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Important information:
This document is manage by electronic form.

1. Scope

The scope of this Supplier Quality Manual is to inform the requirements that KOH-I-NOOR Ponas will request during the launch and the serial life, in order to be known before the acceptance of a new product. Globally, the goal is to achieve zero defects throughout the supply chain, to reach this, the supplier must have set up continues improvement process. The supplier must work to step by step reduce carbon footprint with the monitoring of Scope 1 and 2 and general target should be to use in near future 100% of renewable of consumed energy.

2. Conduct code between KOH-I-NOOR Ponas and supplier

a. Scope

The purpose of this Conduct Code is to develop and maintain an acceptance standard of conduct for KOH-I-NOOR Ponas and its stakeholders, including:

-Behavior patterns consistent with company policies that reflect the way in which KOH-I-NOOR Ponas perceive its image.

-The commitment of KOH-I-NOOR Ponas to comply the legislation and regulations in force in the countries where it operates.

-It serves to remind all suppliers which we expect of them and how their actions, conducts and behaviors affect the company.

b. Application areas

This Conduct Code will be applicable in all organizational areas and affects all suppliers, as new as existents.

Also, it will be tried that the Suppliers that collaborate with KOH-I-NOOR Ponas assume as their own the principles and contents of the Code.

c. Ethical principles

1. Behavior within the legal and regulatory framework

All Suppliers of KOH-I-NOOR Ponas must be up to date and comply with the legislation in force of the place where they live and where they carry out their professional activity.

The code application in no case it will be able to suppose a non-compliance of the legal provisions in force in the countries where it operates.

The commitment to comply with laws, regulations and standards is the ethical behavior basis expected of all suppliers with whom KOH-I-NOOR Ponas works.

2. Financial Transactions

All financial transactions carried out in the KOH-I-NOOR Ponas interest must have record at the accounting level.

Accounting records must show the nature of all transactions right way and non-deceptive.

3. Interest Conflict

The staff of KOH-I-NOOR Ponas should avoid situations that may suppose to a conflict between their personal interests and those of the company, abstain from representing the company or influence the decision making in which,

directly or indirectly, they or third parties associated with them, have a personal interest.

Some potential conflict situations and that must be communicated to hierarchical superior who is the responsible to manage, are:

- No person of KOH-I-NOOR Ponas may receive undue personal benefits from thirds parties derived from your position.
- In the case of a close relationship with a supplier, customer, etc. and this could influence when we are making decisions, the hierarchical superior will be informed who will estimate the timely action.

4. Responsibility with Image and Corporate Reputation

KOH-I-NOOR Ponas considers that one of the basics elements of its image and reputation are the relations with the society and the relations between the organization´s workers.

KOH-I-NOOR Ponas employees should make every effort to preserve the image and reputation of the organization in all professional activities, but also to monitor the respect and appropriate image use and reputation of the company by suppliers, subcontracted companies and customers.

5. Measures against Bribery and Corruption

Suppliers may not receive, offer, or deliver directly or indirectly any payment in cash, in kind or any other benefit to any employee of KOH-I-NOOR Ponas, person who works for a public or private entity with the intention to obtain or retain any business type, favour or interest. Employees may not resort or tolerate bribes from third parties to the company and vice versa and shall act in accordance with the laws that apply to them.

Incurred expenses on behalf of and to account of KOH-I-NOOR Ponas must be documented by receipts or payment invoices and have to be approved and reviewed by the hierarchical superior, then will be notified to the financial department for review in accordance with the expenditure policy.

All kinds of invitations to customers, suppliers, audits and other third parties must guarantee their transparency.

d. Human rights and Labour Relations

1. Safety and Health

Suppliers must ensure that the development of their activities don't cause risks to the health and safety at work of the organization's employees. As well as, employees must know and comply the standards, procedures and instructions on the protection of health and safety at work and ensure the own safety, other employees, suppliers, customers and other people who may be affected by the development of its activities. Suppliers are expected to demonstrate a clear compromise with the health and safety and to keep their policies and procedures active.

2. Employees

Suppliers must not accept any type of discrimination in the professional area due to age, race, color, sex, employment or corporate relation, religion, political opinion, social origin, disability or any other reason and through their action policies to ensure the equal opportunities for all. KOH-I-NOOR Ponas and their suppliers will not hire under legal age children and if the presence of any minor of legal age is detected, the responsible person will be informed to take the appropriate measures in this regard. Nor will participate in or support the use of forced labor.

Suppliers as well as KOH-I-NOOR Ponas respect the rights of freedom of association and collective bargaining in the work environment.

e. Environmental Principles and Cyber security

Suppliers shall comply with the organization's policy, standards, requirements, instructions and procedures on the environmental and strive to minimize the environmental impact derived from their products or services during the product's life cycle. During the selection phase and under equal conditions, the Supplier certified in ISO14001 will prevail, and in the absence of certificated Suppliers, the environmental impact will be assessed in terms of waste reduction by packaging, reduction of transported distances and the inclusion of an environmental commitment within the Company's policy.

The supplier undertakes to purchase from trusted vendors as part of cyber security. Critical machines and equipment are disconnected from external networks to prevent security breaches. The supplier further undertakes to regularly educate its employees about threats and protective measures in the field of cyber security.

3. GENERAL REQUIREMENTS

The Supplier undertakes not to make any change in the Product/Process without informing KOH-I-NOOR Ponas.

KOH-I-NOOR Ponas is obliged to deliver replacement parts to its Customers for a period of 15 years after the end of the serial production. Supplier according to the contractual agreements must ensure the supply of parts. In case of unavoidable discontinuation the Supplier shall send a written notification to KOH-I-NOOR Ponas minimum 24 months prior to such planned discontinuation. In case of Customer requirement, Supplier should complete the Feasibility analysis.

The Supplier shall comply the applicable legislation of it country, delivery country and destination country.

The Supplier shall spread applicable requirements throughout its supply chain.

All correspondences must be in English or Czech language.

All information used during development or serial life between Supplier and KOH-I-NOOR Ponas must be confidential, ergo the Supplier cannot be assigned, displayed or transmitted to third parties, unless written approval from KOH-I-NOOR Ponas. In the same way, measures must be applied to prevent unauthorized access to this information. Measurement and control registers should be archived during the product's serial life and for at least ,1 year after the end of series, unless a longer period is required. Any file related to regulatory or security characteristic should be archived for 15 years.

4. PPAP REQUIREMENTS FOR FIRST SAMPLES.

The rest of required documents and reports submitted for the release of a product are different depending of type of product.

a. Raw material, masterbatches, paints, inks

These Suppliers are required to send for example bellow documents to KOH-I-NOOR Ponas:

- PSW Part Submission Warrant level 1, in case of Bulk materials
- Safety Data Sheet in the language of destination country in case of dangerous substances
- Material Data Sheet and Tolerances for production parameters, if applicable
- Certificate of compliance with Material Norms and/or flammability characteristic (TL1010, FMVSS302, ISO 3795, Renault D451333...) or FCD food contact compliance or REACH, depending of final customer
- Certificate of compliance with Conflict Minerals, and others documents to evidence the conformity with legal requirements.
- Identification according characteristic.R or S depending customer classification, at every delivery unit, if applicable
- If necessary, IMDS register must be sent to 8322 KOH-I-NOOR Ponas.

b. Components and subcontracted parts

For initial release of a component or sub-contracted part, Suppliers are required to send bellow reports to KOH-I-NOOR Ponas based on the AIAG Production Part Approval Process(PPAP) level 3, unless otherwise specified, they have to submit for example;

- PSW Part Submission Warrant
- Drawing, if requiered
- Samples to release from every cavity/print,
- Complete dimensional report per cavities/print, quantity to be defined with customer
- CPKs if required, of significant dimensions of drawing of min. 30 parts, with a capacity >1,67, unless customer requires otherwise.
- Tests, trials, treatments tests required according Cdc or drawings.
- Flow Diagram, FMEA, and Control plan,
- Identification according R or S, at every delivery unit, if required.
- If necessary, IMDS register sent to 8322 KOH-I-NOOR Ponas.
- A Process Audit should be performed before SOP to project release.
- Signed Supplier agreement, Contract and Supplier Quality Manual
- Packaging proposal

c. External services such calibration, material or product tests and other external services.

Once this type of suppliers is in our Suppliers Panel, it is possible to request the service, without any specific submission. Please note, if supplier hasn't ISO/IETC 17025 it is mandatory a derogation from customer accepting lack of certification for sub-contracted test.

5. PERIODICAL REQUALIFICATION and CUSTOMER SPECIFIC REQUIREMENTS

Supplier must update PPAP periodically and upon request by KOH-I-NOOR Ponas. This frequency will be agreed in the start up of Project with customer, an annual frequency is usual. If any frequency is specified, it will be performed every 3 years.

KOH-I-NOOR Ponas will share with supplier during feasibility analysis all customer specific requirements. This customer specific requirements must be shared and follow throughout the supply chain.

6. NON-CONFORMITY MANAGEMENT

In case of not compliance of product, material or component KOH-I-NOOR Ponas will open a Non-conformity in 8D format. KOH-I-NOOR Ponas measures the supplier's Quality Non-Conformities answers, in deadlines and content terms. This value is an input in monthly Performance of supplier. General required deadlines are detailed bellow, in case of gravity of problem, shorter deadlines could be required. Supplier should follow G8D (Global 8 Disciplines).

Until D3, a 24h term is required,

D1 – Team. Definition of team. Team leader defined.

D2 – Problem description. Everyone must understand what is the problem.
There should be picture of OK part and picture of NOK part for better understanding.
For problem description basic is to use 7W (5W and 2H)

D3 – Contaiment action, including:

- To block and sort supplier's stock, To inform how many ok/ nok parts.
- To sort the stock of KOH-I-NOOR Ponas plant
- First analysis of problem, and return of product in transit
- Contention measures for new production, if necessary
- To inform KOH-I-NOOR Ponas about identification of checked parts and checking method; and first ok delivery
- Red alert. Re-training.

Until D5 required term is 14 days:

D4 – Root cause. Analysis and definition of root causes. Preferable with a 5Whys analysis.

- Analysis of root cause of Occurrence factors
- Analysis of root cause of Non-Detection factors

D5 – Planned corrective action. Identification of corrective measures or actions. What, how and when.

Until D8 required term is 60 days.

D6 – Verification of corrective action
To close actions, verify corrective actions, and check effectiveness.
Verification can be a picture, updated document...

D7 – Prevention
To extrapolate and/or transversalize these actions: to apply corrective action to similar product or process
To update Control Plan, update FMEA

D8 - Closure

KOH-I-NOOR Ponas will charge to supplier all costs caused by the Non-Conformity opened to Supplier, according the principle causer responsible: costs of selections, stops of machines, urgent transports, charges of final customer... An administrative cost will be included in every charge back according the detection place as described in bellow paragraph.

The cost of open Nonconformities or charge back is different depending of where the defect is detected:

- **100€** if problem is detected during incoming inspection control
- **150€** if problem is detected during production and/or involving costs
- **200€** if Customer is who open the nonconformity (Customer of KOH-I-NOOR Ponas or Final Customer)

7. ESCALATION PROCESS.

An escalation is expected in case of negative performance of Supplier and/or in case of delay or missing answer, supplier out of target or claims with impact in Customer. In these cases, Purchasing department, in a first step the quality and in second step, Purchasing Manager, can act against these situations and monitor their resolution. In the case where the Supplier doesn't meet defined quality causing a critical situation at KOH-I-NOOR Ponas or at our Customers,KOH-I-NOOR Ponas will apply an Escalation Control. Based on the severity of the supplier caused situation, we define 3 escalated levels:

1. Level 1. Monitoring level.

CSL 1: 100% control in Supplier by internal people.

Supplier should delegate appropriate resources to ensure communication and actions definition and follow up.

- Entry criteria: 2 reocurrences during 12 month (so 3 same defect claims)
- Time: 3 moths
- Exit criteria: without deffective in Supplier and in KOH-I-NOOR Ponas or Customer

2. Level 2. Alarm level

CSL 2: 100% control in Supplier Plant by external company paid by supplier.

Product Improvement Program.

- Entry criteria: Another reocurence after aplication escalation Level 1
- Time: 3 moths
- Exit criteria: without deffective in Supplier and in KOH-I-NOOR Ponas or Customer

3. Level 3. NBH. New Business Hold.

CSL 3: 100% control in Supplier Plant plus 100% control in incoming in KOH-I-NOOR Ponas paid by supplier.

NBH. New Business on Hold.

Supplier Improvement Program

- Entry criteria: Again reocurence after aplication escalation Level 2
- Time: 3 moths
- Exit criteria: without deffective in Supplier and in KOH-I-NOOR Ponas or Customer

CSL's targets, time and exit criteria will be defined by Quality of KOH-I-NOOR Ponas where supplier is delivering.

8. PERFORMANCE EVALUATION.

In general is performance avaluation done once per year and is shared with supplier. Supplier will receive evaluation during February for previous year. In case of some issue or problems KOH-I-NOOR Ponas will do special performance evaluation and escalate to supplier.

Areas to be evaluated:

- QUALITY
- COST/PURCHASING
- LOGISTICS

An evaluation of each point will be assigned according to this satisfaction level, and in a percentage basis:

- Satisfactory 100%
- Rather satisfied 80%
- Dissatisfied 0%

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Supplier evaluation:

Quality:		
Number of claim	0 claim in last 12 months	100%
	1 - 2 claim in last 12 months	80%
	2 and more claims in last 12 months	0%
Comunication	Satisfactory - answers on time	100%
	Rather satisfied - answer with small delay	80%
	Dissatisfied	0%
Certification	Supplier meets the requirements	100%
	Supplier does not meet the requirements	0%
Cost/Purchasing:		
Payment condition	Satisfactory - 30 days and more	100%
	Rather satisfied - 14 - 30 days	80%
	Dissatisfied - less then 14 days or instant payment	0%
Price	Satisfactory	100%
	Rather satisfied	80%
	Dissatisfied	0%
Logistic:		
Logistic service	Satisfactory - JIT or max. 1 extra delivery	100%
	Rather satisfied - 3 day delay or max. 2 extra delivery	80%
	Dissatisfied - more then 4 day delay or more then 3 extra deliveries	0%

According this evaluation, the classification that may be obtained by suppliers will be as follows:

A ≥ 90 to 100% Supplier capable: fully complies with our requirements
B ≥ 80 to 89% Supplier capable but does not fully comply with requirements. Next steps: Request an action plan and check its implementation.
C < 80% Supplier does not comply requirements. Next steps: Request an action plan and check its implementation.

In the case where the same supplier obtains different scores at two different plants, the lowest score will prevail. The evolution of B Suppliers will be yearly monitored, and from this analysis could be derived corrective actions or continuous improvement activities. Supplier must take and submit to us special actions in case of total classification C; these actions must be monitoring by Plant and Purchasing department. According the assessment, if the conclusion is that they do not attain the quality and service levels required, the following decisions may be taken:

- To put Supplier for new business on hold
- Escalation to the customer
- Supplier's approval will be withdrawn and it will be removed from the Approved Supplier Register (as long as there is an alternative supplier and this has no impact on our customers).
- A period of time may be given to Supplier to put right deviations, with the final decision being postponed.

The reduced rating will be reviewed during the next regular evaluation. It can also be reviewed earlier in case the suppliers requests its.

9. Supplier control audits and certificates

Based on Supplier's Performance, Supplied Product's Criticity Matrix, and Quality certified System, KOH-I-NOOR Ponas will schedule yearly planning of Supplier Audits, a Supplier audit should be carried in following cases:

- In case of poor classification of Supplier, level C,
- In case of negative trend or risk detected, which could affect to quality, supplies or fulfillment of customer's regulation or safety requirements. In case of safety product or supplied process, should be verified the compliance with Safety procedure.
- To make Product and/or Process audits in Supplier location to verify corrective or preventive measures, Product validation in SOP, or to increase the control to Supplier.
- If Supplier loses ISO 9001 or IATF certification,
- In case of Supplier hasn't any quality certification from a third body, a yearly audit will be planned, in any case Customer approval should be requested
- If it is necessary to develop an Improvement Plant focused in Supplier's Quality System Management development.

Different formats for Audit will be followed: f.ex. Product Audit, Process Audit, VDA 6.3, except if final customer requires a different model, like Formel Q, VDA6.3...
An action plan will be requested to solve detected deviations.
A Self VDA 6.3 audit and CQIxx (if is applicable)may be requested to Supplier in a yearly basis following Customer's requirement, but also in case of
negative trend, in order to identify and limit potential risks generated by Supplier.
A yearly Product audit should be included into Supplier Control Plan and should be available upon request.

Certificates

KOH-I-NOOR Ponas have 5 group of suppliers according to the type of what he buys. Below you can see more information.

Certificate:	Type of supplier:
IATF 16949	Supplier of componets for final products to automotive industry, Supplier external service provider
ISO 9001	Supplier of raw material
	Supplier of packaging if is applicable
	Distributor of raw material
	External sorting companies
	Supplier of componets for final products to non-automotive industry
ISO 14001	Producer of raw material
	Producer of packaging of is applicable
	Producer of paint
N/a	Seller of consumer goods
	Seller of wooden pallets
	Purchase of service
	Carriers
	Purchase of meters
	Cooperation for toolshop
	Purchase of metallurgical materials, fasteners, tools, packaging, CHLS
	Purchase of technology, machines, equipment
ISO 45001	N/a
ISO/IEC 17025	Laboratory, calibration service

If the type of supplier is not in the table, must be defined requirements during releasing of new supplier.

10. Signature

KOH-I-NOOR Ponas signature:

Quality manager: Roman Vavříček - r.vavricek@ponas.cz

Purchasing press-shop: Marie Cihlářová - m.cihlarova@ponas.cz

Polička

Supplier signature:

Name:

Position:

Date:

Coment:

Through the communication of this Supplier Quality Manual, The Supplier is informed about KOH-I-NOOR Ponas internal requirements, as well as common requirements of our Customers and agree then will follow them.