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QUALITY POLICY MANUAL

CLT-M01

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1.0 INTRODUCTION

Centerline Technologies, Inc. of Hudson, Massachusetts (hereafter referred to as Centerline), is an industry leader precision cutting and custom finishing of ceramic materials for the microelectronics industry. Centerline has gained expertise in precision substrate fabrication services for the microwave, telecommunications, military, and commercial markets dating back to 1970.

This document represents Centerline's *Quality Policy Manual*. As such, it formally describes the quality program implemented by Centerline to provide our customer with an assurance that their product requirements and quality expectations will be attained. All changes to this document are made in accordance with Section 4.2 of this manual and the related processes for document control.

Centerline's documented quality system has been established in accordance with all applicable requirements of ISO 9001:2008, *International Standard - Quality Management Systems - Requirements*. This manual was written under the direction and leadership of the senior management staff and has the approval of the CEO/President. The systems and processes referenced in this manual are followed by all employees and departments within the company. Employees are encouraged to provide input and ideas on how to make the quality system outlined herein more efficient and effective in an effort to assure customer satisfaction.

The information contained in this manual may not be copied in part or in full without the consent of the company.

2.0 QUALITY POLICY STATEMENT & QUALITY OBJECTIVES

The following statement, defined by Centerline's senior management, defines our corporate commitment to quality. Through training, this policy is understood, implemented, and maintained at all levels of our company.

Quality Policy Statement

In keeping with Centerline's commitment to ISO 9001:2008 principles of continuous improvement and customer satisfaction, the following three phrases epitomize our company's Mission and Quality Policy:

CUSTOMER FOCUS
Company-Wide Commitment to Satisfied Customers

TECHNICAL EXCELLENCE
Qualified Employees Delivering Superior Products in a Healthful Environment

CONTINUAL IMPROVEMENT
Process Improvement at all Levels of the Organization

Quality Objectives –

In addition to reviewing the quality policy statement to ensure its continuing suitability, Centerline's top management will define, monitor, and evaluate quality objectives to ensure that we are making progress toward measurable goals. These quality objectives (defined for relevant areas and functions) are:

- Established, revised, and regularly monitored by Centerline's Quality Council,
- Documented in the minutes of their meetings, and
- Distributed and communicated to applicable functions and employees.

3.0 CONTENT AND SCOPE OF THIS MANUAL

3.1 QUALITY MANUAL CONTENT

The policies defined in Sections 4, 5, 6, 7, and 8 of this manual are organized generally in accordance with clauses of ISO 9001:2008.

Section 9 of this manual (the *Policy-to-Procedure Coverage Matrix*) describes the structure and hierarchy of Centerline’s quality system documentation and defines the linkage between the policies in this manual and the documented processes in place that support each policy. The documented processes, in turn, refer to applicable forms and templates used in support of the process. This provides the necessary linkage between all three levels of quality system documentation – Policies (this *Quality Policy Manual*), Process Documents, and Forms.

3.2 EXCLUSIONS AND JUSTIFICATIONS

In accordance with ISO 9001:2008, Section 1.2, Centerline has **excluded** the following requirements from its documented and implemented quality system:

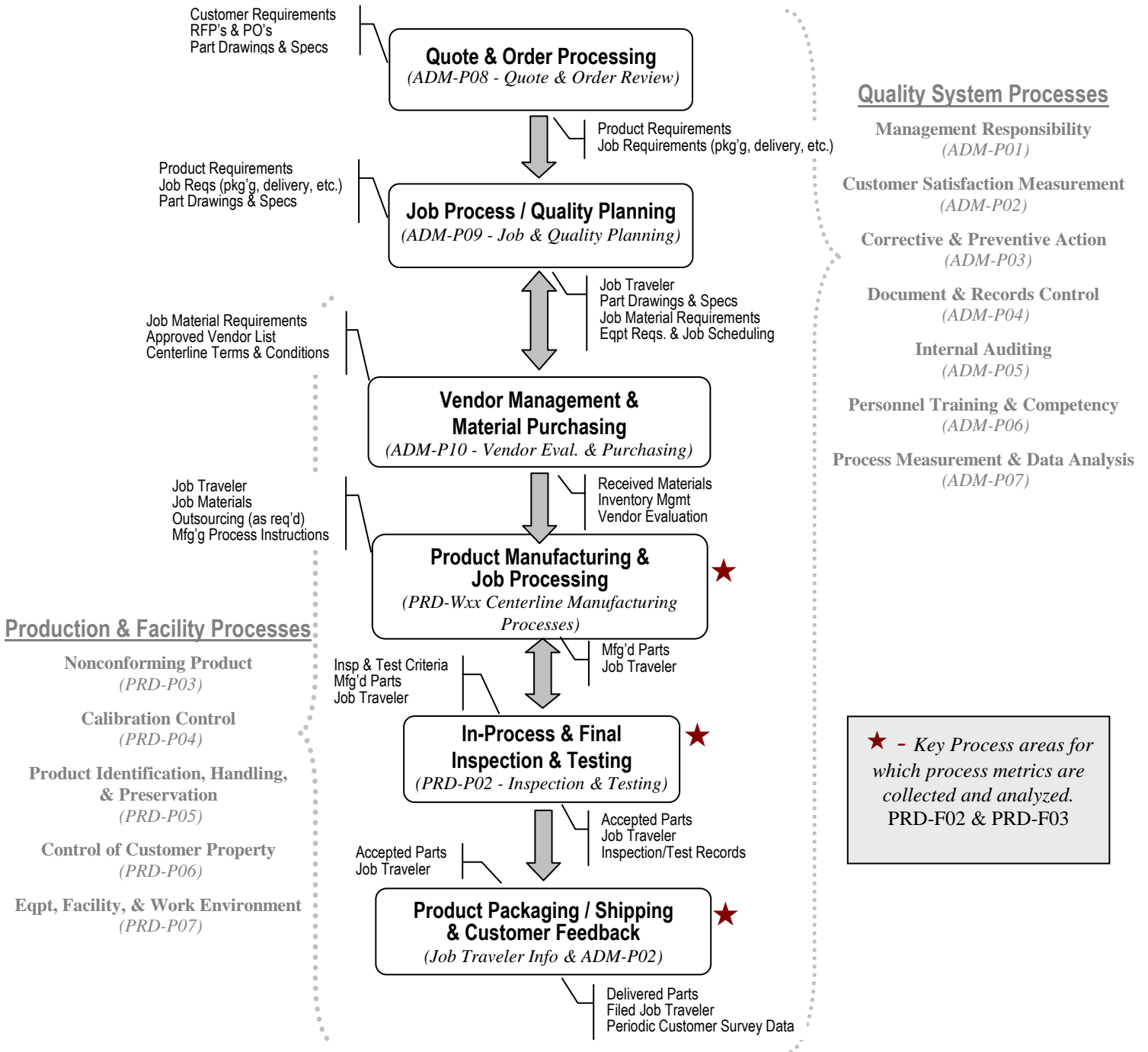
Exclusion	ISO 9001:2008 Section	Justification
Service Provision	Section 7.5	Centerline does not engage in the servicing of delivered product.
Validation of Processes	Section 7.5.2	Centerline engages in no production processes where the results of the process cannot be verified by subsequent monitoring or measurement, or where deficiencies become apparent only after the product has been delivered.
Design & Development	Section 7.3	Centerline is not design-responsible for any product realized within its quality system. Our customers provide the design criteria and specifications for all contracted product, and we produce manufactured results based on the customer’s design.

The exclusion of these requirements from the quality system in no way affects Centerline’s ability or responsibility to provide products and services that meet all customer and applicable regulatory requirements.

4.0 QUALITY MANAGEMENT SYSTEM

4.1 QUALITY SYSTEM and CORPORATE PROCESS FLOW

The following flow diagram depicts the overall process by which Centerline designs, plans, produces and verifies products and services that meet customer requirements. Inputs to each process step, and outputs from each step, are also defined.



Centerline will establish, document, implement, maintain, and continually improve the quality system by:

- a. Identifying the processes needed for the quality system.
- b. Determining the sequence and interaction of these processes.
- c. Determining criteria/methods required to ensure the effective operation/control of these processes.
- d. Ensuring necessary information is available to support the operation and monitoring of processes.
- e. Measuring, monitoring, and analyzing these processes, and implementing the actions necessary to achieve planned results and continual improvement.

4.2 DOCUMENTATION SYSTEM

The quality system documentation will include:

- ◆ Level 1 – Policies as contained in this *Quality Policy Manual*.
- ◆ Level 2 – Documented processes describing the operation of the quality system.
- ◆ Level 3 – Forms and templates that support level 2 processes.

The extent and scope of this documentation will be dependent on:

- ◆ Changes to the size and organization of Centerline.
- ◆ The complexity and interaction of the processes.
- ◆ The competence of personnel.

This *Quality Policy Manual* has been established and will be maintained in such a way that includes:

- ◆ The scope of the quality system, including details of, and justification for, any exclusions.
- ◆ References to documented processes.
- ◆ A corporate process flow diagram that depicts the sequence and interaction of the processes included in the quality system.

Document control will be provided for the quality system. A documented procedure will be established:

- a. To approve documents for adequacy prior to issue.
- b. To review, update as necessary, and re-approve documents.
- c. To identify the current revision status of documents.
- d. To ensure that relevant versions of applicable documents are available at points of use.
- e. To ensure that documents remain legible, readily identifiable, and retrievable.
- f. To ensure that documents of external origin are identified and their distribution controlled.
- g. To prevent the unintended use of obsolete documents, and to apply suitable identification to them if they are retained for any purpose.

Furthermore, records generated in support of the quality system will also be controlled. Such records will be maintained to provide evidence of conformance to requirements and of effective operation of the quality system. A documented process will be established for the identification, storage, retrieval, protection, retention time, and disposition of records.

QUALITY MANAGEMENT SYSTEM

Responsibility and Authority

The CEO and ISO 9001:2008 Management Representative have overall responsibility and authority for implementing this policy. This responsibility includes ensuring that adequate process documentation is in place for all Centerline processes.

5.0 MANAGEMENT RESPONSIBILITY

5.1 MANAGEMENT COMMITMENT

Centerline's top management will provide evidence of its commitment to the development and improvement of the quality system by:

- a. Communicating to the organization the importance of meeting customer as well as regulatory and legal requirements.
- b. Establishing the quality policy and quality objectives.
- c. Conducting management reviews.
- d. Ensuring the availability of necessary resources.

5.2 CUSTOMER FOCUS

Centerline's top management will ensure that customer needs and expectations are determined, converted into requirements, and fulfilled with the aim of achieving customer satisfaction.

5.3 QUALITY POLICY

Centerline's top management will ensure that the quality policy:

- a. Is appropriate to the purpose of the organization.
- b. Includes a commitment to meeting requirements and to continual improvement.
- c. Provides a framework for establishing and reviewing quality objectives.
- d. Is communicated and understood at appropriate levels in the organization.
- e. Is reviewed for continuing suitability.
- f. Is controlled.

5.4 PLANNING

Top management will ensure that quality objectives are established at relevant functions and levels within the organization. The quality objectives will be measurable and consistent with the quality policy, including the commitment to continual improvement. Quality objectives will include those needed to consistently meet customer requirements.

Top management will also ensure that the resources needed to achieve the quality objectives are identified and planned. The output of the planning process will be documented. Quality planning will include:

- a. The processes of the quality system, considering permissible exclusions.
- b. The resources needed.
- c. Continual improvement of the quality system.

Planning will ensure that change is conducted in a controlled manner and that the integrity of the quality system is maintained during this change.

5.5 RESPONSIBILITY, AUTHORITY and COMMUNICATION

Functions and their interrelations within the organization, including responsibilities and authorities, will be defined and communicated in order to facilitate effective quality management. Centerline maintains an *Organization Chart* that depicts the relationship and interaction of our employees and functions.

In addition, top management will appoint an ISO 9001:2008 Management Representative -- a member of management who, irrespective of other responsibilities, will have responsibility and authority that includes:

- a. Ensuring that processes of the quality system are established and maintained.
- b. Reporting to top management on the performance of the quality system, including the needs for improvement.
- c. Promoting awareness of customer requirements throughout the organization.

Centerline will also establish methods for appropriate internal communication between its various levels and functions regarding the processes of the quality system and their effectiveness.

5.6 MANAGEMENT REVIEW

Top management will review the quality system, at planned intervals, to ensure its continuing suitability, adequacy, and effectiveness. The review will evaluate the need for changes to Centerline's quality system, including quality policy and quality objectives. The inputs to management review will include current performance and improvement opportunities related to the following:

- a. Results of audits.
- b. Customer feedback.
- c. Process performance and product conformance.
- d. Status of preventive and corrective actions.
- e. Follow-up actions from earlier management reviews.
- f. Changes that could affect the quality system.

The outputs from management review will include actions related to:

- ◆ Improvement of the quality system and its processes.
- ◆ Improvement of product related to customer requirements.
- ◆ Resource needs.

Centerline's management review activity is performed by the *Centerline Quality Council*. The results of Quality Council meetings will be recorded.

MANAGEMENT RESPONSIBILITY

Responsibility and Authority

The CEO and the ISO 9001:2008 Management Representative have responsibility and authority for implementing this policy.

6.0 RESOURCE MANAGEMENT

6.1 PROVISION OF RESOURCES

Centerline management will determine and provide, in a timely manner, those resources needed to:

- a. Implement and improve the processes of the quality system, and
- b. Address customer satisfaction.

As resource needs become apparent (during normal staff communications, informal management meetings, and/or Quality Council meetings), these needs will be quickly addressed.

6.2 HUMAN RESOURCES

Personnel who are assigned responsibilities defined in the quality system will be competent on the basis of applicable education, training, skills, and experience. Centerline will:

- a. Identify competency needs for personnel performing activities affecting quality.
- b. Provide training to satisfy those needs.
- c. Evaluate the effectiveness of the training provided.
- d. Ensure that our employees are aware of the relevance and importance of their activities and how they contribute to the achievement of the quality objectives.
- e. Maintain appropriate records of personnel education, experience, training, and qualifications.

6.3 INFRASTRUCTURE

Centerline will identify, provide, and maintain the facilities needed to achieve the conformity of product, including:

- a. Workspace and associated facilities;
- b. Equipment, hardware, and software;
- c. Supporting services.

6.4 WORK ENVIRONMENT

Centerline will identify and manage the human and physical factors of the work environment needed to achieve conformity of product.

RESOURCE MANAGEMENT
Responsibility and Authority

The ISO Management Representative has responsibility and authority for implementing the policies related to training. The CEO has responsibility and authority for implementing the policies related to Infrastructure and Work Environment.

7.0 PRODUCT REALIZATION

7.1 PLANNING OF PRODUCT REALIZATION

Product realization is defined as that sequence of processes and sub-processes required to achieve quality products at Centerline. Planning of the product realization process will be consistent with other requirements of Centerline's quality system and documented in a form suitable for our method of operation.

In planning the processes for realization of products, Centerline will determine the following, as appropriate:

- a. Quality requirements for the product or job.
- b. The need to establish processes and documentation, and provide resources and facilities specific to the product or job.
- c. Verification and validation activities, and the criteria for acceptability.
- d. The records necessary to provide confidence of conformity of the processes and resulting product.

7.2 CUSTOMER-RELATED PROCESSES

Centerline will determine customer requirements, including:

- a. Requirements specified by the customer, including the requirements for availability, delivery, and support.
- b. Requirements not specified by the customer by necessary for intended or specified use.
- c. Obligations related to the design product or service, including regulatory and legal requirements.

Centerline will review the identified customer requirements, together with additional requirements that we determine. This review will be conducted prior to the commitment to supply a product to the customer (i.e., submission of a quote, acceptance of a contract or order) and will ensure that:

- a. Customer requirements are defined.
- b. Where the customer provides no documented statement of requirement, the customer requirements are confirmed before acceptance.
- c. Contract or order requirements differing from those previously expressed (e.g., in a quote) are resolved.
- d. Centerline has the ability to meet defined requirements.

The results of the review, and subsequent follow-up actions, will be recorded. Where product requirements are changed, Centerline will ensure that relevant documentation is amended. Centerline will ensure that relevant personnel are made aware of the changed requirements.

Centerline will identify and implement arrangements for communication with our customers relating to:

- a. The products and services Centerline provides.
- b. Inquiries, contracts or order handling, including amendments.
- c. Customer feedback, including customer complaints.

7.3 DESIGN & DEVELOPMENT

Centerline is not responsible for the planning or control of product designs and/or product development efforts. As such, no policies related to design and/or development are applicable. Should Centerline choose to design or develop product in the future, such policies (and the processes to support them) will be defined and documented.

7.4 PURCHASING

Centerline will control our purchasing processes to ensure that purchased materials and services conform to our requirements. The type and extent of control that we exercise will be dependent upon the effect that the purchased materials or services may have on the overall production activity.

Centerline will evaluate and select vendors based on their ability to supply services to Centerline and/or our customers, in accordance with requirements. Criteria for vendor selection and periodic evaluation will be defined. The results of evaluations and follow-up actions will be recorded.

Centerline's purchasing documents will contain information describing the materials or services to be purchased, including (where appropriate):

- a. Requirements for approval and qualification of:
 - The end-product provided by the vendor
 - Procedures followed by the vendor
 - Processes and methods used by the vendor
 - Equipment utilized by the vendor
 - Vendor personnel
- b. Quality system requirements.

Centerline will ensure the adequacy of specified requirements contained in the purchasing documents prior to their release.

Centerline will also identify and implement the activities necessary for verification of purchased materials or services. Where Centerline or Centerline's customers propose to perform verification activities at a vendor's premises, Centerline will specify the intended verification arrangements and the method for this verification in the purchasing documentation.

7.5 PRODUCT PROVISION

Centerline will control our product delivery through:

- a. The availability of information that specifies the characteristics of the product.
- b. Where necessary, the availability of work instructions.
- c. The use and maintenance of suitable equipment for production operations.
- d. The availability and use of measuring and monitoring devices.
- e. The implementation of monitoring activities.
- f. The implementation of defined processes for release, delivery, and applicable post-delivery activities.

Centerline will:

- a. Identify, where appropriate, product and materials by suitable means throughout production operations.

- b. Identify the status of product and materials with respect to measurement and monitoring requirements.
- c. Provide traceability, as required, by controlling and recording the unique identification of product and materials.

Centerline will exercise care with customer property while it is under our control or in use by our personnel. Centerline will identify, verify, protect, and maintain customer property provided for use or incorporation into our products or services. The occurrence of any customer property that is lost, damaged, or otherwise found to be unsuitable for use will be recorded and reported to the customer.

Centerline will preserve conformity of products and services with customer requirements during internal processing and delivery to the intended destination. This will include proper identification, handling, packaging, storage, and protection for both end products and their constituent parts.

Process validation is excluded from Centerline's quality system. Should process validation become a requirement in the future, Centerline will define arrangements for validation.

7.6 CONTROL OF MONITORING and MEASURING DEVICES

Centerline will identify the measurements to be made and the measuring and monitoring devices required to assure conformity of product to specified requirements. Measuring and monitoring devices will be used and controlled to ensure that measurement capability is consistent with the measurement requirements. Where applicable, measuring and monitoring devices will:

- a. Be calibrated and adjusted periodically or prior to use, against devices traceable to international or national standards; where no such standards exist, the basis used for calibration will be recorded.
- b. Be safeguarded from adjustments that would invalidate the calibration.
- c. Be protected from damage and deterioration during handling, maintenance, and storage.
- d. Have the results of their calibration recorded.
- e. Have the validity of previous results re-assessed if they are subsequently found to be out of calibration, and corrective action taken.

Software used for measuring and monitoring of specified requirements (if any) will be validated prior to use.

<p style="text-align: center;">PRODUCT REALIZATION <u>Responsibility and Authority</u></p>
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<p style="text-align: center;">The ISO 9001:2008 Management Representative has overall responsibility and authority for implementing the policies in this section.</p>
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8.0 MEASUREMENT, ANALYSIS, AND IMPROVEMENT

8.1 PLANNING

Centerline will define, plan, and implement the measurement and monitoring activities needed to assure conformity and achieve improvement. This will include the determination of the need for, and use of, applicable methodologies including statistical techniques.

8.2 MONITORING and MEASUREMENT

Centerline will monitor information on customer satisfaction and/or dissatisfaction as one of the measurements of performance of the quality system. The methodologies for obtaining and using this information will be determined.

Centerline will conduct periodic internal audits to determine whether the quality system:

- a. Conforms to the requirements of this *Quality Policy Manual* and ISO 9001:2008.
- b. Has been effectively implemented and maintained.

Centerline will plan the audit program taking into consideration the status and importance of the activities and areas to be audited as well as the results of previous audits. The audit scope, frequency, and methodologies will be defined. Audits will be conducted by personnel other than those who perform the activity being audited. A documented procedure will include the responsibilities and requirements for conducting audits, ensuring their independence, recording results, and reporting to management. Management will take timely corrective action on deficiencies found during the audit. Follow-up actions will include the verification of the implementation of corrective action, and the reporting of verification results.

Centerline will apply suitable methods for verifying those processes necessary to meet customer requirements. These methods will confirm the continuing ability of each process to satisfy its intended purpose.

Centerline will measure and monitor the characteristics of the product to verify that requirements for the product are met. This will be carried out at appropriate stages of the product realization process. Evidence of conformity with the acceptance criteria will be documented. Records will indicate the authority responsible for release of the product. Product release and service delivery will not proceed until all activities have been satisfactorily completed, unless otherwise approved by the customer.

8.3 CONTROL OF NONCONFORMING PRODUCT

Centerline will ensure that product which does not conform to requirements is identified and controlled to prevent unintended use or delivery. These activities will be defined in a documented procedure, and records of the nature of nonconformities and subsequent actions taken (including concessions obtained) will be maintained. Nonconforming product will be corrected and subject to re-verification after correction to demonstrate conformity. When nonconforming product is detected after delivery or use has started, Centerline will take appropriate action regarding the consequences of the nonconformity.

8.4 ANALYSIS OF DATA

Centerline will collect and analyze appropriate data to determine the suitability and effectiveness of the quality system and to identify improvements that can be made. This includes data generated by monitoring activities and other relevant sources. Centerline will analyze this data to provide information on:

- a. Customer satisfaction and/or dissatisfaction.
- b. Conformance to customer requirements.
- c. Characteristics of processes, products, and their trends.
- d. Vendors.

8.5 IMPROVEMENT

Centerline will plan and manage the processes necessary for the continual improvement of the quality system. We will facilitate the continual improvement of the quality system through the use of the quality policy, objectives, audit results, analysis of data, corrective and preventive action, and management review.

Centerline will take corrective action to eliminate the cause of nonconformities in order to prevent recurrence. Corrective action will be appropriate to the impact of the problems encountered.

Documented procedures for corrective action will define requirements for:

- a. Identifying nonconformities (including customer complaints).
- b. Determining the causes of nonconformity.
- c. Evaluating the need for actions to ensure that nonconformities do not recur.
- d. Determining and implementing the corrective action needed.
- e. Recording the results of action taken.
- f. Reviewing the corrective action taken.

Centerline will take preventive action to eliminate the causes of potential nonconformities in order to prevent occurrence. Preventive actions taken will be appropriate to the impact of the potential problems.

Documented procedures for preventive action will define requirements for:

- a. Identifying potential nonconformities and their causes.
- b. Determining and ensuring the implementation of preventive actions needed.
- c. Evaluating the need for actions to ensure that nonconformities do not recur.
- d. Recording the results of action taken.
- e. Reviewing the preventive action taken.

MEASUREMENT, ANALYSIS, AND IMPROVEMENT

Responsibility and Authority

The Quality Council and the ISO 9001:2008 Management Representative have overall responsibility and authority for implementing the policies in this section.

9.0 Centerline Policy-To-Process Coverage Matrix

The following matrix provides the references from the policies in this manual to the process documentation that address each policy. The specified process documents provide references, as applicable, to related work instructions and forms used to support the process.

<u>POLICY</u>	<u>PROCESS DOCUMENT(S)</u>	
	Document No.	Document Title
4.0 Quality Management System		
4.1 Corporate Process Flow	CLT-M04	Organization Chart
4.2 Documentation System	ADM-P04	Document & Records Control
5.0 Management Responsibility		
5.1 Management Commitment	ADM-P01	Management Responsibility & Review
5.2 Customer Focus	ADM-P02	Customer Satisfaction Measurement
5.3 Quality Policy	ADM-P01	Management Responsibility & Review
5.4 Planning	ADM-P09	Job & Quality Planning
5.5 Responsibility, Authority & Communication	ADM-P01	Management Responsibility & Review
5.6 Management Review	ADM-P01	Management Responsibility & Review
6.0 Resource Management		
6.1 Provision of Resources	ADM-P01	Management Responsibility & Review
6.2 Human Resources	ADM-P06	Personnel Training & Competency
6.3 Infrastructure	ADM-P01	Management Responsibility & Review
6.4 Work Environment	PRD-P07	Equipment, Facility, & Work Environment
7.0 Product Realization		
7.1 Planning of Realization Process	ADM-P09	Job & Quality Planning
7.2 Customer Related Processes	ADM-P08	Quote & Order Review
7.3 Design and/or Development	-	<i>Not Applicable</i>
7.4 Purchasing	ADM-P10	Vendor Evaluation & Purchasing
7.5 Production Operations	PRD-P01 PRD-P05 PRD-P06	Production Control Product ID, Handling, & Preservation Control of Customer Property
7.6 Control of Measuring & Monitoring Devices	PRD-P04	Calibration Control
8.0 Measurement, Analysis, & Improvement		
8.1 Planning of Measurement and Monitoring	ADM-P09	Job & Quality Planning
8.2 Measurement and Monitoring	ADM-P05 PRD-P02	Internal Auditing Inspection & Testing
8.3 Control of Nonconformity	PRD-P03	Nonconforming Product
8.4 Analysis of Data	ADM-P07	Process Measurement & Improvement
8.5 Improvement	ADM-P03 ADM-P07	Corrective & Preventive Action Process Measurement & Improvement