



SHUR-LOK COMPANY

SPS Fastener Division, a **PCC** Company

POLICIES & PROCEDURES INSTRUCTIONS

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1.0 Purpose

The purpose of this document is to provide our suppliers, and members of their supply chain, with requirements for conducting business with Shur-Lok Company and its customers.

2.0 SCOPE

This document applies to all suppliers that provide Shur-Lok Company with raw material, parts, process, and special process services that are associated to Shur-Lok Company finished product. This document forms a part of any purchase order upon which it is references. Exception to this document are listed on the face of individual purchase orders.

3.0 REFERENCED DOCUMENTS AND ORDER OF PRECEDENCE

For all Military, Federal, and Industry specifications and standards, the supplier shall comply with the revision in effect at the time of manufacture. Shur-Lok Company reserves the right to request a different revision that would be specified on the purchase order

All requests for required specifications, drawings, or other applicable documents shall be requested from Shur-Lok Company' purchasing department.

In the event of conflict between this manual and other documents, the following order of precedence applies:

1st Contractual agreement or procurement document

2nd Drawing

3rd Specifications

4th PPI 0070

4.0 ACCESS

The supplier shall grant access to Shur-Lok Company' duly authorized representatives or appropriate government authorities to any and all areas and records pertaining to



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work performed to meet Shur-Lok Company procurement or contractual documentation requirements.

the right of access by Supplier, its customer, and regulatory authorities to the applicable areas of facilities and to applicable documented information, at any level of their supply chain, ensuring that persons are aware of their contribution to product or service conformity; their contribution to product safety; and the importance of ethical behavior.

5.0 BUSINESS CHANGES

Suppliers are required to notify Shur-Lok Company Purchasing Department in writing, within 30 business days, in the event of any significant changes to their business. Significant changes are defined as, but not limited to acquisitions, changes in senior management and / or ownership, changes to key quality personnel, company name change, pending litigation, divestitures, and any other activity that might have impact to the financial stability of the company and product quality.

6.0 USE OR CONTAINMENT OF OZONE DEPLETING SUBSTANCES.

Definition. "Ozone-depleting substance," as used in this clause, means any substance the Environmental Protection Agency designates in 40 CFR Part 82 as--

- (1) Class I, including, but not limited to, chlorofluorocarbons, halons, carbon tetrachloride, and methyl chloroform; or
- (2) Class II, including, but not limited to hydro chlorofluorocarbons.

Seller shall label products which contain or are manufactured with ozone-depleting substances in the manner and to the extent required by 42 U.S.C. 7671j (b), (c), and (d) and 40 CFR Part 82, Subpart E, as applicable:

Warning

Contains * _____, a substance(s) which harm(s) public health and environment by destroying ozone in the upper atmosphere.

Warning

Manufactured with * _____, a substance(s) which harm(s) public health and environment by destroying ozone in the upper atmosphere.

* Seller shall insert the name of the substance(s).

7.0 CHANGES IN PROCESSES



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Seller agrees not to make any change in materials, processes or design details of the parts after qualification or approval without written approval from Shur-Lok. This shall include changes in material, processes or design details by subcontractors. In addition to these changes, changes which would affect the part or any component part thereof with regards to (A) part number identification, (B) physical or functional interchangeability and (C) repair and overhaul procedures and processes and material changes with affect thee procedures without prior written approval of Shur-Lok is prohibited. If such approval is granted, all part numbers and the originals of all drawings or data shall be revised and provided to Shur-Lok accordingly. Seller will ensure subcontracts include the above requirements for supper part numbered items, whether such equipment is supplier to seller as an end item or as a component part of an end product.

8.0 QUALITY SYSTEM REQUIREMENTS

8.1 THIRD PARTY CERTIFICATION

As a condition to conducting business with Shur-Lok Company suppliers must be approved and incorporated into Shur-Lok Company' Approved Vendor List (AVL). Vendor approval may be assumed by the supplier once a purchase order has been issued by Shur-Lok Company.

Shur-Lok policy is to place orders with suppliers that are certified by accredited third party organizations as follows. When exception is made to this policy, it is understood that the exemption is temporary and the supplier is urged to become certified.

Non – certified suppliers will be subject to increases scrutiny and control which may include on site audits, 100% receiving inspection and source inspection.

Raw Material Distributors –Should be certified to AS9100 or AS9120.

Special Process Suppliers – Should be certified to: AS9100 quality system or be accredited to NADCAP AC7004; and have appropriate NADCAP certification for the process being performed.

Calibration and testing suppliers should be certified to ISO / IEC 17025 or other applicable standard.

Direct Material Suppliers – Should be certified to ISO9001 or AS9100 quality system requirements.



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All Other Suppliers – Suppliers (other than material suppliers, special process suppliers, or raw material distributors), whose product or service can have impact on Shur-Lok.

8.2 MINIMUM QUALITY SYSTEM ELEMENTS

Shur-Lok Company feels there are a set of critical elements within an effective quality system. To that extent, Shur-Lok Company requires the following set of elements as a condition for quality approval:

Quality Policy

A documented commitment by top management toward quality & continual improvement.

Document Control

A written procedure that addresses control of Shur-Lok Company documents (prints and specifications), to include administration and revision level maintenance.

Record Control

Seller shall maintain, and have available on a timely basis, quality record traceable to the conformance of the product delivered to Shur-Lok. Seller shall make such records available to regulatory authorities and authorized representatives. Seller shall retain such records for 10 years from the date of shipment under each applicable order for all products and processes unless otherwise specified on the purchase order. At the expiration of the retention period, Shur-Lok reserves the right to request delivery of such records. In the event Shur-Lok chooses to exercise this right, seller shall promptly deliver such records to Shur-Lok at no additional cost on media agreed to by both parties.

Purchasing Control

The supplier shall have a written procedure for purchasing control, to include quality and delivery expectations of sub-tier suppliers.

The supplier is responsible for assuring that work, processes performed, and material provided by subcontractors meet all applicable Shur-Lok Company requirements.



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The supplier is also required to flow-down all Shur-Lok Company requirements and latest revision changes to requirements that affect the work and processes performed and material provided by subcontractors for Shur-Lok Company.

Suppliers of material product shall maintain test reports (e.g. certificate of tests or material certifications) and make them available for all material shipped to Shur-Lok Company.

Corrective Action

The supplier shall have a written procedure defining actions required to address product, process, and quality system deficiencies.

Control of Non-Conforming Product

The supplier shall have a written procedure for how they will control non-conforming product. At a minimum, the procedure must include how non-conforming product will have identified and contained to prevent its unintended use or delivery.

Foreign Object Damage / Debris (FOD) Control

The supplier shall have a system to prevent damage to parts by contact with foreign objects or the inclusion of foreign objects in the parts or packaging. Control measure appropriate to the part or process shall be established. NAS 412 shall be used as a guide for FOD Control systems.

9.0 DETAIL QUALITY REQUIREMENTS

9.1 INSPECTION

Suppliers shall perform planned inspection activities to confirm that all characteristics and processes called out on the purchase order, either directly or indirectly through noted specifications and procedures, are compliant with requirements.

Results of these inspections will be supplied to Shur-Lok upon request or as required on the face of the purchase order. See certifications and test reports.

9.2 SAMPLING INSPECTION



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Sampling inspection is allowed at supplier's discretion as long as the sampling plan does not knowingly accept non-conformances in the sample. Sample size is to be normally reported on the certification if not controlled by the ordered specification.

Shur-Lok reserves the right to conduct sampling at our discretion up to and including 100% inspection of product and processes from suppliers. Any rejection by Shur-Lok will be based on the sample inspection used by Shur-Lok.

9.3 Visual and Workmanship Requirements

All parts shall be handled with care to protect them from nicks, dents, scratches, internal contamination and other damage that could result in subsequent rejection. Shur-Lok has established workmanship standards that can be provided to suppliers upon request.

Parts with finished machined surfaces shall be free from chips, foreign material, nicks, tool marks, burrs, sharp edges, blowholes, porosity, rust, stains, discoloration, missed operations and other non-conformances that can be detected visually.

Tapped, drilled and reamed holes shall be free from dirt, chips and burrs before gauging.

Transition of fillets and the blending of sharp edges shall be smooth and the intersection with adjacent surfaces shall be at the point of tangency.

All internal passages must be free of chips, metal spirals, machining compounds and other foreign materials.

All blind holes, oil holes, internal intersections, etc., shall be probed or bore scoped for burrs and contamination.

Magnification (3X) shall be used only to evaluate visual inspection non-conformances that are not readily discernible to the unaided eye.

For plated, painted and/or coated parts, the following items shall be inspected for conformance during visual inspection operations.

Optional plated areas, if plated, shall be inspected to the same visual requirements, unless otherwise specified, as mandatory plated areas. Parts shall be visually inspected according to the visual characteristics called out in the applicable plate, paint or coating specification.



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Except as permitted by applicable specification, parts shall be free from peeling, flaking, chips, blisters, nodules, pits, pin holes, porosity and bare areas.

Coatings shall be smooth, continuous, visually adherent and uniform in appearance. Slight staining or discoloration shall not be cause for rejection.

Precautions shall be used to assure that there is not contact between titanium or uncoated columbium parts and other objects composed of cadmium, gold, silver, lead, tin, bismuth or zinc. Personal articles such as, rings, watches, belt buckles, etc. shall be suitably covered or removed prior to handling parts with finished surfaces.

All articles shall be inspected prior to shipment to assure compliance with all required preservation and packaging requirements.

9.4 Control of Non-Conforming Material

Rejected or non-conforming material shall be immediately controlled, upon discovery, per the supplier's control of non-conforming product procedure.

Counterfeit Material shall be considered non-conforming

In the event of escape, the supplier shall immediately disclose all pertinent information to the appropriate Shur-Lok Company Buyer or Quality Department.

Supplier must contact purchaser to receive disposition in the event Shur-Lok supplied material, components, or sub-components are rejected.

In the case where a non-conformance escapes to Shur-Lok Company or one of its customers, the supplier may be requested to complete a corrective action request. At a minimum, the supplier is expected to provide: containment plan; root cause analysis; proposed corrective action; and completion date for implementation of corrective action. The supplier is free to use their own corrective action format as long as the prescribed required elements aforementioned are included.

9.5 Traceability

The supplier is required to establish a system for lot traceability in order to be able to trace material or product throughout the entire process or supply chain. Material shall be clearly identified in a manner that provides traceability to a lot



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number or other manner that is compliant to associated specification or drawing requirements.

9.6 Measurement & Test Equipment

All measurement and test equipment used to accept product shall be managed and calibrated in accordance with ANSI/ISO/ASQ 10012.

All gauges are required to have a 10:1 resolution of the characteristic being evaluated (e.g. If characteristic is tolerance to 0.001, then the gage must be graduated to 0.0001”).

9.7 Packaging & Shipping

All Shur-Lok Company product must be packaged in a manner that will prevent damage and preserve the product adequately. Special packaging requirements will be listed on the purchase order.

9.8 Certifications and Test Reports

When the purchase order states “Certification Required” the following documents are to be sent with the parts or the order.

Certificate of Conformance

Each shipment must include a certificate of conformance for all materials and processes specified on the purchase order or contract. This document shall include a general statement of conformance and include a signature by the appropriate quality assurance designee of the company. Signatures may be in electronic or stamp format.

Certificate of Test

When testing is required by the purchase order or by specifications on the purchase order, the results of the testing shall be provided on a test report. This document will contain at a minimum: specific processes or tests performed; specification number; revision level of specification; lot size; sample size; and test results.



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Material Certificates

Each shipment of raw material (including castings and forgings) shall include a "true copy" of the original mill certificate or material test report. The results must include chemical, physical, and mechanical properties as required per the drawing and/or material specification.

Raw material certifications may not be altered or have any markings on them, other than inspection validation check marks.

9.9 Supplier Performance

Shur-Lok Company expects each approved supplier to take ownership and responsibility for managing his or her performance.

In the event a supplier has been determined to be, underperforming by either the Shur-Lok Company purchasing or quality group a review will be conducted to determine an appropriate course of action, up to and including disqualification of the supplier.

9.10 DFARS 252.225-7014- Preference for Domestic Specialty Metals (Berry Amendment)

All orders that reference DFARS on the purchase order or contract that incorporate specialty metals into articles delivered shall contain a statement of conformance to these requirements or shall list the country in which the material was melted.

DFARS requirements must be flowed down to sub-tier suppliers.

9.11 Suppliers shall have a counterfeit parts protection program that meets the requirements of AS6174. This requirement must be flowed down to sub-tier suppliers.

9.12 Application of Acceptance Authority Media (Inspection stamps)

Seller shall comply with the AS/EN/JISQ 9100 requirements and 14CFR Part 21.2 regarding the application of the Acceptance Authority Media (AAM) requirements.

Seller shall with its organization and its supply chain, ensure that the use of AAM is clearly defined within its Quality Management System (QMS).



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Seller shall be able to demonstrate evidence of communication to its employees and to its supply chain that the use of AAM must be considered as a personal warranty of compliance and conformity.

Seller shall maintain compliance to the AAM requirements by assessing its process and supply chain as part of its internal audit activities.



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REVISION RECORD:

<u>Rev / Date</u>	<u>Change</u>
N/C 05/08/2017	New Release
A 10/25/2017	Added Para 9.11 to comply with AS6174 Counterfeit parts requirements.
B 06/26/2018	Added Para 9.12 to comply with 14CFR Part 21.2 Requirements.

Approvals:

Sr. QA Engineer B. Mosallaei	Quality Assurance Director D. Foster	Purchasing B. Moscoe

NOTE: This is a Web Access Point Document. Any revisions require uploading per QAI1001.