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Kirkhill Aircraft Parts Co Corporate Quality Manual

KIRKHILL AIRCRAFT PARTS CO

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 	<i>11/2017</i>
	<i>Revision 36</i>
<i>CORPORATE QUALITY MANUAL</i>	

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0.1 General:

This Quality Management System defines the Corporate Quality Management System (QMS) of Kirkhill Aircraft Parts Co, hereafter referred to as Kapco Global (KG) a proponent Company. The corporation headquarters is located at 3120 E Enterprise Street – Brea, CA 92821 (Site Acronym: CA), and this site includes the building located at 3051 Enterprise Street of Brea, CA. The KG QMS described herein has multiple locations and encompasses the site locations as identified on the “Cover Page” (First page) of this document. KG has and may operate under the following d.b.a.’s: Kapco Global, KAPCO, KAPCO|VALTEC, KAPCO|Ball Glide, Ball Glide Products, Valtec International, Valtec Aircraft Supply, and Coast Air.

This Quality Management System covers the processing requirements of all products that are licensed, manufactured, sold or distributed through these facilities. This shall include all processes required from the order receipt, contract review, procurement and/or in-house manufacture, inspection processes, through the delivery of such product. The KG Quality Management System shall also include and adhere to all customer contract and/or licensing agreements, and applicable regulatory requirements.

Due to the variety of QMS requirements as related to each International Standard, customer, and/or regulatory requirement, the KG QMS has been developed to encompass three independent Tiers of Quality activities, each having their own aspects and authority. These “Tiers” are based upon the customer and/or product requirements.

The definitions contained herein will define the Quality activity based on product parameters, aspects, and authority. This will become the basis to determine which Tier (Tier I, II, or III) that the QMS and personnel will be functioning under when carrying out operational tasks as well as being used in the contract review process to determine and/or negotiate organizational responsibilities. Tier definitions/scope are as follows:

Tier Definition/Scope

Tier	Definition/Scope	Requirements Manual	
I	<i>(aka: KG has PMA or TSOA)</i> KG controls the quality and manufacturing of the product under a direct regulatory approval. The quality requirements are dictated by government regulations in making airworthiness determinations on articles. However, the Quality System itself is controlled directly by KG. Whether produced in-house or with the use of sub-tier suppliers, KG is the regulatory definition of the manufacturer.	PMA - Quality Systems Manual (PMA-QSM) Or FAA - Quality Systems Manual (FAA-QSM)	
II	<i>(aka: Supplier to a Production Approval Holder)</i> There are two different types of Tier II activity as listed below in (a) and (b) but this Tier is indicative of having to meet the unique requirements of a “customer” Quality System extrinsic to KG:	See Tier IIa and Tier IIb	
	IIa	KG controls the quality and manufacturing of the product as a sub-tier supplier/partner to an OEM/PAH e.g.-type certificate holder/production certificate holder, sub-contractor thereof or it is otherwise customer designed product. KG is acting under the direct control of the OEM/PAH, sub-contractor, or customer’s quality system to AS9100 as the baseline (See Note 1). This may include a Direct Ship Authorization from a PAH;	Tier IIa Quality Manual (AS9100)
	IIb	KG does NOT control the quality and manufacturing of the product as completely or directly as documented in (a) above by virtue of being recognized as a distributor/purchasing agent by the OEM/PAH e.g.-type certificate holder/production certificate holder, sub-contractor or customer’s quality system and KG is contracted under AS9120 as the baseline (See Note 2). Tier II (b) applies if KG cannot make the argument for Tier III status under the applicable proposal.	Tier IIb Quality Manual (AS9120)
III	<i>(aka: Distributor)</i> Is not Tier I or II. KG does not control the quality or manufacturing of the product but is acting as an authorized distributor of a manufacturer or as an agent for the customer as a stockiest or to otherwise locate and deliver a customer specified requirement and has minimal quality responsibilities in the capacity of distributor (See Note 3).	Tier III Quality Manual (AS9120) (See Note 4)	

Notes:

Note 1: In either Tier II (a) or (b) the term “baseline” means there will be aspects extrinsic to KG that are particular to the customer Quality System such as detailed inspections, approved supplier’s lists, approved processes and processors, FAIR submittals, material and process certifications, testing, direct supplier control and surveillance to name a few. It is imperative that we detect, interpret, document and comply with any and all applicable requirements that may be unique to the customer.

Note 2: The sites that are Value Add Distributors (VAD) must be AS9100 and will be under the control of the entity extending the VAD when acting in that capacity.

Note 3: A Tier II type entity may procure from us under the Tier III environment if during the contract review process we do not contractual accept any terms that would cause it to be a Tier II activity for example AS9100 or AS9120 quality system requirements. For it to be Tier III it must be accepted as “off the shelf” inventory or a “pass through” sale but always must be reviewed to the purchasing requirements of the customer purchase order to ensure compliance.

Note 4: Tier III general responsibilities are for example, approved parts, traceability to manufacturer cert of conformance, ID and damage, lot splitting control and meeting customer PO requirements. In Tier III, the manufacturer of the product controls the quality and KG has no input or jurisdiction in the inherent quality of the part.

Table 1 – Quality Tiers

It is emphasized that the quality management system requirements specified in this quality manual are complimentary, and are not an alternative to contractual and applicable statutory and regulatory requirements. Should there be a conflict between the requirements of this document and applicable statutory or regulatory requirements, the latter shall take precedence.

KG has designed and maintains a quality management system to satisfy the needs of its customers. This quality system is also designed to comply with the requirements of:

- ISO 9001:2015 - Quality Management System
- AS9100D 2016 - Aerospace Standard (or as applicable, EN9100).
- AS9120B 2016 - Quality Management Systems – Aerospace Requirements for Stockist Distributors (or as applicable, EN9120)
- FAA Advisory Circular AC 00-56B Voluntary Industry Distributor Accreditation Program of the Aviation Suppliers Association.

<i>QMS Certifications are maintained as shown at each KG location</i>	ISO 9001	AS 9100	AS 9120	AC 00-56	When requirements of the International Standards cannot be applied due to the nature of our business and/or product, these requirements will be shown as not applicable. The applicability by section shall be identified in the applicable Quality Manual, as established by the appropriate “Tier” as defined in Table 1.
Brea - Main Brea – Mfg CT Florida UK AMS SXB SIN	•	•	•	•	

0.2 Plan-Do-Check-Act (PDCA)

In supporting continual improvement, KG encourages the Plan-Do-Check-Act (PDCA) cycle (See Figure 2). This tool can be utilized to develop new processes based upon customer requirements, or may be used as a problem solving tool when there is a need to improve performances. A brief description of the PDCA is as follows:

Plan:

- Establish the objectives and processes needed to provide the desired results in accordance with the customer requirements, KG policy, or performance expectations.
- Develop a measurement process to measure the process performance and the objective.
- Identify alternatives solutions, evaluate, and determine what needs to be done to achieve the desired results.

Do:

- Implement the determined solution. Plan the implementation – Who, What, When, Where, & How Schedule of events (Training)

Check:

- Monitor and measure the new or revised process or product against policies, objectives, and/or requirements.
- Measure the process, study the results. Did the new process resolve the issue?
- Were any new problems created?
- Was the change beneficial for costs/benefits?

Act:

- If it worked, institutionalize/standardize the change.
- If it didn't, try something else.
- Repeat the PDCA cycle

The Plan–Do–Check–Act cycle (Figure 2) is a four-step model for carrying out change. Just as a circle has no end, the PDCA cycle should be repeated again and again for continuous improvement.

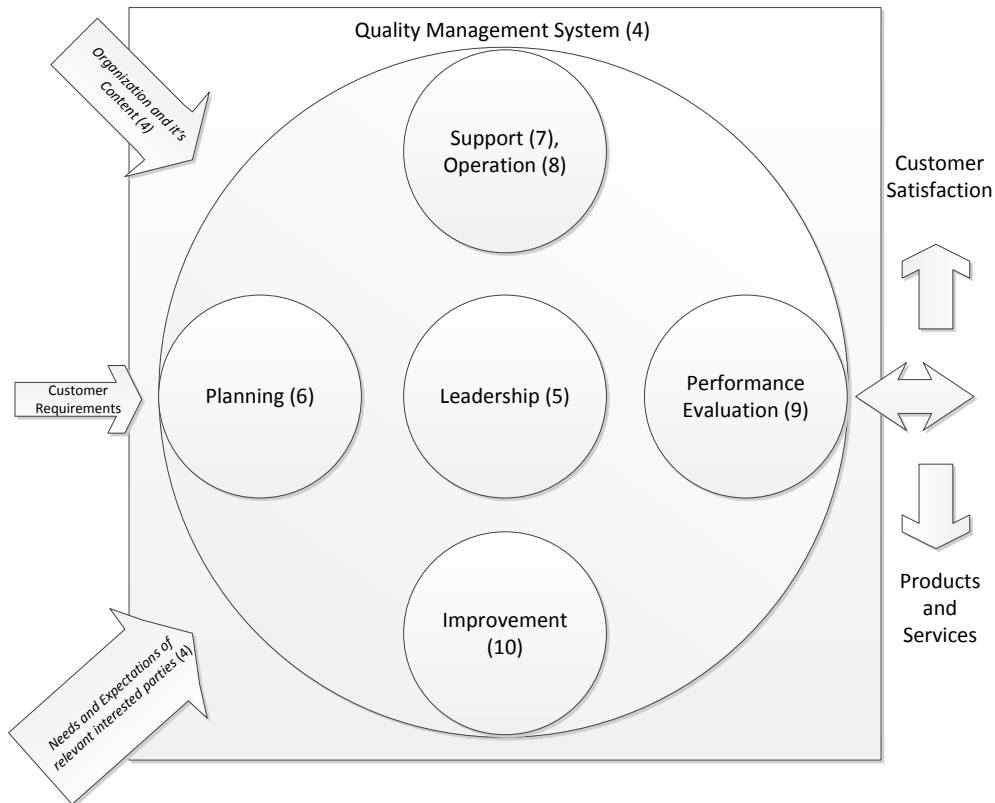


Figure 1: Plan-Do-Check-Act (PDCA) Cycle

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When to Use Plan-Do-Check-Act

- As a model for continuous improvement.
- When starting a new improvement project.
- When developing a new or improved design of a process, product or service.
- When defining a repetitive work process.
- When planning data collection and analysis in order to verify and prioritize problems or root causes.
- When implementing any change.

KG is dedicated to improving our customer service commitment by recognizing that the parts we supply play a critical role in our customers operations. It is our commitment to provide the highest quality parts and the most complete airworthiness documentation in the industry. We pride ourselves in responding to the needs of the customer quickly and completing customer orders on time:

- a) consistently provide products that meet customer expectations and applicable regulatory requirements, and
- b) enhance customer satisfaction through effective application of the quality system, including processes for continual improvement of the system and assurance of conformity to customer and applicable regulatory requirements.
- c) The requirements of the Quality Manual are implemented through written procedures and work instructions where applicable.

0.3 Risk Based Thinking

Risk based thinking is established by the Board of Directors during quarterly meetings reviewing financial statements and industry developments. Other topics are included as appropriate to ensure that risks are being addressed and mitigated adequately. Additional to these considerations risks are cascaded through the organization and defined in Kapco Global procedure BCP-050. The Board of Directors established risks that may include:

- Succession planning
- Employee Handbook
- Export Compliance
- Annual Insurance Review
- Porter forces
- SWOT analysis
- Inventory Management
- Forecasting

SECTION 1 SCOPE

This corporate quality manual applies to all locations of Kapco Global and is applicable to all activities at these locations. The addresses shown in the table below are for all Kapco Global locations.

Site Location	Country	Site Acronym
3120 E Enterprise Street – Brea, CA 92821	USA	CA or Main
3051 E Enterprise Street – Brea, CA 92821	USA	CA or Main
1 Industrial Park Road – Essex, CT 06426	USA	CT
10601 State Street, Suite 1 – Tamarac, Florida 33321	USA	FL or PBI or MIA
J Keplerweg 16 2408 AC, Alphen aan den Rijn	Netherlands	AMS
37 Woolmer Way – Bordon, Hampshire GU35 9QE	United Kingdom	PTFD or UK
7, Zone d’Activite du Ried, 67590 Schweighouse sur Moder	France	SXB or FR
15 Changi North Street 1, Unit #01-30, 498765	Singapore	SIN

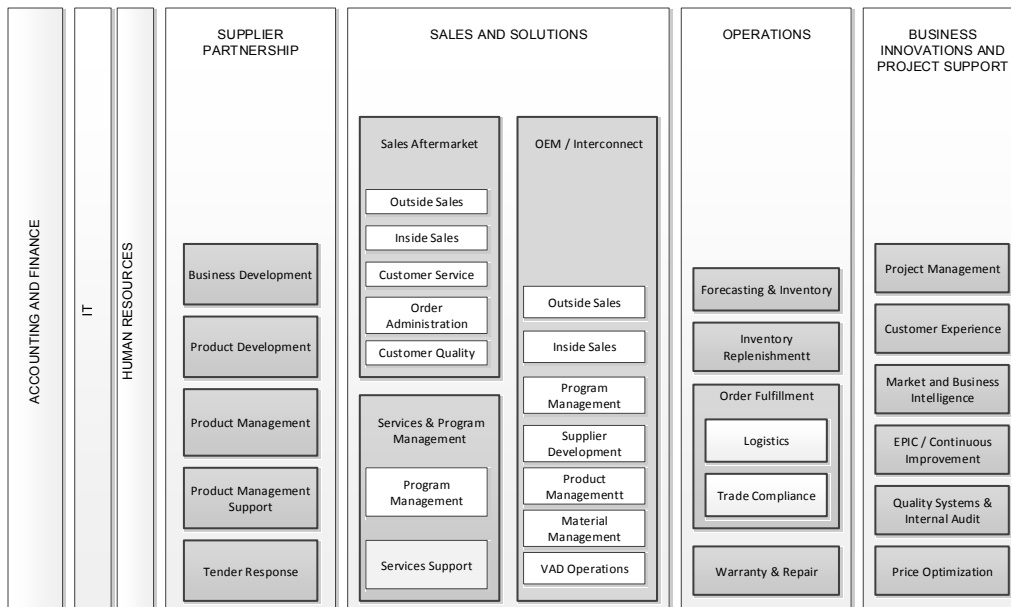
SECTION 3 TERMS AND DEFINITIONS

Terms and Definitions shall be identified in the applicable Quality Manual, as established by the appropriate “Tier”.

SECTION 4 CONTEXT OF THE ORGANIZATION

4.1 Understanding the Organization and its Context

Annually the Board of Directors evaluates the company’s position in the market, and reviews the organization, strategic direction, and KPIs. See section 6 for the planning.



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4.2 Understanding the Needs and Expectations of Interested Parties

Customers

Beside customer unique requirements, customers specify requirements which flow from the aviation approval they hold.

Most of these requirements are part certification requirements specified in the applicable FAA and/or EASA aviation regulations.

Government

Government regulations that affect the quality management system are;

- Regulations on Health and Safety,
- Regulations on the use of Substances or Chemicals,
- Aviation regulations as published by the FAA, EASA,
- IATA Dangerous Goods Regulations (DGR), and
- US Export Regulations

Suppliers

Suppliers have been considered but because they don't require Kapco Global to meet specified quality management system requirements, they are not considered to be an Interested Party.

4.3 Determining the Scope of the Quality Management System

The scope of the QMS certifications for each warehouse location are available by viewing the current certification available on the Kapco Global website.

4.4 Quality Management System and Its Processes

KG utilizes the process approach when developing, implementing, and improving the effectiveness of the quality management system and to enhance customer satisfaction by meeting customer requirements.

For KG to function effectively, it has determined and manages numerous linked activities. An activity or set of activities using resources, and managed to enable the transformation of inputs into outputs, can be considered as a process. Often the output from one process directly forms the input to the next.

The application of a system of processes within KG, together with the identification and interactions of these processes, and their management to produce a desired outcome, can be referred to as the "process approach".

KG has identified and will manage the following key processes to determine the effectiveness of the overall system:

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Aerospace Standard	AS 9100			AS 9120			
Key Processes	KP-DOC	KP-PRD	KP-VAD	KP-QSP	KP-IAP	KP-IR	KP-COF
Brea-3120	X			X	X	X	X
Brea-3051		X			X	X	X
CT					X	X	X
FL			X		X	X	X
UK			X		X	½	X
AMS					X	X	X
FR					X	X	X
SIN					X		X

When used properly, this approach emphasizes the importance of:

- a. Understanding and meeting requirements
- b. The need to consider processes in terms of added value
- c. Obtaining results of process performance and effectiveness, and
- d. Continual improvement of processes based upon objective measurement.

The Kapco Global model of our process-based quality management system shown in Figure 1 illustrates the process linkages presented in various of this document. This illustration shows that customers play a significant role in defining requirements as inputs. Monitoring of customer satisfaction requires the evaluation of information relating to customer perception as to whether KG has met the customer requirements.

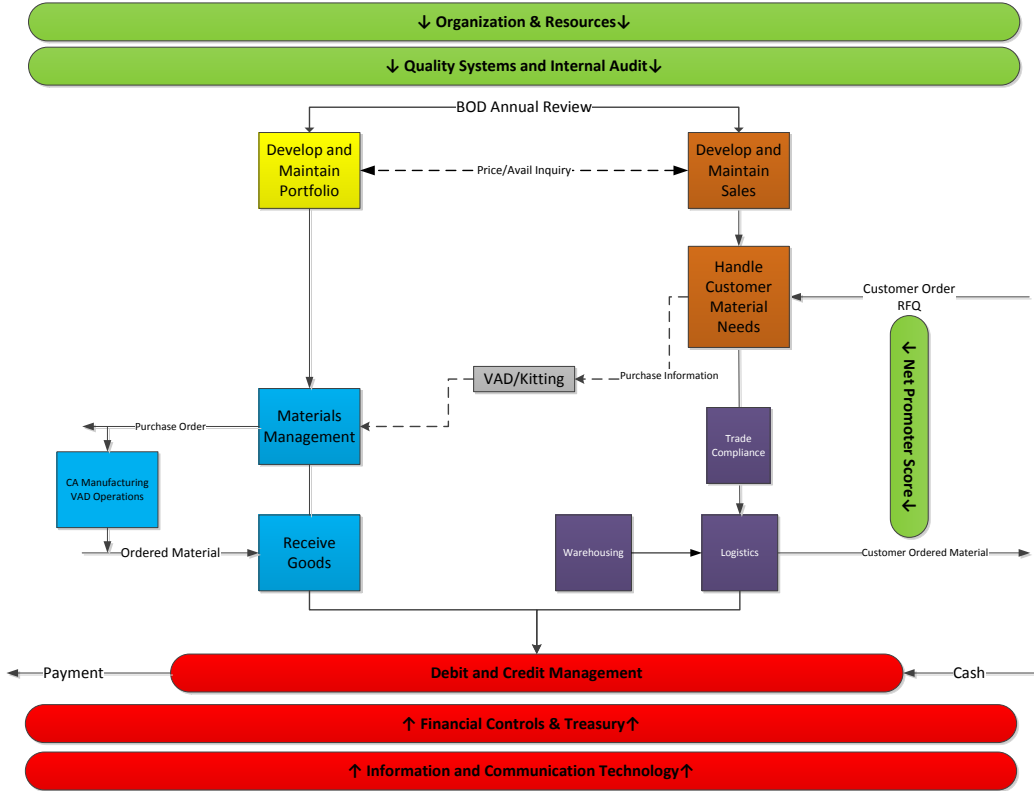


Figure 2 – Model of Process-Based Quality Management System

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SECTION 5 LEADERSHIP

5.1 Leadership and Commitment

General

Kapco Global Senior Leadership demonstrates leadership and commitment with respect to the quality management system (QMS) by:

- Taking accountability for the effectiveness of the quality management system
- Ensuring a quality policy and quality objectives are established and compatible with the context and strategic direction of the organization
- Promoting the process approach and risk-based thinking
- Ensuring that resources needed for the QMS are available
- Communicating the importance of effective quality management and of conforming to the QMS requirements
- Ensuring the QMS achieves its intended results
- Engaging, directing, and supporting persons to contribute to the effectiveness of the QMS
- Promoting improvement
- Supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility

Customer Focus

One of the key success factors to ensure the continuity of the company is continues fulfill customer needs and requirements. Because customers are driving the requirements of the operation, management is committed to ensure that customer's needs and expectations are understood by the organization, converted into sales order requirements, and fulfilled in an economical and viable manner.

The focus on customer satisfaction is demonstrated by the fact that management decided that the Net Promoter Score (NPS) it is one of the company's key performance indicators.

The needs and expectations of the individual customer are mapped by collecting information on the customer's market position, during contacts with the customer and during the acceptance of customer orders. We fulfill the needs and expectations of the individual customer by established procedures. With the NPS tool we collect additional information on what customers expect from the services provided by Kapco Global.

Kapco Global is aware that customer satisfaction starts with a high level of product conformity and on-time delivery.

5.2 Policy

5.2.1 Establishing the Quality Policy

The Quality Policy is developed and occasionally reviewed to assure it is appropriate to the purpose and context of the organization and supports the current strategic direction as decided by Senior Leadership.

5.2.2 Communicating the Quality Policy

Kapco Global regularly communicates the established quality policy in regular communication from the CEO/President and through periodic communications distributed internally.

Quality Policy

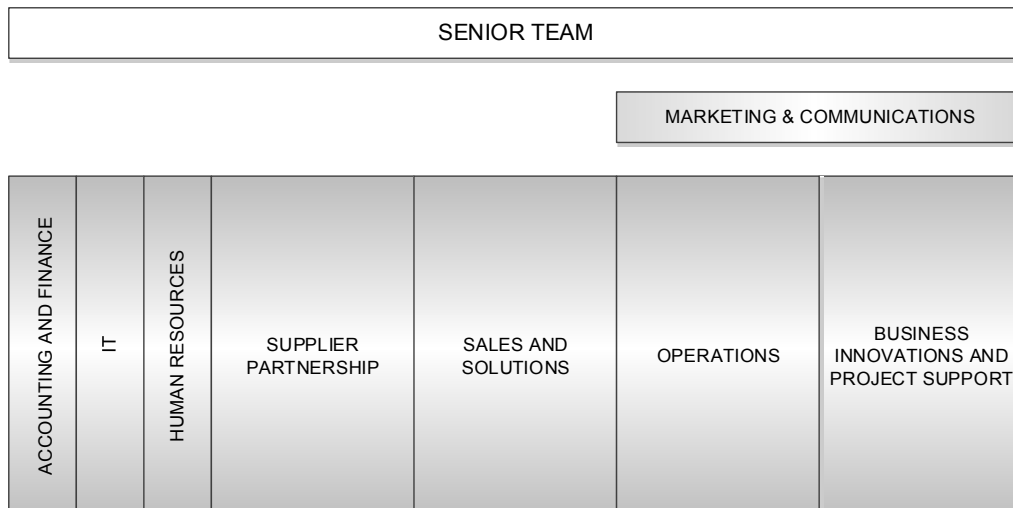
We aspire to be a trusted partner to our customers and suppliers, delivering innovative solutions in an engaging work environment.

We embrace continuous improvement and will employ metrics to measure our progress and ensure we are meeting expectations of customers, suppliers, and employees.

We will fully satisfy the requirements of the AS9100/AS9120 standard(s) and will comply with all governmental regulations and industry requirements.

5.3 Organizational Roles, Responsibilities, and Authorities

The company's processes are broken down to the organizational functional columns, see figure below. Each functional column is responsible for an assigned part of the company's operational or supporting processes.



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Business Innovation and Project Support

The role of the Business Innovations & Project Support is to support the company goals by improving the quality of the way we work, the information we use, the decisions we take and to drive innovation through positive change in everything we do. This results in the following activities:

- Identification of improvement potential in the company
- Initiate innovations and stimulate innovative behavior
- Support improvement and innovation projects (small and big)

The function can be divided into six sub functions with different activities and responsibilities.

Project Management improves the project management skills in the organization and offers project management support for company projects

Customer Experience develops and implements strategies to deliver a seamless and positive customer experience across the entire customer lifecycle

Market & Business Intelligence finds new intelligence market data sources, researches data and create relevant and actionable insights for the ADKG community. Also responsible for building a combined business intelligence data warehouse

EPIC/CI (Pronamic) implements improved ways of working according to the LEAN principles resulting in continuous improvement and empowered employees who can improve their own way of working

Quality Systems & Internal Auditing ensures certification of the company's management systems related to Quality, Environment, and FAA approval against international standards, as expected by customers and suppliers. Internal audits will demonstrate compliance and where possible recommendations for improvements

Pricing Optimization is committed to the long-term development of an analytical, intelligence-based pricing strategy to increase gross margin, market share & process efficiency

Supplier Partnerships

Supplier Partnership is assigned to the process Develop and Maintain Product Portfolio. This process is broken up into the following 3 sub-processes or teams.

Business Development.

Develop, maintain broad industry contacts, maximize right place at right time, raise company profile,

Find and deliver new distribution opportunities, build our direct-to-mfg product access and portfolio,

Lead efforts to develop a portfolio growth strategy,

Collaborate internally to develop complimentary BD targets, new capability/business models attractive to potential supplier-partners, and

Corporate supplier development – broaden division specific relationships into broader corporate relationships.

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Product Management.

Manage relationships with existing supplier-partners, negotiate favorable terms of business,

Manage and report financial performance of product lines,

Analyze market and competitive landscape, identify strategies and opportunities to grow,

Establish the strategic price policy for product lines,

Develop and deliver product/supplier campaigns through Customer Solutions team,

Train Customer Solutions on product/market/opportunity, and

Implementation of new product lines,

Product Management Support.

Price management – maintain all system pricing, maximize inventory coverage, available cost data, etc.,

Collecting and registering part data like shelf life data, interchangeability, export classification codes.

Data integrity – ensure proper part setup, quality of data,

Technical support – field questions to support customer orders, capture/distribute available data to support transactional business, and

Sales and Solutions

Sales and Solutions is responsible for the process Develop and Maintain Sales.

This process includes the sub-processes; business development, customer account management, quoting, order processing, the order follow up process, and customer complaint handling.

The sales organization is split in 3 geographical teams EMEA, the Americas and Asia-Pacific which are mainly serving customers in the aftermarket.

Sales and Solutions includes the OEM-Interconnect group and the group Services & Program Management. The OEM-Interconnect group focus on worldwide support to OEM and Interconnect customers.

The Services group is supportive to all sales teams and groups when it relates to offering service programs like VMI programs, kitting programs and other complex customer specific service programs.

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Operations

Within Operations there are two main groups Inventory Management and Order Fulfillment. Within Kapco Global the following processes are assigned to these groups.;

Inventory Replenishment - Materials Management

Maintain replenishment cycles for stock parts,

Respond to quote & order requests for order as needed parts,

Purchasing,

Non-conformance handling,

Review & manage safety stock levels, and

Coordinating internal company transfers.

Order Fulfillment - Trade Compliance

Support tariff classification of parts in the system,

Support Product Management Support in classifying parts, and

File for export licenses.

Order Fulfillment - Logistics

Receiving and Incoming Inspection,

Non-conformance handling,

Stocking and Picking,

Shipping,

Maintaining cost benefits with carriers/freight forwarders, and

Supports materials management in selecting transit outside of regular shipments.

Marketing & Communications

Marketing & Communications is tasked with developing, implementing, and maintaining communications strategies. The department has two major functions – one internal and one external - in support of this goal.

Marketing is tasked to raise the company's brand presence and affirm our position as a trusted partner for external audiences. The Marketing team works to build partner loyalty by collaborating with customer- and supplier-facing departments to provide messaging tools, as well as managing broad marketplace messaging to elevate the brand.

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The team develops collateral in support of Sales and Supplier Development communications. In addition, the team is responsible for creating digital marketing initiatives, coordinating tradeshow and events, and developing marketing campaigns that differentiate the brand and effectively position the company for long-term success.

Internal Communications ensures that there is clarity and continuity in our communications for our global employees. As an international company with over 500 employees across 12 sites, we need effective and consistent messaging in order to succeed. The Communications team is tasked with conveying company values and ongoing initiatives through corporate newsletters, brand initiatives, meeting recaps, and internal marketing campaigns that aid in building company culture.

Information Technology

The processes of IT can be split in 3. They relate to the following activities;

Business Systems Development develops and/or enhances business systems, either internally or through management of outside development resources. The team includes programmers and business analysts.

Helpdesk management is taking care of daily user support, help with hardware and software issues, and the management of user requests.

Infrastructure takes care of servers, data and storage networks, and phone systems. Ensures backups are performed and systems are maintained and ensures networks and systems can support the business going forward.

Accounting and Finance

Accounting and Finance facilitates long-term sustainable growth of the company. This is accomplished in four key areas:

Processing

Processing transactions effectively and efficiently

Supporting

Providing timely and relevant reporting, analysis and advice to support effective decision making

Safeguarding

Safeguarding the company's assets through balanced controls and risk management

Financing

Ensuring the company has sufficient, cost-effective financing in place

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Human Resources

Through strategic partnerships and collaboration with all functional departments, the Human Resources department attracts, develops and retains a high performing workforce and fosters a healthy, safe, and productive work environment for employees in order to maximize individual and organizational potential and position the organization as an employer of choice. The processes assigned to Human Resources are:

- monitoring available competences, and championing career and professional growth; Continually (support of) Improving individual and organizational efficiency and effectiveness
- identifying and reporting potential risks with respect to the deployment of staff and / or succession,
- monitoring applicable laws and regulations related to staff and labor environment and when applicable, taking measures to ensure the company complies,
- maintaining and publishing the HR Policy Manual / Staff Regulations,
- maintaining the employee files, which include the training records,
- initiating, - and monitoring progress of -, the assessment of employee performance,
- monitoring sick leave of employees and when needed, taking initiatives to get people back to work,
- Monitoring various HR (K)PI's and if needed take action on this,
- Development of leadership skills

Besides, Human Resources supports managers with the fulfilling of vacancies, onboarding, termination, and advise on employee related issues.

Management Representative

The VP Business Innovations & Project Support is appointed to be the Management Representative. The Management Representative has the following responsibilities:

- Ensuring that the quality management system remains in compliance with the requirements of AS9100, AS9120, and FAA AC0056B and its integrity is maintained,
- Informing the Senior Team on the status and performance of the quality management system and identified opportunities for improvement,
- ensuring the promotion of awareness of customer focus throughout the organization,
- promoting continuous compliance with the quality management system requirements within the Senior Team.

Being a member of the Senior Team, the Management Representative has the organizational freedom and unrestricted access to the other Senior team members to resolve quality related issues.

When required, the Management Representative has the authority to intervene and to initiate actions.

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SECTION 6 PLANNING

The Board of Directors meet quarterly. During the meetings, the financial statements and industry developments are reviewed along with topics that are reviewed annually.

The annual topics concern:

- Budget
- Organization
- Personnel development and succession planning
- ESOP (Employee Stock Ownership Plan)
- Reviewing industry trends
- Assessing risks and opportunities
- Strategic Planning
- Key Performance Indicators
- Audit Committee report
- Infrastructure

The main activities of management have been planned in a management planning. The planning ensures that objectives and budgets are set in time and reviews and assessments are conducted.

6.1 Actions to Address Risks and Opportunities

Risk is an integrated part of the way strategies are set and decisions are taken by management. The same applies for opportunities. As well management as the Business Development departments are continues on the lookout for opportunities to increase business.

- The Senior Team looks for strategic opportunities,
- Outside Sales and Inside sales look for sales opportunities,
- Business Development and Product Development look product Portfolio opportunities, and
- The Business Innovation teams are set up to capture opportunities to improve the organization.

The Board of Directors use a Porter forces analysis to determine the risks and opportunities in the market and with respect to the internal organization a SWOT analysis is used. With the results of the analysis and SWOT the company's strategies are set. for the next years.

Besides risk being taken into account when a decision is made with a large financial impact, several other measures have been taken and implemented to mitigate risks that have been identified.

- A Code of Conduct to prevent employees from behavior that could bring the company into a vulnerable and liable position.
- Processes have been work out and described to limit errors made by employees and to ensure that matching errors between workflows are prevented.
- Automation of operational processes to reduce the risk on errors due to manual handling,
- Implementing an Export Compliance system to reduce the risk on a violation of export regulations,
- Analysis of customer complaints to identify risk areas within the operation.

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- Having different insurances in place and review these yearly as a measure of damage control in case an unlikely and unwanted occurrence happens.
- Measures taken to reduce the down time of business essential computer systems in case of a disaster or serious failure.

Key Performance Indicators

The company has set seven corporate key performance indicators to monitor the health of the combined company. Each month the KPI's are measured, reviewed, and discussed within the Senior Team.

The corporate Key Performance Indicators are:

- | | |
|--------------------------|--------------------------------|
| 1. Growth | (Gross Margin US\$) |
| 2. Labor Productivity | (Margin US\$ / Labor US\$) |
| 3. Return on Inventory | (Margin US\$ / Inventory US\$) |
| 4. Customer Satisfaction | (Net Promoter Score) |
| 5. Employee Engagement | (Employee NPS) |
| 6. Supplier Development | (Supplier NPS) |
| 7. Innovation Culture | (Innovation NPS) |

6.2 Quality Objectives and Planning to Achieve Them

Quality objectives have been established for the various key processes defined by Kapco Global. These are documented on the key process turtle diagrams.

Quality and Delivery Performance

In addition to the KPI's described sect. 6.1 above Quality (product conformity) and Delivery Performance are measured and monitored each Kapco Global warehouse location.

6.3 Planning of Changes

Changes developed for the quality management system will be planned and communicated prior to execution. This will include appropriate communication with leadership and process owners in regard to purpose, the availability of resources required for an effective implementation, and the allocation or re-allocation of responsibility and authority.

SECTION 7 SUPPORT

7.1 Resources

The resources, needed for the realization of the company's goals and targets and to carry through set policies and strategic initiatives, are identified and provided for.

Applicable government regulations and good workmanship practices shall be taken into account.

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The Senior Team members and the Site Managers have the responsibility and authority for the identification and provision of resources.

Resources may include, but not limited to, any of the following:

- Human resources
- Financial resources
- Training
- Company guidelines
- Authorizations
- Facilities
- Communication systems
- Information systems
- Office furniture
- Warehouse equipment
- External Information sources

During the Management Review the participants determine if sufficient resources have been made available to the organization and if resources need to be added to improve the functioning of the quality management system.

Infrastructure

All employees will have at their disposal the necessary facilities to accomplish their tasks in a proper, safe and effective manner.

All Kapco Global facilities are kept in a safe, efficient and clean manner. The workspace shall be adequate to accommodate task to be performed and organized in such a way to optimize the quality level of the work to be performed.

Site Managers have the responsibility and the authorization to maintain the buildings, to take measures to prevent unauthorized access, to identify and to provide warehouse equipment and office utilities taking into account the company's house-style.

Decisions on occupying new buildings or radical changes of used buildings are made only with the agreement of the Senior Team.

Warehouses are equipped with racks, bins, transport equipment and other warehouse equipment to stock and to handle parts and materials according to regulations of the aviation industry and taking into account workers safety.

Warehouses are accessible to authorized employees only.

The IT department maintains the communication and information system (hardware and software) supporting the Kapco Global processes and supports the organization by developing new applications within the current systems and retrieving data in a requested format.

Based upon customer requirements, organizational needs and business developments, the Senior Team decides to invest in new systems.

Budgets are available for subscriptions on external information sources.

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Environment for the Operation of Processes

A clean and a well-organized, well-managed, facility contributes to a safe, efficient and effective work place. Management and the HR department keep an open eye to see if the work to be done is not causing an over-stress situation with employees.

Work environment factors include, but are not limited to:

cleanliness,	security,	space,
temperature,	safety,	light,
humidity,	ergonomics,	circulating air.

The physical plant layout and the control of the work environment factors is a responsibility of the Site Manager. In consultancy with the department managers the best possible work environment is created for the individual work places.

Monitoring and Measuring Resources

Kapco Global has determined and provided resources necessary to ensure valid and reliable results when monitoring or measuring is used to verify conformity of its products and services to requirements. Continued use and fitness for this purpose is accomplished per TGC-650 when tools or equipment are used to verify conformity.

In addition suitable monitoring and measurement activities are carried out as a review of the effectiveness of the various key processes identified in section 4.4.

7.2 Competence, Awareness and Training

To ensure effective operation of the quality system, Kapco Global (KG) management maintains an ongoing training program that ensures that personnel performing work affecting product quality shall be competent on the basis of appropriate education, training, skills, and experience. The training program is described in KG procedure CTP-075 Company Training Procedure.

7.3 Communication

General

Effective communication is central for the success of the company. Our goal is to have an effective exchange of information and a continues dialog with the employees.

Beside different meetings at different management levels and the Quarterly Reviews, the employees are informed by the joint newsletter ENGAGE. Sharepoint provides the employees information on the organization they can look up.

By bilateral meetings with their manager and the Employees survey the employees can share information important to the them with management.

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Internal Communication

As a means to promote communication regarding quality, top management has created a Quality Systems Community (QSC) Team whose members shall meet periodically to discuss issues pertaining to the quality management system. Members of the QSC Team will consist of representation of all KG organizations.

Meetings

Board of Directors Meeting.

The Board meets quarterly to discuss the strategic issues, budget and other issues, which have a major impact on the company’s operation.

Senior Team Meeting.

The Senior Team meeting is held every week. Participants of the Senior Team meeting are the CEO and the VP’s of the functional columns.

Topics of the Senior Team meeting are, but not limited to:

- corporate business activities,
- key performance indicators,
- financial performance,
- integration of KG AD,
- business opportunities,
- potential risks.

Quarterly Review

Each quarter the CEO informs all employees on the financial and operational performance of the organization, on the realization of the goals and targets set for the combined company, and on the strategic initiatives the company is working on. The Quarterly Review is held by means of a presentation.

7.4 Documented Information

Creating and Updating

When documents required by the QMS are either created or updated, our web based document management system will be utilized to track and control the update and intended implementation of the documents.

Control of Documented Information

Refer to QSM AS9100 Tier IIa	Refer to QSM AS9120 Tier IIb	Procedures
Sect. 4.2.3 and 4.2.4	Sect. 4.2.3 and 4.2.4	DCM-600, QRP-725

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SECTION 8 OPERATION

For the purpose of addressing the requirements defined within AS9100/AS9120 section 8 requirements are referred to in the Tier IIa, Tier IIb quality manuals.

8.1 Operational Planning and Control

Refer to QSM AS9100 Tier IIa	Refer to QSM AS9120 Tier IIb	Procedures
Sect. 7.1	Sect. 7.1	POR-300, PQO-400, QRP-725

Operational Risk Management

Refer to QSM AS9100 Tier IIa	Refer to QSM AS9120 Tier IIb	Procedures
Sect. 7.1.2	Sect. 7.2	BCP-050, CRP-900, POR-300, MSP-700

Configuration Management

Refer to QSM AS9100 Tier IIa	Refer to QSM AS9120 Tier IIb	Procedures
Sect. 7.1.3	Sect. 7.1.1	DCM-600, PRD-040, PQO-400, IAP-500, CRP-900

Product Safety

Refer to QSM AS9100 Tier IIa	Refer to QSM AS9120 Tier IIb	Procedures
Sect. 7.2.1 and 7.2.2	Not Used	CRP-900

Prevention of Counterfeit Parts

In order to prevent that Kapco Global purchases counterfeit parts, Kapco Global purchases from known suppliers and requests full traceability to be demonstrated by the packing lists and certificates coming with the parts or material.

A training course provides awareness and guidelines to the employees to recognize possible counterfeit parts and how these parts come into the supply chain.

Refer to QSM AS9100 Tier IIa	Refer to QSM AS9120 Tier IIb	Procedures
N/A	N/A	CUP-450

8.2 Requirements of Products and Services

Refer to QSM AS9100 Tier IIa	Refer to QSM AS9120 Tier IIb	Procedures
Sect. 7.2	Sect. 7.2	CRP-900

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Customer Communication

Refer to QSM AS9100 Tier IIa	Refer to QSM AS9120 Tier IIb	Procedures
Sect. 7.2.3	Sect. 7.2.3	CRP-900

Determining the Requirements for Products and Services

Refer to QSM AS9100 Tier IIa	Refer to QSM AS9120 Tier IIb	Procedures
Sect. 7.2.1	Sect. 7.2.1	CRP-900

Review of the Requirements for Products and Services

Refer to QSM AS9100 Tier IIa	Refer to QSM AS9120 Tier IIb	Procedures
Sect. 7.2.2	Sect. 7.2.2	CRP-900

Changes to Requirements for Products and Services

Refer to QSM AS9100 Tier IIa	Refer to QSM AS9120 Tier IIb	Procedures
Sect. 7.2.2	Sect. 7.2.2	CRP-900

8.3 Design and Development of Products and Services

Kapco Global develops customer specific services that are based upon customer requirements and expectations. For manufacturing see references below.

Refer to QSM AS9100 Tier IIa	Refer to QSM AS9120 Tier IIb	Procedures
Sect. 7.1.1, 7.1.2, 7.1.3, and 7.1.4	N/A	DCM-600

8.4 Control of Externally Provided Processes, Products, and Services

Refer to QSM AS9100 Tier IIa	Refer to QSM AS9120 Tier IIb	Procedures
Sect. 7.4.1	Sect. 7.4.1	POR-300, PQO-400, SQM-410, CRP-900, QRP-725, CAP-350, CUP-450

General

Refer to QSM AS9100 Tier IIa	Refer to QSM AS9120 Tier IIb	Procedures
Sect. 7.4.1	Sect. 7.4.1	POR-300, PQO-400, SQM-410, CRP-900, QRP-725, CAP-350, CUP-450

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Type and Extent of Control

Refer to QSM AS9100 Tier IIa	Refer to QSM AS9120 Tier IIb	Procedures
Sect. 7.4.1 and 7.4.3	Sect. 7.4.1 and 7.4.3	POR-300, PQO-400, SQM-410, CRP-900, QRP-725, CAP-350, CUP-450

Information for External Providers

Refer to QSM AS9100 Tier IIa	Refer to QSM AS9120 Tier IIb	Procedures
Sect. 7.4.2 and 7.4.3	Sect. 7.4.2 and 7.4.3	POR-300, PQO-400, SQM-410, CRP-900, QRP-725, CAP-350, CUP-450

8.5 Production and Service Provision

Refer to QSM AS9100 Tier IIa	Refer to QSM AS9120 Tier IIb	Procedures
Sect. 7.5 and 7.6	Sect. 7.5 and 7.6	PQO-400, TGC-650, QRP-725, MSP-700, OPS-175

Control of Production and Service Provision

Refer to QSM AS9100 Tier IIa	Refer to QSM AS9120 Tier IIb	Procedures
Sect. 7.5.1 and 7.5.2	Sect. 7.5.1	PQO-400, TGC-650, QRP-725, MSP-700, OPS-175

Identification and Traceability

Refer to QSM AS9100 Tier IIa	Refer to QSM AS9120 Tier IIb	Procedures
Sect. 7.5.3	Sect. 7.5.3	PQO-400, CCD-095, SCI-625, PRD-040, MSP-700, OPS-175, QRP-725

Property Belonging to Customers or External Providers

Refer to QSM AS9100 Tier IIa	Refer to QSM AS9120 Tier IIb	Procedures
Sect. 7.5.4	Sect. 7.5.4	PQO-400, QRP-725

Preservation

Refer to QSM AS9100 Tier IIa	Refer to QSM AS9120 Tier IIb	Procedures
Sect. 7.5.5	Sect. 7.5.5	OPS-175, HAZMAT Manual

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Post-Delivery Activities

Refer to QSM AS9100 Tier IIa	Refer to QSM AS9120 Tier IIb	Procedures
Sect. 7.5.1 and 7.5.1.4	Sect. 7.2	PQO-400, QRP-725, CRP-900, CAP-350, DCM-600

Control of Changes

Refer to QSM AS9100 Tier IIa	Refer to QSM AS9120 Tier IIb	Procedures
Sect. 7.3.7, 7.5.1.2	CRP-900, PQO-400	MSP-700, OPS-175

8.6 Release of Products and Services

Refer to QSM AS9100 Tier IIa	Refer to QSM AS9120 Tier IIb	Procedures
Sect. 7.4.3 and 8.2.4	Sect. 7.4.3, 8.2.4 and 8.2.5	POR-300, PQO-400, SQM-410, CRP-900, QRP-725, CAP-350, CUP-450, TGC-650 and (Manufacturing only MSP-700)

8.7 Control of Nonconforming Outputs

Refer to QSM AS9100 Tier IIa	Refer to QSM AS9120 Tier IIb	Procedures
Sect. 8.3	Sect. 8.3	NCM-360

SECTION 9 PERFORMANCE EVALUATION

For the purpose of addressing the requirements defined within AS9100/AS9120 section 9 requirements are referred to in the Tier IIa, Tier IIb quality manuals.

9.1 Monitoring, Measurement, Analysis, and Evaluation

Refer to QSM AS9100 Tier IIa	Refer to QSM AS9120 Tier IIb	Procedures
Sect. 8.0	Sect. 8.0 and 7.6	

9.1.1 General

Refer to QSM AS9100 Tier IIa	Refer to QSM AS9120 Tier IIb	Procedures
Sect. 8.1 and 8.2.3	Sect. 8.1 and 8.2.3	MRP025, PQO-400, SIP-425, IAP-500, MRP-025

9.1.2 Customer Satisfaction

Refer to QSM AS9100 Tier IIa	Refer to QSM AS9120 Tier IIb	Procedures
Sect. 8.2.1	Sect. 8.2.1	CRP-900, MRP-025

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9.1.3 Analysis and Evaluation

Refer to QSM AS9100 Tier IIa	Refer to QSM AS9120 Tier IIb	Procedures
Sect. 8.4	Sect. 8.4	MRP-025

9.2 Internal Audit

Refer to QSM AS9100 Tier IIa	Refer to QSM AS9120 Tier IIb	Procedures
Sect. 8.2.2	Sect. 8.2.2	IAP-500, MRP-025

9.3 Management Review

The Senior Team members, Site Managers of stock holding sites, and the DCQA with the Manager Quality Assurance & Certification conduct a management review on the quality management system at least once a year.

Based upon the review of pre-defined data and results of different analysis the meeting decided if:

- the quality system is sufficiently implemented and maintained,
- the quality system is adequate and effective and fits the expectations and requirements of the market,
- the quality policy statement is adequate,
- risks are sufficiently addressed,
- sufficient resources are available,
- the measures to capture opportunities for improvement are sufficiently.

Details are described in the procedure (MRP-025) on Management Reviews.

SECTION 10 IMPROVEMENT

For the purpose of addressing the requirements defined within AS9100/AS9120 section 10 requirements are referred to in the Tier IIa, Tier IIb quality manuals.

10.1 General

Refer to QSM AS9100 Tier IIa	Refer to QSM AS9120 Tier IIb	Procedures
Sect. 8.5.1	Sect. 8.5.1	MRP-025

10.2 Nonconformity and Corrective Action

Refer to QSM AS9100 Tier IIa	Refer to QSM AS9120 Tier IIb	Procedures
Sect. 8.2.2, 8.3 and 8.5.2	Sect. 8.2.2, 8.3 and 8.5.2	NCM-360, CAP-350

10.3 Continual Improvement

Refer to QSM AS9100 Tier IIa	Refer to QSM AS9120 Tier IIb	Procedures
Sect. 8.5.1 and 8.5.3	Sect. 8.5.1 and 8.5.3	MRP-025, PAP-340

KG shall continually improve the effectiveness of the quality management system through the use of the quality policy, quality objectives, audit results, analysis of data, corrective and preventive actions and management review.

KG shall monitor the implementation of improvement activities and evaluate the effectiveness of the results.

SECTION 11 NOTES

11.1 Revision Indicator

Revision to editorial or technical information in this document will be shown in 'red' text at the time of implementation. Those changes will return to automatic on subsequent revision to this document.

11.2 References

Kapco Global FAA Quality System Manual
Kapco Global Quality Manual Tier IIa AS9100
Kapco Global Quality Manual Tier IIb AS9120

11.3 Revision History

Revision Number	Revision Date	Pages/Section Revised	Comments
1	9/26/86	Page ii	Added revision 1.
		Section 1.2	Clarification of forms.
		Section 2.1	Deleted document number.
		Section 2.2	Clarification of Supplier Surveillance and deletion of last paragraph.
		Section 2.3	Clarified submittal of samples to independent labs.
		Section 3.0	Changed name of stores to Material Stock Control.
		Section 3.1	Clarified material/part issuance.
		Section 3.2	Deleted reference to DAC document.
		Section 5.0	Clarified inspection planning.
		Section 5.3	Editorial changes.
		Section 7.2	Changed calibration cycle.
		Section 8.0	Changed drawing status card to drawing file jacket.
Section 9.0	Editorial changes.		

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		Section 9.1	Editorial changes and defining “use as is” disposition.
		Section 13.0	Updating forms.
2	10/11/86	Section 9.1	Clarifying “use as is” discrepant material/part is to be returned to vendor or scrapped.
3	1/10/89	Section 11.2	Inspection records will be maintained: was 2 years, is now 4 years.
		Section 13.0	Replaced receiving inspection report with new form.
4	8/17/89	Section 14.0	Expanded facility layout to include 3051 E. Enterprise
5	4/2/90	Section iii	Added D.M.I.R.
		Section 7.2	Calibration cycle was three months, is six months.
		Section 9.0	Add NCR document.
		Section 9.2	No MRB authority.
6	3/21/91	Section 1.0	Added Part J.
		Section 6.0	Added new stamps and Section 6.3.
		Section 7.0	Added Section 7.4.
		Section 13.0	Added new inspection form.
7	7/23/91	Section 7.0	Revised to add reference to Procedural Manual.
		Section 7.1	Was N.B.S., is N.I.S.T.
8	1/2/92	Section 3.2	Added Part A.
		Section 9.2	Clarified “No MRB.”
		Section 12.0	Added Section 12.2.
9	2/18/93	Section 1.2 B	Added reference to Procedural Manual PTS-750.
		Section 9.2	Added production certificate to Type Certificated.
10	10/5/93	All Sections	Reformatted and rewritten.
11	12/16/94	All Sections	Reformatted to WordPerfect 6.0.
		Section iii	Revised organizational chart: QA Manager to report to Company President.
		Section 8	Added Section 8.4, Intellectual property and proprietary rights.
12	11/9/95	Section I	Added: “Federal Aviation Administration” Editorial changes.
		Section ii	Part 2C - changed manual to “controlled manual.”
		Section iii	Revised organizational chart to include Production department.
		Section 1	Editorial changes and removed last (*) in Part 1.2.1. Changed Section 1.3 and 1.4. Included Section 1.5.
		Section 2	Added K2-100 to Part 2.1 and removed Form QC201, On-site Survey Report.” Part 2.3.3 - added “First time supplier, etc., and changed Prime to Production Certificate Holder. Added forms QC K2-100a and K2-100b.
		Section 3	Part 3.1.2 - Editorial changes. Part 3.2 - Changed, Material Selection: to Pick Ticket.
		Section 4	Part 4.1 - added K2-100.
		Section 5	Part 5.1.3 - revised.
		Section 6	Part 6.2 - revised.
		Section 7	Part 7.3.4 - editorial changes.

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Revision Number	Revision Date	Pages/Section Revised	Comments
		Section 8	Added Form QC602, "Drawing Sign-out Form."
		Section 9	Added Form QC905, "Nonconforming Material Notification" and Part 9.1.3. Part 9.2.5 - revised to "beyond use."
		Section 12	Part 12.2.1 - added "Principal Inspector" Part 12.2.2 - revised. Added Forms QC400 and QC550, audit sheets for Receiving Inspection and Final Shipping Inspection. Revised Part 12.3.2 and Part 12.3.6.
		Section 14	Added new QC forms.
13	5/97	All Sections	Was Quality Assurance, is Quality Systems. Completely rewritten to bring into compliance with ISO9000.
	12/98		Complete Review of Manual done. On 12/98 there are no changes to the Quality Manual at this time.
14	3/10/99	Several Sections	Changes to the following sections were made on 3/10/99. The Approval Page, Table of Contents, Introduction, Section 2, Section 7, Section 10, Section 11, Section 13, and Section 15.
15	3/10/00	All Section, Less Sec 19	Reformatted all sections except 19. Updated Table of Contents, Modified Introduction, Minor changes made to content of all sections, except 19.
16	5/17/00	Approval Page, Introduction, Sec's 1,2,5,14, And 17	Removed "Director of Quality Systems" and replaced with "Quality Systems Facilitator, Lead Auditor, or Data Control and Distribution Supervisor" as applicable.
17	08/27/01	All Sections	Format changed - Was: "ACTIONS AND METHODS" heading, changed to: "POLICY". Revised Sections 5, 9, 14, 16, 17 to meet AS9100 requirements.
18	05/14/02	Approval page, Sec 2	Revised Sec 2 to add AS9100 and D6-82479 req'ts. Revised entire QM to reflect the new KAPCO VALTEC Logo.
19	07/03/03	Entire QM	Reformatted QM to AS9100:2000 Rev A Format (8 Elements) Not Released, used for preliminary audit evaluation purposes.
20	07/24/04	Entire QM	Minor revisions per preliminary audit evaluation.
21	01/26/04	Entire QM	Removed all BGP references, except BGP 1.91, removed "SPC" objective from Sec 4.2.1.2.

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Revision Number	Revision Date	Pages/Section Revised	Comments
22	7/17/06	Entire QM	<p>The changes are as follows:</p> <ol style="list-style-type: none"> 1. All three sites have been added under this single Quality Manual. 2. All procedural references have been removed, replaced by a statement in 4.2.2 referencing the matrix below. 3. A matrix has been created to identify all procedural references, based upon site. (See QD-9000M) 4. The FAA-PMA portion of the Valtec QM is being relocated to a FAA-PMA Procedure, and is referenced in the Matrix. 5. Exceptions are taken to Design and Servicing (Revised Wording to Section 7.3, 7.5.1.5)
23	12/01/06		Added references to FAA Addendum in Sections 1.1 and 4.2.1, Revised Section 7.3, Added FAA Addendum.
24	03/30/09	Entire QM	<ol style="list-style-type: none"> 1. Editorial and format changes. 2. Updated cover and footers, included site and HQ relationships. 3. Added Table of Contents. 4. All applicable sections have been updated in accordance with AS9120 and QS Memo 010. Additional text has been noted in italic text. 5. Changed name and logo to KAPCO, removed all references to KAPCO VALTEC. 6. Added AMS Site and Site index in Section 1.1 7. Updated FAA Addendum to include AMS Site. 8. Changed FAA Procedure to FAA-100 in FAA Addendum <p>(This Revision was not approved by the FAA CA MIDO office and was not released for use)</p>
25	07-08-2009	Entire QM	Revised QM Sections 1.1, 2.0, 4.1, 4.2, 5.5, 6.2, 6.3, 6.4, 7.1, 7.2, 7.5, 7.6, 8.2, 8.4, and 8.5 to incorporate ISO9001:2008 requirements.
26	08-05-2009	QM p3, p17, p22, p25, and p31	Revised Section 1.0 to remove BG Site, and identify other buildings at the Corp HQ Site and add reference to FAA AC 00-56a, and correct/clarify exclusions. Revised Section 7.1, 7.5.1, 7.5.2, and 7.5.3 to correct/clarify exclusion justification. Removed AMS exclusion identified within Section 8.2.4.1.

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Revision Number	Revision Date	Pages/Section Revised	Comments
27	4/26/2011	Cover Page, section 1.1, 1.2, 3.1, 4.2, 7.3, 8.5.3	<p>Added Santa Clarita Site, and updated location to the AMS Facility.</p> <p>Added SC Site to Section 1.2</p> <p>Updated Section 1.1 to remove “FAA Fabrication Inspection System” references and replaced with FAR 21 Quality Management System Requirements, updated 4.2.1f, 7.3 to remove and replace all references to the “FAA Addendum” to the KAPCO PMA-QSM. Removed FAA Addendum.</p> <p>Revised Section 8.5.3 to correct terminology and replace “preventative” with “preventive”</p> <p>3.1 updated from “JAA Form 1” to “EASA Form 1”</p> <p>Revised Sec 5.6.1 to incorporate QS Memo #011 and revise to an annual Mgt Review.</p>
28	09/01/2011	As defined	<p>1. Revised to incorporate FAR Part 21 requirements Removed FAA Addendum. Added FAR Part 21.137 to Section 1.1.</p> <p>2. Revised to incorporate AS9100 Rev C, and AS9120:2009 Policy Requirements. Various changes throughout the entire document – too numerous to list.</p> <p>3. Revised all references within section 8.5.3 from “Preventative” to “Preventive”.</p> <p>4. Updated to add procedural references to each section, removed reference to QD9000M Procedural Matrix.</p> <p>5. Updated to correct CT address to match OASIS DB and Registration certificates.</p> <p>6. Revised Cover page to reflect “Controlled” Document via KAPCO Document Management when accessed electronically.</p>

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Revision Number	Revision Date	Pages/Section Revised	Comments
29	06-15-2012	Cover Page, Section 1.1, 1.3.1, and 4.1.	<ol style="list-style-type: none"> 1. Revised section 4.1 to better define “Outsourced processes”. 2. Revised AMS Address due to relocation on “Title page” and Section 1.1. 3. Revised Section 1.3.1, to remove the ‘and Service’ exclusion under Section 7.5.1. 4. Revised Section 1.1 to permit site designation “Main” for the CA Site location. 5. Revised Section 4.1 to removed AMS procedure reference to ICR-202, added ICA-201. 6. Revised titles in “Document Approvals” section on Cover Page. 7. Removed “SC” site references from each section, as SC is a part of the CA or Main Site.
30	04/18/2013	Cover Page	Quality Manual structure revised, Defined scope of Tier I, IIa, IIb, and III. Created Quality Manuals for each Tier. Requirements relocated to Tier I, IIa, IIb, and III Quality Manuals.
31	1/17/2014	Signature page, Section 1.1, 1.1.1, Section 4, All page numbering	Updated Section 1.1 Scope to include d.b.a.’s, added Coast Air to the list of d.b.a.’s, Revised Section 1.1.1, Added the revised Quality Policy to Section 4. Corrected page numbering system.
32	8/5/2014	Signature Page	Updated approval signatures block to add MIA and SIN site locations. Updated entire document to reflect new logo and d.b.a. Kapco Global. Updated AMS location. All changes identified in Red Font.
33	04/14/2015	Page 1, site locations; page 2, signature block; page 12 section 1.3	Removed Santa Clarita site from site locations list. Removed Rick Crislip from signature block and added Doug Creelman. Added list of key processes to section 1.3.
34	12/23/2015	Cover page, site locations; page 2 signature block, sect. 1.1 SC site	Revised site locations cover page, remove Wellington and Miami, add Tamarac. Added Kevin Stibich as Corporate Quality Systems Manager and deleted SC site in sect. 1.1. Removed Paul Ferri, Managing Director AMS site. Removed Terry Vieira, Managing Director Mia site.
35	11/4/2016	Cover page, site location	Revised the AMS site address location and removed the 3101 Enterprise location of KG Brea.
36	11/10/2017	ALL	Revised entire QMS Manual to comply with 9100D and 9120B requirements. Corrected current titles and added new Proponent logo.