
FISK ALLOY, INC SUPPLIER QUALITY MANUAL

Revision	Date	Description of Change	Documented by	Approved by
B	04/25/2018	Revised section 2 Added section 5.13 Added section 5.14 Revised the description of the performance levels	A. Dodokh	M. Scott
C	11/12/2019	Adjusted section 5.12 – Evaluation Criteria Added section 5.16 Material Obsolescence Added section 5.17 FOD	A. Dodokh	B. Yankovich
D	5/11/2020	Revised section 5.13 - Document and Data Control – Included the activity after the retention period	A. Dodokh	B. Lennon
E	01/28/2022	Added Section 5.1 – Right of Access, 5.9 – Control of Non-Conforming Products and updated Section 5.11 to add Existing Supplier/Products.	S. Gardazi	J. Meringer
F	09/30/2022	Added Section 5.15, 5.22, 5.23. Updated section 5.2 to have requirement of compliance with Dodd Frank/ Conflict Minerals requirement.	S. Gardazi	J. Meringer
G	02/28/2024	Removed Formal Acknowledgment Form.	S. Gardazi	J. Meringer
H	7/22/2024	Revision Notes in UP	C. Giordano	J. Meringer



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1. Purpose and Scope

Fisk Alloy, Inc. produces highly engineered copper alloy wire and conductors for a large range of applications. All of Fisk's products are made to order and are technically demanding, as are our customers and the markets they serve. Making quality and consistency paramount.

This Supplier Quality Manual is integral to compliance of the Fisk Alloy, Inc. Quality Management System with ISO 9001:2015 and AS9100 Rev. D as well as the stipulated requirements of our customers. This document is applicable to all Fisk Alloy, Inc. raw material and external manufacturing process suppliers.

2. Supplier Quality Manual Acknowledgement

Acceptance of Fisk's purchase orders or completion of the acknowledgement form listed on Page 11, shall be considered as evidence of acknowledgement and approval of this manual.

3. Confidentiality:

All Fisk products, processes, and specifications are confidential and may not be shared with any third party without the formal written agreement of Fisk Alloy, Inc.

4. Fisk Expectations:

Derived from Fisk's customers' requirements, Fisk's expectations include, but are not limited to, the following:

- Fisk expects the suppliers to meet 100% on time delivery requirements.
- Fisk expects that all products will be delivered defect free per Fisk purchasing specifications.
- Fisk product suppliers agree to meet the requirements laid forth in this document.

5. Requirements:

5.1. Right of Access

Suppliers shall provide Fisk, its Customers, and regulatory authorities access to the applicable areas of their facilities and applicable documented information for cooperation on products, processes, and business issues.

5.2. Environmental Compliance

Fisk requires all suppliers to meet the latest requirements, where applicable, of:

- Restriction of Hazardous Substances Directive (RoHS)
- Registration, Evaluation, Authorization and Restriction of Chemicals (REACH)
- Dodd-Frank Act Section 1502 (“the Act”) reporting requirements, regardless of the country or countries in which it is doing business. For the minerals identified as Conflict Minerals, the supplier is expected to conduct a reasonable country of origin inquiry and proper due diligence to determine the conflict status of the smelter and/or mine.

Fisk reserves the right to request objective evidence of compliance. If requested, the objective evidence shall be supplied to Fisk in one of the following manners:

- Documented on Fisk form.
- Documented on the supplier’s form, if it is approved by Fisk Compliance team.

In addition, the suppliers shall provide Safety Data Sheets (SDS) related to the product and/or service supplied as applicable, upon request.

5.3. Quality Management System Compliance

Fisk’s suppliers’ Quality Management System must comply with the following requirements:

- Suppliers are required to implement and maintain a Quality Management System which ensures that all of Fisk’s requirements are met.
- It is desired that the Quality Management System of each supplier complies with the latest revision of the ISO 9001 and/or AS9100 standards. Evidence of compliance must be supplied to Fisk by providing a current ISO 9001 and/or AS9100 certificate. If the system does not comply with either of the referenced standards, the supplier’s QMS will be evaluated per PUR-134P - Assessment of Suppliers procedure.

5.4. Purchasing

It is the responsibility of Fisk’s suppliers to ensure that copies of Fisk’s purchasing specifications, to their latest revision as specified on the purchase orders, are obtained and

maintained in a secure manner, and are not shared with any outside parties without a formal documented and signed agreement with Fisk.

Fisk reserves the right to verify that the purchased product meets purchasing specifications and information provided on the purchase order. If the product or service does not meet the Fisk requirements listed on the purchase order and/or the purchasing specification, it is then considered non-compliant and is subject to return.

The suppliers are required to provide a Certificate of Compliance (CofC) with each shipment that includes, at a minimum:

- The related purchase order number.
- The purchasing specification number, if supplied on a Fisk purchase order.
- The date of shipment.
- The lot and heat numbers related to the shipment (raw material suppliers).
- The actual chemical analysis (raw material suppliers).
- The actual testing values of the required physical and mechanical properties of the product.
- The total net quantity shipped.

5.5. Packaging

It is the responsibility of suppliers to assure that the products shipped to Fisk are protected from damage by external and environmental factors. Fisk reserves the right to reject a product if it is received in a damaged condition.

5.6. Labeling

Products provided by suppliers must have identification labels on each packaged unit that are referenced in the Packing List and the C of C received at Fisk. The label IDs must be visible upon receipt. Each packaged unit must be traceable throughout its processing cycle using a unique identifier included on the label.

5.7. Traceability

Fisk's suppliers must implement a traceability system that meets the latest revision of the ISO 9001 and/or AS9100 standards. The suppliers shall guarantee that the products provided to Fisk are traceable throughout their processing cycle in a suitable manner prior to shipping. Fisk reserves the right to request the traceability information of any supplied product when deemed necessary.

5.8. Monitoring and Measurement

The suppliers must ensure that the Monitoring and Measurement (M&M) activities utilized for measuring the supplied product comply with the latest revision of the ISO 9001 and/or AS9100 standards.

The suppliers must implement a calibration system that complies with the latest revision of the ISO 9001 and/or AS9100 standards. At a minimum, the system must include:

- Records of calibration.
- Date of calibration.
- Results of calibration.
- The next required calibration date.

Fisk reserves the right to audit the supplier's calibration and M&M systems to ensure their compliance.

5.9. Control of Non-Conforming Products

The suppliers are required to notify Fisk about escaped non-conforming products and make all necessary arrangements for immediate containment and product recall if necessary.

The advance notification shall include details of product information, nature of non-conformity, manufacturing date, lot and part traceability information to the point of origin, containment plan, and actions in all locations and en-route.

The suppliers shall request a formal deviation from Fisk Quality or the Supply Chain department on any non-conforming product before it ships. Fisk reserves the right to return non-conforming product(s) shipped without obtaining a written deviation from Fisk Quality or Supply Chain personnel.

5.10. Corrective Action

The suppliers are required to have a documented procedure that governs the Root Cause (RC) analysis and Corrective Action (CA) processes. If a product is found to be non-compliant, the suppliers must:

1. Provide a containment action plan within 48 hours that includes a disposition plan to be approved by Fisk.
2. Complete the RC analysis and develop a corrective action (s) plan within 20 business days.
3. The completion of the verification activities and the documentation of the lessons learned shall be communicated to Fisk after the implementation of the corrective action (s).

If any of these timelines cannot be achieved, the suppliers must inform Fisk's Quality Assurance team about the delay and submit a request to extend the timeline. Documentation of the RC analysis, CA implementation, and the verification activities must be communicated to Fisk using Fisk's Supplier Corrective Action Request (SCAR) form, PUR-131F, or equivalent form as approved by Fisk. The claim shall not be considered closed until evidence of effective CA is submitted to and approved by Fisk.

5.11. New Suppliers/Products, Existing Suppliers/Products Evaluation and Approval

In addition to appropriate technical and process review and approval measures, prospective new suppliers must also submit information regarding their Quality Management System for evaluation. The suppliers must complete Fisk's Supplier Self-Assessment form PUR-132F.

Fisk reserves the right to perform an on-site audit if determined to be necessary. Additional requirements, such as PPAP, First Article Inspection, and representative trial samples may be requested to complete the verification or qualification activities.

5.12. Control of Changes

Fisk suppliers must formally notify Fisk of any changes related to the following:

- Material.
- Process.
- Manufacturing location.
- Manufacturing equipment.
- Sub-supplier.
- Monitoring and Measuring activities.
- Obsolescence.

The suppliers shall not implement any such changes without written approval by Fisk. Fisk reserves the right to reject the product received without formal authorization.

Prospective changes shall be communicated to Fisk's Quality and/or technical representatives via email. The notification shall be communicated six months prior to the implementation of the change. Fisk's reserves the right to request additional requirements, such as PPAP, First Article Inspection, and representative trial samples prior to the approval of the prospective change(s).

5.13. Sub-Supplier or Contractor Requirement:

The suppliers shall flow down the requirements presented in this manual to their suppliers if it affects the product or the service supplied to Fisk. This includes, but not limited to:

- QMS requirements.
- Environmental standards requirement, as applicable.
- Control of Changes requirements.
- Supplier qualification requirements.
- Slavery, Forced Labor & Human Trafficking

5.14. Supplier Evaluation/Scorecard

Fisk evaluates suppliers based on:

- Overall Quality performance.
- Overall On-Time Delivery performance.

The individual performance evaluation results are reported to each of Fisk's suppliers of raw material or manufacturing process product on a Quarterly basis.

Suppliers may review the evaluation report with Fisk if they believe it is not accurate. The Fisk team will review all information provided by the supplier and re-issue the report if appropriate.

Based on the performance levels and historical performance, the supply chain management and quality management will assign SCARs on a case-by-case basis.

5.14.1. Evaluation Criteria – On Time Delivery (OTD)

The supplier's delivery performance is rated based on the shipment receipt date at Fisk compared to the promise date provided by the supplier. If a delivery is received after the promised date, this will affect the overall OTD performance score. If a delivery is received before the promised date and there was an early delivery restriction in place, this will also affect the overall OTD performance score.

Fisk employs a four-level system to evaluate the delivery performance of the suppliers based on the percentage of late and/or early deliveries (as specified) and the overall number of deliveries received.

Level	Range
Excellent	Above 98%
Good	95%- 98%

Satisfactory	88% - 94%
Poor	Less than 88%

Excellent level: the supplier is encouraged to maintain this level of excellence.

Good level: the supplier is encouraged to achieve higher performance levels.

Satisfactory level: The supplier may be required to provide a corrective action plan using Fisk SCAR form PUR-131F or equivalent, to achieve higher performance levels. The corrective action timelines referenced in section (5.10) apply in this case.

Poor level: The supplier may be required to provide a corrective action plan using Fisk SCAR form PUR-131F or equivalent, to achieve higher performance levels. The corrective action timelines referenced in section (5.10) apply in this case. The suppliers may be subjected to an on-site audit by the Fisk team if deemed to be necessary or deemed to be not approved.

5.14.2. Evaluation Criteria – Quality Performance

The supplier's quality performance is rated based on the number of deliveries rejected compared to the overall number of deliveries.

Fisk employs a four-level system to evaluate the quality performance of the suppliers based on the percentage of rejected deliveries and the overall number of deliveries received.

Level	Range
Excellent	Above 98%
Good	95%- 98%
Satisfactory	88% - 94%
Poor	Less than 88%

Excellent level: the supplier is encouraged to maintain this level of excellence. Completion of Fisk SCAR form PUR-131F or equivalent, may be required for defective deliveries.

Good level: the supplier is encouraged to improve and achieve higher performance levels. Completion of Fisk SCAR form PUR-131F or equivalent, may be required for defective deliveries.

Satisfactory level: the supplier is encouraged to improve and achieve higher performance levels. Completion of Fisk SCAR form PUR-131F or equivalent, may be required for defective deliveries.

Poor level: the supplier is encouraged to improve and achieve higher performance levels. Completion of Fisk SCAR form PUR-131F or equivalent, may be required for defective deliveries. The supplier may be subjected to an on-site audit by the Fisk team if deemed to be necessary or deemed to be not approved.

5.15. Statistical Techniques:

Suppliers are expected to utilize appropriate statistical techniques for establishing, controlling, and verifying process capability for critical product characteristics when required by Fisk QOP.

5.16. Document and Data Control

The suppliers must implement a system that controls the documents and data related to the processes that could affect the product and/or service provided to Fisk. The Document and Data Control system must comply with the latest revision of ISO 9001 or AS9100 standards.

The suppliers must maintain and retain all the records related to shipments supplied to Fisk for at least 15 years. In addition, the records must be identifiable and maintained in a safe and secure environment.

At the end of the retention period, or upon any change in the status of the suppliers, which could lead to premature disposal of records, the suppliers shall contact Fisk prior to the disposition/disposal of any records. Fisk reserves the right to extend the retention period.

5.17. Resource Management

The suppliers shall determine and provide the resources needed to meet Fisk requirements. Personnel performing work affecting product quality shall be competent based on appropriate education, training, skills, and experience.

5.18. Counterfeit Parts

Fisk's suppliers must prevent the use of counterfeit parts. A counterfeit part is defined as follows: Intentional delivery of product that falsely imitates the genuine article per specified requirements, without disclosure to Fisk.

5.19. Awareness

Fisk's suppliers must ensure that their employees are aware of:

- Their contribution to the product or service supplied to Fisk.
- Their contribution to the product safety.
- The importance of ethical behavior.

5.20. Material Obsolescence

Obsolescent material is a material that Fisk suppliers will no longer manufacture or sell. The suppliers shall notify Fisk at least 180 days in advance if the supplier anticipates any of the raw material supplied to Fisk will be discontinued.

5.21. Foreign Object Debris (FOD)

The suppliers shall be responsible for maintaining the cleanliness of the raw material supplied to Fisk. This effort is performed to ensure that the raw material is free from FOD that may affect the form, fit, and function of the finished product.

5.22. Slavery, Forced Labor & Human Trafficking

The suppliers shall prevent and eliminate Slavery, Forced Labor, and Human Trafficking by:

- Supporting and respecting the protection of internationally proclaimed human rights.
- Being not complicit in human rights abuses
- Uphold the elimination of all forms of forced and compulsory labor.
- Uphold the effective abolition of child labor.
- Not allowing discrimination in employment and occupation.
- Working against corruption in all its forms, including extortion and bribery.

5.23. *Environmental Sustainability*

Suppliers shall work to promote socially responsible and environmentally sustainable practices by:

- o Supporting a precautionary approach to environmental challenges.
- o Undertaking initiatives to promote greater environmental responsibility.
- o Encouraging the development and diffusion of environmentally friendly technologies.