



NEWELL CORPORATION
SUPPLIER QUALITY ASSURANCE REQUIREMENTS
SQAR 840

QA-100 General: All QA-1XX clauses apply to any purchase order that requires SQAR 840

(QA-101) Right of Entry - Newell Corp, its customer and/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-ISO 9001/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) Control of Quality Records by Newell Corp Suppliers - Newell Corp suppliers used for raw material, processing, 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. Prior to disposition of records, supplier shall notify Newell Corporation, and provide records if requested.

(QA-104) 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 the individual purchaser listed on the Newell Corp P.O. If inquiries pertain to quality aspects of products or services, Newell Corp Quality Assurance Organization may be contacted directly.

(QA-105) 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-106) 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-107) 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-108) 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 while fulfilling Newell Corp



NEWELL CORPORATION
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-109) 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-110) 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. Additionally, supplier should immediately contain/segregate other effected product. The Newell Corp Quality Manager may require root cause analysis and a corrective action plan to accompany any discrepancy documentation submitted to Newell Corp.

(QA-111) Quality System Documentation - The supplier shall assure that the latest revision status of applicable drawings, specifications, technical requirements, as specified on Newell Corp Purchase Order, are available at the Supplier's facility.

(QA-112) Subcontracting without Written Approval – All suppliers must obtain written approval from Newell Corp. before subcontracting any machining or fabrication.

(QA-113) 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 any applicable requirements.

(QA-114) 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-115) Supplier Performance - Suppliers are expected to verbatim adhere to any/all PO requirements i.e. quality and on-time delivery. Newell Corp shall be contacted immediately once supplier recognizes it cannot fulfill any/all PO requirements.

(QA-116) Counterfeit Parts/Materials Prevention - All Suppliers of materials, hardware, components, sealants/adhesives etc., procured for the purpose of incorporation into deliverable Newell Corp product, shall establish and maintain a counterfeit parts/materials control plan to ensure counterfeit parts/materials are not delivered to Newell Corp.

(QA-117) 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. In addition, supplier shall ensure that parts have been protected from Foreign Object Debris/Foreign Object Damage (FOD) throughout the manufacturing process.

See below for additional QA-2XX requirements (ONLY REQUIRED IF EXPLICITLY CALLED OUT IN P.O.)



NEWELL CORPORATION
SUPPLIER QUALITY ASSURANCE REQUIREMENTS
SQAR 840

QA-2XX Requirements (ONLY REQUIRED IF EXPLICITLY CALLED OUT IN P.O.)

(QA-201) DPAS - The requirements of Defense Priority Rating must be followed per 15 CFR Part 700.

(QA-202) DFARS - Material must be mined, produced, or manufactured in a qualifying country as specified in DFARS 225.872-1.

(QA-203) ITAR & EAR Requirements - Supplier must comply with ITAR requirements per 22 CFR part 120 through 130 and EAR requirements per 15 CFR part 730 through 799.

(QA-204) CMTR's - A Certified Mill Test Report is required with each shipment to Newell Corp including the applicable heat lots and chemical and physical analysis/test reports.

(QA-205) Certifications - Suppliers must submit with each shipment a certificate of conformance stating that all manufacturing, processing, and inspection results comply with the applicable engineering and purchase order requirements.

(QA-206) AS9102 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-207) 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-208) Source Inspection - Source 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 source inspection by Newell Corp Quality.

(QA-209) 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.

(QA-210) 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-211) 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.

(QA-212) Nadcap Approval - Supplier must be Nadcap approved for all chemical processing, heat treating, welding, non-destructive testing and all other processes required by Newell Corp customer.

(QA-213) 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.