



Draka

Draka Cableteq | USA



Quality and Environmental Management System Manual

QUALITY MANAGEMENT SYSTEM

CERTIFIED BY DNV

ISO 9001:2008

ENVIRONMENTAL MANAGEMENT SYSTEM

CERTIFIED BY DNV

ISO 14001:2004

Quality and Environmental Management System Manual

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APPROVALS

Approved By: 
President, Draka Cableteq USA, Inc.

Revision History:

| | | |
|--------|-----------|--|
| Rev. 0 | 4/7/2003 | First Issue to ISO 9000:2000 format |
| Rev. 1 | 9/10/2003 | Editorial adjustments |
| Rev. 2 | 10/3/2003 | Editorial adjustments |
| Rev. 3 | 9/1/2005 | Revise company name to Cableteq |
| Rev. 4 | 11/8/2006 | Add environmental management system |
| Rev. 5 | 3/6/07 | Add reference to ISO17025 and titles of management representatives |
| Rev. 6 | 4/22/08 | Revise Appendix A, remove ANSI N45.2-1977 |
| Rev. 7 | 3/19/2010 | Revise to ISO 9001:2008, revise process flow diagram |

Quality and Environmental Management System Manual

1.0 SCOPE

This Manual describes the quality and environmental management system used at Draka Cableteq USA, Inc.

2.0 PURPOSE

This manual provides direction for the implementation and maintenance of the quality and environmental management system to ensure products are of the highest quality and customer satisfaction is obtained through an environment of continual improvement.

3.0 ORGANIZATION OF MANUAL

For ease of reference, this manual is divided into sections corresponding to the ISO 9001:2008 standard. Reference to specific procedures is in Appendix A.

4.0 MANAGEMENT SYSTEM

4.1 General Requirements

4.1.1 The program covered by this manual is for the quality and environmental management systems of Draka Cableteq USA, Inc. and all outsourced activities.

* 4.1.1.1 The Quality Management System is designed to meet or exceed the requirements of the following quality standards: Quality Systems - ISO 9001:2008, "Quality Management Systems - Requirements", 10 CFR 50 App. B, and ISO/IEC 17025 as related to the CSA Category Program, UL Client Data Test Program and ETL Supervised Applicant Testing Program.

4.1.1.2 The Environmental Management System is designed to meet or exceed the requirements of ISO 14001:2004, "Environmental Management Systems".

4.2 Documentation Requirements

4.2.1 This manual defines policies and guidelines necessary to ensure that all actions affecting quality are conducted according to documented procedures; the end result being control of processes which affect the quality of products shipped to our customers.

4.2.2 The following controlled documents ensure the effective operation and control of our processes:

Level 1 - Quality and Environmental Management System Manual - provides information about the organization's quality and environmental management system

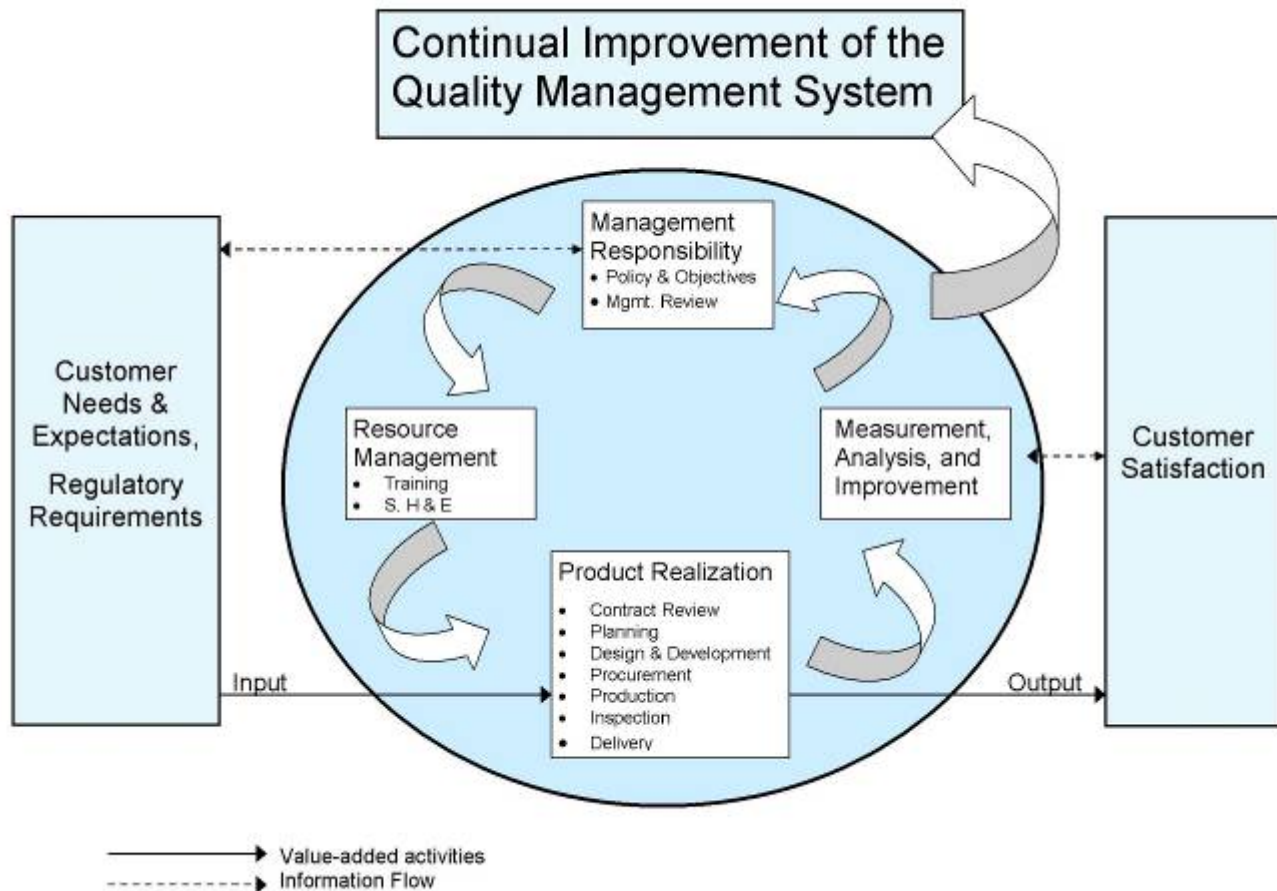
Level 2 - Procedures - describes what activities are performed

Level 3 - Work Instructions - describes how to perform specific activities

Level 4 - Records - provide objective evidence of activities performed and results achieved

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A description of the interaction of processes is as follows:



4.2.3 A system is maintained to control documents required for the quality and environmental management system. Documented procedures exist to establish the following levels of control:

- Approval of documents for adequacy prior to issue;
- Review, update as necessary and re-approval of documents;
- Identification of the current revision status of documents;
- Assurance that relevant versions of applicable documents are available at points of use;
- Assurance that documents remain legible, identifiable and readily retrievable;
- Assurance that documents of external origin are identified and their distribution controlled;
- Preventing the unintended use of obsolete documents, and to apply suitable identification to them if they are retained for any purpose.

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- 4.2.4 Records required for the quality and environmental management system are controlled. Such records are maintained to provide evidence of conformance to requirements and effective operation of the quality management system. Procedures exist to document the identification, storage, retrieval, protection, retention time and disposition of quality records.

5.0 MANAGEMENT RESPONSIBILITY

5.1 Management Commitment

Top management has defined the overall strategy and objectives for the quality and environmental management system in the form of the Quality and Environmental Policies.

5.1.1 Top management's commitment to and continued improvement of the quality and environmental management system is shown through active participation in the Management Review meetings and by endorsement and review of the Quality and Environmental Policies.

5.1.2 Top management is responsible for identifying and providing adequate resources to achieve the Quality and Environmental Policy objectives. The need for required resources shall be discussed at Management Review meetings and documented in Management Review minutes.

5.1.3 Top management regularly communicates to the organization the importance of meeting customer and regulatory requirements.

5.2 Customer Focus

5.2.1 Top management ensures that customer requirements are identified and met with the aim of improving customer satisfaction.

5.3 Policy

5.3.1 Quality Policy

“Draka Cableteq USA is committed to achieving complete internal and external Customer Satisfaction through continual improvement. Customer Satisfaction means understanding who the customer is, what the requirements are and meeting those requirements without error, on time, every time.”

5.3.2 Environmental Policy

“Draka Cableteq USA is committed to achieving a positive impact on our surrounding environment and communities. Through implementation of our environmental management system we will understand our materials and processes, set objectives, enact continual improvement programs, promote a clean environment with safe products, ensure compliance with legal and regulatory requirements and communicate this program throughout the organization, supplier base and interested external parties.”

5.3.3 Top management communicates to the organization the intent of the policies and ensures that they are understood at appropriate levels of the organization.

5.3.4 The policies and objectives are periodically reviewed for suitability by top management as part of the Management Review.

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- 5.4 Planning
- 5.4.1 Top management ensures that objectives, including those needed to meet requirements for product, are established at relevant functions and levels. The objectives are measurable and consistent with the policies.
- 5.4.2 Top management ensures that the resources needed to achieve the quality and environmental objectives are identified and planned.
- 5.4.2.1 Planning is conducted to ensure that changes to the management system are conducted in a controlled manner such that the integrity of the management system is maintained.
- 5.4.3 Environmental aspects have been identified by ranking the process hazards and the level of incidents associated with them. Significant aspects are documented, monitored, and targets are established.
- 5.4.4 Legal environmental requirements are documented by the Facility Manager and meet federal and state regulations.
- 5.4.5 An emergency response plan is in place describing potential emergency situations and how to prevent and respond to them and evacuation plans. The emergency response plan is periodically tested and reviewed.
- 5.5 Responsibility, Authority, and Communication
- 5.5.1 Responsibilities and authorities within the organization are defined in job descriptions and organizational charts.
- * 5.5.2 Top management has appointed the Standards Assurance Manager as the quality system management representative and the Facilities Manager as the environmental system management representative. The Management Representative(s) shall:
- Ensure that products are produced that satisfy the requirements of customers and environmental requirements.
 - Ensure the prevention of pollution through compliance to regulations, consolidation and review of environmental impacts.
 - Have the authority and responsibility to ensure that the requirements of the management systems are established, implemented, and maintained.
 - Report on the status of the management system and continual improvement for Management Review.
 - Promote awareness of customer requirements throughout the organization.
- 5.5.3 Top management ensures that appropriate communication processes are established and communication takes place regarding the effectiveness of the management system through meetings, newsletters, and internal postings.
- 5.5.4 The Plant Manager shall be notified of any environmental inquiries and shall coordinate responses to external parties. Management shall determine whether the facility will respond to an external party's inquiry and the level of information to provide.

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5.6 Management Review

5.6.1 Top management has established a process to review the management system at planned intervals to evaluate its effectiveness and suitability and verify that the policies and objectives are being satisfied. At a minimum, the attendees to the Management Review shall be department managers or designates and representation from top management.

5.6.2 Management review input includes information on the following, as a minimum:

- a) Results of internal and external audits
- b) Customer feedback
- c) Process performance and product conformance
- d) Status of preventive and corrective actions
- e) Follow-up actions from the previous management review meetings
- f) Planned changes that could affect the management system
- g) Summary of agency inspections and assessments
- h) Recommendations for improvement

5.6.3 Management review output includes decisions and actions related to the following, as a minimum:

- a) Recommendations for improvement of the management system and its processes
- b) Recommendations for improvement of product related to customer requirements
- c) Resources needed

Records from management review meetings are maintained (ref. 4.2.4)

6.0 **RESOURCE MANAGEMENT**

6.1 Provision of Resources

Management identifies and provides resources, including equipment, raw materials, work areas, and trained personnel for implementing and continually improving the effectiveness of the management system. The justification and acquisition of the required resources is discussed at the Management Review and documented in Management Review minutes. Roles and responsibilities to maintain and improve the quality and environmental management systems are defined in organizational charts.

6.2 Human Resources

6.2.1 Competency needs for personnel performing activities that impact quality or environmental compliance are identified in job descriptions.

6.2.2 Training needs for all employees are determined based on job description and regulatory requirements. The Department Manager/Supervisor shall establish a training plan to address these needs.

6.2.3 Training effectiveness is evaluated against predetermined requirements to determine the employee's competency.

6.2.4 Management ensures that employees are aware of the relevance and importance of their work activities and how they contribute to the achievement

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of the objectives.

6.2.5 General awareness training is conducted for all employees. Training records are stored and maintained. (ref. sec. 4.2.4)

6.3 Infrastructure

6.3.1 Management provides the necessary infrastructure to ensure achievement of product conformity.

6.4 Work Environment

6.4.1 Management identifies and provides the work environment necessary to produce conforming product.

7.0 **PRODUCT REALIZATION**

7.1 Planning of Product Realization

The organization plans and develops the processes needed for product realization. Planning of product realization shall be consistent with the requirements of the other processes of the quality management system. Records of planning will be maintained.

7.2 Customer-Related Processes

7.2.1 Determination of requirements related to the product

Requirements for any new product or major design variations are identified and documented. These requirements include:

- a) requirements specified by the customer.
- b) requirements not stated by the customer but necessary for specified or intended use, when known.
- c) statutory and regulatory requirements related to the product.
- d) any additional requirements determined by the organization.

7.2.2 Review of requirements related to the product

All potential contracts are reviewed to determine that requirements are clearly defined and documented to ensure our capability to meet all customer requirements. Any differences are resolved prior to acceptance of the contract. Records of contract review and subsequent changes are maintained.

7.2.3 Customer Communication

The Sales and Marketing organization has the responsibility for coordinating and interfacing all customer contacts.

Amendments to a contract are documented and communicated by both parties. If all customer requirements cannot be met, (changes in delivery status, etc.) this is communicated to the customer.

Customer feedback and complaints that affect customer satisfaction are documented and discussed at Management Review meetings.

7.3 Design and Development

7.3.1 Design and Development Planning

Product Engineering plans new designs, production samples, and initial product qualification. Product Engineering will also establish and maintain procedures to control and verify the design of product and to ensure that customer specified requirements are met.

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7.3.2 Design and Development Inputs

Applicable statutory, regulatory and customer requirements, are identified, documented, and reviewed. Incomplete, ambiguous, or conflicting requirements are resolved with the parties responsible for imposing the requirements. Records of design inputs are maintained (ref. 4.2.4).

7.3.3 Design and Development Outputs

A controlled design is developed from the applicable inputs. Design outputs are documented within manufacturing specifications, which are maintained as quality records. The controlled design includes full details of construction, dimensional tolerances, machine assignment (where critical), in process and final inspection requirements, and acceptance criteria, and is approved prior to release.

7.3.4 Design and Development Review

At appropriate stages of design, reviews are identified, planned, conducted, and documented. Participants consist of representatives from all of the functions concerned with the design stage being reviewed (ref. 4.2.4).

7.3.5 Design and Development Verification

At appropriate stages of design, verification activities are performed and documented to ensure that the design-stage output meets the design-stage input requirements. Records of verification activities are maintained (ref. 4.2.4).

7.3.6 Design and Development Validation

Design validation is performed on the final product to ensure that product conforms to the customer's requirements. Qualification testing may be performed by an outside company as deemed necessary by Engineering. Records of validation activities are maintained (ref. 4.2.4).

7.3.7 Control of Design and Development Changes

Changes to designs are identified, documented, reviewed, and approved by authorized personnel prior to acceptance. Records of design changes are maintained (ref. 4.2.4).

7.4 Purchasing

7.4.1 Purchasing Process

It is the responsibility of Purchasing to ensure that materials used in a product are procured from approved suppliers who can comply with the purchase order and regulatory requirements as specified. An Approved Supplier List is maintained.

Suppliers are selected on the basis of their ability to meet purchase order requirements, and/or the results of a quality system review, where applicable. Assessment of suppliers is conducted in accordance with procedures at each division. Supplier assessment records are maintained (ref. 4.2.4).

7.4.2 Purchasing Information

Purchasing ensures that purchasing documents clearly describe the product ordered. Materials are specified by supplier standard, industry standard, purchase specifications, or specification control drawings. The applicable issue of standards and specifications will be specified or referenced on the purchasing

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documents. Where appropriate, purchasing documents shall describe the requirements for qualification of personnel and quality/environmental management system requirements.

Changes to procurement documents require the same degree of control as the original issue.

7.4.3 Verification of Purchased Product

The amount of inspection required is determined based on the type of material, the impact of the material on final product quality, and the historical capability of suppliers providing the material.

Where the company or its customer intends to perform verification at the supplier's premises, the organization shall state the intended verification arrangements and method of product release in the purchasing documents.

7.5 Production and Service Provision

7.5.1 Control of Production and Service Provision

Documented instructions exist for any activity where the absence of such instructions would adversely affect quality or environmental aspects. The manufacturing specification documents the production sequence, materials to be utilized, design criteria, and acceptance criteria. Manufacturing specifications may be supplemented by other documents such as Procedures, Work Instructions, Technical Manuals (TM's), etc. when deemed necessary. Environmental instructions are available for processes having significant environmental risk.

A Preventive Maintenance program is maintained to ensure continuing process capability and to provide a suitable working environment.

Post-delivery activities are not performed.

7.5.2 Validation of Processes for Production and Service Provision

Excluded from the quality system because product requirements can be validated through production monitoring and product testing.

7.5.3 Identification and Traceability

Materials used in deliverable product are readily identified throughout the manufacturing process.

Material which has lost its original identity cannot be applied to an order until its identity is re-established.

Traceability of critical raw materials and processes is maintained. The level of traceability required for critical materials is defined in procedures and work instructions. Records of traceability are maintained (ref. 4.2.4).

7.5.4 Customer Property

Customer-supplied material for incorporation into a product is uniquely identified. Customer-supplied material is subject to the same handling, inspection, and storage requirements as purchased material, or as agreed upon with the

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customer. Records of lost, damaged, or otherwise unsuitable product are maintained and communicated to the customer for a disposition.

7.5.5 Preservation of Product

Each facility is responsible to establish and maintain documented procedures for the handling, storage, packaging, preservation, and delivery of products to prevent damage or deterioration.

7.6 Control of Monitoring and Measuring Equipment

To ensure product and environmental compliance, the organization shall determine the measurements to be made, required accuracy, instrument capability, measurement uncertainty, equipment to be calibrated, frequency of calibration, and the validity of previous measurement results when instruments are found to be out of calibration.

7.6.1 Identified equipment is calibrated or verified prior to use under normal environmental conditions and against standards traceable to international or national standards. Where no such standards exist, the basis used for calibration or verification is documented.

7.6.2 The calibration status of equipment shall be identifiable through the use of labels, tags, color-coding, engraving and records, etc. and be safeguarded against adjustments that would invalidate measurement results.

7.6.3 Equipment will be protected from damage during handling maintenance and storage.

7.6.4 Records of calibration are maintained in accordance with section 4.2.4.

8. MEASUREMENT, ANALYSIS AND IMPROVEMENT

8.1 General

Measurement and monitoring activities needed to assure conformity and continually improve the effectiveness of the Quality and Environmental Management System are defined, planned, and implemented. This includes the determination of the need for, and use of, applicable methodologies including statistical techniques.

8.2 Monitoring and Measurement

8.2.1 Customer Satisfaction

Information relating to customer perception as to whether the company has met customer requirements is monitored. Methods of analysis are determined and documented.

Results of customer satisfaction measurements are part of the Management Review and are used to identify and prioritize continual improvement projects.

8.2.2 Internal Audit

Internal audits are scheduled on the basis of the results of previous audits and importance of the activity being audited and are performed by personnel independent from the activity being audited. Audits are performed in accordance with a documented procedure.

Audit findings are documented by the auditor and reported to the area Supervisor of the activity audited, corrective action is taken by the responsible

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personnel, and follow-up activity is performed and recorded to verify that the corrective action taken was implemented without undue delay and is effective.

Audit results are maintained as records and are part of the management review of the management system (ref. 4.2.4).

8.2.3 Monitoring and Measurement of Processes

Monitoring and measurement of quality and environmental management system processes are performed and discussed as part of Management Review.

* Consultant-administered audits will be used for the evaluation of legal compliance for ISO 14001, conducted a minimum of every three years.

8.2.4 Monitoring and Measurement of Product

Identification of inspection and test status is maintained throughout production and delivery of the product to ensure that only product that has passed all required inspections is delivered to the customer.

Incoming inspections are conducted and documented as detailed in quality procedures on materials used in deliverable product.

In-process inspections and tests are performed as indicated on the manufacturing specification and/or inspection procedures.

Each unit of final product is inspected to ensure that it is complete and required operations have been performed. Each unit lot or batch of product is verified to a final test specification generated or referenced within the manufacturing specification. Records of final test results and authorized release are maintained.

8.2.5 Monitoring and Measurement of Environmental System Components

Processes with significant environmental impacts are monitored and measured to ensure compliance with objectives and regulatory requirements. This includes monitoring of water, emissions and discharges, and raw material consumption.

8.3 Control of Nonconforming Product

The Quality Department has the responsibility to control and maintain nonconforming material in accordance with a documented procedure. Nonconforming material is identified to prevent inadvertent use.

Material which has been reworked or repaired is subjected to the same re-inspection and tests as the original product.

Records of nonconformities and any actions taken, including release authority of acceptance by concession, are maintained (ref. 4.2.4).

If a nonconformance is found after shipment of product, the organization shall take actions appropriate to the magnitude and consequences of the defect.

8.4 Analysis of Data

Data is analyzed to solve recurring problems, identify trends and causes, monitor and

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improve customer satisfaction, suppliers, product characteristics, process capability, and environmental compliance. Results of data analysis are discussed in management review meetings.

8.5 Improvement

8.5.1 Continual Improvement

The effectiveness of the management systems is continually improved through the use of the quality and environmental policy, objectives, audit results, analysis of data, corrective and preventive action and management review.

8.5.2 Corrective Action

The intent of corrective action is to identify and eliminate the root cause of nonconformance to prevent recurrence.

The need for corrective action is based on assignable nonconformances found by reviewing processes, work operations, concessions, records, customer complaints, negative trends, environmental issues and audit findings. Procedures for initiation, control, and follow-up of corrective actions are established at each facility. Records of the results of corrective actions taken are maintained (ref. 4.2.4).

8.5.3 Preventive Action

The intent of preventive action is to identify and eliminate potential nonconformances to prevent occurrence.

The need for preventive action is based on the review and analysis of processes, work operations, concessions, quality records, customer complaints, trends, environmental issues and audit results. Procedures for initiation, control, and follow-up of preventive actions are established at each facility. Records of the results of preventive actions taken are maintained (ref. 4.2.4).

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* APPENDIX A

DRAKA CABLETEQ PROCEDURE CROSS-REFERENCE

| Manual para. | | Procedure No. |
|--------------|--|--|
| 4.2.3 | Control of Documents | QP Sec 5 P-1, 2, 4, 6, 7, QP Sec 16 P -1 |
| 4.2.4 | Control of Records | QP Sec 16 P-1 |
| 5.1 | Management Commitment | QP Sec 1 P-1 |
| 5.2 | Customer Focus | See Quality Manual |
| 5.3 | Quality Policy | QP Sec 1 P-1 |
| 5.4.1 | Quality Objectives | QP Sec 1 P-1 |
| 5.4.2 | Quality Management System Planning | QP Sec 1 P-1 |
| 5.5.1 | Responsibility & Authority | QP Sec 1 P-1 |
| 5.5.2 | Management Representative | See Quality Manual |
| 5.5.3 | Internal Communication | QP Sec 1 P-1 |
| 5.6.1 | Management Review-General | QP Sec 1 P-1 |
| 5.6.2 | Review Input | QP Sec 1 P-1 |
| 5.6.3 | Review Output | QP Sec 1 P-1 |
| 6.1 | Provision of Resources | QP Sec 1 P-1 |
| 6.2.1 | Human Resources - General | QP Sec 18 P-1 & 3 |
| 6.2.2 | Competence, Awareness, and Training | QP Sec 18 P-1 & 3 |
| 6.3 | Infrastructure | QP Sec 9 P-3, 16 |
| 6.4 | Work Environment | QP Sec 9 P-3 |
| 7.1 | Planning of Product Realization | QP Sec 3 P-1, 2 |
| 7.2.1 | Determination of Product Requirements | QP Sec 3 P-1, 2 |
| 7.2.2 | Review of Product Requirements | QP Sec 3 P-2 |
| 7.2.3 | Customer Communication | QP Sec 3 P-1, 2 |
| 7.3.1 | Design & Development Planning | QP Sec 4 P-1, 2 |
| 7.3.2 | Design & Development Inputs | QP Sec 4 P-1, 2 |
| 7.3.3 | Design & Development Outputs | QP Sec 4 P-1, 2 |
| 7.3.4 | Design & Development Review | QP Sec 4 P-1, 2 |
| 7.3.5 | Design & Development Verification | QP Sec 4 P-1, 2 |
| 7.3.6 | Design & Development Validation | QP Sec 4 P-7 & 8 |
| 7.3.7 | Control of Design & Development Changes | QP Sec 4 P-2, QP Sec 5 P-1 |
| 7.4.1 | Purchasing Process | QP Sec 6 P-1, 2, 3, 5 |
| 7.4.2 | Purchasing Information | QP Sec 6 P-2 |
| 7.4.3 | Verification of Purchased Product | QP Sec 6 P-3, 5 |
| 7.5.1 | Control of Production and Service Provision | QP Sec 9 P-1, 2, 3, 4, 5, 8, 9, 11 |
| 7.5.2 | Validation of Processes for Production and Service Provision | See Quality Manual |
| 7.5.3 | Identification and Traceability | QP Sec 8 P-1, QP Sec 12 P-1, QP Sec 10 P-1 & 2 |
| 7.5.4 | Customer Property | QP Sec 7 P-1 & 2 |
| 7.5.5 | Preservation of Product | QP Sec 15 P-1 |
| 7.6 | Control of Monitoring and Measuring Devices | QP Sec 11 P-1, 4, 6 |
| 8.1 | Measurement, Analysis, and Improvement | QP Sec 10 P-1, 2, 3 & 4 |
| 8.2.1 | Customer Satisfaction | See Quality Manual |
| 8.2.2 | Internal Audit | QP Sec 17 P-1 |
| 8.2.3 | Monitoring and Measurement of Processes | QP Sec 1 P-1 |
| 8.2.4 | Monitoring and Measurement of Product | QP Sec 9 P-5, QP Sec 10 P-2, 3, 4, 5 |
| 8.3 | Control of Nonconforming Product | QP Sec 8 P-1, QP Sec 13 P-2, 3, 4, 6 |
| 8.4 | Analysis of Data | QP Sec 1 P-1 |
| 8.5.1 | Continual Improvement | QP Sec 1 P-1 |
| 8.5.2 | Corrective Action | QP Sec 14 P-1 |
| 8.5.3 | Preventive Action | QP Sec 14 P-2 |

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APPENDIX B ISO 14001 PARAGRAPH CROSS-REFERENCE

| ISO 14001 paragraph | ISO 14001 paragraph | Cableteq Manual Paragraph |
|---------------------|--|---------------------------|
| 4.1 | General Requirements | 4.1 |
| 4.2 | Environmental Policy | 5.3 |
| 4.3.1 | Environmental Aspects | 5.4.3 |
| 4.3.2 | Legal and Other Requirements | 5.4.4 |
| 4.3.3 | Objectives, Targets and Programs | 5.4 |
| 4.4.1 | Resources, Roles, Responsibility and Authority | 5.5, 6.1 |
| 4.4.2 | Competence, Training and Awareness | 6.2 |
| 4.4.3 | Communication | 5.3.3, 5.5.3, 5.5.4 |
| 4.4.4 | Documentation | 4.2 |
| 4.4.5 | Control of Documents | 4.2.3 |
| 4.4.6 | Operational Control | 7.5.1 |
| 4.4.7 | Emergency Preparedness and Response | 5.4.5 |
| 4.5.1 | Monitoring and Measurement | 7.6 |
| 4.5.2 | Evaluation of Compliance | 8.2.3 |
| 4.5.3 | Nonconformity, corrective action and preventive action | 8.3, 8.5.2, 8.5.3 |
| 4.5.4 | Control of Records | 4.2.4 |
| 4.5.5 | Internal Audit | 8.2.2 |
| 4.6 | Management Review | 5.6 |