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Introduction

We value the partnership we form with our suppliers and recognize that our suppliers are key to the long-term growth to our business. Our expectations from our suppliers are identical to those expected by our customers.

Purpose

This Supplier Requirements Manual describes the Supplier’s obligations to Brighton NC Machine (BNC). Because purchased materials, parts, products and services affect every part and assembly shipped by us, these obligations are to ensure that the Supplier can and does conform to BNC's quality requirements and is committed to customer satisfaction through continuous improvement of its processes and product.

Scope

This Manual (as it may be amended) shall be incorporated into each contract agreement issued by BNC to the Supplier. The Supplier’s sale of any goods and/or services to BNC constitutes acceptance of the applicable purchase order (PO) (including this Manual). Obligations of the Supplier contained in this Manual may only be modified or waived by a BNC Executive Representative (i.e Quality, Material Control, or Supplier Development) in writing.

Contacts

Quality Manager:	Amy Ohler	810-227-6190
Material Control:	Kim Finneran-Lyons	810-227-6190
Supplier Quality Engineer:	Jason Utley	810-227-6190
Business Development:	Scott Thacker	810-227-6190

Purchasing Philosophy

It is our intention to team with suppliers that are committed to and deliver quality products, on time. These suppliers can support BNC’s goals by consistently providing defect free products delivered on time, taking a proactive approach to continuous improvement, and reacting quickly to our collective needs.

Quality, Delivery, Value, and Service are factors that govern the evaluation of all sources prior to soliciting a quotation and during the tenure of the purchase contract. BNC must be assured that new suppliers will be able to produce an improved product, reduce current costs, or offer other advantages. To improve both the quality and cost of BNC products, we are constantly searching for additional suppliers who offer the best value.

Values and Beliefs

Brighton NC will be guided by its values and beliefs and further dedicates itself to conducting all activities in a fair, ethical and professional manner. It is the policy of Brighton NC to maintain relationships with suppliers that are legal, ethical, and consistent with good business practices.

We believe that we can contribute to the realization of a sustainable society through your understanding and commitment to practice the underlying idea of Corporate Social Responsibilities in order to operate in an economically, socially, and environmentally sustainable manner. In particular, we ask you to thoroughly comply with the following items:



1. Environmental Responsibility:

- By complying with laws and regulations of countries and regions concerning prevention of pollution of air, water, and soil, etc
- By prevent environmental contamination through continuous monitoring and reduction of pollutants
- By not using prohibited chemical substances in manufacturing processes
- Regarding chemical substances that are specified by laws and regulations of countries and regions, monitor their emission volumes and report to governmental agencies.

2. Human Rights Responsibility


- By elimination of discrimination-Do not discriminate based on race, ethnicity, nationality of origin, religion, gender, or any other legally prohibited reason in any aspect of employment.
- By elimination of harassment- Do not allow any form of harassment in the workplace based on race, nationality, gender, religion, or any other reason.
- By prohibiting child labor-Do not permit the employment of children who do not meet the legal minimum working age of each country and region
- By ensuring wages comply with the applicable laws and regulations of each country and region regarding minimum wages, overtime hours, wage deduction, performance-based pay and other remuneration.
- By maintaining a safe and healthy working environment-Make the health and safety of workers the top priority and strive to prevent occupational accidents

3. Philanthropic Responsibility

- By representing your company's commitment to society, by demonstrating that you value the community beyond simply providing a workforce or source of revenue, e.g. funding educational programs, supporting health initiatives, donating to causes, supporting community projects, etc.)

4. Economic Responsibility

- By improving business operation while participating in sustainable practices – for example, using a new manufacturing process to minimize wastage.
- By committing to creating economic value for clients, communities, and society in general. Working to provide solutions that solve business challenges and achieve financial goals.
- By ensuring Fair Trade-Comply with the competition laws of each country or region
- By obtaining personal or confidential information concerning employees, customers and business partners only by legitimate methods, while managing and protecting such information

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Corporate Social Responsibility Non-Compliance

Action in the event of non-compliance-In the event of any violation or serious incident in the business activities of our suppliers, we require suppliers to immediately report the infraction to us. BNC will review the Supplier's report and will request the full details of the investigation, including its cause and results. In addition, we will request the Supplier to submit in detail the countermeasures taken to prevent a recurrence. If appropriate measures are not taken, we may take actions such as suspending business relations.

Quality and Supplier Visits

BNC recognizes the latest version of ISO 9001 requirements for our suppliers. All suppliers are encouraged to establish documents and implement effective quality management systems compliant with the latest version of ISO 9001 requirements as a minimum. This manual defines BNC specific requirements and is in conjunction with the latest version of ISO 9001 Requirements.

BNC reserves the right to verify supplier compliance to the latest version of ISO 9001 requirements with on-site visits to those suppliers identified as having a high impact to quality.

Audit Review(s) may be performed anytime a supplier's performance is deemed unsatisfactory by BNC Management.

Our primary goal for Supplier visits is the development of both current and potential suppliers that are committed to providing defect-free products to BNC. The emphasis is in the development of those suppliers who will add value to our product at the lowest total cost.

Customer Specific Requirements

All Customer Specific Requirements shall be evaluated by BNC suppliers. BNC will flow down any other customer specific requirements such as special print items. Other customer-specific requirements will be identified on the PO. If a supplier does not have access to Customer Specific Requirements, they can request the most current revision by contacting BNC's Supplier Quality or Quality Engineer.

Internal Audits


Supplier Internal Self-Audits

Suppliers are expected to conduct regular internal audits to ensure that internal systems and procedures which have been implemented to assure that customer requirements are being met, are in effect, are meeting goals and objectives, and are subject to continuous improvement.

Internal audits should, wherever possible, be conducted by personnel who are independent of the organization or functional activity that is being audited.

Documented procedures should be in effect for internal audit, indicating:

- Audited system review for effectiveness from use of continuous improvement analysis.
- Defined responsibilities for personnel conducting the audit.
- Records of the results of the audit are reviewed at a Management Review.

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Follow-up internal audits shall be performed to verify the effectiveness of the corrective actions for any non-conformances found in the internal audits. Such follow-up activities are to be maintained on file for three years and are to be available for review, upon request from BNC.

Supplier Quality System Self-Audits

There are two primary reasons for conducting a Supplier Quality System Self-Audit:

- (1) To evaluate potential suppliers and determine their ability to meet BNC requirements.
- (2) To evaluate current suppliers having reoccurring non-conforming materials and/or unsatisfactory performance history rating.

Rating Requirements for Supplier Quality System Self-Audits and On-Site Audits

Rating requirements are defined on a Self-Audit form and are communicated in advance to Supplier.

Audit results for potential suppliers requires a rating of:

- 80%-100% (green) to be considered a BNC recommended supplier, BNC may request an improvement plan if score is between 80% to 84%
- 60%-79% (yellow) may be considered a BNC supplier, an action plan may be required.
- 59% or less (red) cannot be considered a BNC supplier, unless an action plan is provided and accepted by BNC. BNC will require a follow-up on the action plan to re-evaluate rating.

Audit results for current suppliers will be rated:

- >85% (green) for acceptance
- 70%-85% (yellow) Conditioned acceptance
- <70% (red) Rejected.

Any single audit finding rated as red will require an action plan even though the overall rating is on green.

All suppliers may be subject to an on-site audit.


All suppliers not meeting the required score may be subject to a re-audit unless substantiated documentation of corrective action(s) is provided.

Special Process System Assessments (CQI-9, CQI-11, CQI-12, CQI-15, CQI-27)

Suppliers shall conduct special process system audits annually using the AIAG assessments: Heat Treat System Assessment (CQI-9) Plating System Assessment (CQI-11), Coating System Assessment (CQI-12), Welding System Assessment (CQI-15), Casting System Assessment (CQI-27)

Distribution of Audit Results

Audit results will be communicated between BNC and supplier. All information shared during the audit process is considered confidential.

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Purchase Order Administration and Acknowledgment

Upon being deemed eligible and selected as a supplier (ISO 9001 certification or Brighton, Customer exceptions) and going through the RFQ process, the initial Purchase Order will be released from BNC. Any PO exceptions are to be reported back to the BNC Requester or Business Development immediately. Suppliers are required to acknowledge the receipt of the PO and the commitment date(s). This is typically in the form of an email or fax.

Quality Planning

All suppliers are required to use quality planning to support the development of new products and/or services, in accordance with the guidelines in the latest version of ISO 9001 requirements. The supplier is to report the status of the quality planning activities to the BNC Requester or Business Development as required.

Part Approval Process (PPAP)


Suppliers are expected to have systems and procedures in place to ensure the capability of the products and/or measurement system used to evaluate product conformance prior to shipment of goods to BNC. Utilization of AIAG PPAP documents is required with approved PSW forms and format.

Document requirements for PPAP include:

- Design Record(s)/Print(s)
- Engineering Change Notice (if applicable)
- Process Flow Diagram
- Control Plan
- PFMEA
- MSA (if applicable)
- Dimensional Report/Layout
- Material Performance Results
- Process Studies-Capability (if applicable)
- Qualified Lab Documents (including Lab Certification, Qualified Tech Certification, and Training Records)
- Appearance Approval Report-Paint, Coating, E-coating and industrial finishes
- Record of Compliance/Certificate of Conformance (including Certification of Origin)
- Tooling Pictures (including pictures of tooling ownership)
- Packaging Requirements (including pictures)
- SPC (if required)
- PSW-Part Submission Warrant
- IMDS (if required)

Test Labs:

- Accredited Test Lab - An accredited lab has been evaluated and approved to ISO-17025 standards by an accreditation body (e.g. SCC, A2LA, etc.). This body then accredits the lab to perform testing to specific methods and standards. The laboratory is subject to periodic reassessment.

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- Registered Test Lab - A registered lab has completed a satisfactory assessment by an Accredited Registrar certified by a national body (e.g. Registrar Accreditation Board). The audited facility is registered as meeting the requirements for a given commodity. The laboratory is reassessed at appropriate intervals.

The quantity of sample parts required for initial sample approval will be determined at the time of PPAP. In the case of multi-cavity tooling, each cavity will be required unless otherwise specified by Brighton NC Supplier Quality. The paperwork and sample parts submitted to BNC must be clearly marked to ensure that the data is traceable to an individual cavity and inspected parts.

IMDS (International Material Data System)

OEM automotive suppliers now require their suppliers to use the IMDS to disclose and quantify the chemical and recycled content of the article and hazardous material of the products purchased and incorporated into the finished product.

- Brighton NC requires suppliers to utilize the IMDS for reporting and disclosing 100% substance and recycled contents to SSC prior to their PPAP submission.
- The PPAP Part Submission Warrant (PSW) must identify the IMDS ID number or numbers and version in the assigned section. (AIAG PPAP Manual)
- Also, as part of the PPAP submission, suppliers are required to include a hardcopy receipt from IMDS containing the following verbiage.
 - Article name
 - IMDS ID#(s) and version #(s)
 - STRATTEC Security Corporation Part Number
 - IMDS transmitted date.
 - Verbiage acknowledging the part or parts as “Accepted” by SSC.

Failure to submit “acceptable” data via IMDS and provide a hard copy receipt showing the data “acceptable” by SSC could result in the PPAP rejection.

Each supplier is responsible to contact EDS (the creator of IMDS), submit an online registration form to obtain access to the IMDS, and receive appropriate training on entering and receiving data via the system. Information for the IMDS is available as follows:

Website for IMDS is located at www.mdssystem.com

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Registration, Evaluation, Authorization and Restriction of Chemicals (REACH)

As of June 2007, the European **Regulation (EC) 1907/2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH)** entered into force.

REACH affects all industries, including the Automotive Industry (AI). As the AI is made up of vehicle manufacturers and many tiers of the supply chain, it has several roles and obligations under REACH. Action is required from the OEMs and suppliers, some immediately and some over the coming 11 years and beyond.

To be prepared for REACH, representatives of all the major vehicle manufacturers and the automotive supply chain around the world developed an “Automotive Guideline on REACH” which can be used to get a quick overview of REACH, its requirements and the recommended actions arising. This guideline can be found at: www.acea.be/reach

Conflict Material Compliance

Certificate of Origin (Annual) for all materials shipped under this order must be submitted to BNC Supplier Quality Manager and must be on file.

Product/Process Changes

BNC must be notified prior to any change in product or production process. Samples may be required for review and to evaluate potential impact on BNC’s’ process. Submission for PPAP is required unless specifically waived.

Unapproved changes will result in:

- Rejection and/or
- Quarantine of all goods at the discretion of BNC
- New Business Hold

Any charges incurred due to the lack of advanced notification will be the responsibility of the supplier.


Production Location Changes

BNC must be notified prior to any change in production location. BNC Material Control or Supplier Development will facilitate the development of a move plan with input from BNC Management and the Supplier. Any charges incurred due to the lack of advanced notification will be the responsibility of the Supplier.

Certification of Conformance

A. With each shipment of items, supplier shall submit a certificate of conformance, signed by a responsible representative, which shall constitute a representation by supplier that:

- Materials used are those which have been specified by BNC and that the items delivered were produced from materials for which supplier has, on file, reports of chemical or physical analysis and any other required evidence of conformance of such items to applicable specifications.

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- Processes used in the fabrication of items delivered are in compliance with applicable specifications.
- The items as delivered comply with all specifications and other requirements communicated by BNC at the time of order. In case of drop shipment, a copy of the above certificate shall be submitted direct to BNC at time of shipment.

B. By making shipment under this Order, Supplier automatically Certifies:

- that the materials (except when they are furnished by BNC) used in the items shipped and the processes applied to such items comply with the applicable drawings and specifications.
- Supplier agrees to retain objective evidence, including records, of the inspections and tests performed while manufacturing, testing inspecting, preserving, packaging, and packing of said items. These records shall be available to BNC upon request.

Receiving Inspection

All Production components and materials will be subject to Receiving Inspection counts, weights and potential product compliance inspections as material is being received.

Quality & Delivery Problem Reporting and Resolution - Notification from Supplier to BNC

If a Supplier has reason to believe that a non-conforming condition exists in the areas of Quality, Delivery, or other services:

- Immediate action must be taken by the Supplier to notify BNC Material Control or Supplier Development.
- Notification to BNC shall be followed up by providing immediate action to sort or replace the material in house within 24 hours.


Supplier Corrective Actions Request (SCAR)

Acceptance of this the PO obligates the Supplier to perform, upon request, a corrective action investigation when non-conforming material is received by BNC. BNC will request corrective action from Supplier when a quality problem exists. Supplier shall respond to such requests within 30 days and shall include the following information: analysis of the cause of the problem, statement of the action taken, corrective action to prevent reoccurrence and verification plan.

A SCAR Is generated when:

- Supplier receives an overall scorecard quarterly rating of 60% or in the red for two consecutive quarters.
- Top Management determines a SCAR should be generated due to a significant product quality non-conformance was caused by the supplier.
- The request for a SCAR has been made by any external customer or an internal customer.
- Repeated non-conformances during a month or over a multi-month period and is determined by Top management.

Corrective actions shall be in an industry accepted format including root cause analysis, e.g. 8D, Fishbone, Pareto, 5 Why's, etc.).

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Return of Supplier Defective Material

BNC requests that all Suppliers review and reply within 48hrs to all DMRs issued by BNC for non-conforming or defective material(s), with an RMA number and means of dispositioning all defective material.

Suppliers will have a reasonable amount of time (four weeks) from the submission date of the DMRs to receive and review all non-conforming material and issue credit to BNC. If no credit is issued within this four-week period, and BNC has no communication with the Supplier, a debit memo will be sent to the supplier along with the original DMR(s). Such a memo will be given to the accounting department and the supplier's account will be debited in the amount listed on the debit memo.

Further to the debit of the supplier's account, the supplier has a reasonable amount of time (four weeks) to respond with the correct disposition of any and all defective material that has not yet been returned. BNC will accept no responsibility for the safekeeping of defective material if we do not have your instructions as to the disposal of your material after this time. Any return of defective material is at the Suppliers expense.

Charge Backs

For every Rejection issued, the supplier may be charged for expenses accrued from BNC and its customers.

Product found to have a defect that was not visible prior to processing is the responsibility of the Supplier. If the percentage of scrap parts is above the industry standard, the Supplier may incur charge back of the value-add BNC has invested in the product.

Expenses for sorting, reworking and transportation charges will be charged at cost.

Suppliers will have 30 days to dispute any charges, in writing, to BNC Supplier Quality.

Repeat Concerns

Repeated concerns in quality may result in containment shipping, or material sort and certification.

Lot Traceability

Supplier must ensure lot traceability on all materials, components, and assemblies to support customer needs as required.

Product Preservation and Packaging

Unless otherwise specified in the purchase order, Supplier shall handle and package all material in a manner that will ensure protection against corrosion, oxidation, deterioration, and physical damage during shipment to BNC. The packaging materials should satisfy standards for environmental safety and

pose no hazards to operators who are in contact with them. Suppliers must ensure the product is delivered with proper sealed packaging, or treatments, to allow for a useful shelf life of 9 months.

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Failure to handle, pack and seal all materials in a manner that will ensure protection against corrosion, oxidation, deterioration, and physical damage during shipment will result in expenses for sorting, reworking, de-rusting and transportation charges to the Supplier at cost.

Material Certifications

Material certifications shall accompany all shipments for raw materials to be included into BNC products or available at the supplier’s facility. Other certification requirements from BNC are to be identified on the Brighton PO. In addition to PPAP requirements, IMDS is to be utilized to collect required material data sheet information from suppliers, if required. Suppliers must report and define the status of their conflict free sourcing initiative (CFSI). The latest CFSI declaration is to be utilized that defines Country of Origin of all conflict minerals. Certificate of Origin data is required on an annual basis or due to material or supplier changes.

Record Retention

The supplier shall maintain all applicable quality records dependent upon the record retention time frame in place by the end-user customer or engineering standards. Environmental records shall be retained for retention time called out in regulatory standards from which the record is derived.

Delivery

BNC requires 100% on-time delivery performance from all suppliers.

Any delivery delays must be reported to BNC Material Control or Supplier Development immediately. On-time deliveries are defined as 0 days late or not more than 7 days early. All deliveries are to be made per the logistics arrangements determined and within the normal scheduled delivery time. Excess costs attributed to supplier lateness are the responsibility of the Supplier. It is the Suppliers responsibility to work with BNC schedulers to create and meet proper lead times.

Premium Freight

It is BNC policy to avoid usage of premium freight. Unfortunately, its usage is unavoidable due to varying circumstances. Supplier attributed issues (Quality rejection, late delivery, etc.) will require premium freight to be paid by the Supplier to meet required dates. BNC attributed issues (Inventory loss, short lead time, etc.) will be paid for by BNC.

Safety & Environmental

Safety Data Sheets must accompany any initial shipments from all suppliers and marked to the attention of the BNC Safety Manager.

Where required, Material Certifications should be placed in a separate envelope and addressed to BNC Supplier Quality or sent by email. All material safety data sheets should be in a separate envelope and addressed to BNC Supplier Quality or sent by email.

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Supplier Monitoring

Where BNC or its customer intends to perform verification at the supplier's premises, BNC will state the intended verification arrangements and method of product release in the purchasing information.

BNC verification activities may include:

- a. obtaining objective evidence of the quality of the product from suppliers (e.g., accompanying documentation, certificate of conformity, test reports, statistical records, process control),
- b. inspection and audit at supplier's premises,
- c. review of the required documentation,
- d. inspection of products upon receipt, and
- e. delegation of verification to the Supplier, or Supplier certification.

Where specified in the contract, the customer or the customer's representative shall be afforded the right to verify at the Supplier's premises and at BNC's premises that the subcontracted product conforms to specified requirements.

Verification by the customer shall not be used by BNC or our suppliers as evidence of effective control of quality by the Supplier and shall not absolve BNC or our suppliers of the responsibility to provide acceptable product, nor shall it preclude subsequent rejection by the customer.

Monitoring Methods

Quality performance will be monitored by tracking defective parts received. The requirement for quality performance is 100% (Zero Defects).

Delivery Performance will be monitored by tracking compliance to shipment due date(s) and quantity accuracy from the BNC receipts. Delivery performance data will be periodically reviewed by BNC. Delivery performance requirement is 100%.


Supplier Profile


Suppliers are requested to forward a copy of their Quality System Certification (i.e. ISO 9001 or IATF 16949 certificate from 3 party audit). For those suppliers not certified to the appropriate standard, customer acknowledgement and approval must be sent and added to Approved Supplier List.

New Business Hold

At BNC's discretion, suppliers will be placed on New Business Hold for anyone, or combination of, the following criteria:

- Suspension of their Quality System Certificate (supplier must notify BNC if this situation occurs).

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- Performance issues resulting in multiple instances of quality or shipping problems.
 - Financial risk or instability
 - Contractual issues (at BNC discretion)
- 

Supplier Requirements Manual

Please update all contact information below with name and email:

Quality Manager: _____ Email: _____

Production Manager: _____ Email: _____

Material Control/Scheduler: _____ Email: _____

I acknowledge receipt and agree, after review, of the new Supplier Requirements Manual.

Company Name

Representative Title and Signature

Date

* Please note: If no response is sent within a 30 days period of time after receiving the Supplier Requirements Manual, the Supplier Requirements Manual is considered as approved by the Supplier.