Supplier Manual

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Approved by:

INTRODUCTION

Welcome to Colson

Colson Group is the largest manufacturer and distributor of caster and wheel products in the world. Over 1,600 global employees support Colson Group's leading product portfolio and proprietary global value chain. World renowned brands, such as: ***Colson, Albion, Shepherd, Jarvis, Rhombus, MedCaster, Revvo, Pemco, Faultless,*** *and* ***Bassick*** are manufactured and marketed around the world through Colson Group's 25 global facilities – where over 192,000 products are shipped out every day.

Introduction to Manual

In today's manufacturing environment, product that is found to be non-conforming at receiving, or during production, causes serious disruptions of the production and shipping schedules, resulting in high production costs. Even the best Receiving Inspection program cannot detect all defective material. Colson requires suppliers to control the quality of material shipped to Colson, so that Colson does not need to inspect the product when it is received.

This manual describes Colson's expectations for its suppliers in order to ensure that purchased material meets Colson's requirements.

Scope

This information applies to all suppliers who have interest in doing business with Colson. It also applies to Colson's outsourced partners or subsidiaries.

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1.0 Quality Management System Requirements

1.1 Quality Management System

Each Colson supplier should, at a minimum, maintain an effective quality management system compliant to the latest ISO 9001:XXXX Quality Management System standard or equivalent. Suppliers not compliant to this standard will only be considered for new business if a compliance commitment letter is signed by the supplier's senior leadership and submitted to Colson. In addition, the supplier must meet all other requirements of this manual.

1.2 Control of Sub-tier Suppliers

Suppliers are responsible for the quality of materials and components provided by their sub-tier suppliers and sub-contractors even if Colson directed sourced. Colson suppliers must impose controls on their sub-tier suppliers that provide quality results and documentation comparable to the controls applied to suppliers by Colson. The extent of the controls may vary, depending on the nature and complexity of the product and processes, but should normally include:

- Evaluation and qualification of sub-tier supplier facilities
- Control to ensure that raw materials used meet Colson's requirements
- Controls to ensure that the sub-tier suppliers of components used are those approved by Colson, where applicable.
- Part qualification, including use of AIAG APQP/PPAP processes, first article inspection and process capability studies as applicable.
- Control of drawings/revisions
- Control of nonconforming material
- Corrective action and preventive action programs
- A continuous quality improvement program

Colson reserves the prerogative to evaluate the quality system and records of such sub-tier suppliers as necessary. In the event of Colson's involvement, it does not absolve suppliers of the ultimate responsibility for the quality performance of their sub-tier suppliers.

2.0 Supplier Qualification Process

All suppliers of production materials to Colson must be qualified suppliers. The extent of the qualification process is dependent upon the criticality of product purchased and other factors determined by Colson. The qualification process in its most complete form consists of three parts:

- A questionnaire completed by the supplier.
- A quality management system self-assessment completed by the supplier, using the Colson supplier assessment survey form.
- An on-site assessment by Colson personnel or their authorized agents.

Colson periodically reevaluates suppliers through the use of quality performance data and/or on-site assessments.

2.1 New Supplier Questionnaire

In the early stages of the supplier selection process, potential suppliers are sent a questionnaire. This questionnaire solicits general information about the company such as location(s), size, capabilities, and financial stability as well as detailed questions regarding the Company's quality management system and quality history.

2.2 New Supplier Self-Assessment

When a new supplier is being considered, they are sent a quality management system self-assessment survey form. The supplier completes the self-assessment and returns it along with a copy of their supporting documents. Colson will review to determine if the documented quality system meets Colson's requirements.

2.3 On-Site Assessment

For suppliers of critical components, an on-site assessment of the supplier's facility may be performed. The on-site assessment includes three components:

- A quality assessment to determine whether the supplier's quality management system is in place and functioning effectively.
- A business assessment to determine whether the supplier has financial resources, production capacity, and other business resources needed to fulfill Colson's production needs.
- A technology assessment to determine whether the supplier has the needed technical resources, including production and inspection equipment, facilities, engineering resources, etc.

If the assessment team determines that the supplier meets Colson's requirements, Colson qualifies the supplier to bid on new business and supply production materials.

2.4 Periodic Reevaluation

Colson periodically reevaluates current production suppliers through the use of quality performance data and/or on-site assessments. If requested, the supplier shall make their facility available for on-site process verification by Colson personnel, with reasonable notice.

3.0 Part Qualification

The supplier is responsible for submitting all PPAP or First Article data requested by Colson on the first article requirements checklist. Colson and the supplier will agree on the number of the samples required to support this requirement. Where possible, all qualification documents should be submitted to the appropriate supplier quality engineer in electronic format (preferably Adobe Acrobat or Microsoft Office). Unless otherwise specified in the purchase agreement, the default requirement will be AIAG PPAP Submission Level 3.

In some cases, Colson personnel may wish to be present during the initial production run.

3.1 PPAP / First Article (FAI) Requirements Checklist

For each new or changed part, Colson sends the supplier a PPAP or First Article Requirements Checklist. This checklist details information that must be submitted for qualification of the component or assembly. The checklist items selected may vary based on the application, type of component or assembly to be supplied.

3.2 Dimensional Inspection Report

For dimensional inspection reports, the supplier should consult with Colson on the appropriate number of parts to be inspected. The supplier inspects or tests each sample against all dimensions, drawing notes, and specification requirements listed on the current revision of the Colson drawing and/or specification. The supplier records the results on the appropriate dimensional layout form using a ballooned copy of Colson's drawing and/or specification to correspond with the supplier's results.

The dimensional inspection report must include the specification number, specified requirements, and the inspection/test results. A simple statement that the material meets the requirements is not acceptable. Each report must be traceable to the supplier's material, through lot/heat/coil/batch numbers or equivalent, and must be signed by the organization that performed the testing. For any requirements that the supplier does not have the equipment to inspect or test, the supplier shall obtain reports from their sub-supplier or other test agency.

3.3 Material Certification/Test Report

When requested, the supplier must provide a material certification/test report. This report must include the specification number, specified material and/or physical requirements, and the inspection/test results. A simple statement that the material meets the requirements is not acceptable. Each report must be traceable to the supplier's material, and must be signed by the organization that performed the testing.

3.4 Control Plan

The supplier must develop a control plan, and submit it for approval as requested. The control plan is a detailed description of the supplier's proposed processing steps required to produce the part, and the controls that are put into place to control the quality at each step. The control plan must include all in-house processing, external processing, inspection, packaging, and shipping. Suppliers may use their own format but must meet AIAG Control Plan format guidelines. Measuring devices and fixtures designed and built to check Colson parts must be identified with a gage number and drawing, and must be listed on the control plan.

The control plan must include all critical characteristics (product and process). Where detailed instructions are required, the supplier details those instructions in a work instruction, or equivalent, which must be listed in the control plan. Inspection methods, sample sizes, and sampling frequencies should be based on the process capabilities, seriousness and likelihood of potential non-conformances, and process stability.

Critical characteristics that do not meet Colson's process capability requirements must be inspected 100%, unless Colson approves alternate control methods in writing.

It is the supplier's responsibility to identify any Pass Thru Characteristics (PTC) during activities from the APQP process and must be indicated as such on the appropriate PFMEA and Control Plan.

3.5 Material Safety Data Sheets (MSDS)

As applicable, Material Safety Data Sheets (MSDS) must be provided during PPAP/FAI process.

3.6 Government and Regulatory Compliance

Supplier's manufacturing processes and products, including purchased products, shall conform to applicable local, state and national laws and regulations (e.g. conflict minerals). Laws and regulations include those related to health, safety, environment, toxic and hazardous materials. Unless otherwise communicated in writing to the supplier, all components must be RoHS compliant Suppliers shall provide declarations of conformance as requested. Additional requirements shall be communicated to the supplier through the purchase agreement or design record (e.g. REACH).

3.7 Traceability

The supplier should plan for traceability of components. The supplier should provide a written plan specifying how components will be marked with serial or lot numbers and date codes if required, or how containers will be identified with lot numbers or date codes if component marking is not required. The plan will also include sizes of lots or batches. Where possible, batch sizes should be minimized to aid in containment should quality problems be found.

3.8 Delivery

The supplier shall deliver product to Coslon in accordance with the PO release requirements received and maintain an on-time delivery performance rating acceptable to Colson expectations. Missed shipments or deliveries that are not authorized by Colson may be subject to expedited mitigation at the supplier's expense.

4.0 Manufacturing Control

4.1 Process Control

Colson suppliers are required to control all manufacturing processes in accordance with the control plan, which is approved during part qualification.

4.2 Statistical Process Control

Where specified by a critical characteristic designation on the Colson drawing, the supplier is required to apply effective statistical process controls to demonstrate both short and long term capability of Cpk>1.33 or greater. Effective controls must include:

- The control chart displays control limits that are correctly calculated (specification limits may not be used as control limits).
- The control chart is at the process area, visible to the operator, or persons who are responsible for controlling the process.
- For each out-of-control condition, actions are taken to bring the process back into control. Actions taken to bring the process back into control are recorded.
- Product produced during any out-of-control condition is sorted, scrapped, reworked or dispositioned through the supplier's material review process

4.3 Lot Control

A lot consists of product of one part number and revision that are made at the same time, under the same processing conditions, from the same lot of raw materials. The primary purpose for identifying lots is to determine the scope of actions that must be taken when problems arise during further manufacturing or with customers. Each container of material shipped to Colson must be identified with the Supplier's lot number. Inspection records must be traceable to lot numbers.

The following are typical conditions that result in a change of lot numbers:

Change of part number or revision
Change of part number or revision of components
Interruption of continuous production (typically for more than a few hours)
Repairs or modification to the tooling or equipment
Tooling changes (other than minor adjustment or replacement of consumable tooling)
Change to a different lot of raw materials
Process changes

4.4 Traceability

Traceability ties finished product back to the components used in the product. When traceability is specified, the traceability marking should be effective down to the individual component (i.e., lot code, batch or serial should be identifiable throughout Colson's processes).

4.5 Workmanship

When workmanship standards are not referenced on Colson drawings or specifications, the supplier is expected to follow industry-accepted standards (e.g. ANSI, IPC). When in doubt, consult with Colson for clarification.

4.6 Safety

At no time should any customer, or person at a Colson facility, be exposed to hazardous material or situations that are not inherent in a component's structure. Residues, films, out-gassing products and

packaging materials should comply with OSHA (Occupational Safety & Health Association) standards. For items with inherent hazards, safety notices must be clearly observable. As applicable, MSDS sheets must be provided during the PPAP / FAI process.

4.7 Maintenance

The supplier must maintain all facilities, manufacturing machines, tooling (including Colson owned tooling) measuring devices, and other equipment in such a manner that the supplier can support Colson's production requirements, and the quality of parts manufactured for Colson is not degraded in any way. The supplier is required to identify all Colson owned tooling with an appropriate asset tag and maintain a listing of these tools. The supplier should identify all critical equipment and spare parts so as to mitigate any potential delays in fulfilling orders. Orders missed due to lack of machine availability that are not communicated to Colson proactively will be the responsibility of the supplier to cover all associated costs (e.g. customer penalties; air freight, etc.) to fulfill the order through the most expedient method available while not compromising product integrity.

5.0 Supplier Performance

5.1 Supplier Scorecards

Colson Group will provide monthly scorecards to suppliers as a method to communicate supplier performance against established performance targets. Although a supplier may satisfactorily meet performance targets, Colson Group expects suppliers to drive continuous improvement into their business and manufacturing operating systems. With this philosophy, Colson Group supports a "drive for zero" communication on supplier performance: Zero CPAR (PPM to our customers); Zero DMR's (No Colson plant line disruptions); Zero PPM.

The Scorecards will consist of the following metrics which suppliers are expected to meet against agreed targets. Failure to meet the expectations of Colson Group may result in one or more performance mitigation activities at the supplier's expense:

- Expedited Shipments
- Third Party containment (CS2)
- Focus Supplier Activity
- New Business Hold
- On-site Assessment (Section 2.3)

6.0 Drawings/Changes

6.1 Drawing and Change Control

The supplier should have a documented system for assuring that the latest Colson drawings are in effect at their facility for all parts shipped to Colson. Exceptions to this (e.g. raw material, etc.) must be approved by Colson purchasing. The supplier's quality management system should contain a documented procedure that describes the method used for the receipt, review, distribution, and implementation of all changes to drawings and specifications. In addition, the procedure should address control of obsolete drawings and specifications. A documented procedure should also detail the method used to contain new or modified parts until approved by the customer.

6.2 Process Changes, Engineering Changes

Suppliers must have systems in place to control changes to drawings, specifications, processes, or produced parts. Systems should be capable of handling changes being requested by the customer, and also changes requested by the supplier.

NOTE: **<u>Suppliers may not make any changes in their process, location, material, sub-supplier, or to the part without written approval from Colson</u>.** The supplier must formally request a product or process change on all Colson components through the SPCR process.

6.3 Supplier Process Change Request (SPCR)

A Supplier Process Change Request (SPCR) is used to request a change to a released part, process, drawing, or specification. Colson requires SPCRs obtain approval by authorized representatives from product engineering and the receiving facility quality function. Colson requires a minimum of 3 weeks for review and disposition notification of a submitted SPCR. Notification of SPCR disposition (approval or rejection) by Colson will communicate any appropriate requirements needed prior to implementation by the supplier (e.g. PPAP/FAI, testing, etc.). If no requirements are identified with approval, it is the responsibility of the supplier to validate the change and update all relative internal process documentation in accordance with the requirements of AIAG PPAP.

The originator of an SPCR includes the following information:

- Drawing or part number
- Drawing or part title
- Description of problem or recommended change
- Reason for change or "rationale"
- Proposed effective date

The supplier submits the SPCR with any applicable supporting documentation to Colson for evaluation and approval.

When monitoring is required, the appropriate markings must be identified on the lots etc. for a specified time frame as decided jointly with Colson and the supplier.

6.4 Supplier Deviation Request

A supplier is never permitted to knowingly ship product that deviates from the print, specification limits, or design intent without written authorization from Colson. If such a condition exists, the supplier may request Colson to allow shipment of the product. This is accomplished by initiating a Deviation Request.

If directed by Colson, the supplier must send samples of non-conforming items to Colson for evaluation. The cost of any testing required to determine the acceptability of the product will be charged to the supplier. Colson will determine the item's acceptability and what corrective actions (if any) are required beyond the deviation. If approved, Colson will send a written deviation approval to the supplier.

The deviation is only intended to be an interim action and **is not** to be construed as an engineering change. The supplier must begin work immediately to correct the condition in question. This must be accomplished within the time frame stated on the deviation. Failure to comply with the mutually agreed upon closure date for the deviation may result in the supplier's rating being affected.

In all cases, the supplier must fully contain all product suspected of being non-conforming at their facility. In addition, the supplier may be required to sort any suspect product at Colson.

Any parts sent to Colson that have been approved on a Deviation must be clearly identified on the box, container, or other packaging method with the appropriate markings decided jointly by Colson and the supplier.

7.0 Packaging & Labeling

7.1 Packaging

Each supplier must adequately plan for packaging. Colson encourages supplier-initiated packaging improvements. Suppliers will provide packaging that provides protection from any damage that may occur. Packaging, labeling, and shipping materials must comply with the requirements of common carriers, in a manner to secure the lowest transportation costs.

Expendable materials and packaging must be legal and safe for standard "light industry" disposal and be compliant to international (customs) transportation standards when necessary.

When more than one part number or lot number is packaged in a shipping container, each part number and/or lot number must be separately packaged (i.e. bags or boxes) inside the container, with each labeled as to the contents.

All kits must be individually packaged within the shipping package so that the full content of one kit is inclusive.

All supplier packaging must be approved by the Colson receiving location prior to production shipments. The use of a packaging approval form is recommended and may be required by Colson as part of the Colson Part Qualification process.

7.2 Labeling

All suppliers must adhere to Colson's requirements as per Colson Labeling standard.

8.0 Corrective Action System

Colson encourages suppliers to utilize a closed-loop corrective action system when problems are encountered in their manufacturing facility, or after nonconforming product has been shipped to Colson.

8.1 Corrective Action Process Approach

The corrective action system utilized should be similar to the process outlined below. The focus should be on identifying the root cause(s) of the problem and taking action to prevent its recurrence.

- Use a team approach
- Describe the problem
- Contain the problem
- Identify and verify root causes(s)
- Implement permanent corrective actions
- Verify corrective action effectiveness
- Close the corrective action

8.2 Supplier Corrective Action and Responsiveness

Colson Group issues real-time DMR communications and requires appropriate actions to be taken within a timely manner to ensure supply continuity. The required actions by your company and timing are outlined below.

- **24 Hour Containment.** The supplier is required to provide immediate containment, sorting, and certification activities on all suspect product(s) at the affected Colson and/or Colson customer facilities in an effort to isolate, insulate and eliminate all nonconforming products from the supply chain. This containment may be done by one or more of your employees or by an Colson approved 3rd party containment company at your company's expense.
    - Note: If your company chooses to perform the containment action itself and requires assistance from a temporary labor firm, a representative from your company must be on-site to manage all of the temporary firm's activities.
    - Note: Failure to provide certified product within the required 24 hr timeframe may result in containment to be initiated by Colson at your expense.
    - Note: Colson may initiate containment prior to 24 hours at the supplier's expense in order to sustain immediate production needs.

- **Controlled Shipping – Level 1 (CS1).** CS1 must be implemented at your facility beginning immediately after the DMR is received and must remain in place until the DMR is closed. The results of the CS1 inspection should be sent electronically to the Quality Representative who issued the DMR prior to each shipment of parts for the duration containment is in place. If your CS1 inspection is determined ineffective (e.g. escape of the same defect to Colson during the quarantine period), a mandatory Controlled Shipping level 2 (CS2) inspection (CS1 + 3rd party containment action) will be required at your location and expense by a 3rd party.

- **Five (5) day Root Cause Analysis.** Root cause response must include evidence of analysis in determining both the escape and occur points of the non-conformance as part of the corrective action report (e.g. 5 Why, Fishbone, etc.). This part of the corrective action report should be completed within 5 working days of the DMR being issued.

- **Ten (10) day Permanent Corrective Action.** The corrective action plan must be identified and reported on the corresponding corrective action report within 10 working days of the DMR being issued. The requirement for CS1 inspection will not be removed until implementation of the corrective action plan can be verified and is approved by the issuing plant Quality Representative via e-mail notification.

Thirty (30) day Automatic Return. Material on Quality Hold that does not have an approved mitigation plan by the supplier (e.g. certification action identified, RMA for return, etc.) may be returned to the supplier

or scrapped after 30 days from DMR issuance at the supplier's expense. The above stated process is a well-established expectation in the industry and is necessary if we are to achieve the high level of supply chain performance required by our customers.

8.3 Cost of Poor Quality (COPQ) Recovery

- The supplier shall be responsible for all costs incurred by Colson and its customers in conjunction with a corrective action or any failure of the supplier's deliverables. Colson may take immediate actions to satisfy customer requirements while notification of the issue is provided to the supplier. A supplier shall respond to any debit notifications within 10 days.

- Potential costs incurred include, but are not limited to:

    - Incoming inspections
    - Necessary sorting activities
    - Return shipments or shipments to a third part location
    - Analysis of warranty and field returns
    - Rework, repair or scrap of product at Colson and/or its customer facilities
    - Premium Freight Charges
    - Process changes for accommodating product
    - Additional inspections or process controls
    - Costs to manage action items

9.0 Supplier Monitoring

Colson continually monitors its suppliers to ensure they continue to meet Colson's requirements, and to ensure that the supplier continues to ship acceptable parts. This may consist of:

- A quality management system surveillance audit at the supplier's facility
- An on-site audit of the supplier's control plan
- A random incoming inspection audit of a batch of product
- Source inspection of product at the supplier's facility
- Review of supplier-furnished data packages
- A supplier progress review meeting conducted periodically at the supplier's site or Colson to review supplier performance and progress

9.1 Supplier Audits

Periodically, Colson may audit the supplier's quality management system. The supplier must make their facility available for on-site process verification by Colson personnel at any time, with reasonable notice. This may be a full or abbreviated documentation and on-site audit. The purpose is to evaluate any changes that may have occurred in the supplier's quality management system, and to assess the supplier's continuing commitment to quality improvement.

Periodically, Colson may also audit the supplier's continuing conformance to the control plan approved in the First Article process.

9.2 Inspection Audits

Colson expects its suppliers to furnish material that conforms to all requirements, and that does not need to be inspected when Colson receives it. Colson may uses a C=0 sampling plan (see example in Appendix 1) that rejects the entire lot when a single non-conforming part is found in the sample. At Colson's discretion, in order to meet production requirements, 100% sorting may be done as necessary at the supplier's expense.

Colson may inspect product at the supplier's facility to detect potential problems prior to shipment. Colson may also inspect product at sub-tier suppliers.

9.3 Supplier-Furnished Lot Documentation

Colson may require the supplier to furnish inspection, test, process performance, or other quality data with each shipment to ensure that the product meets Colson's requirements. When data submission is required, the data must accompany each shipment, or be e-mailed or faxed to Colson at the same time the lot is shipped. All documentation must be clearly identified with Colson's part number, and the supplier's lot number.

Appendix 1

C = 0 SAMPLING PLAN

	.010	.015	.025	.040	.065	.10	.15	.25	.40	.65	1.0	1.5	2.5	4.0	6.5	10.0
LOT SIZE	**SAMPLE SIZE**															
2 to 8	*	*	*	*	*	*	*	*	*	*	*	*	5	3	2	2
9 to 15	*	*	*	*	*	*	*	*	*	*	13	8	5	3	2	2
16 to 25	*	*	*	*	*	*	*	*	*	20	13	8	5	3	3	2
26 to 50	*	*	*	*	*	*	*	*	32	20	13	8	5	5	5	3
51 to 90	*	*	*	*	*	*	80	50	32	20	13	8	7	6	5	4
91 to 150	*	*	*	*	*	125	80	50	32	20	13	12	11	7	6	5
151 to 280	*	*	*	*	200	125	80	50	32	20	20	19	13	10	7	6
281 to 500	*	*	*	315	200	125	80	50	48	47	29	21	16	11	9	7
501 to 1200	*	800	500	315	200	125	80	75	73	47	34	27	19	15	11	8
1201 to 3200	1250	800	500	315	200	125	120	116	73	53	42	35	23	18	13	9
3201 to 10,000	1250	800	500	315	200	192	189	116	86	68	50	38	29	22	15	9
10,001 to 35,000	1250	800	500	315	300	294	189	135	108	77	60	46	35	29	15	9
35,001 to 150,000	1250	800	500	490	476	294	218	170	123	96	74	56	40	29	15	9
150,001 to 500,000	1250	800	750	715	476	345	270	200	156	119	90	64	40	29	15	9
500,001 and over	1250	1200	1112	715	556	435	303	244	189	143	102	64	40	29	15	9

*Indicates entire lot must be inspected
NOTE: The Acceptance Number in all cases is ZERO.