
# Quality Manual

**The Boulder Company**
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This document has been approved for use by the ISO Representative. Amendments shall be recorded on the Table of Amendment.

Justin Bruce – ISO Representative

This document is approved for use by: _____

# Quality Manual
# Copy Holder & Scope Details

Copy Holder: ISO Representative - Des Moines, IA

Copy Number: 1

This Quality Manual Covers the activities and functions performed by operating areas included in the service scope definition:-

**"Boulder Company specializes in the distribution of fastening solutions for manufacturers from the Manufacturing, Construction, Municipal, Agricultural and other industries."**

The Quality Management System is designed to meet the requirements of

ISO 9001:2015
Clause 8.3 Design & Development is not applicable

Certificate Number: CA 2885 US

# Quality Manual
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# Quality Manual Contents

# Quality Manual Amendments

This Quality Manual must be kept under strict control to prevent the System from becoming unreliable. Adherence to the following paragraphs ensures that the System remains current and valid:-

1) The Quality Manual shall be clearly numbered and the Holder recorded.

2) Each page in the Quality Manual shall carry its own unique reference number (QM number), page number, revision status and effective date. The ISO Representative shall be solely responsible for releasing the read-only PDF copy to the network, therefore no electronic signature shall be necessary.

3) Changes can be suggested by any Employee but must receive approval from the ISO Representative before being entered into the Quality Manual.

4) The ISO Representative shall be responsible for all revisions and additions being made, approved and recorded.

5) All changes must be recorded on the Table of Amendment (QM 04) by the ISO Representative who ensures that the appropriate pages of the Quality Manual are updated.

6) "Uncontrolled" copies of this Quality Manual may be issued to customers or other third parties at the discretion of the ISO Representative. Any such copied Manual shall be clearly marked "UNCONTROLLED COPY", together with the date on which it was copied/printed. It follows, therefore, that the copied/ printed Manual ceases to be 100% accurate after that date as further revisions may be made to the controlled copies.

# Table of Amendment – Quality Manual

| Document Number | Page Number | Revision | Date | Description of Change | Authorization |
| --- | --- | --- | --- | --- | --- |
| ALL | ALL | 1 | 07/15/09 | Manual re-issued as Revision 1 against ISO 9001:2008 to remove all references to ISO 9001:2000 | Dale H. |
| ALL | ALL | 2 | 12/30/09 | Revised to Rev 2 from findings of External Audit on 10/23/09 | Dale H. |
| ALL | ALL | 3 | 12/08/10 | Revised to Rev 3 from findings in External Audit 11/02/10 | Dale H. |
| ALL | ALL | 4 | 12/27/11 | Revised to Rev 4, fixed all ISO 9001:2000 errors to ISO 9001:2008, pg 14 of 18 chg devices to equipment. | Dale H. |
| ALL | ALL | 5 | 07/17/18 | Whole Quality Manual upgraded to ISO 9001:2015 | JB |
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# Corporation Profile

Jim Strong founded The Boulder Company in 1978. The Boulder Company focuses on providing quality fastening solutions and related C-class items to manufacturers.

The Boulder Company offers a number of value-added processes including; painting, plating, patching and packaging. The Boulder Company inventories large quantities of foreign and domestic fasteners provides special processes as necessary, provides inventory stocking and control systems as necessary and delivers to customers. The Boulder Company primarily serves the Manufacturing industry but also serves the Construction, Municipal, Agricultural and other industries.

An essential requirement of the continuing maintenance and development of The Boulder Company's Quality Objectives is the implementation and maintenance of a Quality System registered to ISO 9001:2015.

# Quality Policy & Objectives

The Boulder Company recognizes that the discipline of quality is an integral part of its management function. We view quality as a primary responsibility.

Our Quality Policy calls for continual improvement in our Quality Management activities and business will be conducted according to the following principles:

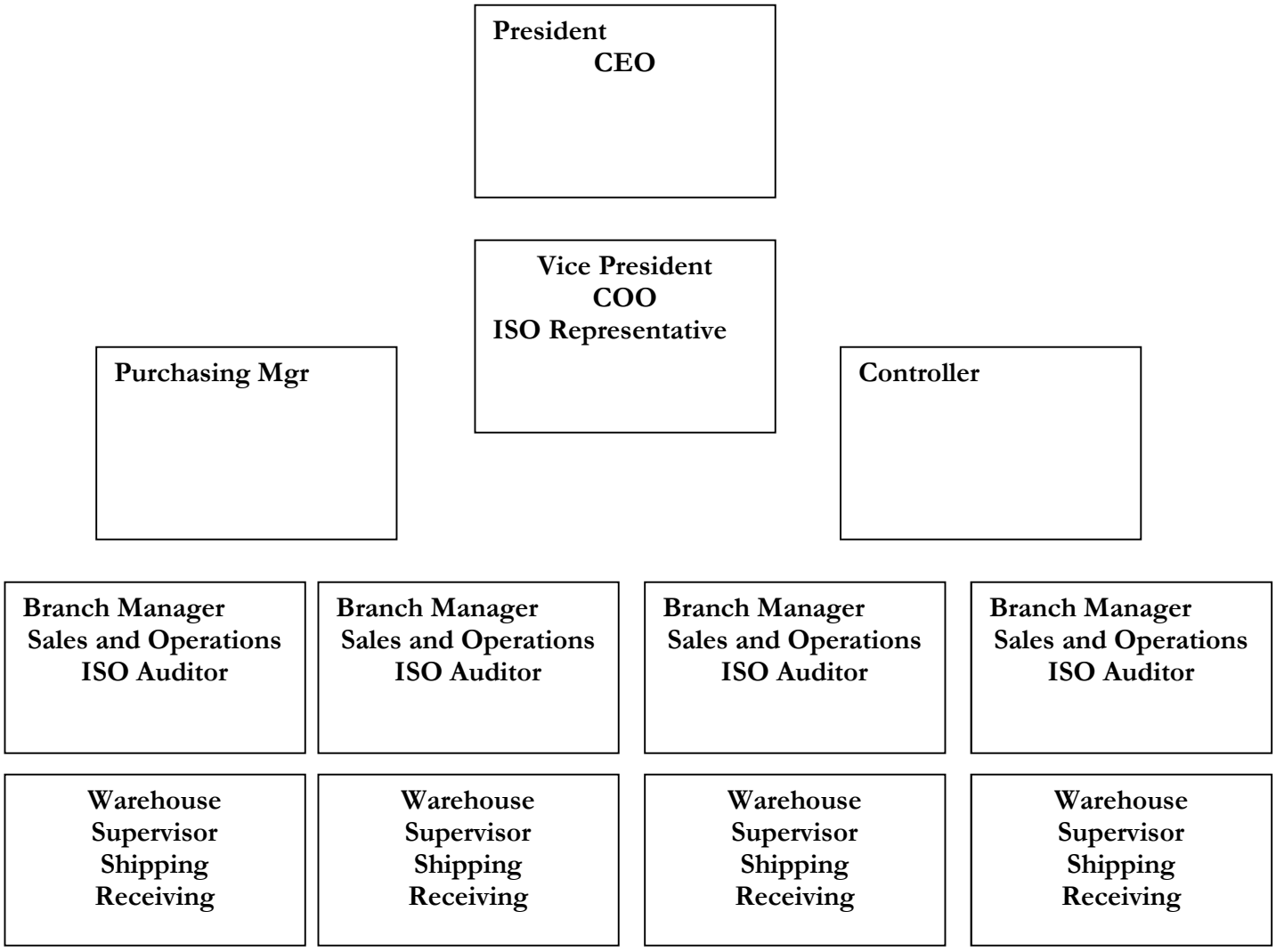
We will:

- ✓ Comply with all applicable laws and regulations;
- ✓ Follow a concept of continual improvement;
- ✓ Communicate our Quality Objectives and our performance against these objectives throughout the company and to interested parties;
- ✓ Take due care to ensure that activities are safe for employees, associates and sub-contractors and others who come into contact with our work;
- ✓ Work closely with our customers and suppliers to establish the highest quality standards;
- ✓ Adopt a forward-looking view on future business decisions that may have quality impacts;
- ✓ Train our staff in the needs and responsibilities of Quality Management.

To assist us in achieving our quality requirements we are committed to operating in a manner that sustains registration to the International Quality Standard ISO 9001:2015.

It is our belief that, in operating to these standards, we will meet or exceed the requirements of our customers and the industry.

# Organization – Responsibility & Authority




Top Management defines working relationships, authorities and key responsibilities for all personnel. Working relationships are summarized in our Organization Chart. Job Descriptions contain more complete details as to specific roles and responsibilities, competency levels, etc, and are documented separately. Quality responsibilities may also be indicated in Quality Management System Procedures. All employees are responsible for complying with legal and regulatory requirements.

Our Quality Policy statement is displayed on the premises and all personnel are expected to share a commitment to continual quality improvement.

# Organization – Responsibility & Authority

In accordance with the requirements of the ISO 9001:2015 Standard, the following employees are appointed as ISO Representative and Quality Auditors:-

**ISO REPRESENTATIVE:** **Justin Bruce**

**QUALITY AUDITOR:** **Justin Bruce**

**QUALITY AUDITOR:** **Kay Delaughter**

**QUALITY AUDITOR:** **Heidi Fries**

**QUALITY AUDITOR:** **Troy Woods**

## 3 Terms and Definitions

The following terms, used in this Manual to describe the supply chain, reflect the vocabulary currently used within The Boulder Company

Supplier→Organization→Customer

**Supplier/vendor** – our definitions of the words supplier and vendor are interchangeable but we use the term "supplier" within our Quality Management System. We define a supplier as providing a product **and/or** an outsourced service.

**Top Management** – person or group of people who direct and control an organization at the highest level.

**Document** – Information and its supporting medium. (NOTE – The medium can be paper, magnetic, electronic or optical computer disc, photograph, master sample, or a combination thereof.)

**Quality Management System - Requirements**

## 4 Context of the Organization

### 4.1 Understanding the Organization & its Context

We have determined the relevant external and internal issues that affect our ability to achieve the intended outcomes of our Management System. We have considered the full business environment, the key drivers and trends having impact on the objectives of The Boulder Company and the relationship and values of external stakeholders.

External Issues include:

- ✓ Economic/Currency - we import fasteners from abroad.
- ✓ Logistics - Shipping, weather, customs, global community raw material prices, lead-time, vendor control.
- ✓ Competition – there is a lot of competition from other US companies.
- ✓ Technological - customers can buy direct from Amazon or E-Bay.
- ✓ Cultural - The Chinese New Year and local customs affect trade.
- ✓ Political Instability - North Korea could impede obtaining product from China.

Internal Issues include:

- ✓ Employees - local unemployment statistics were at their lowest ever in 2017 which made hiring competent people and retention of people harder.
- ✓ Performance - we are a small team so if one person is not performing, it affects us all.
- ✓ Knowledge – we have older employees retiring and taking knowledge with them.

## 4.2 Understanding the Needs & Expectations of Interested Parties

We have identified the interested parties and their requirements with the emphasis being on quality. We have included a process to determine any legal requirements relating to activities, products and services that are relevant to the Scope of our Management System.

Interested Parties include:

- ✓ Customers – our Quality Management System (QMS) must produce quality products to customer requirements with on-time delivery.
- ✓ Suppliers - our suppliers need to provide us with quality products and on-time delivery.
- ✓ Owners/Shareholders - we need to make a good profit margin and provide resources.
- ✓ Employees - our employees contribute to the profitability our the business. Providing clear instructions helps our employees do their job right first time.

## 4.3 Determining the Scope of the Quality Management System

We have determined the boundaries and applicability of our management system and have taken into account the issues identified in Clause 4.1 and 4.2 (above) as well as those that relate to our product and service when establishing the scope.

The Boulder Company specializes in the distribution of fastening solutions for manufacturers from the Manufacturing, Construction, Municipal, Agricultural and other industries.

The Boulder Company offers a number of value-added processes including; painting, plating, patching and packaging. The Boulder Company inventories large quantities of foreign and domestic fasteners and provides special processes as necessary, provides inventory stocking and control systems as necessary and delivers to customers.

As a distribution service working to customer instructions, we have concluded that Clause 8.3 Design & Development of Products & Services is not applicable to our QMS.

## 4.4 Quality Management System & Its Processes

The top management of The Boulder Company is committed to maintaining an effective Quality Management System. This Quality Manual has been prepared to satisfy the requirements of ISO 9001:2015 for Quality Management Systems for the activities carried out at the site defined in our organization's address and for the scope stated at QM 01 of this Manual. Wherever possible, Quality Controls have been integrated into existing systems (Health & Safety, etc) and cross-referenced for ease of interpretation.

The effective implementation of our Quality Management System shall be verified by regular reviews and audits which compare our practice and performance against the requirements of our written Procedures. We shall take corrective action wherever necessary to eliminate error, and we shall review the effectiveness of the actions we take.

In order to deliver the requirements, we have identified:

- ✓ The processes needed for the implementation, operation and maintenance of the QMS along with opportunities for its improvement and their application throughout The Boulder Company;
- ✓ The inputs required and outputs expected from these processes;
- ✓ The sequence and interaction of these processes (QM 09);
- ✓ Criteria and methods needed to ensure that both the operation and control of these processes are effective;
- ✓ The availability of resources and information necessary to support the operation and monitoring of these processes;
- ✓ The risks and opportunities within the QMS and how to plan to address them;
- ✓ The monitoring, measuring and analyzing of these processes, and implementation of actions necessary to achieve planned results and continual improvement;

Appropriate documented information is maintained to support these processes and is retained as records to demonstrate that all processes are working as planned.

## 5 Leadership

### 5.1 Leadership & Commitment

Our Top Management has demonstrated leadership and commitment with respect to our QMS by taking accountability of the effectiveness of the QMS; by establishing a Quality Policy and Quality Objectives that are compatible with our direction.

We ensure that both the Quality Policy and Quality Objectives are communicated, understood and applied within The Boulder Company; ensuring integration of QMS requirements into The Boulder Company's business processes and by promoting awareness of a process approach (QM09) and risk-based thinking.

In addition, our Top Management have provided the necessary resources for the QMS; communicated the importance of effective Quality Management and of conforming to QMS requirements; ensuring that the QMS achieves intended results; engaging with, directing and supporting persons to contribute to the effectiveness of the QMS; promoting improvement and supporting other members of the Management Team to demonstrate their leadership as it applies to their area of responsibility.

Our Top Management ensures that all employees are aware of the need to meet customer and regulatory requirements and that the necessary resources are available. We strive to meet our customers' expectations and Top Management have demonstrated their leadership and commitment by ensuring that customers' requirements and applicable regulatory and statutory requirements are met; that risks and opportunities that could affect our products and services have been addressed; that our focus is on consistently providing customer satisfaction (Measurement & Improvement, PM 11, Customer Requirements, PM 04).

### 5.2 Policy

We have established, through our Quality Policy, the need to meet requirements and continually improve our products and services. The Policy is available as documented information, is communicated throughout The Boulder Company and is also available to interested parties, as appropriate. Quality Objectives are reviewed for continuing suitability and communicated as appropriate throughout The Boulder Company

### 5.3 Organizational Roles, Responsibilities & Authorities

The President is responsible for ensuring that individual responsibilities and authorities are assigned and communicated (QM 07) throughout The Boulder Company. The President has the authority and responsibility to ensure that the QMS is established and maintained and that reports on the performance of the System and any needs for improvement are communicated appropriately. The significance of meeting customer requirements is understood by everyone.

The President ensures that internal communication is such as to ensure the effectiveness of the processes of the QMS. We have identified, documented and communicated the roles, responsibilities and authorities of those involved in the Management System and their inter-relationships within The Boulder Company

## 6 Planning

### 6.1 Actions to Address Risks & Opportunities (PM 10)

We have considered the issues detailed in Clause 4.1 and 4.2 and have determined the risks and opportunities that need to be addressed to assure the QMS can achieve its intended outcomes; that we prevent or reduce undesired effects and achieve continual improvement.

We have put a plan in place to address these risks and opportunities and also a plan to integrate and implement these actions in the QMS and evaluate their effectiveness. We have documented a Procedure (PM 10) and produced a Risk Assessment Register.

### 6.2 Quality Objectives & Planning to Achieve Them

We have established Quality Objectives at various levels within The Boulder Company, in line with the requirements of ISO 9001:2015 Clauses 6.2.1 and 6.2.2. Quality Objectives are documented within Management Review Reports.

### 6.3 Planning of Changes

If we make changes to our QMS they would be carried out in a planned and systematic manner. We will consider the purpose of any changes, their potential consequences, the integrity of the QMS, the availability of resources and the allocation or reallocation of responsibilities and authorities.

## 7 Support

### 7.1 Resources, 7.1.1 General (Resources, PM 03)

We have determined and provided the resources needed for the establishment, implementation, maintenance and continual improvement of our QMS. We have considered the capabilities of our existing resources and what we need to obtain from external providers. Responsibility for maintenance of equipment and the work environment is defined. (See PM 03).

### 7.1.2 People (PM 03)

These resources include people who have the necessary skills and competencies to effectively operate our QMS in order to meet and exceed our customers' expectations. Also see Clause 7.2.

### 7.1.3 Infrastructure (PM 03)

We have provided the infrastructure determined necessary for the provision of our processes and conformity of our products and services.

### 7.1.4 Environment for the Operation of Processes (PM 03)

We have provided the environment determined necessary for the provision of our processes and conformity of our products and services.

### 7.1.5 Monitoring & Measuring Resources (Control of Monitoring & Measuring Equipment and Software, PM 07)

Monitoring and measuring equipment and software are used by The Boulder Company where quality is affected, since product conformance is indicated by inspection measurements. Equipment shall be purchased new with a certificate of calibration and identified and calibrated at specified intervals (or prior to use) against measurement standards traceable to National or International Standards and shall be protected against random adjustments, damage or any deterioration which would invalidate the measurement result.

Records of calibration shall be maintained. The Boulder Company does not allow the use of employee-owned monitoring or measuring equipment.

### 7.1.6 Organizational Knowledge

We have determined the knowledge necessary to operate our processes when achieving conformity of our products and services. We have systems in place to address any changes to our needs and possible trends that come up from time-to-time. The knowledge is in the form of documented information and is available to those who require it.

### 7.2 Competence (PM 03)

Where employees are assigned responsibilities affecting product conformity, we have ensured that they are competent on the basis of applicable education, training, skills and experience. We have identified the training needs for quality-related activities and provided training to satisfy these needs. Performance is evaluated and appropriate training records are maintained. More detail is provided in PM 03.

### 7.3 Awareness (PM 03)

We have ensured that people doing work under our control are aware of our policies; our Quality Objectives that are relevant to them; their contribution to the effectiveness of the System and the implications of not conforming to the QMS requirements.

### 7.4 Communication

We have determined the need for internal and external communications relevant to the system including on what, when, with whom, how and who would communicate.

### 7.5 Documented Information (Control Documentation, PM 00, & Control of Documents & Records, PM 01)

We have written our Quality Policy (stating our Quality Objectives) and this forms part of this Manual. Our Quality Policy is available to all employees. We have prepared - and shall maintain - this controlled Quality Manual which defines the scope of our activities. Wherever necessary, we have made reference to documented Procedures with a brief description of how our Procedures operate. We have justified any Clauses of the Standard which are inapplicable but have documented Procedures for all other parts of the Standard which are applicable to the scope of our activities. Our QMS has been developed taking into account the size, type and complexity of our business, and the competence of our employees. This is demonstrated through our training and competence assessment records.

Procedures (PM 00 and PM 01) ensure that all relevant documents are controlled and adequate; and that they are reviewed, updated and approved, as necessary. The status of relevant documents is identified and these shall be legible, easily-retrievable and located as required within our facility and other Branches.

Whenever we have control of any documents that have originated externally (eg, Standards, customers' Quality Requirements, suppliers' price lists, etc), these relevant documents shall be identified and their distribution controlled. We shall clearly identify any obsolete Quality Management System documents in order to prevent their unintended use. Procedures PM 00 and PM 01 control the identification, storage, retrieval, protection, retention time and disposal of quality records. Records will be legible, identifiable and retrievable.

## 8 Operation

### 8.1 Operational Planning & Control (Customer Requirements, PM 04, & Process Control, PM 05)

We have planned, implemented and control the processes needed to meet requirements for the provision of our products and services, and to implement the actions determined in Clause 6.1. We have determined the requirements for our products and services, and established criteria for processes and the acceptance of our products and services. We have also determined the resources needed to achieve conformity of our products and services and by implementing control of the processes in accordance with the detailed criteria.

We keep documented information to the extent necessary to have confidence that the processes have been carried out as planned and that they demonstrate the conformity of our products and services.

We shall control planned changes and review the consequences of unintended changes, taking action to mitigate any adverse effects, as necessary. We shall ensure that outsourced processes are also controlled.

### 8.2 Requirements for Products & Services (Customer Requirements, PM 04)

#### 8.2.1 Customer Communication (PM 04)

Reference Boulder Work Instruction #THBC009.0 – VMI Program Management

All customer communications which affect the requirements of any order are documented. Our trained staff keep our customers informed regarding all relevant product/service information, enquiries and requirement changes/amendments. If customer complaints are received, we shall ensure that our customers are aware of our progress in dealing with these matters.

### 8.2.2 Determining the Requirements for Products & Services (PM 04)

When determining the requirements for our products and services offered to potential customers, we have ensured that applicable regulatory and statutory requirements have been defined and that we have the ability to meet those requirements and that we can substantiate any claim made for our products and services.

### 8.2.3 Review of the Requirements for Products & Services (PM 04)

We review customer requirements, including those for any delivery or post-delivery activities, as well as any statutory and regulatory requirements applicable to the product being provided. We also review those requirements not stated by the customer, when known, plus any contract or order requirements that are different from the original request. We conduct this review prior to our commitment to supply our products and services; and we always provide a documented confirmation of the order.

### 8.2.4 Changes to the Requirements for Products & Services (PM 04)

We will ensure that when changes are made to our products and services, relevant persons are made aware and relevant documentation is amended to reflect the changes made.

## 8.3 Design & Development of Products & Services

This Clause is not applicable to our quality requirements. We provide a service by supplying fasteners to customer requirements using the customer's own specification or an industry-standard specification. We do not, therefore, design/develop products.

## 8.4 Control of Externally-Provided Processes, Products & Services (Purchasing PM 06)

Reference Boulder Work Instruction #THBC003.0 - Vendor Performance Ratings
Reference Boulder Work Instruction #THBC008.0 – Import Procurement Guide

We have written a Procedure to describe how we deal with the control of externally-provided (purchased) products and services. We control our purchasing function to ensure that the purchased materials conform to requirement. External providers are selected against defined criteria and are subject to planned review and evaluation. The results of evaluations and follow-up actions are recorded. Purchasing documents are reviewed before release for the adequacy of information on product or service required.

We verify purchased products on receipt but if verification were ever to take place at an external provider's premises, details of the arrangements and the method of release will be specified.

## 8.5 Production & Service Provision (Process Control Procedure, PM 05)

### 8.5.1 Control of Production & Service Provision (PM 05)

We have documented Procedures which control the provision of our service. Product release and any post-delivery processes are defined. We add value to our customers'/suppliers' fasteners according to stated requirements and/or to an industry-specific standard. We carry out visual inspection of the components and use measuring equipment to verify the component dimensions. We outsource any processes that we cannot – or are not qualified to – perform in-house, our service suppliers being carefully chosen and monitored in accordance with Clause 8.4 above. Suppliers of outsourced services shall be required to provide certification with their service if this is requested by our customers.

Where verification of product/service cannot be ensured during the process by measuring/ monitoring, control shall be exercised by qualification of the process, equipment and/or personnel through defined methods, records and re-validation - if required.

### 8.5.2 Identification & Traceability (PM 05)

All product shall be adequately labeled in storage to ensure its proper identification, including any customer property. We maintain the identity of the product throughout our service provision by means of the suppliers' documentation.

Non-conforming product is identified and separated from conforming product.

Where traceability is required, the unique identification of the product shall be controlled and recorded. Certificates and the certification of any outsourced processes shall be communicated to any customer who requires them. We ensure that product is traceable. We maintain traceability from receipt of order from our suppliers through to actual delivery to the customer.

### 8.5.3 Property Belonging to Customers or External Providers (PM 05)

When customer or supplier property comes within our control it shall be identified, verified, maintained and protected. We immediately report details of any non-conforming customer or supplier property at receipt, and any deterioration in – or damage to – customer or supplier property. Refer to paragraph 8.2.1 above. The most strenuous efforts are made, however, to ensure that no damage/deterioration occurs while customer or supplier property is in our care.

### 8.5.4 Preservation (PM 05)

We preserve the conformity of product during internal operations, storage and delivery by provision of adequate handling, storage and protective packaging systems.

### 8.5.5 Post-Delivery Activities (PM 05)

We identify, handle with care, pack, store and protect all products (and/or any constituent parts) including customer or supplier property, documentation, etc, either at our premises or en route to a customer. All parts are handled in such a manner as to reduce/eliminate the possibility of damage. We have considered the risks associated with our products and services, the nature of use and lifetime of the products and services, customer feedback and statutory and regulatory requirements.

### 8.5.6 Control of Changes (PM 05)

We review and control changes necessary for production and service provision to ensure continued conformity of our products and services. We retain documented information regarding any changes.

### 8.6 Release of Products & Services (PM 05)

We have implemented arrangements at appropriate stages of service provision to verify that product and service requirements have been met. Monitoring of product throughout the process is designed to ensure that customers receive a product that meets their requirements and that any non-conforming product is not released. Evidence of such acceptance criteria is recorded and maintained as documented information. Products and services are not released to customers until verification arrangements have been met, unless authorized by our customers. Appropriate documented information of who authorized the release is recorded.

### 8.7 Control of Non-Conforming Outputs (Control of Non-Conformance Procedure, PM 09)

We have established controls to identify and isolate non-conforming product/service wherever possible. Purchased non-conforming products or services are returned to suppliers for replacement or credit. In the event of non-conforming product reaching a customer, we take appropriate corrective action, according to the severity of the circumstances.

## 9 Performance Evaluation (Process Control, PM 05, Internal Quality Audit, PM 08, Control of Non-Conformance, PM 09, Measurement & Improvement, PM 11)

### 9.1 Monitoring, Measurement, Analysis & Evaluation, 9.1.1 General

We have determined what needs to be monitored/measured, as well as how to monitor, measure, analyze and evaluate, as applicable, to ensure valid results. We have decided when the monitoring and measuring shall be performed. We review, analyze and evaluate the results from monitoring and measurement at Management Review Meetings.

We retain documented information on the results of such monitoring and measurement to enable us to evaluate the effectiveness of our QMS. From time-to-time we review our internal processes which directly affect customer requirements in order to ensure that the objectives stated in our Quality Policy are being achieved.

Internal Quality Audits of our Quality Management System shall ensure that our processes are achieving planned results.

### 9.1.2 Customer Satisfaction (PM 11)

Reference Boulder Work Instruction #THBC002.0 - Corporate Annual Goals

We have determined the methods for obtaining information regarding our customers' perception in terms of meeting or exceeding their requirements. Feedback is sought during ongoing communications with our customers via meetings, telephone, e-mail and unsolicited customer feedback such as compliments and/or complaints. Where customers supply us with objective, unsolicited performance feedback regarding delivery % on-time rates, rejection % rates, etc, we shall retain this information. All of the above information shall be discussed at our Management Review Meetings and we shall implement corrective action/changes wherever this can improve our customers' perception of our products/our relationship with our customers.

### 9.1.3 Analysis & Evaluation (PM 11)

Reference Boulder Work Instruction #THBC002.0 - Corporate Annual Goals

We analyze and evaluate data gathered as part of our monitoring and measuring activities and the results are used as part of our Management Review process. We are committed to collecting data referring to any product/service quality problems. Where we can achieve improvements by making changes to our Quality Management System, these changes shall be introduced in a controlled manner. Areas for attention are non-conforming product, customer complaints, meeting customer needs and supplier performance.

### 9.2 Internal Audit (PM 08)

Reference Boulder Work Instruction THBC001.0 - Internal Audit.

We conduct internal audits at planned intervals to provide information on whether our Quality Management System conforms to our requirements, as well as to the requirements of the ISO 9001:2015 Quality Management System Standard. We ensure our Quality Management System is effectively implemented and maintained. We also take into consideration the importance of our processes concerned, when carrying out internal audits.

### 9.3 Management Review (PM 02)

The complete Quality Management System is reviewed at planned intervals to ensure its continuing suitability, adequacy and effectiveness and to evaluate the need for change. Each review includes the evaluation of current performance and improvement opportunities related to audits, customer feedback, process performance, follow-up from previous meetings, any changes that could affect quality of product or service, as well as any changes in internal or external issues relevant to our Quality Management System and performance information, including trends and indicators and the effectiveness of action taken to address risks and opportunities. All results of management review activity are recorded. These include decisions and actions relating to improving the effectiveness of the Quality Management System, improving products or service in relation to customer requirements and any changes in resource needs.

## 10 Improvement

### 10.1 General (PM 11)

We have determined and shall select such opportunities as necessary for improving our customers' requirements and satisfaction. This will include improving our products and services; correcting, preventing or reducing undesired effects, and improving the performance and effectiveness of our Quality Management System.

### 10.2 Non-Conformity & Corrective Action (PM 09)

Reference Boulder Work Instruction #THBC004.0 - Control of Non-Conforming Product

When non-conformity occurs, we shall react to the non-conformity and take action to control and correct it and then deal with the consequences. We will evaluate the need for action to eliminate the causes of the non-conformity in order that it does not recur or occur elsewhere within The Boulder Company. We will implement the actions required and review the effectiveness of any corrective action taken, update risks and opportunities determined during planning (if necessary) and make changes to the Quality Management System, where necessary. We record all non-conformances, actions taken and the results of any corrective action using the appropriate documentation.

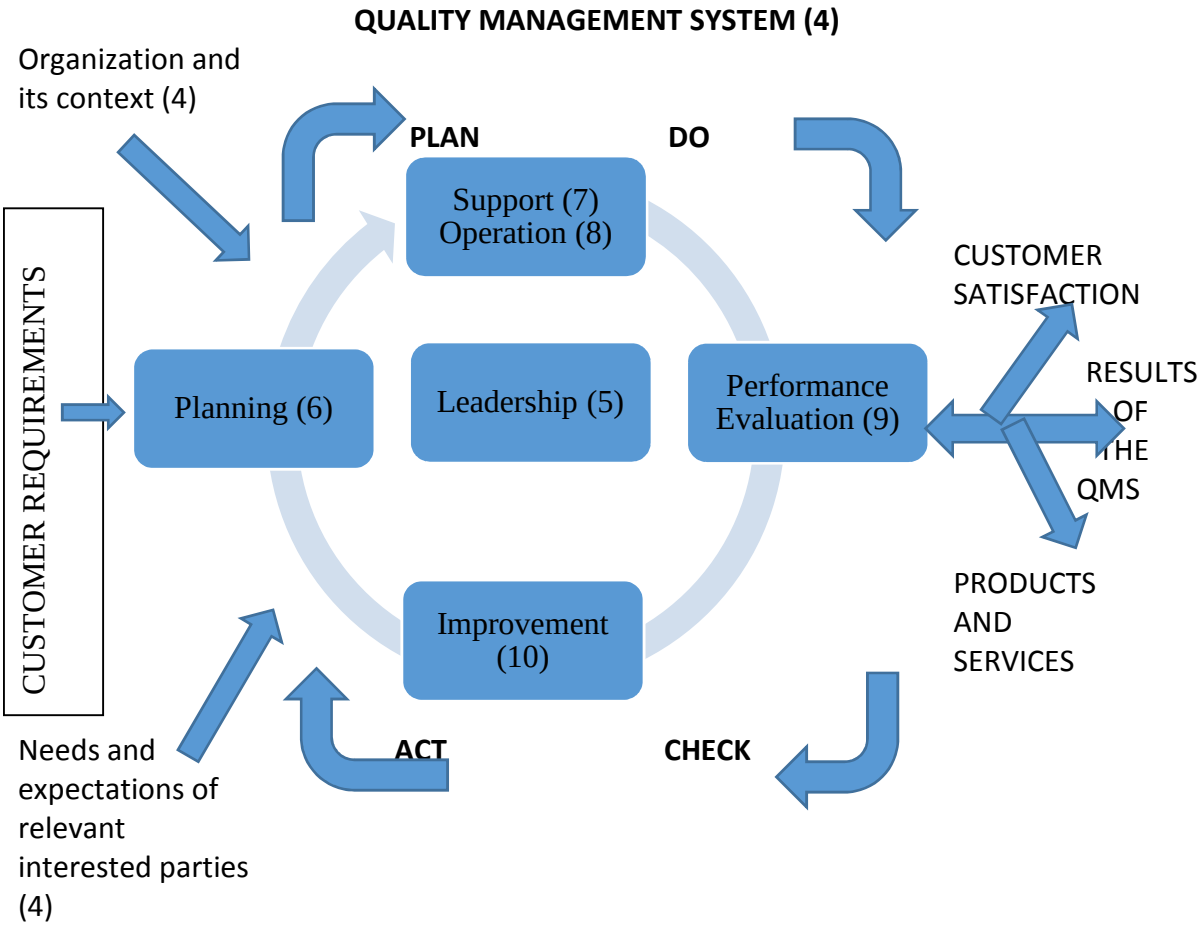
### 10.3 Continual Improvement (PM 11)

Reference Boulder Work Instruction #THBC002.0 - Corporate Annual Goals

We shall continually improve the suitability, adequacy and effectiveness of our QMS. We consider the results of analysis and evaluation and the outputs from Management Review to determine if there are needs or opportunities that could be addressed as part of our continual improvement activities.

# Process Flow Chart

Our Quality Management System has been developed using a process approach and the key processes are shown below. Further details are included in respective procedures in the Procedures Manual.




**NOTE** - numbers in brackets refer to ISO 9001:2015 Clauses.