

Preface

This manual has been created to assist our suppliers in understanding the purchasing expectations and quality requirements for products supplied to RCO Engineering. The manual is also a tool to assist RCO Engineering in complying with the IATF 16949 and to develop our suppliers.

In order for RCO Engineering to maintain compliance to the IATF 16949 requirements, suppliers to RCO Engineering must achieve certification by an accredited certification body to a current version of the ISO 9001 Quality Management System (at minimum), or be able to demonstrate assessment and approval by an OEM or by a system audit made by RCO Engineering following the customer specific requirements to use suppliers without Quality Management system certification.

When circumstances dictate, the requirements of this manual may be modified to comply with the requirements for the supply of aviation products.

Through implementation and adherence to the standards stated herein, RCO Engineering looks forward to a long and mutually beneficial relationship with our suppliers.

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SECTION 1: Introduction

1.1 Scope

This manual has been developed to communicate the operating principles, general expectations, requirements, and procedures of RCO Engineering. Adherence to the guidelines described in this manual is required by all RCO Engineering suppliers. Acceptance of any and/or all purchase orders constitutes acceptance and commitment on behalf of the recipient to comply with this manual's content. This manual is provided as a supplement to, and does not replace or alter, any purchase agreement, the general purchase conditions or requirements included in applicable engineering drawings, specifications and other contractual documents. This manual describes the minimum requirements for which the supplier has responsibility. However, system improvements that exceed the requirements specified within this manual are always encouraged.

This policy is in effect and shall be flowed down to all supplier sub-tier suppliers and evidence to support this shall be supplied to RCO upon request.

1.2 Purpose

RCO Engineering believes it is necessary that all functions within RCO Engineering and their business associates operate on the "Zero Defects" philosophy. We must both strive for a fundamental quality system that provides for continuous improvement in the quality of product, delivery and services. Emphasis should be on defect prevention and the reduction of variation and waste in the supply chain.

1.3 Application

The expectations and requirements described in this manual apply to all suppliers of production products. Suppliers must meet all applicable requirements specified herein.

1.4 Implementation

Suppliers are responsible for the development, documentation, implementation, and maintenance of a quality system that complies with ISO 9001. Suppliers are encouraged to become certified to the quality management system standard IATF 16949, and the environmental management system ISO 14001.

When circumstances dictate the requirements of this manual may be modified to comply with the requirements for the supply of aviation products.

SECTION 2: RCO Engineering Expectations

2.1 Engineering / Technical Support

RCO Engineering is dedicated to the manufacture of the highest quality products. In order for this objective to be achieved, all suppliers should offer engineering and technical support to RCO Engineering when said support is requested.

2.2 Manufacture Capability / Capacity / Location

Suppliers are expected to have the resources necessary (people, property, facilities, equipment, and materials) to supply the products required to accommodate RCO Engineering's production schedule. This is a requirement to be able to be a preferred supplier to RCO Engineering.

2.3 Consistent Quality

Zero-defect products are required from suppliers to RCO Engineering. Any deviation from this will result in rejection and return of the product to the supplier with subsequent charges attached. This is according to the general automotive industry standard. Payment by RCO Engineering shall not constitute acceptance. Even after acceptance of a shipment, RCO Engineering reserves the right to return any material that proves to be defective for full credit. Defective material shall be returned at the supplier's expense and account debited accordingly. Additional charges for sorting, administrative fees and other related costs (extra transport, end customer charges, etc) will also be added.

2.4 On-Time Delivery

RCO Engineering requires all suppliers to provide 100% on-time delivery performance with the correct quantity and pricing agreed upon. Monitoring of performance levels in this area will be ongoing with formal reporting on an annual basis. To further clarify this, we consider unauthorized early or late deliveries and partial or over shipments to be unacceptable. The quantity shipped per order or release cannot vary from specified quantity without the consent of the materials coordinator who is responsible at the receiving plant. If a production line is shut down due to poor quality, late delivery, or incorrect quantity on any shipment, the supplier will be responsible for all costs incurred including expediting shipments or charges from RCO Engineering customers.

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2.5 Cooperative Management Attitude

RCO Engineering expects our supplier's top management to share our commitment to meet or exceed our customer's quality expectations through continuous improvements. It is also expected that they will give their full support to the relationship that exists between our companies and demonstrate flexibility in assisting RCO Engineering in meeting all of our customer's requirements.

Ensuring your employees are aware of:

- Their contribution to product/ service conformity
- Their contribution to product safety, and
- The importance of ethical behavior

The Supplier is required to maintain a RCO Engineering plant contact, who can be readily available to assist in solving problems relating to quality, delivery and other issues. Focus should be on continuous improvements.

2.6 Rights of Verification of Products/Processes

RCO Engineering reserves the right to verify the products on the supplier's premises by their representatives and our customer and/or their representative. This can be done by different kinds of audits and the supplier will be notified in a timely fashion.

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SECTION 3: Supplier Selection and Performance

3.1 Supplier Assessment and Selection

RCO Engineering's supply base will consist of organizations supportive of our business needs. RCO Engineering utilizes controlled methods through which suppliers are evaluated, selected, developed and monitored.

Criteria for assessment and selection of suppliers for placement on RCO Engineering's Preferred Suppliers List is based on the supplier's abilities to meet our specific supplier requirements.

3.2 Supplier monitoring

All vendor claims on suppliers sent from our plants will be reported into the RCO Engineering global computer system. On a monthly basis the purchasing department will present internal reports based on this data (e.g. PPM and number of claims) and follow up with the suppliers that cannot meet our requirements. RCO Engineering may elect to call these suppliers for meetings and will expect that the top management is involved and can show us their action plans to solve the problem. New Business Hold status will be raised based on the supplier's performance and their ability to solve the problems.

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SECTION 4: Quality Requirements

4.1 Quality Management System

Our suppliers are required to be certified to the ISO 9001 Quality Management System by an accredited 3rd party registration body. Suppliers are however encouraged to register to the IATF16949 Automotive Quality Management System (or be able to demonstrate assessment and approval by an OEM or by a system audit made by RCO Engineering following the customer specific requirements to use suppliers without Quality Management system certification). Supplier Quality System shall be formally documented, implemented and maintained to ensure that supplier's products conform to the identified purchase specifications, engineering or material specifications and/or contract requirements. The system should be defined and documented in the supplier's own Quality Manual. This manual should be made available to RCO Engineering for review upon request.

4.2 Product Quality

Suppliers are fully responsible for the quality of their products including their sub-suppliers. Both are responsible for providing products that meet all RCO Engineering requirements, specifications, and drawings as identified on the purchase order and that the products are free from defects as warranted in RCO Engineering General Purchasing Conditions. Zero-defect products are expected from all suppliers.

4.3 Quality Planning (APQP)

All suppliers are required to complete APQP on all projects (new or changed parts) according to the provided time schedule, and report on the activity as requested. Any change in the time schedule needs to be approved by RCO Engineering. This process will be followed up by the responsible Supplier Quality Engineer.

4.4 Handling of Non PPAP Approved Parts

If requested, for all deliveries of prototype, first off tool and pre series components, the supplier must provide an inspection report detailing:

- Five parts per batch: full 100% control on all characteristics (must be separately identified).
- The remaining parts: inspection of all key characteristics defined on the drawing, specification or as detailed in the APQP process.

4.5 Production Part Approval Process (PPAP)

The PPAP with all requested documentation and samples according to the APQP process shall be available or submitted on the agreed date.

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This documentation shall show that all requirements specified in our drawings and specifications are fulfilled.

The supplier can apply for an Interim approval if the part or documentation cannot conform to all specified requirements. The supplier must apply for this as soon as they see that they cannot present a complete PPAP on the agreed date. The Interim approval shall specify what requirement the supplier cannot fulfill and an action plan showing how and when the part (e.g.: 100% sorting before shipping to KA) or documentation will be according to specification. An interim approval is always restricted for a limited number of parts or time period.

RCO Engineering reserves the right to inspect these samples for conformance and will return a signed Warrant indicating whether it is approved to produce parts for serial production purposes. This report will be submitted to the Supplier. Shipping of production material is only allowed with an approved PSW (Part submission Warrant) by RCO Engineering.

4.6 Production Ramp Up Inspection

At the Start Of Production (SOP) the Supplier is required to implement a reinforced inspection for an agreed period of time, produced number of parts or until all requirements regarding capability studies are fulfilled. This reinforced inspection plan must contain all key characteristics defined on the drawing as a minimum requirement and will require submission and approval by the receiving RCO plant before the SOP. It must be submitted during the APQP process and is a part of the PPAP submission.

The reinforced inspection plan will be subject to the following rules:

- 100% inspection of all key characteristics based on the RCO Engineering requirements and/or non-conforming capability results.
- The production control plan frequency shall be doubled for all other characteristics.
- For appearance items 100% inspection shall be based on the approved Boundary and Master Samples.

4.7 Annual PPAP Re-Validations

Whenever RCO Engineering is required to submit a PPAP to their customers, all supplier PPAP documentation must not be more than one year old. At that time, all PPAP's over one year are to be updated upon the request of RCO Engineering.

4.8 Continuous Improvements and Statistical Process Control (SPC)

Continuous improvements in the quality of products and/or processes are important to be a preferred supplier to RCO Engineering. The supplier should maintain documented evidence of continuous improvement for review upon

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request by RCO Engineering's representative. One portion of any continuous improvement program should be the proper use of statistical methodologies. Statistical data shall be provided as required by the RCO Engineering representative, as identified by the respective engineering drawing, applicable specifications or standards, and/or the purchase order.

Critical Characteristics:

Designated critical characteristics shall be subject to continuous ongoing Statistical Process Control. Other characteristics may be called out for initial or continues ongoing SPC control.

Customers generally select special characteristics (dimensions, material ...) impacted by safety standards and/or critical to fit or function. Those are identified by symbols.

Capability Studies and Statistical Process Control shall be performed in accordance with the rules defined in the latest edition of the AIAG PPAP and SPC manuals.

Initial Capability:

Products are taken from pre-production at the manufacturing location(s) and analyzed statistically. Parts from each unique production process e.g. duplicate assembly line and/or work cell, each position of a multiple cavity die, mold or pattern, shall be measured and representative parts tested. RCO Engineering requirement on initial capability studies are Min 1.67 Ppk. A Ppk of minimum 2.0 can also be required.

For non-critical dimensions a minimum Ppk of 1.33 might be required.

On-going Control:

For critical or agreed characteristics where the process can be adjusted during the production run, SPC will be used to control the process output. If nothing else is agreed the RCO Engineering requirement on serial production capability is Min 1.33 Cpk.

In the event of non-compliance with the capability requirements, the supplier is required to perform 100% sorting (visual sorting is not accepted) and/or to implement a mechanical poka-yoke on the corresponding characteristics until the agreed action plan is completed and the capability results fully comply with the requirements. These actions (100% sorting or addition of mechanical poka-yoke) will have to be fully documented in the Control Plan and the process FMEA.

4.9 Process Records

Process records shall be maintained and be available for RCO Engineering upon request. All records shall be retained for a time period of minimum 10 years after production end or for an agreed period of time.

As a minimum, during the production, the supplier shall maintain:

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- Process change record
- Ongoing quality control records
- Production record

4.10 Non-Conforming Product Control

If a supplier's parts are found to be defective the supplier will be notified by RCO Engineering personnel to provide immediate containment and support to resolve the problem using the 8D format and Root Cause Analysis tools.

Upon identification of suspect or confirmed fraudulent/counterfeit material RCO will provide timely notification to the reporting service organizations as applicable (GIDEP, FAA, etc.).

A most serious concern is when a supplier product/process shuts down a RCO Engineering production line making delivery to a RCO Engineering customer late. Any condition causing line shutdown and late shipment warrants the supplier's immediate action to eliminate the condition. The supplier is responsible to address containment of the problem at their facility, parts in transit, parts in RCO Engineering stocks and at RCO Engineering end customer(s), including Safety Stocks.

If requested by RCO Engineering a supplier or a supplier hired third party company (can be directed by RCO Engineering) may send in a team to sort parts in-house at the supplier expense. If RCO Engineering must sort supplier parts in order to keep production supplied with defect free components, the Supplier will be charged for the sorting cost. This charge may be applied to both components and finished assemblies in which the components are used. If a supplier defect causes RCO Engineering's finished product to be reworked or scrapped, all charges incurred will be the responsibility of the supplier. All other related costs will be charged to the supplier including eventual costs from RCO Engineering's customer.

If a supplier cannot implement a permanent corrective action to supply zero defects to RCO Engineering and problems continue, RCO Engineering will implement QIP- level 2 (Quality Improvement Plan). This is a containment process that will be implemented until the supplier has shown their ability to ship defect-free material on a continuous basis. An RCO Engineering representative will follow up the containment actions. If another defect is discovered within this containment period, QIP-level 3 (New Business Hold) will be implemented at the Suppliers' expense. The QIP process is not designed to penalize our supplier, the purpose is to prevent any non-conforming part to be delivered to RCO Engineering and to assist our supplier's efforts to achieve the 0-defect quality level.

If a supplier detects non-conforming product prior to shipment to RCO Engineering, the supplier must immediately determine the extent of the problem and take action to correct the problem. If suspect material has been

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shipped, the supplier must notify user plants and implement all necessary actions to prevent the material being used in RCO Engineering production.

Any rework or repairs to suspect material must be conducted in a controlled manner that assures that the reworked product meets RCO Engineering specifications. Written instructions should detail the rework, the re-inspection of reworked product and the return of this product to normal production flow. A formal deviation request from the supplier must be sent to RCO Engineering, and an approval must be received from the plant before any reworked material is shipped to RCO Engineering.

A copy of the vendor complaint will be distributed to the supplier when defective material has been found, initial response with initial containment must be completed and returned within 24 hours, long-term actions must be defined and reported within 7 calendar days unless otherwise agreed. The supplier is expected to implement all necessary actions to close the 8D within 30 calendar days unless otherwise agreed. The supplier will be notified if any aspect of the 8D report is not acceptable and will be required to resubmit the updated report in a timely fashion.

A vendor complaint may also be issued for other reasons. Some examples include, but are not limited to:

1. Repeated early or late delivery, or late delivery without prior notification.
2. Repeated over/under shipments.
3. Incorrect items sent.
4. Inadequate or incorrect containers/packaging received without authorization from RCO Engineering.
5. Lack of shipping and/or certification paperwork.
6. Lack of timely response to vendor complaints.

4.11 Supplier Request for Change Approval

No change on the product, process (including production location) or sub-supplier is allowed without written RCO Engineering approval. The supplier must send a notification specifying the change to RCO Engineering. RCO Engineering will then investigate the possibility to implement the change and will inform the supplier when a decision has been taken. A PPAP re-validation of the part and process will be requested if the change is accepted. The notification and request has to comply with the latest edition of AIAG PPAP manual as agreed upon.

4.12 Packaging and Shipping Requirements

The supplier shall package, label and ship products according to the agreed packaging instruction and shipping agreement.

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4.13 IMDS report (International Material Data System)

All components, semi-components and materials delivered to RCO Engineering must be entered into the IMDS system. This will be requested in the APQP process. The IMDS report must be accepted before the PPAP can be approved.

4.14 Special Processes

When required during the APQP process suppliers shall comply with the following AIAG standards:

- CQI-9 Special Process: Heat Treat System Assessment
- CQI-11 Special Process: Plating System Assessment
- CQI-12 Special Process: Coating System Assessment
- CQI-15 Special Process: Welding System Assessment
- CQI-23 Special Process: Molding System Assessment

4.15 Conflict Mineral Reporting

RCO Engineering, Inc. is committed to sourcing components and materials from companies that share our values around human rights, ethics and environmental responsibility. We expect all of our suppliers to abide by the requirements of which prohibit human rights abuses and unethical practices. We also require all suppliers to comply with applicable legal standards and requirements.

On August 22, 2012, the U.S. Securities and Exchange Commission (“SEC”) issued the final conflict minerals rule under Section 1502 the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Conflict Minerals Rule”). The Conflict Minerals Rules requires publicly traded companies to report annually the presence of conflict minerals (tin, tungsten, tantalum and gold, or “3TG”) originating in the Democratic Republic of the Congo (DRC) and adjoining countries (“Covered Countries”).

RCO supports the goal of ending violence, human rights violations and environmental devastation in the Covered Countries. We are committed to complying with any requirements applicable to our Company under the Conflict Minerals Rules.

RCO requires all of our suppliers to provide us with completed conflict minerals declaration using the Conflict Minerals Reporting Template. (CMRT) which can be found at <http://www.conflictreesourcing.org/conflict-minerals-reporting-template/>

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4.16 Material Safety Data Sheet

A material safety data sheet must be sent and approved by the receiving plant before delivery, of any chemicals used in production processes is allowed.

4.17 Counterfeit Material Avoidance

RCO will only procure materials from original manufacturers, manufacturer franchised distributors or authorized aftermarket manufacturers. As such, suppliers to RCO shall in turn ensure that only new and authentic materials are used in materials delivered to RCO. Suppliers may only purchase material directly from original manufacturers, manufacturer franchised distributors or authorized aftermarket manufacturers. Use of material that was not provided by the aforementioned sources is not authorized unless first approved in writing by RCO purchasing representative. The supplier must present compelling support for its request (e.g., original manufacturer documentation that authenticates traceability of the material to the original manufacturer) and include in its request all actions to ensure the material thus procured is authentic and conforming.

4.18 Product Traceability

All Suppliers to RCO Engineering must have an identification system that distinguishes one lot/batch/part from another when shipping finished product. Each lot/batch/part of material should be clearly identified on the product (where applicable) according to the part drawing or as agreed if not specified on the drawing, and on the product packaging. The traceability system must comply with the FIFO (First In – First Out) principles for incoming and outgoing material.

4.19 Tools & Gauges Labeling

All Tools and Gauges, property of RCO Engineering, or belonging to RCO Engineering on the behalf of RCO Engineering Customers, must be properly labeled by the supplier according to RCO Engineering's requirements.

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4.20 Life Limited Products

All material supplied to RCO must be delivered with a minimum of 90% remaining shelf life. RCO reserves the right to reject shipments that do not meet the 90% minimum. Supplier may deliver product with less than 90% only under the condition of written approval from the authorized buyer of said material.

4.21 Human Trafficking Policy

All suppliers are mandated to comply with RCO Engineering's Human Trafficking Policy. This policy is located on the RCO Engineering website: <https://www.rcoeng.com/assets/rco-human-trafficking-policy.pdf>

4.22 Child Labor Policy

All suppliers are mandated to comply with RCO Engineering's Child Labor Policy. This policy is located on the RCO Engineering website: <https://www.rcoeng.com/assets/child-labor-policy.pdf>