



NEWELL CORP

SUPPLIER QUALITY ASSURANCE REQUIREMENTS

SQAR 840

QA-100 General

(QA-101) Right of Entry - Newell Corp, its customer or regulatory agencies shall be afforded the right to review and verify that subcontracted product, processes and records conforms to specified requirements. Verification by Newell Corp, its customer or regulatory agency does not absolve the supplier of the responsibility to provide acceptable product, nor does it preclude subsequent rejection by Newell Corp or its customer.

(QA-102) Non ISO9001/AS9100 Suppliers - Supplier shall provide and maintain an inspection system which will assure that all delivered products conform to Purchase Order requirements, whether manufactured or processed by the supplier or a sub-tier supplier. Supplier shall maintain controls and perform all inspections and tests required to substantiate product conformance requirements.

(QA-103) ISO9001/AS9100 Suppliers - The supplier will as a minimum maintain a documented quality system that meets the requirements of AS9100 and/or ISO9001. The Supplier's Quality Assurance function shall be clearly designated within the Supplier's Organization. Personnel having the responsibility for the quality of product shall have sufficient authority to assure that quality is not compromised. The Supplier's Quality Assurance System shall be implemented by written procedures that adequately provide for compliance with the requirements of Newell Corp Purchase Order. The Supplier shall notify Newell Corp whenever there is a significant change to their Quality Assurance System, i.e. gaining or losing any NADCAP approvals, gaining or losing any FAA or governmental operating approvals, or gaining or losing any Quality System registration or certification (ISO/AS).

(QA-104) Control of Quality Records by Newell Corp Suppliers - Newell Corp suppliers used for processing and machining or any service procured that affects product conformity must maintain on file all quality records showing conformance to Newell Corp purchase order requirements for a minimum of 10 years.

(QA-105) Supplier Assistance - If Purchase Order requirements are not completely clear, or where special assistance is needed, Newell Corp will provide qualified personnel to consult with Supplier. Requests for assistance shall be made to Newell Corp Purchasing Department. If inquiries pertain to quality aspects of products or services, Newell Corp Quality Assurance Organization may be contacted directly.

(QA-106) Supplier Audits - Newell Corp may conduct periodic audits of the Supplier and/or their sub-tier Supplier's Quality system, to evaluate their ability to comply with Newell Corp requirements. As necessary, Newell Corp Customer may accompany Newell Corp Quality representative in such audits.

(QA-107) Government Inspections - Materials and/or components supplied under the terms of this Purchase Order may be utilized in equipment which has been or will be subject to Federal Government approval, including Federal Aviation Administration (FAA). The Suppliers Quality system, and the Quality system of any sub-tier Supplier, is therefore subject to surveillance by authorized representatives of the US Government and/or the FAA. The Supplier shall provide all reasonable facilities and assistance to the authorized representatives upon request.

(QA-108) Nonconforming Product Produced by Supplier - The supplier must notify Newell Corp of nonconforming product or processes prior to delivery. All parts dispositioned by a supplier as scrap will be sorted 100% for the defect that is discrepant. Also, all parts that have been dispositioned as scrap must be identified with a discrepant part tag or other means of identification. The supplier must obtain approval from Newell Corp Quality / Purchasing for nonconforming part disposition.

(QA-109) Production or Process Changes - The supplier must notify Newell Corp of any changes in the product or process used in the manufacture of product for Newell Corp. Newell Corp reserves the right for approval of the product, the parts used, the materials used and equipment used by the supplier in the fulfilling Newell Corp



NEWELL CORP

SUPPLIER QUALITY ASSURANCE REQUIREMENTS

SQAR 840

Purchase Order requirements. This includes changes of suppliers, manufacturing and / or processing facility locations or additional facilities. These changes may require Newell Corp approval depending upon the change.

(QA-110) Nonconformance Disposition of Supplied Discrepant Parts - If nonconforming parts or processes are found during inspection at Newell Corp the supplier will be contacted and will have 14 days to respond to the discrepancy by coming to Newell Corp to re-inspect, or Newell Corp may, at their discretion, return the parts to the supplier for inspection.

(QA-111) Notice of Escapement / Disclosures - Newell Corp suppliers shall provide a written notification of nonconformities that may have affected parts or services delivered to Newell Corp within 48 hours of the realization of the escapement. The Newell Corp purchasing agent will be notified and the discrepancy documentation must include a clear and concise description of the discrepancy which includes as a minimum; part number, purchase order number, quantity and the date the parts were delivered to Newell Corp. Also, immediate corrective action / containment as well as the root cause and corrective action must accompany the discrepancy documentation submitted to Newell Corp.

(QA-112) Quality System Documentation - The supplier shall assure that the latest revisions status of applicable drawings, specifications, technical requirements, as specified on Newell Corp Purchase Order, are available at the Supplier's facility.

(QA-113) Subcontracting without Written Approval - Subcontracting all or substantially all of the order without written consent of Newell Corp Quality or Purchasing is prohibited.

(QA-114) Subcontractor Flow Down - If any portion of the order is subcontracted, it is the responsibility of the supplier to flow down to the supply chain the applicable requirements, including customer requirements.

(QA-115) Supplier Awareness - Newell Corp suppliers shall ensure that their workforce is aware of their contribution to product conformity, product safety, and the importance of ethical behavior.

QA-116 Supplier Performance - Newell Corp suppliers are expected to continuously perform at a high level and will be periodically monitored in the areas of product quality, and on-time delivery performance. When performance levels do not meet Newell Corp expectations, suppliers will be contacted by Newell Corp procurement.

Additional Requirements

QA-200 Newell Corp Supplier – Manufacturing

(Page 3) QA-300 Newell Corp Supplier –

Processing (Page 4)

QA-400 Newell Corp Supplier – Raw Material, Hardware, Components, Sealants (Page 5)



NEWELL CORP

SUPPLIER QUALITY ASSURANCE REQUIREMENTS

SQAR 840

QA-200 Newell Corp Supplier – Manufacturing

(QA-201) *Certifications* - Suppliers must submit with each shipment a certificate of conformance stating that all manufacturing and inspections complies with the applicable engineering and purchase order requirements. Material and processing certifications must be supplied to Newell Corp if parts were purchased by Newell Corp complete.

(QA-202) *First Article* - AS9102 first article inspection is required. First article shall consist of 100% verification and documentation showing compliance to the Newell Corp drawing, including dimensional and functional data of each item manufactured and supplied to Newell Corp. Copies of AS9102 forms are available from Newell Corp upon request.

(QA-203) *Statistical Process Control* - Statistical process control may be required and shall be implemented as defined by the Newell Corp Purchase Order. The supplier shall contact the process improvement coordinator prior to manufacturing to arrange a meeting to define the required key or special characteristics affected.

(QA-204) *In-Process Inspection* - In process inspection may be required by Newell Corp. When this is required, the specific inspection point in the process will be specified on the purchase order. The supplier will contact Newell Corp and hold the material for in-process inspection by Newell Corp Quality.

(QA-205) *Protection of Parts against Contamination or Damage* - The parts must be boxed, banded, or shipped in a manner that will ensure that no damage will occur.

(QA-206) *Digital Data Sets* - When digital data is provided to the supplier as a manufacturing aid, Supplier's Quality system shall assure that the configuration management and media security are handled in accordance with Boeing Document D6-51991 or equivalent. All datasets provided for the purposes of bidding, and marked "Preliminary," shall be discarded upon bid completion.

(QA-207) *Newell Corp Supplied Drawings and PCM's* - All drawings / PCM's or other Engineering media provided to a supplier must be returned with the order upon completion.

(QA-208) *Newell Corp Furnished Material* - Heat lot traceability must be maintained by the supplier when the material is supplied by Newell Corp. No heat lot substitution or co-mingling of heat lots is allowed unless written permission is granted by Newell Corp.



NEWELL CORP

SUPPLIER QUALITY ASSURANCE REQUIREMENTS

SQAR 840

QA-300 Newell Corp Supplier – Processing

(QA-301) *Nadcap Approval* - Suppliers must be Nadcap approved for all chemical processing, heat treating, welding, non-destructive testing and all other processes required by Newell Corp customers.

(QA-302) *Newell Corp Customer's Approved Processors* - All Heat Treat, NDT, Welding and Coatings subcontracted by Newell Corp must be performed by a Newell Corp Customer Approved Processor. The supplier is responsible for verifying their approval status prior to any processing being performed.

(QA-303) *ITAR Requirements* - "In entering into any agreement with Newell Corp, relating to the manufacture of defense articles or the provision of defense services, the Subcontractor (or Supplier) warrants to Newell Corp that is has registered as a defense manufacturer with the Department of State, Directorate of Defense Trade Controls, as required by ITAR 122.1."

(QA-304) *Certifications* - Processing certifications must reference all relevant processes performed, specifications and revisions of the processes completed.

(QA-305) *Specifications* - The Supplier must meet the requirements of all specifications referenced on drawings or on the purchase order. Current revision level, and all applicable specification departures will be included with the purchase order as attachment QF 740-1 Special Process Specs and PSD's.



NEWELL CORP SUPPLIER QUALITY ASSURANCE REQUIREMENTS SQAR 840

QA-400 Newell Corp Supplier – Raw Material, Hardware, Components, Sealants

(QA-401) *Certifications* - A Supplier Certificate of Conformance is required with each shipment to Newell Corp including the applicable heat lots and chemical and physical analysis / test reports. The C of C must state the material type, the material temper, and that the material meets the applicable specifications and revisions of the material specification procured by Newell Corp.

(QA-402) *Preference for Domestic Specialty Metals* - When a line item on a Newell Corp purchase order has the part number identified as XXX-DFARS the supplier agrees to comply with Defense Federal Acquisition Regulation Supplement DFAR 252.225-7014 (Alt. I), Preference for Domestic Specialty metals when this clause is specified in the purchase order. Use of foreign specialty metals may only be made with the written authorization from Newell Corp. Note: Country of melt must be identified on certification.

(QA-403) *Newell Corp Customers Approved Manufacturers* - All Suppliers of materials, hardware, components, sealants / adhesives, etc., where applicable, must be on the current approval listings of Newell Corp Customers. The supplier is responsible for verifying their approval status prior to the manufacture of these goods.

(QA-403) *Shelf Life* - The date of manufacture must be noted on each individual container and / or certification. Sealants / adhesives and adhesive tapes must have at least 80% of shelf life available upon receipt at Newell Corp or it will be returned to the supplier

(QA-404) *Counterfeit Parts/Materials Prevention* - All Suppliers of materials, hardware, components, sealants / adhesives, etc., procured for the purpose of incorporation into deliverable fly-away parts by Newell Corp, shall establish and maintain a counterfeit parts/materials control plan to ensure counterfeit parts/materials are not delivered to Newell Corp.