior to destruction of any documented information and offered the option to transfer to WCL if disposition will occur before the required retention period
- Prevention of the unintended use of obsolete documented information by removal or by application of suitable identification or controls if kept for any purpose.

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

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

P16 Right of Access

External provider's system shall include right of access by WCL, their customer and regulatory authorities to all applicable areas of all facilities and to applicable documented information, at any level of the supply chain, involved in the order.

P17 DFARS Compliance

When applicable, external provider is subject to the requirements of DFARS 252.225-7003, 252.225-7008, 252.225-7009 and 252.225-7010.

A statement certifying compliance to DFARS 252.225-7003, 252.225-7008, 252.225-7009 and 252.225-7010 shall be included for each shipment of item delivered. This statement may be included as a part of the Certificate of Conformance. The statement shall identify the material or item by lot, date of manufacture, and/or serial number, revision date and/or grade, as applicable.

DFARS requirements may be found at
http://www.acq.osd.mil/dpap/dars/dfars/html/current/252225.htm

P18 First Article Inspection

The external provider shall use a representative item from the first production run of a new part or assembly to verify that the production processes, production documentation and tooling are capable of producing parts and assemblies that meet requirements. This process shall be repeated when changes occur that invalidate the original results (e.g., engineering changes, manufacturing process changes, tooling changes). First article inspection may be accomplished in accordance with the requirements of AS9102 or equivalent.

P19 Source Inspection

When required, WCL and/or its customers or government representatives will inspect the products submitted on the applicable purchase order at the external provider's facility.

Source inspection acceptance by WCL and/or its customers or government representatives shall not constitute final acceptance of the items procured, nor shall it relieve the external provider of their responsibility to furnish acceptable product.

As applicable, external provider shall notify WCL Quality Department 48 hours in advance when order is ready for source inspection.

P20 Conflict Minerals “The Dodd-Frank Wall Street and Consumer Act”

The Security and Exchange Commission (SEC) has imposed that publicly traded companies report of any product containing Tantalum (and all its derivatives), Tin, Tungsten or Gold from the Democratic Republic of Congo, Angola, Burundi, Central African Republic, Rwanda, Tanzania, South Sudan, Uganda and Zambia. WCL is expecting you as a external provider to perform a due diligence effort to make these determinations. It will be required that you do not knowingly supply any product that contains these minerals from the above listed countries based on the concerns that the revenues obtained from the mining and transport of conflict minerals aid in financing the ongoing conflict in the Democratic Republic of Congo (DRC) and the surrounding countries.

P21 Counterfeit Materiel Prevention

External provider shall establish and maintain a Counterfeit Materiel Prevention and Control Plan per AS6174 (Section 3) to ensure counterfeit parts are not delivered to WCL. Counterfeit materiel prevention program should consider:

- Training of appropriate persons in the awareness and prevention of counterfeit parts
- Application of a parts obsolescence monitoring program
- Verification and test methodologies to detect counterfeit parts
- Monitoring of counterfeit parts reporting from external sources
- Quarantine of suspect or detected counterfeit parts

External provider shall:

- Ensure that counterfeit materiel has not been delivered and shall ensure that only new and authentic materials are used in materiel delivered to WCL.
- Only purchase materiel directly from original or authorized manufacturers, authorized distributors, or other approved sources
- Maintain a method of commodity and item level traceability for assuring traceability of parts and components to their original or authorized manufacturers, authorized distributors, or other approved sources
- Immediately notify WCL with the pertinent facts if external provider becomes aware or suspects that it has furnished counterfeit materiel. When requested, the external provider shall provide documentation that authenticates traceability of the affected items to an original manufacturer or authorized distributor chain that identifies the name and location of all the supply chain intermediaries from the part manufacturer to the direct source of the product.

WCL will take all necessary actions to prevent reentry into the supply chain if counterfeit materiel is determined to be received, including physically rendering the counterfeit materiel unusable.

P22 REACH/RoHS Compliance

If applicable, external provider shall ensure the following requirements are met if REACH and/or RoHS compliance is called out on the purchase order.

- REACH
  (Registration, Evaluation, Authorization, and Restriction of Chemicals) in accordance with European Union Regulation (EC) 1907/2006
    - Substances of Very High Concern (SVHC): No substances identified in the Candidate List of SVHC are present in articles above a concentration of 0.1% weight by weight (w/w):
        - Candidate List of SVHC
          https://echa.europa.eu/candidate-list-table
    - Restricted Substances: No substances identified in the Annex XVII of restricted substances are present in articles outside the consequent restriction conditions:

- Annex XVII of Restricted Substances
  https://echa.europa.eu/substances-restricted-under-reach

- RoHS, RoHS2 & RoHS3
  (Restriction of Hazardous Substances Directive) in accordance with EU Directive 2002/95/EC (RoHS) & Directive 2011/65/EU (RoHS2), respectively and Commission Delegated Directive (EU) 2015/863
  - No restricted substances identified below are to be present in homogeneous materials above the listed concentration values by weight:
    - Cadmium (0.01 %)
    - Lead (0.1 %)
    - Mercury (0.1 %)
    - Hexavalent chromium (0.1 %)
    - Polybrominated biphenyls (PBB) (0.1 %)
    - Polybrominated diphenyl ethers (PBDE) (0.1 %)
    - Bis (2-ethylhexyl) phthalate (DEHP) (0.1 %)
    - Butyl benzyl phthalate (BBP) (0.1 %)
    - Dibutyl phthalate (DBP) (0.1 %)
    - Diisobutyl phthalate (DIBP) (0.1 %)

P23 Acceptance Authority Media (AAM)

External provider shall comply with the AS/EN/JISQ 9100 and 14 CFR Part 21.2 requirements regarding the application of AAM requirements.

When applicable, external provider shall, within its organization and its supply chain, ensure that the use of AAM is clearly defined within its quality management system.

Upon request, external provider shall be able to demonstrate evidence of communication to its employees and its supply chain of this requirement.

External provider internal audit shall include assessment to AAM requirements including, but not limited to the following:

- AAM application errors
- AAM application ultimate use
- AAM application misrepresentation
- AAM application training deficiencies

P24 Applicable Code of Federal Regulations (CFRs)

External provider shall comply with the following:

i. 48 CFR 52.222-50, Combating Trafficking in Persons
   a. Requirements may be found at https://www.acquisition.gov/far/52.222-50 or https://www.ecfr.gov/

P25 European Union (EU) Sanctions on Russia-Origin Products Compliance

Regulation European Union (EU) 2023/1214 of 23 June 2023, amending Regulation (EU) No. 833/2014, prohibits the import into the European Union, and direct or indirect purchase, of iron and steel products, as listed in Annex XVII of Regulation (EU) No. 833/2014, that originated in Russia or were exported from Russia.

WCL aims to ensure that these requirements are met for the manufacturing of our products.

External provider is to ensure the following, regarding all iron and steel products provided to WCL, and as listed in Annex XVII of Regulation (EU) No. 833/2014:

- Iron and steel products are not imported or purchased, directly or indirectly, iron and steel products, as originated in Russia or exported from Russia
- Iron and steel products are not processed in a third country, incorporating iron and steel products, as originated in Russia, or exported from Russia

External Provider is to notify WCL, in writing, of any information that contradicts the above statements immediately upon receipt of such information.

3. REVISION HISTORY

Revision	Date	Revision Record
NC	11/29/2010	Initial issue.
A	10/24/2013	Updated section 2.1 and provisions P16, P17 and P18. Added provision P19.
B	02/24/2014	Added provision P20.
C	08/16/2016	Updated sections 1.3 and P13.
D	09/20/2016	Added provision P21.
E	05/16/2017	Was: QP-7.4.3 External provider Purchase Order Provisions; Is: QP-843 Information for External Providers Fully updated in accordance with the requirements of AS9100:2016.
F	09/20/2017	Updated provision P21. Added provision P23.
G	04/26/2019	Updated provision P22.
H	09/14/2020	Updated P22 to remove number of SVHC and restricted substances (current number noted on website). Added provision P24.
I	12/21/2023	Updated provision P25.
J	09/26/2025	Updated to reflect Monroe WCL, LLC (references, logos, document approval, etc.). Update P15 from ten (10) years to thirty (30) years.