



## Corporate Policy Manual

(ABN-0001)

AS9100 Rev D; ISO 9001:2015; ISO 13485:2016

**This Policy Manual is applicable to the following AirBorn facilities:**

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Georgetown, Texas 78626  
Phone: 512. 863.5585

**Addison AirBorn**

4321 AirBorn Drive  
Addison, Texas 75001  
Phone: 972.931.3200

**Lake City AirBorn**

2700 Mechanic Street  
Lake City, Pennsylvania 16423  
Phone: 814.774.5658

**Little Falls AirBorn**

15820 18<sup>th</sup> Street NE  
Little Falls, Minnesota 56345  
Phone: 320-632-9231

**Taunton AirBorn**

355 Constitution Drive  
Taunton, Massachusetts 02780  
Phone: 800.225.8684

**Phoenix AirBorn**

11048 N. 23rd Drive  
Phoenix, Arizona 85029  
Phone: 602. 331.6047

**Winnsboro AirBorn**

4533 FM 312 North  
Winnsboro, Texas 75494  
Phone: 903.629.7821

**Toronto AirBorn – (Separate QMS)**

11 Dohme Avenue  
Toronto, Ontario M4B 1Y7, Canada  
Phone: 416-752-2224

**United Kingdom (Edenbridge) - AirBorn International Ltd – (Separate QMS)**

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Edenbridge  
Kent  
TN8 6HL  
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### MASTER DISTRIBUTION RECORD

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### Revision Record

Revision Number	ECN / DCRN#	Date	Change
NA	DRAFT I	02/20/2017	DRAFT I
NA	DRAFT II	06/16/2017	DRAFT II
NA	DRAFT III	09/15/2017	DRAFT III
-	N/A	10/20/2017	Initial Release – Draft III
NA	DRAFT IV	04/16/2018	Updated for ISO 13485:2016 Listed Boundaries and Exclusions. Updated appendix for reference to corporate procedures – added site scopes; clarified exclusions / boundaries
A	W58313	07/12/2018	Released Draft IV
NA	DRAFT V	08/01/2018	Updated for Akron added procedures and exclusion to 7.5.5 for ISO 13485
B	W60154	10/24/2018	Release of Draft V
C	W62086	12/04/19	Minor updates within manual and appendix to reference AirBorn Strategy (Qiii), Continuous Improvement and High level procedure references.
D	W62414	02/07/20	Minor update of a typo pg 5 ISO 13485:2003 to ISO13485:2016
E	W63489	09/04/2020	Added appendix D for AirBorn Code of Conduct Added Reference to ABN-0018 in Appendix A
F	W63748	10/26/2020	Updated Exclusions; Updated Corp / Site level procedure references within the appendices; minor verbiage updates to Context; Leadership / Management Representative; Definitions sections.
G	W64032	12/02/2020	Added ISO 13485:2016 scope for Lake City and Taunton
NA	DRAFT VI	05/07/2021	Updated Taunton & Lake City Site Procedure List; Removed reference to Akron.
H	W65005	07/29/2021	Updated Taunton & Lake City Site Procedure List; Removed reference to Akron.
NA	DRAFT VII	11/09/2022	Updated AIL address and added justification for exclusion of design and development for ISO 13485. Added UK to include 8.3 design and development. Updated PEARS to include design for the Edenbridge Site. Add CP 16 Design and Development to page 22. Page 26 add "Scope: The provision of design...". Multiple grammatical changes and change "ten" to "nine" on page 5.
J	W67099	01/25/2023	Implemented DRAFT VII

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## CONTEXT

AirBorn Inc. is a 100% employee owned company with nine facilities worldwide. AirBorn's core business structure, depending on location, ranges from engineering services, design, manufacturing, distribution and contract manufacturing of connectors, cable assemblies, flexible circuit assemblies, PCBA, box builds, power supplies, high level assemblies and full testing & lab services.

AirBorn is proud to be the Go-To organization for high reliability, high quality processes for innovative products, servicing a diverse group of customers in the military, aerospace, medical device and industrial markets.

AirBorn's strategic initiatives, based on Qiii (the vital life force), are formed around the defined internal and external stakeholders (interested parties) to provide the structure and platform to ensure solid growth plans in Quality and Excellence, Customer Intimacy, Continuous Improvement and Constant Innovation, because lives depend on us.

AirBorn's culture is based on a Servant Leadership platform to promote a Great Place to Work atmosphere. AirBorn is vested in recurring Servant Leadership education for employees in leadership roles as an evolving evergreen program lead and supported by senior leadership.

The AirBorn Leading Edge, AirBorn's continuous improvement platform, is derived from Qiii providing a sustainable structure for AirBorn to continually work on improvements to AirBorn processes through 5 key principals: Culture, Knowledge, Operational Excellence, Business Management System, Project Management.

Note: Further information on products, capabilities, technologies, locations, customers and reference materials can be found at the organization's website. ([www.airborn.com](http://www.airborn.com)).

Note: Interested Parties and External and Internal Issues are located in the Risk Management / Business Continuity / Critical Processes / Interested Parties Document.

Note: Also refer to the AirBorn Employee Handbook, where needed.

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## **CORPORATE QUALITY POLICY**

*Meeting our customers' requirements for products and services through effective continual improvement of the Business Management System that aligns with our strategic direction.*

AirBorn, Inc. will achieve conformance to the corporate quality policy by operating the organization based on the following principles:

- Align corporate objectives with the organizations strategic direction with emphasis on the defined interested parties.
- Develop and maintain an atmosphere that fosters participation of all employees in the success of our organization.
- Work with our customers and suppliers in a manner that is mutually beneficial.
- Conduct all business activities with the highest level of integrity.

Note: The quality policy is available to all interested parties through the policy manual, website, signage and / or personal reference materials such as badge reminders.

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## **BMS SCOPE**

AirBorn recognizes its responsibility as a provider of engineering services, design, and manufacturer of connectors, cable assemblies, flexible circuit assemblies, PCBA, box builds, power supplies, and high level assemblies to its interested parties taking into consideration any requirements from those parties and any determined external / internal issues.

As a provider of quality products, AirBorn has developed a business management system taking into consideration the strategic direction, relevant interested parties and conformance to international standards such as ISO 9001, ISO 13485 and AS9100, where clauses are within the boundaries of the organization and/or not excluded (see listed boundaries / exclusions below).

AirBorn Inc. shall:

- Identify the processes needed for the business management system.
- Determine the sequence and interaction of these processes,
- Ensure that the operations of these processes are effective.
- Ensure the availability of resources and information necessary to support the operation of these processes.
- Monitor, measure, and analyze these processes.
- Implement actions necessary to achieve planned results, maintain and/or continually improve these processes.

Where AirBorn chooses to outsource any process that affects product conformity, the organization shall ensure control over such processes and shall identify such processes in the business management system.

### ***Listed Boundaries / Exclusions:***

The organization indicates the following boundaries or exclusions:

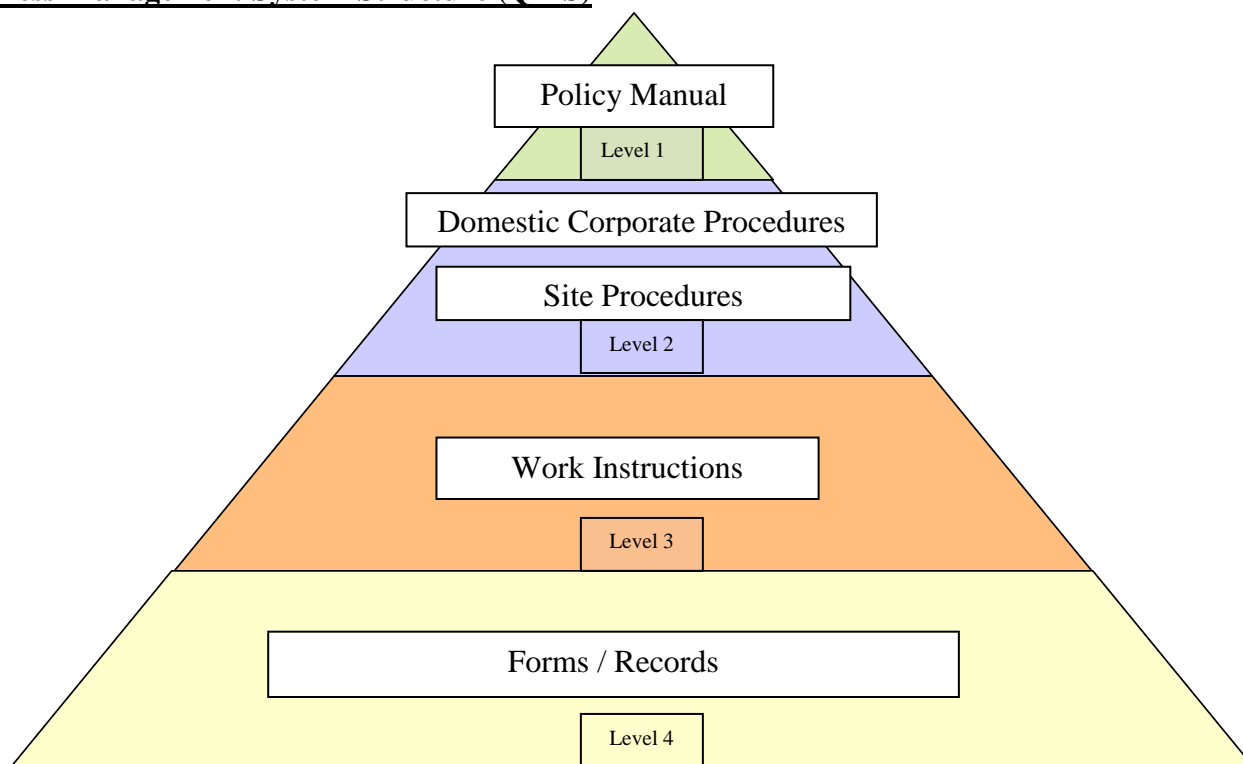
- 6.4.2 (ISO 13485) Second paragraph: “For sterile medical devices...” - No sterilization. ISO13485 sites only
- 8.3 / (7.3) Design and Development – AS9100 Rev D; and (ISO 13485:2016 - Product specifications/drawings are provided by customers and are not modified or changed by AirBorn.) (Excluded at all sites except Georgetown and Edenbridge (AirBorn International LTD) AS9100 Rev D)
- 7.5.2 (b., c., d) (ISO 13485) Cleanliness of Product - No sterilization. ISO13485 sites only
- 7.5.3 (ISO 13485) Installation Activities - No Installation Activities. ISO 13485 sites only.
- 7.5.4 (ISO 13485) Servicing Activities - Servicing activities are not performed by AirBorn on finished medical devices. See RMA / CAR process for disposition and process of handling returns of any subassemblies. ISO 13485 sites only.
- 7.5.5 (ISO 13485) Particular Requirements for Sterile Medical Devices - No sterilization. ISO13485 sites only
- 7.5.7 (ISO 13485) Particular requirements for validation of processes for sterilization and sterile barrier system - No sterilization. ISO 13485 sites only
- 7.5.9.2 (ISO 13485) Particular requirements for implantable medical devices – No implantable devices. ISO 13485 sites only
- 8.5.5 f. g. h Post-Delivery Support – AS9100

These defined boundaries or exclusions are taken based on these sections of the standards are not a part of AirBorn, Inc. scope of capabilities or customer requirements / needs for medical devices. Note that specific exclusions of core processes are also indicated in the process interaction matrix by site. Should AirBorn Inc. offer such services (elements of the standard), in the future, a procedure to control the process shall be developed and implemented.

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## Business Management System Structure (QMS)



**Level 1: Policy Manual:** The policy manual describes the overall guidelines of the business management system.

**Level 2: Procedures (Corporate / Site):** Standard operating procedures that are documented in conformance with, and support of the policy manual's guidelines, interested party requirements or defined external or internal issues supporting the strategic direction. See appendix A for listing of the documented high level corporate domestic, international and site specific procedures.

**Level 3: Work Instructions:** Work instructions are used to detail how particular tasks are to be performed and support corporate and site procedures. Work Instructions are maintained by site.

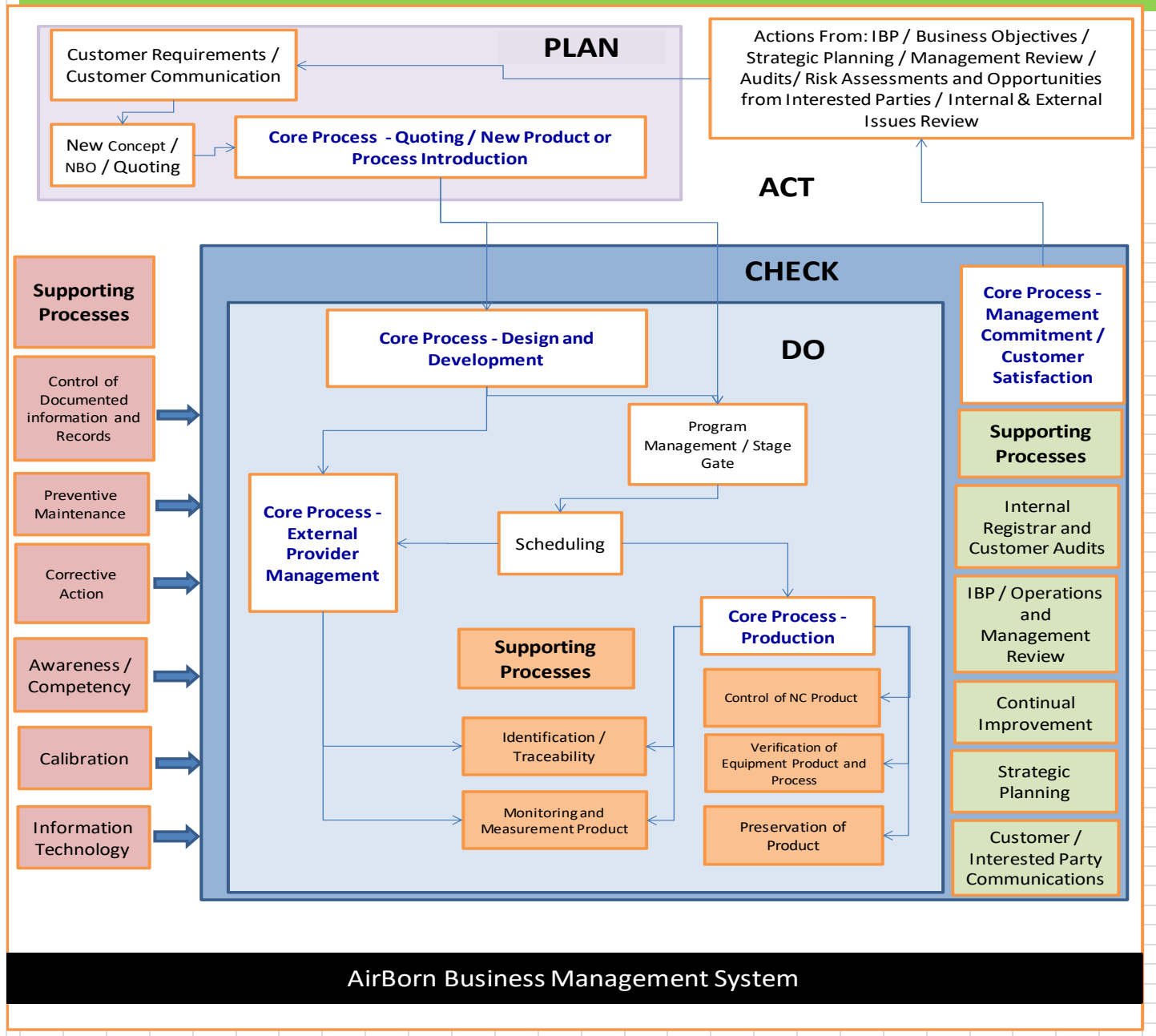
**Level 4: Records, Forms, and Other Documents:** Records needed by the organization to ensure evidence that the required process was completed.

## Business Management System Structure (QMS)

The business management system and the core processes are developed around the process based approach, taking into consideration the interaction of any defined supporting or sub processes. The business management system documentation consists of a policy manual including a quality policy, context of the organization and business management system scope, corporate and site procedures and any supporting instructions and forms, where needed. Where applicable, the documented system is also designed to address any customer requirements, any statutory and /or regulatory requirements.

# PROCESS INTERACTION MATRIX

## AirBorn Corporate Process Interaction Matrix



Core Processes (PEARS):	Addison	Georgetown	Lake City	Little Falls	Phoenix	Taunton	Toronto	Edenbridge	Windsboro
Core Process - Management Commitment / Customer Satisfaction	X	X	X	X	X	X	X	X	X
Core Process - Quoting / New Product or Process Introduction	X	X	X	X	N/A	X	X	X	N/A
Core Process - Design and Development	N/A	X	N/A	N/A	N/A	N/A	N/A	X	N/A
Core Process - External Provider Management	X	X	X	X	N/A	X	X	X	N/A
Core Process - Production	X	X	X	X	X	X	X	X	X

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### **Process Interaction Matrix Notes:**

Note I: See individual turtle diagrams of the core processes for more information on core processes such as Inputs, Outputs, Metrics & Responsibilities and Authorities etc. See table for core processes by site.

Note II: All sub processes may not apply to all sites.

### **Process Interaction Matrix Explanations / Definitions:**



'= Basic Interactions between processes

PEAR = Process Effectiveness Assessment report - Completed by the registrar auditors

Core Process: = Main process. Key activity or cluster of activities which must be performed in an exemplary manner to ensure an organization's success.

Supporting Process: Activities that strengthen and fortify core processes.

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### **LEADERSHIP (TOP AND MID MANAGEMENT RESPONSIBILITY / COMMITMENT)**

AirBorn's top and mid management have implemented a business management system that is continually evaluated for suitability, adequacy and effectiveness through:

- Determination of corporate core processes (Core Process Interaction Matrix - Turtle Diagrams);
  - Interaction of Processes
  - Process Owners (responsibilities and authorities of relevant roles)
  - Risks and Opportunities / Improvements
- Determination of interested parties and internal and external issues (Interested Parties Document);
- Determination and review of business objectives that are compatible with the context and strategic direction;
- Establishing and sustaining the resources necessary to achieve business objectives;
- Determining and implementing actions when business objectives are not achieved.
- Ensure responsibilities and authority of relevant roles are assigned, communicated and understood (Organizational Chart – Workday / Job Descriptions / Procedures)

### **MANAGEMENT REPRESENTATIVE**

AirBorn top management has defined the role of management representative as the site quality manager or highest quality representative per site to ensure;

- The business management system meets international standard requirements;
- The processes are defined, monitored and reviewed with top management to deliver intended outputs (Management Review);
- Reports performance and opportunities for improvement of the business management system to top management;
- Ensure promotion of customer focus and integrity of the business management system is maintained when changes occur.

### **CODE OF CONDUCT (LOCATED IN THE AIRBORN EMPLOYEE HANDBOOK AND APPENDIX D OF THIS POLICY MANUAL)**

The AirBorn Code of Conduct establishes standards to ensure that working conditions in its facilities and supply chain are safe, workers are treated with respect and dignity, and business operations are environmentally responsible and conducted ethically.

Fundamental to the Code is the understanding that AirBorn, in all of its activities, operates in full compliance with the laws, rules and regulations of the countries in which it operates. It is AirBorn's intent to go beyond legal compliance, drawing upon internationally recognized standards, in order to advance social and environmental responsibility and business ethics.

AirBorn is committed to obtaining regular input from stakeholders in the continued development and implementation of its Code of Conduct.

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## **STRATEGIC PLANNING**

AirBorn incorporates strategic planning, including assessing risks and opportunities, into the organization's structure to ensure organizational management activities are in place to set priorities, strengthen operations, focus resources, ensure that employees and interested parties, where applicable, are working toward common goals, establish agreement around intended results, and assess and adjust the organization's direction in response to a fluctuating environment.

## **BUSINESS MANAGEMENT SYSTEM PLANNING / OBJECTIVES**

AirBorn uses the integrated business planning process, operations' reviews, manpower plans, management reviews and capital plans to determine risks and opportunities and to manage resources and changes to the business management system. Business objectives are established by top management, operations, quality assurance and /or department heads to monitor the health of the core processes (and sub processes, if applicable) to implement actions, where needed.

## **INTERNAL COMMUNICATIONS / AWARENESS**

AirBorn management ensures that appropriate communication processes are established within the organization to ensure awareness by all employees in regard to the quality policy, objectives, employee responsibility/accountability/contribution, changes to the systems, product safety (where applicable) and proper ethical behavior. Communications can vary from site to site but may include, AirBorn all hands meetings, AirBorn Employee Handbook, electronic bulletins, signage, corporate memos, bulletin boards and/or internal departmental or site management meetings. These communications are conducted at needed intervals with the appropriate audiences, via the most effective method, by the appropriate AirBorn representative to ensure employee awareness of pertinent information and news.

Note: Also refer to the AirBorn Employee Handbook, where needed.

## **EXTERNAL COMMUNICATIONS**

AirBorn external communications in regard to customers and /or external providers are typically conducted through Sales and Marketing, Customer Service, Program/Project Management, Supply Chain or Supplier Quality Management but may involve other departments as needed. All external communication inquiries into or about AirBorn and/or AirBorn practices, other than typical customer or supplier communications, either in the format of a day to day business inquiry or based on any specific event, shall go through appropriate channels starting with notification to the chief compliance officer by the site management leader for further direction. When external communications, outside of day to day activities, are needed, communications are conducted by the appropriate AirBorn representative with the appropriate audiences, via the most effective method.

## **CUSTOMER FOCUS / SATISFACTION / FEEDBACK**

It is the intent of AirBorn, Inc. and all its employees to ensure that all customer requirements and expectations are met and / or exceeded, to ensure customer satisfaction and focus at the highest level.

### **Customer Requirements – Determination and Review**

AirBorn Sales/Marketing, Program/Project Management, Customer Service and / or supporting departments ensure that customer requirements are determined by conducting activities that may include, contract reviews, risk assessments, design reviews, new product introductions, program management and/or stage gate processes. Customer requirements, including any statutory or regulatory requirements, are reviewed for risk and feasibility at the beginning of the process with the internal cross functional teams. Any recommended updates, clarifications or needed changes are communicated with the customer throughout the process as needed.

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### Customer Communications

AirBorn has established an open communication system with its customers through regularly scheduled site visits, teleconference and electronic communications in addition to encouraging customer visits to AirBorn facilities. Any employee that may communicate with a customer has the ability to log or communicate a customer incident or issue to ensure that customer satisfaction is being monitored and acted upon.

### Customer Satisfaction

Customer Satisfaction is continually monitored by AirBorn through many channels and may include, but not limited to, when deemed necessary;

- Customer feedback on delivered products, or service received, into the AirBorn customer monitoring systems;
- Customer scorecard review by top and mid management teams;
- Customer surveys;
- Sales meeting minutes or reports;
- Market share analysis during strategic planning.

### Pricing Policy

AirBorn's Pricing Policy and process are determined and retained by Contracts, Pricing and Estimating (CP&E). The policy and process are in alignment with the AirBorn strategic plan and are designed to align with AirBorn's customer base. The traditional method of pricing in the market is a cost-based approach, also known as a cost-plus model. The method includes determination of all fixed and variable costs plus a margin. This method helps to reach a projected margin goal but fails to account for competition, product life cycles, different markets and demand, and most importantly, the level of influence we have had on the design and our spec position. AirBorn's Pricing Policy is based on a market-based approach, or market pricing. When pricing, AirBorn not only takes into consideration costs, but also takes into account competition, product life cycles, different markets, demand, and design influence. The goal of the AirBorn Pricing Policy is to reach an optimal price that meets or exceeds the required return on investment and is in line with a perceived value by the customer. The following categories have an impact on pricing where applicable; Determination of Product Cost, Development vs Production Pricing, Early Development Cost Estimation, Book Pricing, Special Price Authorization and Gross Margin.

### EXTERNAL PROVIDERS

Where needed, AirBorn may use external providers to provide goods or services. External providers are selected based on their ability to provide products or services in accordance with AirBorn or related customer or regulatory requirements. The Materials Department maintains a register of approved suppliers that includes the scope of the approval. Materials and/or Supplier Quality are responsible for establishing the criteria / risk for the selection, periodic evaluation, and re-evaluation of suppliers. Materials with input from Supplier Quality, where needed, approve and / or disapprove external providers based on that provider's performance.

### OPERATIONAL RISK MANAGEMENT/ CORRECTIVE ACTION / HUMAN FACTORS / CONTINUAL IMPROVEMENT

Operational Risk is evaluated on a day to day basis by all management employees and process owners. Each process owner is weighing risk when decisions are made. Documented Operational Risk is determined on an as needed basis. Typically operational risk is evaluated using the (FMEA) failure effects mode analysis process where the definition of the risk is evaluated and mitigated through a quantitative process where the outcome would result in assignment of specific responsibilities and actions. AirBorn's policy is to conduct operational risk on defined operational processes where needed to optimize the effects of the actions and resources to those actions.

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Corrective Actions are issued as needed based on the following: Customer issued or internally issued. Corrective Actions can be based on process, audit or external provider issues. It is the intent of the corrective action process to identify root causes and implement corrective actions to eliminate the recurrence of the issue, and reduce the impact of any human factors within the process, where feasible. When the root cause cannot be identified, it is AirBorn's process to review any potential (probable) causes and address, where feasible.

Continual Improvement activities are ongoing and typically based on the needs of AirBorn's business management system and / or strategic direction. Improvement projects or programs can be implemented by corporate, site or departmental management teams. It is typical for the project team to have a leader, team members and a facilitator from top management. The team typically formulates a charter to ensure the scope and expected results of the project are clearly defined for success.

#### **DOCUMENTED INFORMATION / RECORDS**

AirBorn documented information, required by the business management system, is controlled according to the specific corporate or site document and data control procedure. The corporate or site documented information provides the guidance necessary to:

- review and approve documents for adequacy prior to use
- review and update as necessary and re-approve documents
- ensure that changes and the current revision status of documents are available at points of use
- ensure that relevant versions of applicable documents are available at point of use
- ensure that documents remain legible and readily identifiable
- ensure that documents of external origin are identified and their distribution controlled, and
- prevent the unintended use of obsolete documents and to apply suitable identification to them if they are retained for any purpose.

Customer Service, Quality and/or Engineering shall coordinate document changes with customers and/ or regulatory authorities in accordance with contract or regulatory requirements as required. Personnel have access to, and are aware of, relevant business management system documentation and changes via the site change management system (Windchill, QSi, network drive, etc.) and/or notification systems, where applicable.

Required records are maintained to provide evidence of conformance to requirements and to provide evidence of effectiveness of defined processes, where needed. The specific site control of records procedure defines the controls needed for the identification, storage, protection, retrieval, retention time and disposition of records. The documented procedure also defines the method for controlling records that are created by and/or retained by suppliers, when applicable.

In regard to Medical Device Records only - AirBorn shall retain the records for a period of time at least equivalent to the lifetime of the medical device as defined by our organization, but not less than two years from the date of product release by the organization or as specified by relevant regulatory requirements. Records may be in the form of hard copy or electronic media.

#### **ORGANIZATIONAL KNOWLEDGE / COMPETENCY / TRAINING**

AirBorn leadership continually evaluates organizational knowledge based on the necessity of the operations of AirBorn's processes and works towards recruiting and obtaining the needed subject matter experts. Operational knowledge is maintained and made available to the necessary employees through varying forms of education, training, media and documented information. Where additional knowledge may be needed based on the ever changing markets, technology, and trends, AirBorn considers its current knowledge and makes adjustments to obtain further knowledge when needed.

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AirBorn shall ensure that all personnel are adequately trained for the tasks that they are required to complete. Production employees shall receive appropriate training before carrying out their required duties. Training programs are devised to ensure complete familiarity with all requirements of the process. Training records and matrices are maintained for all production employees. Periodic reviews of training requirements may take place to ensure that training remains effective.

Competency may be established by retention assessments, evaluations of performance, business objective reviews, audits, educational background, and / or certifications. Evaluation of the effectiveness of the training can be conducted through immediate feedback of the process owner or long-term evaluation of effectiveness through the employee performance review process. Ultimately, comprehensive measures such as productivity and customer satisfaction are the most critical measures of training effectiveness. Department Managers shall ensure that their direct employees are provided the needed training and/ or on the job training where product or process quality is affected.

**DESIGN AND DEVELOPMENT – APPLICABLE TO DESIGN SITES ONLY – SEE PROCESS MATRIX**

AirBorn Design and Development defines how each AirBorn owned design will be controlled in order to satisfy customer requirements. The results of Design and Development will be captured by the configuration management methodology that includes all elements of configuration management. The steps for each design project is as follows:

*Design and Development Planning* - It is AirBorn's policy to design, develop and supply a range of high quality, cost effective and innovative products which will satisfy required statutory / regulatory and customer requirements, as defined, including product safety and functional objectives. To achieve this objective, the design and development activities are based on documented procedures to include the sequence of tasks and mandatory steps and/or stages, design review, responsibility and authority, control of documentation, and design verification and validation.

Consideration is given to structuring the effort into significant activities and analyzing the tasks and resources within each activity. The analysis shall consider responsible personnel, design content, design constraints, input / output data consistent with requirements, and performance criteria. The input data specific to each element is reviewed to ensure consistency with requirements. Output data is updated as design and development progresses.

*Design and Development Input* – Feedback from all relevant sources will be used to improve the quality of design and to identify areas for new product development. Input from various organizational groups, where applicable, shall be documented and reviewed to ensure consistency with requirements. This feedback shall include functional, product safety and performance requirements, statutory and regulatory requirements, design data from similar designs, other requirements essential for design and development and results of contract review. Completed requirements shall be clear and non-conflicting. Any design or development activity which is carried out externally will be conducted in accordance with directives of Design Engineering.

*Design and Development Output* – The design and development output will be provided in a manner that will allow verification of inputs and approval prior to release, meet the input requirements and provide adequate information for purchasing, production, and service provision, as applicable.

*Design and Development Review* – A documented review of design will be accomplished by the appropriate representatives of functions concerned with the design and will illustrate that the design meets requirements, identify any needed action, and authorize progression to the next stage. Records of the review and actions shall be maintained.

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**Design and Development Verification and Validation** – Documented verification and subsequent validation of design will be accomplished on final product prior to delivery and under defined conditions to ensure the design output meets input and the design is capable of meeting application requirements. Intended use may dictate multiple validations. Verification and validation measures and actions will be recorded and shall demonstrate that product definition meets specifications for operational conditions.

**Design and Development Verification and Validation Testing** –Verification and Validation Testing, where applicable, is planned, controlled, reviewed, and documented. The documentation identifies product and resources, test conditions and objectives, test parameters and acceptance criteria.

**Control of Design and Development Changes** - Design and development changes are reviewed, validated, verified, and approved prior to implementation and will include any necessary customer and/or statutory and regulatory authority approval.

#### **PROGRAM MANAGEMENT (QUOTING / OPERATIONAL RISK / STAGE GATE)**

Quoting / Program and Project Management is conducted in a manner to ensure determination and review of identified requirements. Typically, the new product quote and introduction processes will include determination and review of identified requirements by direct and supporting departments as well as the customer(s) involved thereby resulting in a structured and controlled process that takes into account any risk, resource or schedule constraints. The planning process determines operational processes (inducing steps and activities for inspection, special processes, and test), resources, documentation, technology, and resulting record retention needs. These activities are typically completed within a program or project management process and / or a stage gate process. All customer requirements are reviewed prior to commitment and confirmed before acceptance. This ensures that the requirements are adequately defined and documented to identify any differences between the resulting order and the original quotation.

#### **OPERATIONS / INFRASTRUCTURE / POST DELIVERY SUPPORT**

To achieve conformity and consistency of products, AirBorn determines, provides, and maintains facilities, equipment, supporting services, and appropriate work environments for production builds. Production operations uses an ERP and document data control systems designed to provide elements, such as BOM / Router (Traveler (BOO)), and specific work instructions and/or drawings at the point of use to ensure a proper production build. Where required, steps are taken to preserve product as identified and / or needed based on elements such as shelf life, controlled conditions, ESD prevention, FOD, humidity or temperature control. All needed tools and equipment are provided based on the needs and maintained and / or verified to ensure proper function and monitoring of wear. All products are identified throughout the build process as required by the internal processes or customer requirements. Where required, traceability is implemented based on the specific needs of the customer. All products are traceable back to the work order build. Proper inspection and test processes are implemented within the process steps as internally or customer identified as required. When required, post-delivery support is identified and carried out under specified conditions.

#### **MONITORING AND MEASUREMENT OF PROCESSES / DATA ANALYSIS / INTERNAL AUDITS**

AirBorn applies suitable methods for monitoring and measurement of the AirBorn business (quality) management system processes (see Corporate Process Interaction Matrix, Core Process Turtle Diagrams and Interested Parties Documents). When process objectives do not meet planned results; action, responsibility and completion date may be defined to ensure AirBorn goals are obtained.

AirBorn continually monitors the effectiveness of the quality management system through the use of the quality policy, business and process (core) objectives review and trend analysis, audit results, analysis of data, corrective action, risk / opportunity management and results of management reviews. All AirBorn processes are internally audited at a defined frequency to ensure that the processes are suitable, adequate and effective and to determine any improvements that are needed.

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**MONITORING AND MEASUREMENT OF PRODUCT / CONTROL OF NONCONFORMING MATERIAL / QUALITY ALERT BULLETINS**

AirBorn monitors and measures characteristics (major, critical, product safety or key as defined by AirBorn design or the customer) of the product to verify that product requirements have been met. Evidence of conformity to the defined acceptance criteria shall be maintained in accordance with internal or customer requirements. Product release and delivery shall not proceed until all the planned arrangements have been satisfactorily completed, unless otherwise approved by a relevant authority and, where applicable, by the customer.

Upon detection, nonconforming product will immediately be identified, and controlled from unintended use, for investigation, disposition by the appropriate approval authorities and any further containment or actions required. Material dispositioned as scrap is conspicuously and permanently marked or controlled until rendered unusable to prevent its unintended use. Material will only be dispositioned as “use as is” or “repair” after approval by an authorized approval authority and/ or the customer written consent, where required. Re-verification of any and all product is required after action has been taken to correct the nonconformance. Documented information is maintained where the responsibility and authority for review and disposition of non-conformances, approving personnel for that authority, and determining corrective action are defined. When required, a Quality Alert Bulletin can be issued assuring the notification of the issue to all pertinent AirBorn sites and employees.

Customer or industry quality alerts, such as GIDEPs, require investigation and possible action with resulting notification of customers, suppliers, statutory and regulatory agencies, distributors or internal customers, as necessary and are managed through the AirBorn compliance department. Customers, suppliers, statutory/regulatory agencies, distributors or internal customers, as necessary, will be notified concerning possible effects should a nonconformance/product failure be detected after shipment of product.

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## **APPENDICES**

### **APPENDIX A – REFERENCES TO CORPORATE AND SITE HIGH LEVEL PROCEDURES**

Note: Due to ITAR Requirements, AirBorn International (United Kingdom - Edenbridge) and AirBorn Flexible Circuits (Toronto) retain the site high level procedures.

#### **AirBorn Domestic High Level Procedures (All Domestic Sites)**

ABN-0001: Corporate AirBorn Policy Manual  
ABN-0004: Quality Objectives (Business Metrics) / Data Analysis Procedure  
ABN-0005: Corporate Management Review Procedure  
ABN-0006: Corporate Control of Monitoring and Measurement Equipment Procedure  
ABN-0007: Corporate Federal Agent Visit Procedure  
ABN-0008: Corporate IBP Supply Chain Management Procedure  
ABN-0013: Corporate Supplier Management Procedure  
ABN-0015: Corporate FOD Management via 7S Procedure  
ABN-0016: Corporate Safety Procedure  
ABN-0017: Corporate Lockout / Tagout Procedure  
ABN-0018: Corporate Customer Feedback Procedure  
ABN-0020: Corporate Risk Management Procedure  
ABN-0022: Corporate Control of Work Transfer Procedure  
ABN-0023: Corporate Internal Audit Procedure  
ABN-0025: Corporate Corrective Action Procedure  
ABN-0026: Corporate Preventive Action Procedure  
ABN-0027: Corporate Counterfeit Management Procedure  
ABN-0028: Corporate Project Management Procedure  
ABN-0029: Corporate Quality Alert Bulletin Procedure  
ABN-0030: Corporate RMA Procedure  
ABN-0031: Corporate Business Continuity Procedure  
ABN-0032: Corporate ABC Stratification and Reserve Procedure  
ABN-0033: Corporate New Product Introduction Stage Gate Procedure  
ABN-0034: Corporate Pricing Procedure  
ABN-0035: Corporate Cycle Count Procedure  
ABN-0036: Corporate IRA Procedure  
ABN-0037: Corporate Export Control – Document records form Windchill -Procedure  
ABN-0038: Corporate Inventory Planning Procedure  
ABN-0039: Corporate Strategic Business Unit Procedure  
ABN-0040: Corporate Continuous Improvement Procedure  
ABN-0041: Corporate Large Order Readiness Procedure

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**AirBorn Interconnect High Level Procedures**  
**(Addison, Winnsboro, Phoenix, Georgetown)**

AB-0001 – Document Control Procedure  
AB-0003 – Traceability of Parts and Components Procedure  
AB-0004 – Engineering Change Control Procedure  
AB-0006 – Training Procedure  
AB-0008 – Control of Records Procedure  
AB-0010 – Drawing / Contract Review Procedure  
AB-0013 – Nonconforming Material Procedure  
AB-0014 – Inspection Status Procedure  
AB-0015 – Material Review Board (MRB) Procedure  
AB-0016 – New Product Design and Development Control Procedure  
AB-0019 – Government / Customer Property Procedure  
AB-0020 – Inspection and Testing Procedure  
AB-0022 – Process Control Procedure  
AB-0023 – Handling, Transportation and Storage Procedure  
AB-0025 – Maintenance of Equipment Procedure  
AB-0028 – Release of Equipment to Manufacturing Procedure  
AB-0029 - FOD Procedure  
AB-0030 – Georgetown Lab Policy and Procedures  
AB-0032 – AirBorn ISO 17025 Audit Procedure  
AB-0034 – Emergency Response Procedure – Georgetown  
AB-0035 – Emergency Response Procedure - Phoenix

**AirBorn Interconnect High Level Procedures – (Little Falls)**  
**LF-QP1 Internal Site Procedures**

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**AirBorn Taunton High Level Procedures**

AOP6.2.2	Training
AOP6.3	Infrastructure Procedure
AOP6.4	Work Environment - Safety & Training Procedure
AOP6.4.1	Fire Prevention Plan
AOP6.4.2	Taunton Workplace Emergency Action Plan
AOP7.2.3	Unannounced Audit/Inspection Procedure
EOP7.5.1-01	Engineering Change Procedure
MOP6.3	Preventive Maintenance Procedure
MOP7.5.1-01	Control of Production Electromechanical
MOP7.5.1-02	Control of Production PCBA
MOP7.5.2.1	Special Process Validation
MOP7.5.2.1-02	Equipment Validation Procedure
MOP7.5.2.1-03	Process Validation Procedure
MOP7.5.3	Identification & Traceability Procedure
MOP7.5.5	Lot Control
MOP7.5.5.1	MSD Management
MOP7.5.5.2	Shipping Procedure
MOP7.5.5.5	ESD Control Procedure
MOP7.5.5.6	Customer Owner Property Procedure
POP7.4.2	Purchasing Procedure
QOP4.2.3	Control of Documents
QOP4.2.4	Control of Records
QOP6.3.4	IT Backup & Directory Management Procedure
QOP7.1.3	Configuration Management
QOP7.4.3	Receiving Inspection
QOP7.5.2.1.5	Software Validation Procedure
QOP8.2.4	Monitoring & Measurement of Processes & Product
QOP8.2.4.2	First Article. Piece Approval
QOP8.3	Control of Nonconforming Procedure
SOP7.1	New Product and Process Introduction Procedure
SOP7.2.1	Quoting & Order Acceptance
SOP7.2.3-01	GEHC SCR Procedure

**AirBorn Lake City High Level Procedures**

02-01	Product Quality Planning and Control Procedure
05-01	Control of Documents Procedure
06-03	Purchasing Procedure
07-01	Customer Supplied Product Procedure
08-01	Prod-ID and Traceability Procedure
09-03	Preventive Maintenance Procedure
10-02	Receiving Inspection Procedure
10-06	Monitoring and Measurement of Product Procedure
13-01	Control of Nonconforming Materials Procedure
13-02	Unannounced Audit-Inspection Procedure
14-02	Receiving Inspection
15-01	Handling Packaging Delivery Procedure
15-02	Preservation of Product Procedure
16-01	Control of Records Procedure
18-01	Training Procedure
20-01	Software Validation Procedure
21-01	Process Validation Procedure
22-01	Equipment Validation Procedure
23-01	Work Environment / Infrastructure Procedure
24-01	New Product Introduction Procedure
24-02	GEHC SCR Process Procedure

## **AirBorn International (United Kingdom – Edenbridge) High Level Procedures**

CP. 1	Control of Documented Information Records
CP. 3	Management Commitment / Customer Satisfaction; Business Planning and management Review
CP. 4	Resource Management
CP. 5	Enquiries, Quotes and Contract Review – Core Processes: Quoting/ New Product or Process Introduction
CP. 6	External Provider Management; Purchasing
CP. 7	Production
CP. 8	Identification and Traceability
CP. 9	Customer Supplied Product
CP. 10	Preservation – (Packing and Dispatch)
CP. 11	Control of Monitoring and Measurement Equipment
CP. 12	Performance Evaluation; Monitoring, Measurement, Analysis and Evaluation, Customer Satisfaction, Internal Audit
CP. 13	Release of Product and Services; Inspection
CP. 14	Control of Non-Conforming Outputs (Products)
CP. 15	Continual Improvement
CP. 16	Design and Development

## **AirBorn Flexible Circuits (Canada – Toronto) High Level Procedures**

QSP-0001	Document and Data Control
QSP-0002	Records Control
QSP-0003	Internal Quality Audits
QSP-0004	Corrective and Preventive Action
QSP-0006	Key Performance Indicators
QSP-0007	Management Review
QSP-0008	Training
QSP-0009	Customer Satisfaction
QSP-0010	Infrastructure and Work Environment
QSP-0011	Inspection and Test MIL-PRF-31032
QSP-0012	Qualification and Qualification Test Vehicles
QSP-0013	Critical Process & Equipment Qualification
QSP-0014	Technical Review Board: Roles and Responsibilities
QSP-0015	Conversion of Customer Requirements
QSP-0016	Forms Control
QSP-0017	QPM Revisions
QSP-0018	QSP & WI Revisions
QSP-0019	Creating QSPs and WIs
QSP-0020	Approval Authority
QSP-0021	Distribution of QSPs & WIs
QSP-0022	Order Review
QSP-0023	Customer Complaints
QSP-0024	Scheduling
QSP-0025	Layout Design
QSP-0026	Engineering Change Notice
QSP-0027	Supplier Management
QSP-0028	Supplier Complaints
QSP-0029	Purchase Orders
QSP-0030	Inventory Management
QSP-0031	Preventative Maintenance
QSP-0032	Customer Supplied Material
QSP-0033	Gauge Control
QSP-0034	Control of Nonconforming Product
QSP-0035	Manufacturing Overview
QSP-0036	Environmental Policy Maintenance
QSP-0037	Environmental Aspects and Impacts
QSP-0038	Legal and Other requirements
QSP-0039	Objectives Targets and Programs
QSP-0051	Controlled Goods Program
QSP-0052	Design and Development Process
QSP-0053	Special Processes
QSP-0054	Configuration Management
QSP-0055	Inspection Stamp Control

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QSP-0056 Design Control - PCB Layout  
QSP-0057 Post Delivery Support  
QSP-0058 Risk Management  
QSP-0059 Statistical Sampling Plans  
QSP-0060 Monitoring and Control of Utilities and Supplies  
QSP-0061 AirBorn Corporate - Quality Alert Bulletin Procedure  
QSP-0062 Planning and Performance Overview

## **APPENDIX B – DEFINITIONS**

### **Medical Device Definitions – ISO 13485 Sites Only (Taunton / Lake City)**

**Definitions that are italicized are currently NOT a type of contract manufacturing for AirBorn, Inc.**

- *Active Implantable Medical Device*: Active medical device which is intended to be totally or partially introduced, surgically or medically, into the human body or by medical intervention into a natural orifice, and which is intended to remain after the procedure.
- *Active Medical Device*: Medical device relying for its functioning on a source of electrical energy or any source of power other than that directly generated by the human body or gravity.
- *Implantable Medical Device*: medical device intended:
  - to be totally or partially introduced into the human body or a natural orifice, or
  - to replace an epithelial surface or the surface of the eye,by surgical intervention, and which is intended to remain after the procedure for at least 30 days, and which can only be removed by medical or surgical intervention.  
Note: This definition applies to implantable medical devices other than active implantable medical devices.
- **Medical Device**: any instrument, apparatus, implement, machine, implant, in vitro reagent or calibrator, software, material or other similar or related article, intended by the manufacturer to be used, alone or in combination, for human beings for one or more of the specific purpose(s) of
  - diagnosis, prevention, monitoring, treatment or alleviation of disease,
  - diagnosis, monitoring, treatment, alleviation of or compensation for an injury,
  - investigation, replacement, modification, or support of the anatomy or of a physiological process,
  - supporting or sustaining life,
  - control of conception,
  - disinfection of medical devices,
  - providing information for medical purposes by means of in vitro examination of specimens derived from the human body,

And which does not achieve its primary intended action in or on the human body by pharmacological, immunological or metabolic means, but which may be assisted in its function by such means.

Note: This definition has been developed by the Global Harmonization Task Force (GHTF).

Reference: Global Harmonization Task Force (GHTF) – Document No. N029R11 dated Feb., 2002.

- **Medical Advisory Notice**: Notice issued by the organization, subsequent to delivery of the medical device, to provide supplementary information and/or to advise what action should be taken in:
  - The use of a medical device
  - The modification of a medical device
  - The return of the medical device to the organization that supplied it, or
  - The destruction of a medical device
- **Note**: AirBorn is not a design owner of medical devices. Advisory Notices are issued by the design owner.

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**AIRBORN SITE INFORMATION**

**Corporate AS9100 Rev D certificate scope:** The design, manufacture and contract manufacture of high grade electronic connectors, cable assemblies, PCBAs, and box builds for the military and aerospace industries.

**Corporate ISO 9001:2015 certificate scope:** The design, manufacture and contract manufacture of high grade electronic connectors, cable assemblies, PCBAs, and box builds for commercial industries.

**Georgetown AirBorn – Corporate Headquarters**

Site Scope AS9100 / ISO 9001: The Design and Manufacture of High Grade Electronic Interconnect Components and Systems for Military and Commercial Applications

**Addison AirBorn**

Site Scope AS9100 / ISO 9001: The Manufacture of High Grade Electronic Interconnect Components and Systems for Military and Commercial Applications

**Lake City AirBorn**

Site Scope (AS9100 / ISO 9001): Manufacture of power supplies, wiring harnesses, electronic sub-assemblies and EMI terminal blocks for Military, Aerospace, Commercial, Telecom and Medical industries

Site Scope (ISO 13485): Manufacturer of Printed Circuit Board Assemblies, Cable / Wire Harnesses and Box Builds for the medical device industry.

**Little Falls AirBorn**

Site Scope (AS9100 / ISO 9001): Manufacturer of Precision Assemblies and Electrical Connectors Utilizing High-Speed Stamping, Injection Molding, Metal Finishing and Integrated Automation Systems for the Aerospace Industry

**Taunton AirBorn**

Site Scope (AS9100 / ISO 9001): Contract manufacturer of electronic assemblies, printed circuit board assemblies, wire harnesses, transformers, box builds and chassis for aviation, space, defense, commercial and medical industries

Site Scope (ISO 13485): Manufacturer of Printed Circuit Board Assemblies, Cable / Wire Harnesses and Box Builds for the medical device industry.

**Toronto CA AirBorn**

Site Scope (AS9100 / ISO 9001): The manufacture of flexible electronic circuitry.

**Edenbridge UK AirBorn**

Site Scope (AS9100 / ISO 9001): The provision of design, manufacturing, purchasing, distribution of connectors, interconnecting cabling systems and associated products.

### AirBorn, Inc. Code of Conduct

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#### Purpose

The AirBorn Code of Conduct establishes standards to ensure that working conditions in its facilities and supply chain are safe, that workers are treated with respect and dignity, and that business operations are environmentally responsible and conducted ethically.

Fundamental to the Code is the understanding that AirBorn, in all of its activities, operates in full compliance with the laws, rules and regulations of the countries in which it does business. It is AirBorn's intent to go beyond legal compliance, drawing upon internationally recognized standards, in order to advance social and environmental responsibility and business ethics.

AirBorn is committed to obtaining regular input from stakeholders in the continued development and implementation of its Code of Conduct.

#### A. LABOR

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AirBorn is committed to upholding the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.

The labor standards are:

**1) Freely Chosen Employment / Anti-Human Trafficking / Anti-Modern Slavery**

Forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery or trafficking of persons will not be used. This includes transporting, harboring, recruiting, transferring or receiving vulnerable persons by means of threat, force, coercion, abduction or fraud for the purpose of exploitation. All work must be voluntary and workers shall be free to leave work at any time or terminate their employment. Workers must not be required to surrender any government-issued identification, passports, or work permits as a condition of employment. Excessive fees are unacceptable and all fees charged to workers must be disclosed.

**2) Child labor is not to be used in any stage of manufacturing. The term "child" refers to any person under the minimum age for employment under applicable law. The use of legitimate workplace apprenticeship programs, which comply with all laws and regulations, is supported.**

**3) Working Hours**

Studies of business practices clearly link worker strain to reduced productivity, increased turnover and increased injury and illness. Workweeks are not to exceed the maximum set by applicable law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers generally will be allowed at least one day off per seven-day week.

**4) Wages and Benefits**

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. The basis on which workers are being paid is to be provided in a timely manner via pay stub or similar documentation.

**5) Humane Treatment**

There is to be no harsh and inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements are clearly defined and communicated to workers.

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## **6) Non-Discrimination**

AirBorn is committed to a workforce free of harassment and unlawful discrimination. AirBorn shall not engage in discrimination based on race, sex, gender identity, religion, national origin, color, age, genetic information, ancestry, ethnicity, disability, pregnancy, familial status, military services, veteran status, sexual orientation, physical or mental disability or other characteristic protected by applicable law in hiring, firing, and employment practices such as promotions, rewards, and access to training. In addition, workers or potential workers will not be subjected to medical tests that could be used in a discriminatory way.

## **7) Freedom of Association**

Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. The rights of workers to associate freely, join or not join labor unions, seek representation, and join workers' councils in accordance with local laws shall be respected. Workers shall be able to openly communicate and share grievances with management regarding working conditions and management practices without fear of reprisal, intimidation or harassment.

# **B. HEALTH and SAFETY**

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AirBorn recognizes that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. AirBorn also recognizes that ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace.

The health and safety standards are:

### **1) Occupational Safety**

Worker exposure to potential safety hazards (e.g., electrical and other energy sources, fire, vehicles, and fall hazards) will be controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout / tag-out), and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment. Workers will not be disciplined for raising safety concerns.

### **2) Emergency Preparedness**

Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans.

### **3) Occupational Injury and Illness**

Procedures and systems are in place to prevent, manage, track and report occupational injury and illness including provisions to: encourage worker reporting; classify and record injury and illness cases; provide necessary medical treatment; investigate cases and implement corrective actions to eliminate their causes; and facilitate return of workers to work.

### **4) Industrial Hygiene**

Worker exposure to chemical, biological and physical agents will be identified, evaluated, and controlled. Engineering or administrative controls must be used to control overexposures. When hazards cannot be adequately controlled by such means, worker health will be protected by appropriate personal protective equipment programs.

### **5) Physically Demanding Work**

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated and controlled.

### **6) Machine Safeguarding**

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Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

**7) Sanitation, Food, and Housing**

Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the Participant or a labor agent are to be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate heat and ventilation, and reasonable personal space along with reasonable entry and exit privileges.

## **C. ENVIRONMENTAL**

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AirBorn recognizes that environmental responsibility is integral to producing world class products. In manufacturing operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of the public.

The environmental standards are:

**1) Environmental Permits and Reporting**

All required environmental permits (e.g. discharge monitoring), approvals and registrations will be obtained, maintained and kept current and their operational and reporting requirements are to be followed.

**2) Pollution Prevention and Resource Reduction**

Waste of all types, including water and energy, are to be reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

**3) Hazardous Substances**

Chemicals and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

**4) Wastewater and Solid Waste**

Wastewater and solid waste generated from operations, industrial processes and sanitation facilities are to be characterized, monitored, controlled and treated as required prior to discharge or disposal.

**5) Air Emissions**

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, monitored, controlled and treated as required prior to discharge.

**6) Product Content Restrictions**

AirBorn will adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances, including labeling for recycling and disposal.

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## D. ETHICS

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To meet social responsibilities and to achieve success in the marketplace, AirBorn and its agents will uphold the highest standards of ethics including:

- 1) **Business Integrity**  
The highest standards of integrity are to be upheld in all business interactions. Participants shall have a zero tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement (covering promising, offering, giving or accepting any bribes). All business dealings will be transparently performed and accurately reflected on Participant's business books and records. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.
- 2) **No Improper Advantage**  
Bribes or other means of obtaining undue or improper advantage will not to be offered or accepted. See AirBorn's Anti-Bribery / Anti-Corruption Policy (AB-R070) for more information.
- 3) **Disclosure of Information**  
Information regarding business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.
- 4) **Intellectual Property**  
Intellectual property rights will be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights.
- 5) **Fair Business, Advertising and Competition**  
Standards of fair business, advertising and competition will be upheld. Appropriate means to safeguard customer information have been implemented.
- 6) **Protection of Identity**  
Programs that ensure the confidentiality and protection of supplier and employee whistleblower will be maintained.
- 7) **Responsible Sourcing of Minerals**  
AirBorn has a policy to reasonably assure that the tantalum, tin, tungsten and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. AirBorn shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to customers upon customer request.
- 8) **Privacy**  
AirBorn is committed to protecting the reasonable privacy expectations of personal information of everyone we do business with, including suppliers, customers, consumers and employees. AirBorn will comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.
- 9) **Non-Retaliation**  
AirBorn has a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

## REFERENCES

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The following standards were used in preparing this Code and may be a useful source of additional information.

Responsible Business Alliance Code of Conduct  
<http://www.responsiblebusiness.org/code-of-conduct>

Dodd-Frank Wall Street Reform and Consumer Protection Act  
<http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf>

Eco Management & Audit System  
[www.quality.co.uk/emas.htm](http://www.quality.co.uk/emas.htm)

Ethical Trading Initiative  
[www.ethicaltrade.org/](http://www.ethicaltrade.org/)

ILO Code of Practice in Safety and Health  
[www.ilo.org/public/english/protection/safework/cops/english/download/e000013.pdf](http://www.ilo.org/public/english/protection/safework/cops/english/download/e000013.pdf)

ILO International Labor Standards  
[www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm](http://www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm)

ISO 14001 [www.iso.org](http://www.iso.org)

National Fire Protection Agency  
[www.nfpa.org/catalog/home/AboutNFPA/index.asp](http://www.nfpa.org/catalog/home/AboutNFPA/index.asp)

OECD Due Diligence Guidance  
[http://www.oecd.org/document/36/0,3746,en\\_2649\\_34889\\_44307940\\_1\\_1\\_1\\_1,00.html](http://www.oecd.org/document/36/0,3746,en_2649_34889_44307940_1_1_1_1,00.html)

OECD Guidelines for Multinational Enterprises  
[www.oecd.org](http://www.oecd.org)

OHSAS 18001  
[www.bsi-global.com/index.xalter](http://www.bsi-global.com/index.xalter)

Universal Declaration of Human Rights  
[www.un.org/Overview/rights.html](http://www.un.org/Overview/rights.html)

United Nations Convention Against Corruption  
[www.unodc.org/unodc/en/crime\\_convention\\_corruption.html](http://www.unodc.org/unodc/en/crime_convention_corruption.html)

United Nations Global Compact  
[www.unglobalcompact.org](http://www.unglobalcompact.org)

SA 8000 [www.cepaa.org/](http://www.cepaa.org/)

SAI  
[www.sa-intl.org](http://www.sa-intl.org)



AirBorn's Code of Conduct was established from the Electronics Industry Citizenship Coalition (EICC) Code of Conduct and updated based on the Responsible Business Alliance (RBA) Code of Conduct version 6.0.

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