External Provider Quality Management System Survey

Section I. General Information

External Provider Name: ELEMENT BROKEN ARROW

Address: 3100 N Hemlock Cir City: Broken Arrow State: OK Zip: 74012-1115

Phone: (918) 258-6066 Fax: (918) 258-1154 Website: www.element.com

ORGANIZATION

Leadership	Name	Cell or Office No. & Ext.	Email Address
General Manager:	Jeff Simmons	(918) 258-6066	jeff.simmons@element.com
Purchasing:			
Quality:	Gil Monos	(918) 505-7129	gil.monos@element.com
Accounting:	Angie Foster	(918) 258-6066	angie.foster@element.com

LIST DESIGNATION OF BUSINESS AS APPLICABLE

- ■ LB = Large Business ☐ SB = Small Business ☐ SDB = Small Disadvantaged Business ☐ WOSB = Woman Owned Small Business
- ☐ HUBZONE = Hub Zone Business ☐ HBCU/MI = Historically Black Colleges, Universities and Minority Institutions
- ☐ VOSB = Veteran Owned Small Business ☐ SDVOSB = Service-Disabled Veteran-Owned Small Business
- ☐ ANC-LB = Alaska Native Corporations and Indian Tribes that are Not Small Business
- ☐ ANC-SB = Alaska Native Corp. and Indian Tribes that have not been Certified by the Small Business Admin. as a Small Disadvantage Business

As defined in Code of Federal Regulations Title 13, Chapter I, Part 121: https://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title13/13cfr121_main_02.tpl

As defined in FAR 52.219-1 Small Business Program Representations: https://www.acquisition.gov/sites/default/files/current/far/html/52_217_221.html#wp1135900

As defined in FAR 52.219-8 Utilization of Small Business Concerns: https://www.acquisition.gov/sites/default/files/current/far/html/52_217_221.html#wp1136032

Total # of Employees	# Employees in Production	#Employees in Quality
26	24	2

Major Product or Service: **Metallic and Non-Metallic Materials Testing Including Failure Analysis**

☐ Manufacturer ☐ Distributor ☐ Processor ■ Other ISO/IEC 17025 and Nadcap Accrediterd Materials Testing Laboratory

Section II. Corporate Social Responsibility (CSR) / Regulatory Compliance

COUNTERFEIT PREVENTION *AS9100 8.1.4*	1. Does the external provider have a process in place for counterfeit prevention of materials procured?	☐ YES	■ NO
	2. Does the counterfeit prevention process comply with applicable aerospace and/or regulatory standards? AS5553, AS6174, AS9120 and AS9100	☐ YES	■ NO
	3. Does the external provider have a method for controlling and segregating counterfeit material?	☐ YES	■ NO
CONFLICT MINERALS *Section 1502 of U.S. Dodd Frank Act*	1. Do you have a Conflict Minerals plan preventing the use of conflict minerals in your product or services per the Dodd-Frank Act of 2010?	☐ YES	■ NO
	2. Is any 3TG intentionally added or used in the product(s) or production process? If yes, please complete and submit current **Conflict Minerals Reporting Template**.	☐ YES	■ NO
CODE OF CONDUCT	1. Does your company have an established Code of Conduct Policy? ***If "NO", please click on link to review Senior plc Code of Conduct.*** *Website: https://www.seniorplc.com/investors/corporate-governance/corporate-governance.aspx. Right-click Senior Code of Conduct and select "OPEN LINK IN NEW TAB".*	■ YES	☐ NO

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Section III. Supplier ITAR/EAR Certification

STEICO Industries Inc. A Subsidiary of SENIOR Operations LLC, requires that its suppliers certify the following information to ensure compliance with the U.S. Government export/import laws and regulations including the U.S. Department of State, Directorate of Defense Trade Controls (DDTC), International Traffic in Arms Regulations (ITAR) and the U.S. Department of Commerce, Bureau of Industry and Security (BIS), Export Administration Regulations (EAR). The complete International Traffic in Arms Regulations (ITAR) can be found in the U.S. Department of State, Directorate of Defense Trade Controls, website at www.pmddtc.state.gov/

ITAR 22 CFR 120.15 and EAR 15 CFR Part 772 define a U.S. person as a person who is a lawful permanent resident as defined by 8 U.S.C.1101(a)(20) or who is a protected individual as defined by 8 U.S.C. 1324b(a)(3). It also means any corporation, business association, partnership, society, trust, or any other entity, organization or group that is incorporated to do business in the United States. It also includes any governmental (federal, state or local) entity.

Please Check One

A. OFFEROR ☑ **is,** ☐ **is not** a "U.S. Person" as defined in the ITAR 22 CFR Part 120.15 and EAR 15 CFR 772.

Any person *who engages in the United States in the business of either manufacturing or exporting ITAR controlled defense articles or furnishing defense services is required to register with the Directorate of Defense Trade Controls (DDTC) unless exempted by one of the four conditions listed in ITAR 22 CFR Part 122.1.* ***STEICO Industries Inc. A Subsidiary of SENIOR Operations LLC*** *cannot enter into any procurement contract with a supplier within the United States that involves the acquisition of ITAR controlled defense articles or provision of defense services until the supplier has certified that it is registered with DDTC. This registration requirement does not* ***apply to manufacturers of EAR controlled articles and/or services.***

Please Check One

B. OFFEROR ☑ **is registered; DDTC expires** 03/31/2021 ☐ **is exempt from registration,** ☐ **is not registered** with the U.S. Department of State, Directorate of Defense Trade Controls per ITAR 22 CFR Part 122.1 (a) and (b).

The supplier is responsible for the protection of any controlled technical data or defense articles provided to them by ***STEICO Industries Inc. A Subsidiary of SENIOR Operations LLC*** to assist in the manufacture of a defense article or provision of a defense service. The release of this data by the supplier to a Foreign Person employee or its transfer to another Foreign Person for the purpose of Off-Shore Procurement is defined as an export (ITAR 22 CFR Parts 120.17 and 124.13 and EAR 15 CFR Part 734.2(b)(2)(ii)) and Supplements 1 and 2 or Part 774 and subject to the licensing requirements of the ITAR and EAR as applicable.

Please Initial

C. OFFEROR (GGM) **Will** obtain the necessary export authorization prior to the release of controlled technical data or other defense articles provided by ***STEICO Industries Inc. A Subsidiary of SENIOR Operations LLC*** for the purpose of procurement to any Foreign Person in or outside of the United States.

ACKNOWLEDGEMENT

On behalf of below named SUPPLIER, I the undersigned acknowledge that I have received this letter:

Supplier's Name & Address: Element Broken Arrow 3100 N. Hemlock Cir, OK 74012-1115	Date: 09/23/2020
Printed Name and Title: Gil Monos QA Manager	Signature: Gil Monos

TO BE COMPLETED BY STEICO INDUSTRIES, INC.

STEICO Review EAR/ITAR Empowered Official or Designee Stamp? _____ Date: _____

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Section IV. Third Party Certification

☐ **AS9100 Rev. D** ☐ **ISO 9001** ☑ **NADCAP** *Provide current copy of Certification(s). Proceed to* ***Section VI. Summary of Evaluation****.*

☐ **NO** ***Complete Section V. Quality System Self-Audit*** *below & provide copy of your Quality System manual*

Section V. Quality System Self-Audit

1.	**Quality Management System**	**YES**	**NO**	**N/A**
A.	Does external provider have a Quality Manual and/or Quality procedures? What standard or specification do they meet?	☐	☐	☐
B.	Is the manual periodically reviewed & revised?	☐	☐	☐
C.	Is the manual available to all relevant personnel mentioned in the Manual?	☐	☐	☐
D.	Is the quality management system reviewed to ensure compliance to customers', statutory and regulatory requirements?	☐	☐	☐
2.	**Document and Data Control**	**YES**	**NO**	**N/A**
A.	Does the external provider's procedures/instructions identify a document control system?	☐	☐	☐
B.	Are current revision of documents available to Manufacturing and Quality?	☐	☐	☐
C.	Are obsoleted documents (Work instructions, procedures, etc.) quarantined and controlled to prevent the unintended use of obsolete documents?	☐	☐	☐
D.	Are obsolete drawings and specifications systematically recalled from points of use?	☐	☐	☐
E.	Is there a process to verify customer changes/modifications are being incorporated?	☐	☐	☐
F.	Are customer changes/modifications flowed down?	☐	☐	☐
3.	**CONTROL OF QUALITY RECORDS**	**YES**	**NO**	**N/A**
A.	Does the external provider maintain control of Quality records identifiable to the appropriate product including pertinent subcontractor records?	☐	☐	☐
B.	Are retention times documented? How long?	☐	☐	☐
C.	Are records readily retrievable, legible and accessible to STEICO Industries Inc.?	☐	☐	☐
D.	Are records protected from unauthorized changes, corruption and physical damage?	☐	☐	☐
E.	Does the external provider have a process for proper disposal of records once the customer's record retention requirements have been met?	☐	☐	☐
4.	**MANAGEMENT RESPONSIBILITY**	**YES**	**NO**	**N/A**
A.	Does the external provider have a documented Quality Policy, Quality Objectives and Quality Manual?	☐	☐	☐
B.	Does the external provider have an organization chart or equivalent reflecting Current company operations?	☐	☐	☐
C.	Does quality have access to top management in the resolution of quality and On-Time Delivery problems?	☐	☐	☐
D.	Has the external provider established a method of reporting quality and delivery issues?	☐	☐	☐

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5.	CONTRACT REVIEW	YES	NO	N/A
A.	Are purchase orders reviewed by all interested parties to ensure that all customers', applicable statutory and regulatory requirements can be met?	☐	☐	☐
B.	List personnel and their title responsible for review:	☐	☐	☐
6.	**TRAINING**	**YES**	**NO**	**N/A**
A.	Does the external provider maintain procedures for identifying training needs for personnel?	☐	☐	☐
B.	Does the external provider maintain a list and/or database that tracks and identifies training needs for personnel?	☐	☐	☐
C.	Are training results recorded, retained and retrievable?	☐	☐	☐
D.	Are personnel performing work on product trained to understand their contribution to product conformity, safety and ethical behavior?	☐	☐	☐
7.	**PURCHASING**	**YES**	**NO**	**N/A**
A.	Are capabilities of procurement sources evaluated prior to procurement of items?	☐	☐	☐
B.	Is a list of approved sources utilized, maintained and periodically updated?	☐	☐	☐
C.	Does the external provider apply appropriate control to their sub-tiers and sub-tiers' external providers to ensure requirements are met?	☐	☐	☐
D.	Are product quality and on-time delivery monitored and measured by the external provider?	☐	☐	☐
E.	Do purchase documents contain enough information to clearly identify the product?	☐	☐	☐
F.	Are the purchasing documents reviewed by and approved by QC prior to release?	☐	☐	☐
8.	**PROCESS CONTROLS**	**YES**	**NO**	**N/A**
A.	Are production processes planned by using shop travelers or route cards?	☐	☐	☐
B.	Does the external provider have procedures ensuring that all processes are controlled? (Work instructions, trained personnel, workmanship standards, and documentation and process parameters?)	☐	☐	☐
C.	Are the special processes monitored on a continuous basis?	☐	☐	☐
D.	When required, are only customer approved special process sources used?	☐	☐	☐
E.	Are records retained demonstrating the qualification of special processes, operations, personnel, facilities and equipment?	☐	☐	☐
F.	Is the infrastructure and environment evaluated to ensure adequacy in achieving product conformity to customer requirements?	☐	☐	☐
9.	**DIGITAL PRODUCT DEFINITION**	**YES**	**NO**	**N/A**
A.	Is there a process to control configuration of datasets from receipt throughout the manufacturing and acceptance process?	☐	☐	☐
B.	Does the supplier have the capability to translate digital data?	☐	☐	☐
C.	Does the supplier Verify dataset translation?	☐	☐	☐
D.	Does the supplier have a process that includes control of obsolete datasets and data set derivatives?	☐	☐	☐
E.	Does the Supplier have a process to control configuration of dataset derivative media?	☐	☐	☐

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9.	DIGITAL PRODUCT DEFINITION (continued)	YES	NO	N/A
F.	Are data set derivatives traceable back to the current master dataset?	☐	☐	☐
G.	Does the supplier have a process to verify dimensional accuracy of dataset derivatives, including plotted media, as compared to the master dataset?	☐	☐	☐
H.	Does the supplier have a process of flow down to customer when a sub-tier is used to produce product and/or tooling?	☐	☐	☐
I.	Are these sub-tier producers from an approved source when contractually required? (Ref: BOEING D1-4426, QCS-001, Customer ASL's, etc.).	☐	☐	☐
J.	Does the supplier have any DPD approval (Ref: BOEING D6-51991, NADCAP, etc.)?	☐	☐	☐
10.	**PRODUCT IDENTIFICATION AND TRACEABILITY**	**YES**	**NO**	**N/A**
A.	Does external provider's procedures define methods of identification and traceability?	☐	☐	☐
B.	Is the product identified throughout production? How?	☐	☐	☐
C.	Are individual products or batches uniquely identified? (Is heat lot ID maintained?)	☐	☐	☐
11.	**CONTROL OF CUSTOMER – SUPPLIED PRODUCT**	**YES**	**NO**	**N/A**
A.	Does the external provider's procedures/instructions define control of customer-supplied products?	☐	☐	☐
B.	Is customer notified of damaged or nonconforming customer-owned material?	☐	☐	☐
12.	**HANDLING, STORAGE, PACKAGING, PRESERVATION AND DELIVERY**	**YES**	**NO**	**N/A**
A.	Do methods exist to prevent damage and deterioration of the product?	☐	☐	☐
B.	Does the external provider have designated storage areas with controlled access?	☐	☐	☐
C.	Does the external provider control packing and shipping processes to STEICO Industries Inc. requirements?	☐	☐	☐
13.	**CONTROL OF INSPECTION, MEASURING AND TEST EQUIPMENT**	**YES**	**NO**	**N/A**
A.	Does the external provider maintain procedures/instructions for control, calibration, and maintenance of inspection, measuring and test equipment per ISO 10012-1?	☐	☐	☐
B.	Do procedures/instructions define frequency of calibrations?	☐	☐	☐
C.	Does calibration system provide traceability to national standards (NIST, ISO 17025, etc.)?	☐	☐	☐
D.	Is an equipment register available and utilized in tracking equipment requiring calibration?	☐	☐	☐
E.	Are employee owned tools and gages utilized for production acceptance calibrated?	☐	☐	☐
14.	**STATISTICAL TECHNIQUES**	**YES**	**NO**	**N/A**
A.	Does the external provider maintain a documented SPC program?	☐	☐	☐
B.	If not, are SPC techniques being developed? Implementation date?	☐	☐	☐
15.	**INTERNAL QUALITY AUDITS**	**YES**	**NO**	**N/A**
A.	Does the external provider have a defined internal audit schedule?	☐	☐	☐
B.	Does the external provider maintain records of audit reports, corrective actions taken and effectiveness of those actions?	☐	☐	☐

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16.	INSPECTION AND TESTING	YES	NO	N/A
A.	Does the external provider have written procedures for: (please check applicable boxes) ☐ **Receiving Inspection** ☐ **In-Process Inspection and Test** ☐ **Final Inspection**	☐	☐	☐
B.	Does Quality specify required inspections and tests, and retain records?	☐	☐	☐
C.	Is incoming material properly identified and controlled until inspection acceptance?	☐	☐	☐
D.	Are nonconforming materials identified and controlled?	☐	☐	☐
E.	Do final inspections assure that all inspections and tests have been performed and the product meets specified requirements?	☐	☐	☐
F.	Are records retained and available for all inspection and test operations?	☐	☐	☐
G.	Does the external provider's procedures/instructions detail what methods are to be used to identify the inspection test status of the conforming /nonconforming product?	☐	☐	☐
H.	Is the inspection status maintained throughout the production process?	☐	☐	☐
17.	**CONTROL OF NONCONFORMING PRODUCT**	**YES**	**NO**	**N/A**
A.	Does external provider maintain procedures/instructions for controlling nonconforming products?	☐	☐	☐
B.	Does the nonconformance system provide for the identification, documentation, evaluation, segregation and notification of STEICO Industries Inc. for nonconforming material?	☐	☐	☐
C.	Does the external provider understand MRB limitations on any item produced for STEICO Industries Inc.?	☐	☐	☐
D.	Are controls put in place for handling of counterfeit product?	☐	☐	☐
18.	**CORRECTIVE AND PREVENTATIVE ACTION**	**YES**	**NO**	**N/A**
A.	Does the external provider maintain procedures/instructions for corrective/preventative action?	☐	☐	☐
B.	Do records show investigation of the root cause(s) of nonconformance?	☐	☐	☐
C.	Do records indicate the root cause problems have been corrected to prevent reoccurrence of nonconformance?	☐	☐	☐
D.	Do records show evaluation and effectiveness of corrective action?	☐	☐	☐

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STEICO's External Provider Quality System Survey is intended to review our approved supplier' data and certifications relative to the Quality Management System that support STEICO's commitment to the highest possible standards of environmental, ethical and social responsibility. If you have any questions, please call **Quality Assurance (760) 438-8015** | quality@steicoindustries.com.

Section VI. Summary of Evaluation

Section I. General Information

Section II. Corporate Social Responsibility (CSR) / Regulatory Compliance

Section III. Supplier ITAR/EAR Certification

Section IV. Third Party Certification

Section V. Quality System Self-Audit

Section VI. Summary of Evaluation

I certify that the information provided is accurate and complete.

Signature: Gil Monos Date: 09/24/2020

Print Name: Gil Monos Title: QA Manager

PLEASE COMPLETE, SIGN AND RETURN WITH APPLICABLE CERTIFICATIONS AND DOCUMENTATION TO:		
By Fax	**By Email**	**By Mail**
760-438-5881	quality@steicoindustries.com	STEICO Industries Inc. 1814 Ord Way Oceanside, CA 92056-1502 Attn: Quality Assurance Department

TO BE COMPLETED BY STEICO QUALITY ASSURANCE

Quality Designee has evaluated this survey, registrations, certifications and documents and has deemed the supplier:

- ☐ **Approved**
- ☐ **Conditional**
- ☐ **Disapproved**

Quality Stamp

Signature: Date:

Print Name: Lorena Gillies

Title: Quality Admin

Comments

Supplier ID: EMTBA

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