Speights Group LLC

Quality Management System

Our Commitment to Continuous Improvement

M. Speights / 23 Aug 2024

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APPROVAL

I have fully reviewed, understand, and will comply with and support the company objectives, policies, and procedures established within this Quality Manual, and further commit to providing the resources necessary to assure their implementation, continued improvement, and overall success.

/ 08-23-2024

Petra Speights, Owner / President

MISSION

To lead our global peers in every industry, through the retention and continuous training of quality personnel, the provision quality products and services, and the improvement of product and process in every endeavor.

Speights Group will become a respected brand synonymous with quality operations, which provides equal pay, benefits, and advancement opportunity to all people multinationally.

VISION

Core Values

At Speights Group (SG), we believe that optimum customer service begins with taking care of our employees. For that reason, we hire only the best personnel… we then pay them well, train them thoroughly, and employ them from their geographic area of their preference. In return, as a non-negotiable requisite for employment at our company, every team member must be fully committed to the following:

Safety – Every employee at SG is encouraged and expected to exercise Stop-Work Authority and Responsibility to keep potentially unsafe acts and conditions from becoming incidents. With a common-sense approach, employees are trained to identify, and encouraged to report, potential hazards that can be eliminated, mitigated, or improved so that work may be conducted in a safe and efficient manner at all times. We don't want our employees to *have* to be safe… we want them to *want* to be safe.

Quality – It permeates everything we do. We know that quality attracts and breeds quality… it is evident from our employee recruiting to our service throughput, and it's visible in the vendor and customer relationships that we cultivate. Our quality system is rooted in our Quality Manual, of which every employee receives a copy and is trained upon, and which we proudly display to the public through our company website.

Compliance – It's never wrong to be right. At all times, we strive at every level to meet or exceed the standards and expectations required of us by our clients, by recognized and repudiated organizations of oversight and standardization, and by municipal, state, and federal law in the US, Mexico, and wherever we operate.

Certification – When an SG employee or contractor arrives at a job site, he or she arrives mentally, physically, and materially prepared. A big part of that material preparation is being certified to do the work at hand. SG endeavors for each employee and contractor to have an ever-growing training dossier.

Service – We want to change the field service industry, by putting the "serve" back in "service." Our people are expected to model servant leadership, which we define as being a leader who possesses the qualities of professionalism, integrity, tact, humility, and initiative.

Respect – This is the basis upon which all other tenets are supported. We exude a respectful attitude in all that we do, from the way we work with our customers to the way we communicate about our competitors.

Key Business Processes

Our company was founded in response to an ever-growing need for emergency support services at the global stage. As a business, our primary focus is to be involved in projects that improve the quality of life for those who need it most, to which we contribute in four ways: (1) providing quality, experience-based service and training, and quality products in support of service (2) regular quality assurance inspections that support continuous improvement efforts (3) treating every work opportunity as a training opportunity, and (4) working with our vendors, clients and partners to improve designs, documentation, practices and procedures.

Corporate Responsibility

Speights Group is positioning itself to be a reputable provider of multi-industry field services. As we grow, we are committed to perform all work with consideration to low environmental impact, waste reduction, pollution prevention, sustainable resource use, and a commitment to maintaining biodiversity and protecting the environment. We will demonstrate community stewardship in all of the regions wherein we operate—in every clime and place. We welcome and anticipate future opportunities to partner with and support local civic and nonprofit organizations in order to continually improve the reputation of our industry.

1.0   **Scope of Operations & Exclusions**

Scope: Field service support operations.

Exclusions: None

2.0   **Quality System Structure:** This Quality Manual outlines the basic policies and procedures for which documentation is required according to ISO 9001. For procedures and instructions that are more complex or comprehensive in nature, please refer to the Speights Group *Operating Procedures Manual.* References to the latter are annotated at relevant places throughout this document.

3.0   **References and Abbreviations**

3.1   **References**

ISO 9001: 2008

3.2   **Abbreviations**

For the purposes of this manual the following abbreviations and acronyms apply:

DC	Document Control
FFD	Fit-for-Duty
HSSE	Health, Safety, Security, & Environmental
IAW	In accordance with
JSA	Job Safety Assessment
KPI	Key Performance Indicator
MOC	Management of Change
MRO	Maintenance & Repair Operations
QA	Quality Assurance
QC	Quality Control
QM	Quality Manual
QMS	Quality Management System
O&M	Operation & Maintenance
OP	Operating Procedure
OPM	Operating Procedures Manual
PM	Preventive Maintenance
PMI	Preventive Maintenance Inspection
PPE	Personal Protective Equipment
SMART	Specific, Measurable, Achievable, Realistic, & Time-constrained
SPCC	Spill Prevention, Control, & Countermeasures
SSE	Short-Service Employee
TDP	Technical Drawing Package
WI	Work Instructions

4.0   Quality Management System Requirements

4.1   Quality Management System

4.1.1   General

This manual establishes and implements a quality management system for all services and service-related products provided by Speights Group LLC. Our company proudly maintains this system and manual, and we are committed to the continual measurement and improvement of its effectiveness in accordance with the requirements of the references listed in Paragraph 3.1. This system is designed to meet said requirements verbatim, and to additionally meet the legal requirements required for our scope of work. In all applicable areas, we strive to exceed minimum requirements through value-added practices, techniques, and procedures.

4.1.2   Quality Policy

As established in our Core Values statement, the foundation for Speights Group's quality system is defined in this manual, specifically, within our Quality Policy. The policy is reviewed semiannually by top management to ensure its continued relevance and appropriateness for our company. This semiannual review forms the basis for quality objective development (see 4.1.3), and for the communication, understanding, implementation, maintenance, and ownership of the policy by all employees. The same applies to all third-party entities that conduct business on behalf of Speights Group LLC, as a condition outlined in every contract in which our company enters into. The Quality Policy is stated below; all procedures developed by Speights Group LLC, as defined within our OPM, are a direct reflection of this policy.

> Quality Policy
>
> Employees and Contractors of Speights Group LLC will at all times:
>
> - Be thoroughly committed to providing quality service to our customers
> - Maintain a copy of, understand, and comply with the company Quality Manual
> - Act as respectful ambassadors of the company, and of companies and products we represent
> - Be good stewards of property and information belonging to the company and its customers
> - Present opportunities for improvement of our quality system whenever observed

4.1.3   Objectives

The establishment of quality objectives at Speights Group will be an ongoing process, regularly disseminated throughout the organization and re-evaluated periodically to reflect our continual commitment to quality service and our compliance with the references in Paragraph 3.1, which set forth the requirements for the services and service-related products we provide.   As a guideline for objective development, Speights Group has adopted the SMART strategy: objectives will be Specific, Measurable, Achievable, Realistic, and Time-constrained. At any time, the current company objectives—inclusive of

those relating to our QMS—may be viewed on our company website as a linked document entitled *Speights Group Quarterly*.

4.1.4 Planning

At Speights Group, we believe that poor planning is the root cause of most downtime occurrences, and that conversely, excellent service is the direct result of detailed planning, preparation, and rehearsal. In regards to our quality commitment, our management ensures that:

a) QMS planning is carried out in a way that (1) meets the requirements set forth in our QM per the references in Paragraph 3.1, (2) clearly specifies instructions and identifies responsible parties (3) aligns with current objectives, and (4) honors industry standards and best practices.

b) QMS integrity is maintained with regard to changes in its planning and implementation.

4.1.5 Communication

Our organization is dedicated to the continuous improvement of communication in all areas, including that related to our employees, our customers, our vendors and third party contractors, regulatory agencies and all other outside entities.

4.1.5.1 Internal Communication

The following processes have been established by Speights Group LLC with regard to internal communication:

1. Effectiveness of the QMS will be communicated at regular intervals, occurring biannually
2. Customer requirements will be addressed before each job as a minimum standard, and periodically (as required) throughout each job
3. Legal and other applicable requirements will be addressed before each job as a minimum standard, and periodically as updates are received by the company
4. The results of data analysis will be shared across all levels of the company at our biannual review. This data will relate, and not be limited, to the following: company standing, employee performance, KPI's, QMS effectiveness, market and customer trends, HSE culture, industry standards, service-related products, emerging technologies, changes to laws and regulatory standards, and the importance of this data to our organization

4.1.5.2 External Communication

External communication processes within our organization have been implemented with the determination that all business requirements must be fully understood and that risk is managed (see 5.3) throughout the execution of contracted services, such as those documented below in the following:

1. Execution of inquiries, quotes, contracts, order handling, and amendments (see 5.1)
2. Control of service and service-related product information, including nonconformities

(see 5.10)
3. Provision of information required by product quality plans, to include subsequent changes, when required by contract (see 5.7.2)
4. The appropriate handling of customer feedback and complaints (see 6.2.1)

4.2 Management Responsibility

4.2.1 Organization Structure

The management of Speights Group wholly supports the tenets of our Quality Management System and will provide all necessary resources to see forth its establishment and continued maintenance, evaluation, implementation and improvement.

Our organization's management further provides evidence of its commitment to the development and implementation of the QMS, and to the continual improvement of its effectiveness by:

a) communicating to the organization the importance of meeting customer as well as legal and other applicable requirements (see 4.1.5.1.4)

a) ensuring that quality objectives are established including key performance indicators for use in data analysis; and

b) conducting management reviews (see 6.5).

4.2.2 Responsibility and Authority

Speights Group has defined, documented, assigned and communicated the responsibilities, authorities, and accountabilities of all personnel. Until company growth affords the feasible appointment of a dedicated management representative, QMS representation is borne by the company's managing owner, who assumes the responsibility and authority for:

a) ensuring that a QMS is established, implemented, and maintained IAW reference (see 3.1);

b) initiating actions to minimize the likelihood of occurrence of nonconformities;

c) reporting to management on the performance of the QMS for review, including recommendations for improvement; and

d) ensuring the promotion of awareness of customer requirements throughout the company.

4.3 Organization Capability

4.3.1 Provision of Resources

Speights Group has determined and provided the resources necessary to the implementation, maintenance, and improvement of the effectiveness its QMS. Periodic evaluation will determine the provision of further resources to affect all parts of the QMS throughout the growth of the company.

4.3.2 Human Resources

4.3.2.1 General

Our company has developed and maintains a documented procedure for defining the professional competency of, and identifying ongoing training requirements for, all personnel. The procedure includes self-aligning provisions to measure and ensure its effectiveness in the achievement of personnel competency.

4.3.2.2 Personnel Competence

Personnel competency is based upon the appropriate training, skills, and levels of education and experience per industry standards for the respective activities each employee performs within his or her assigned role, with regard to meeting service and service-related product requirements. Evidence of the determination of competence of personnel is recorded and maintained (see 4.5).

4.3.2.3 Training and Awareness

IAW the references in Paragraph 3.1, our organization:

a) provides QMS and job training of employees and contractors who affect the execution of service or the provision of service-related product;

b) ensures customer-specified training and/or customer-provided training, when required, is included in the training program;

c) ensures that the frequency and content of training complies with legal and other applicable requirements;

d) ensures that personnel are aware of the relevance and importance of their activities and how they contribute to the achievement of the quality objectives;

e) identifies and provides training on legal and other applicable requirements; and

e) maintains appropriate records of education, training, skills, and experience (see 4.5).

4.3.3 Work Environment

Speights Group has determined and continually strives to provide, manage, and maintain the work environment needed to achieve conformity to applicable service or service-related product requirements. Work environment includes, as applicable:

a) buildings, workspace, and associated utilities;

b) process equipment and its maintenance (both hardware and software);

c) supporting services (e.g. transport, communication, information systems); and

d) conditions under which work is performed such as physical, environmental, or other factors.

4.4   Documentation Requirements

4.4.1   General

The QMS documentation includes:

a)   statements of the quality policy and quality objectives;

b)   this quality manual which addresses each requirement of API Q2 and includes:

1) the scope of the quality management system;

2) a description of the sequence and interaction between the processes of the quality management system, including references to documented procedures;

3) allowable exclusions to specific quality management system elements, to include the justification of such claims (see Section 1);

4) identification of legal and other applicable requirements to which our organization claims compliance;

c) documented procedures established for the quality management system (Operating Procedures Manual); and

d) documents and records to ensure the effective planning, operation, and control of its processes, and conformance to specified requirements.

Procedures required by the API reference (see 3.1), and by our QMS, have been established and will be continually documented, implemented, and maintained.

4.4.2   Control of Documents

Speights Group is proud to maintain a documented procedure for the identification, distribution, and control of documents required by the quality management system and this specification, including required documents of an origin external to our organization.

Our document control procedures have been established with the necessary control measures to

ensure the following:

a) that the documents required by the quality management system, including revisions, translations, and updates, are reviewed and approved for adequacy and accuracy prior to issuance and use;

b) the defined responsibilities for approval and re-approval of all documents;

c) the identification of document changes and revision status;

d) that all documents remain legible and readily identifiable, and

e) the availability of relevant versions of applicable documents where the activity is being performed.

Documents of external origin are controlled to ensure that the relevant versions are used and maintained. Obsolete documents are removed from all points of issue or use, or otherwise identified to ensure against unintended use if they are retained for any purpose. Procedures, work instructions, and forms required by the quality management system are controlled, and a master list has been established to identify the current revision status of all documents.

4.5   Control of Records

Speights Group maintains a documented procedure which defines the controls and responsibilities needed for the initiation, identification, collection, storage, protection, retrieval, retention time, and disposition of all records.

Records, including those originating from outsourced activities, have been established and are controlled to provide evidence of conformity to the requirements and effective operation of our quality management system.

Records shall remain legible, identifiable, and readily retrievable. Records are retained for a minimum of five years unless customer, legal, and other applicable requirements require a longer retention period.

5.0   Realization of Service and Service-Related Product

5.1   Contract Review

5.1.1   General

Speights Group maintains a documented procedure for the review of requirements related to the execution of services or provision of service-related products.

5.1.2   Determination of Requirements

Our company ensures, per the references in 3.1, that the following shall be determined in all aspects of work performance:

a) specific customer requirements, including those which relate to planning, execution, and evaluation;

b) legal and other applicable requirements; and

c) requirements not stated by the customer but considered by Speights Group to be necessary for the execution of service and for the provision of service-related product.

In instances where the customer provides no documented statement of service or service-related product requirements, the customer's requirements shall be confirmed in writing by Speights Group before work commences, and records will be maintained IAW Paragraph 4.5.

5.1.3 Review of Requirements

Prior to any work commitment with a customer, Speights Group shall review the requirements related to the execution of service or provision of service-related products, ensuring that:

a) requirements are identified and documented;

b) requirements differing from those previously identified are resolved; and

c) Speights Group has the capability to meet the documented requirements.

Where contract requirements are changed, Speights Group ensures that the relevant documents are amended and that relevant personnel are made aware of the changed requirements.
Records of the results of the review, including resulting actions, are maintained (see 4.5).

5.2 Planning

Speights Group will continuously identify and plan the processes and documents needed for service and service-related product realization. In so doing, our organization shall address the following:

a) customer-specified requirements, including critical success factors (see 5.1);

b) Key Performance Indicators (KPI's);

c) legal and other applicable requirements;

d) initial risk assessment (see 5.3);

e) required resource and work environment management (see 4.3);

f) service and/or service-related product design (see 5.4);

g) contingency planning (see 5.5);

h) Management of Change (MOC)(see 5.11); and

i) records needed to provide evidence that the realization processes meet requirements (see 4.5). The output of planning is documented and updated as changes occur. The plans are maintained in a structure suited to Speights Group's operations.

5.3 Risk Assessment and Management

Our organization maintains a documented procedure to identify and control risk throughout the execution of service. This procedure ensures that Speights Group:

a) identifies real or potential risks associated with our services and service-related products;

b) identifies and uses risk management tools and techniques;

c) selects, communicates, and implements mitigating or preventive control measures to reduce or prevent exposure to loss; and

d) notifies the customer of remaining risks that may impact the service.

Records of risk assessment and management, including actions taken, are maintained (see 4.5).

5.4 Design and Development

5.4.1 Design and Development Planning

Speights Group maintains a documented procedure to plan and control the design and development of the services we provide, including the use of service-related products. This procedure identifies:

a) the design and development stages;

b) the activities required for completion, review, and verification of each stage;

c) the interfaces between different groups involved in design and development; and

d) the responsibilities and authorities for the design and development activities.

When design and development activities are performed at different locations within the same organization, or when either activity is outsourced, our procedure identifies the controls required to ensure that suppliers and their services or service-related products meet the requirements of 5.4.

5.4.2 Design and Development Inputs

Service-related inputs are identified and reviewed by our organization for adequacy, completeness, and lack of conflict. These inputs are recorded and maintained per our OPM, and include the following as applicable:

a) customer-specified requirements (see 5.1);

b) legal requirements; and

c) other applicable requirements including:

1. requirements provided from an external source,
2. requirements for service-related products, including their functional and technical requirements,
3. environmental and operational conditions,
4. results from risk assessments (see 5.3), and
5. historical performance and other information derived from previous similar service designs.

5.4.3 Design and Development Outputs

Design and development outputs are documented to allow verification against the design and development input requirements. These outputs shall:

a) meet the input requirements for design and development;

b) provide information for purchasing of any service-related product;

c) provide controls for the execution of service, including allowable variations in the service execution parameters;

d) include or reference acceptance criteria for the completion of this service; and

e) identify critical service-related product.

5.4.4 Design and Development Verification

Verification of the design of the service shall be continually performed IAW planned arrangements (see 5.4.1) to ensure that the design and development outputs have met the design and development input requirements. Records of the results of the verification shall be maintained (see 4.5).

5.4.5 Design and Development Final Review and Approval

A final design & development review and approval shall be conducted and documented. Individual(s) other than the person or persons who developed the design shall review and approve the final design

and development outputs. Records of the results of the final review and approval shall be maintained (see 4.5).

5.4.6   Control of Design and Development Changes

Changes in the approved design shall be reviewed and verified by the MOC process (see 5.11).

5.5   Contingency Planning

5.5.1   General

Speights Group maintains a documented procedure for contingency planning, which includes incident and disruption prevention and mitigation measures. Contingency planning shall at all times be integrated into services and supporting processes between Speights Group, its suppliers, and the customer.

5.5.2   Planning Output

Contingency planning output at Speights Group shall be documented and communicated to the relevant operational personnel, and updated as required to minimize the likelihood or duration of disruption of service execution. The contingency plan shall be based on assessed risks (see 5.3) and shall include, at a minimum:

a) actions required in response to significant risk scenarios;

b) actions required to mitigate effects of disruptive incidents;

c) identification and assignment of responsibilities and authorities; and

d) internal and external communications controls (see 4.1.5).

5.6   Purchasing

5.6.1   Purchasing Control

Speights Group maintains a documented procedure to ensure that purchased or outsourced services and service-related products conform to specified requirements. This procedure addresses:

a) determination of the criticality of the services and/or service-related products obtained;

b) the evaluation and selection of suppliers based on their ability to supply services and service-related product IAW Speights Group's requirements;

c) the type and extent of control applied to the supplier and service and/or service-related product based on the criticality of the service and service-related product;

d) criteria, scope, frequency, and methods used when performing an assessment on a supplier; and

e) maintaining a list of approved suppliers and scope of approval.

For critical services or service-related product, the criteria for initial evaluation and selection of suppliers by Speights Group shall include the following, prior to initiation of the purchase agreement:

1. assessment of the supplier by Speights Group at the supplier's facility to ensure the Supplier meets our purchasing requirements, and

2. verification that the suppliers QMS conforms to the QMS requirements specified for suppliers by Speights Group.

For re-evaluation of suppliers and the initial evaluation of suppliers for non-critical services or service-related product by Speights Group, one or more of the following shall apply:

i) assessment of the supplier to meet Speights Group's purchasing requirements,
ii) verification that the supplier's QMS conforms to the quality system requirements specified for suppliers by Speights Group,
iii) assessment of the supplier upon delivery of the product or service.

5.6.2 Purchasing Information

As outlined in our *Operating Procedures* manual, Speights Group ensures the adequacy of specified purchasing information prior to its communication to the supplier. Purchasing information provided to the supplier is documented in such a way that it adequately describes the services or service-related product to be purchased, including where appropriate:

a) requirements for acceptance criteria of service and service-related product;

b) requirements for approval of supplier's procedures, processes, and equipment;

c) applicable version of specifications, drawings, process requirements, inspection instructions, traceability (if applicable), and other relevant technical data;

d) requirements for qualification of supplier's personnel; and

e) quality management system requirements.

5.6.3 Verification of Purchased Services and Service-Related Product

Speights Group maintains a documented procedure for the verification or other activities necessary for ensuring that purchased service and service-related product meets specified purchase requirements. Speights Group maintains records of all verification activities (see 4.5).

5.7   Execution of Service

5.7.1   Control of Service Provision

5.7.1.1 General

Speights Group maintains a documented procedure that describes the integration of the following, as a minimum, into the development of a service quality plan (see 5.7.2):

   a) personnel training and competence (see 4.3.2);

   b) defined contract requirements (see 5.1);

   c) risk assessment and management (see 5.3);

   d) information that describes the characteristics of the service and service-related products, and means of ensuring that design requirements are satisfied (see 5.4); and

   e) identification of equipment, including required testing, measuring, monitoring and detection devices (see 5.8).

5.7.1.2 Documentation

Speights Group documents controls for the execution of service through Operating Procedures, Field Service Reports, Job Travelers, and a series of checklists and spreadsheets vital to the success of our operations. These include requirements for verifying conformity to quality plans, procedures, and applicable standards and codes. These control documents also include or reference specific instructions, workmanship, and acceptance criteria for processes, tests, inspections, and hold points for customer inspection, witnessing, acceptance or verification.

5.7.2   Service Quality Plan

5.7.2.1 General

Speights Group has developed and maintains a service quality plan that controls the execution of services and the use of service-related products. This plan is designed to be altered accordingly in order to meet specific customer, legal, and other regulatory requirements, including requirements per this manual and its future revisions, and per the references in Paragraph 3.1.

5.7.2.2 Plan Content

This service quality plan addresses each of the following as a minimum:

a) required activities and documentation for compliance with customer and legal requirements;

b) identification of responsible functions for each activity, including external parties;

c) identification and reference to control of subcontractors;

d) identification of the relevant revision for each procedure, specification or other document referenced or used in each activity;

e) identification of the requirements to perform acceptance inspection for each activity, including hold, witness, monitor and document review points for representatives of Speights Group and the customer;

f) service equipment and monitoring devices (see 5.8);

g) identification and controls of risk (see 5.3);

h) identification of critical services and service-related product;

i) identification of the required deliverables; and

j) identification of the required records (see 4.5).

Speights Group's service quality plan shall be updated when any of the plan content changes.

5.7.2.3 Plan Approval

Service quality plans and any revisions thereunto shall be documented and approved by Speights Group. When required by contract, the service quality plan and any revisions shall be communicated to the customer.

5.7.3   Identification and Traceability

Speights Group maintains a documented procedure for identification and traceability of service-related product. This procedure includes identification controls at all stages of delivery, installation, repair, and redress as required by Speights Group and its customers. This procedure also includes requirements for maintenance or replacement of identification and traceability marks, and records pertaining to the same (see 4.5).

Service-related product shall be identified. Critical service-related product shall be identified and traceable to preventive maintenance, inspection, and test program (PMITP) records (see 4.5 and 5.7.8) and the original manufacturer. Criticality of product will be determined according to Speights Group's *Parts & Equipment Criticality Matrix*, which can be found in our OP Manual. This matrix calculates

criticality according to the factors of customer need, safety factor, cost, size, and function with regard to the availability of alternative equipment which may be used in lieu of the equipment or product.

5.7.4   Service-related Product Status

Speights Group maintains a documented procedure for the identification of service-related product status.

5.7.5   Customer Property

Speights Group maintains a documented procedure for the identification, verification, storage, preservation, maintenance, safeguarding and protection of customer-supplied property, including intellectual property, customer-specific data, and property provided for service use and/or with service-related product, while under control of our company. The procedure includes requirements for reporting to the customer any loss, damage, or unsuitable use of customer-supplied property. Records for the control and disposition of said property are maintained IAW Paragraph 4.5.

5.7.6   Preservation of Service-related Product

Speights Group maintains a documented procedure describing the methods used to preserve the service-related product and constituent parts during internal processing through execution of service. As applicable, preservation includes identification & traceability, transportation, handling, packaging, storage and protection.

5.7.7   Validation of Service-related Product

Validation of service-related product shall be completed prior to the execution of service. Records of the result of validation, when performed, shall be maintained (see 4.5).

5.7.8   Preventive Maintenance, Inspection and Test Program

Our company maintains a documented procedure for the establishment of a preventive maintenance, inspection and test program (PMITP). The procedure addresses recordkeeping requirements (see 4.5), inspection, maintenance, redress, repair, make-up, testing, and acceptance criteria of service-related product. This program includes the following:

   a) actions which address preventive maintenance;

   b) reports that document usage history, repairs or redress, modifications, remanufacturing,
      inspection and test activities that allow direct verification for reuse of product;

   c) technical requirements including those recommended by the original equipment
      manufacturer, and critical spare parts requirements; and

   d) barriers and controls that ensure equipment integrity to original performance requirements

and design acceptance criteria are maintained.

In all circumstances where original performance requirements cannot be met, equipment shall be subject to MOC process requirements and procedures (see 5.11) before continued use.

5.8   Control of Testing, Measuring, and Monitoring Equipment

In order to provide evidence that our service or service-related product meets specified requirements, our company shall determine on a case-by-case basis the proper / required testing, measurement, monitoring and detection equipment.

Speights Group maintains a documented procedure to ensure that testing, measurement, monitoring and detection equipment is calibrated and maintained for the execution of the service or in the provision of the service-related product. This procedure includes or references equipment traceability, frequency of calibration, calibration method, acceptance criteria and suitable environmental conditions. It also identifies required assessments and the maintenance of records (see 4.5) when the validity of previous testing, measuring, monitoring, or detection results are not found to conform to calibration requirements. In such an instance, Speights Group will take appropriate action on the equipment and any service affected.

Testing, measuring, monitoring and detection equipment shall:

    a) be calibrated or verified, or both, at specified intervals, or prior to use, against measurement criteria traceable to international or national measurement standards. Where no such standard exists, the basis for calibration or verification shall be recorded (see 4.5);

    b) have legible identification in order to determine its calibration status;

    c) be safeguarded from adjustments that would render measurement results invalid; and

    d) be protected from damage and deterioration during handling, maintenance, and storage.

When used in the testing, measurement, monitoring and detection of specified requirements, the use of computer software to satisfy the intended application shall be confirmed. This shall be undertaken prior to initial use and reconfirmed as necessary.

When the equipment is externally provided, the organization shall verify that the equipment is suitable to provide evidence of conformity of service or service-related product to specified requirements.

Speights Group maintains a registry of the required testing, measurement, monitoring and detection equipment that includes a clear form of identification, specific to each piece of equipment. Records of the results of calibration and verification shall be maintained (see 4.5).

5.9   Service Performance Validation

Speights Group maintains a documented procedure to validate the execution of the service performance to confirm requirements were achieved. This shall be carried out at appropriate stages during the execution of service IAW design requirements (see 5.4) and the service quality plan (see 5.7.2). Evidence of conformity with established acceptance criteria, including KPI's and critical success factors, shall be maintained. Records of the service performance validation shall be maintained, including identification of the person(s) accepting the results (see 4.5).

5.10   Control of Nonconformities

5.10.1 General

Speights Group maintains a documented procedure to define the controls and regulated responsibilities and authorities for addressing nonconforming service execution and service-related product. The level of response shall be proportionate to the severity of the nonconformity and its effect on the execution of the service.

5.10.2 Nonconforming Service Execution and Service-related Product

Our company shall address nonconforming service execution and service-related product by performing the following sequence of activities:

   a) taking action to correct the nonconformity; or

   b) when 5.10.2a is not possible or appropriate, by taking action to preclude the use of service-related product from its intended use or application; or

   c) when 5.10.2a and 5.10.2b are not appropriate, by authorizing release or acceptance under concession by a relevant authority and / or by the customer.

For nonconforming service execution, Speights Group will take corrective action IAW 6.4.2 that is appropriate to the effects, or potential effects, of the nonconformity.

5.10.3 Verification and Documentation

When nonconforming services and/or service-related product are corrected, they shall be subject to verification in order to demonstrate conformity to the requirements. Records of the nature of nonconformities and any subsequent actions taken, including concessions obtained, shall be maintained IAW Paragraph 4.5.

5.10.4 Customer Notification

In the event that the service execution does not conform to service design requirements, or when nonconforming service-related product has been delivered or used in the execution of service, Speights Group shall notify customers of the nonconformity and maintain a record of the notification (see 4.5).

5.11   Management of Change (MOC)

5.11.1   General

Speights Group maintains a process for MOC, identifying potential risks (see 5.3) associated with the change and any required approvals prior to the introduction of such changes.

5.11.2   MOC Implementation

Speights Group will utilize the MOC process for any of the following that may impact the quality execution of our services:

a) changes or proposed changes to our company's organizational structure;

b) changes in key or essential personnel whose absence or departure could negatively impact the service;

c) changes in critical suppliers whose absence or departure could negatively impact the service;

d) changes to the management system procedures, including temporary changes and improvements resulting from corrective and preventive actions (see 6.4);

e) changes to the original equipment manufacturer's specifications, applications and/or software for service-related product; and

f) changes in approved design (see 5.4) including those that were originally agreed upon by the customer and those required by changes in legal and other applicable requirements.

5.11.3   MOC Evaluation, Notification, and Controls

Speights Group shall conduct a risk assessment (see 5.3) when evaluating a potential change. The organization shall notify relevant personnel, including the customer, of the change and residual or new risk due to changes that have either been initiated by our company or requested by the customer. We shall ensure that relevant documents are amended and that records of MOC activities are maintained (see 4.5).

6.0   Quality Management System Measurement, Analysis, and Improvement

6.1   General

Speights Group will plan and implement accordingly the monitoring, measurement, analysis, and improvement processes needed to ensure conformity of the quality management system and to continually improve the effectiveness of the quality management system.

Quality management system measurement, analysis, and improvement include determination of applicable methods, including techniques for the analysis of data, and the extent of their use.

6.2 Monitoring, Measuring, and Improving

6.2.1 Customer Satisfaction

Speights Group maintains a documented procedure to measure customer satisfaction.   The procedure addresses customer feedback, Key Performance Indicators (KPIs), and other information monitored to determine whether our company has fulfilled the quality requirements of our customer. Records of the results of customer satisfaction information are maintained (see 4.5).

6.2.2 Internal Audit

6.2.2.1 General

Our organization maintains a documented procedure to define responsibilities for planning and conducting internal audits. The planning of internal audits shall take into consideration the results of previous audits and criticality of the process. The aforementioned procedure defines the criteria, scope, frequency, and methods to ensure that all elements of the quality management system claiming conformity to the requirements of ISO are audited at least every 12 months. Outsourced suppliers and activities that impact the quality of services or service-related product, located at our facility, shall be included as part of the internal audit of Speights Group.

6.2.2.2 Performance of Internal Audit

Speights Group shall conduct internal audits to determine whether the QMS conforms to the requirements of ISO and is effectively executed and maintained. Audits shall be performed by competent personnel (see 4.3.2.2) independent of those who performed or directly supervised the activity being audited to ensure objectivity and impartiality of the audit process. An audit of all elements of the management system will be conducted prior to claiming conformance to the requirements of this document.

6.2.2.3 Audit Review and Closure

Speights Group shall identify reasonable response times for addressing detected nonconformities. The management responsible for the area being audited ensures that any necessary corrections and corrective actions are taken to eliminate detected nonconformities and their causes. Follow-up activities shall include the verification of the actions taken (see 6.4.2). Results of internal audits and corrective action status are reported in the management review (see 6.5). Records of the audits and their results shall be maintained (see 4.5).

6.3 Analysis of Data

Speights Group maintains a documented procedure for the identification and use of the techniques for

the analysis of data, determining, collecting, and analyzing appropriate data to demonstrate the suitability and effectiveness of the QMS and to evaluate where continual improvement can be made respectively. This includes data generated as a result of monitoring and measurement and from other relevant sources. The data analysis shall provide information relating to:

      a) customer satisfaction (see 6.2.1);

      b) conformity to service design requirements (see 5.4);

      c) characteristics and trends of processes and service-related products including opportunities for preventive action (see 6.4.1 and 6.4.3);

      d) supplier performance (see 5.6); and

      f) quality objectives (see 4.1.3)

6.4 Improvement

6.4.1 General

Speights Group maintains a documented procedure that identifies the methods used to monitor, evaluate, and improve the effectiveness and implementation of the quality management system processes for the execution of service and the use of service-related product. This procedure also identifies how our company uses the quality policy, quality objectives, customer feedback, audit results, analysis of data, corrective and preventive actions, and the management review for the continual improvement of the effectiveness of our QMS.

6.4.2 Corrective Action

SPEIGHTS GROUP International maintains a documented procedure to correct nonconformities and to take corrective actions, both internally and within the supply chain, to eliminate the causes of nonconformities in order to minimize the likelihood of its recurrence (see OP 8.5.2). Corrective actions are appropriate to the effect(s) of the nonconformity encountered. This procedure identifies requirements for:

      a) reviewing a process nonconformity (including customer complaints);

      b) determining and implementing corrections;

      c) identifying the root cause of the nonconformity and evaluating the need for corrective actions;

      d) implementing corrective action to reduce the likelihood that a nonconformity recurs;

      e) identifying the timeframe and responsible person(s) for addressing corrections and corrective

action;

 f) verification of the effectiveness of the corrections and corrective action taken; and

g) MOC (see 5.11) when the corrective actions require new or changed controls within the quality management system. Records of the activities for control of a nonconforming process are maintained (see 4.5). Records identify the activities performed to verify effectiveness of the corrective actions taken.

6.4.3   Preventive Action

SPEIGHTS GROUP International maintains a documented procedure to determine and implement preventive actions, both internally and within the supply chain, to eliminate the causes of potential nonconformities in order to minimize the likelihood of their occurrence (see OP 8.5.3). Preventive actions are appropriate to the effect(s) of the potential problems. The procedure identifies requirements for:

a) identifying opportunities for improvements;

b) identifying a potential nonconformity and its potential cause(s);

c) evaluating the need for preventive action, including any immediate or short-term action required, to prevent occurrence of a nonconformity;

d) identifying the timeframe and responsible person(s) for implementing a preventive action;

e) reviewing the effectiveness of the preventive action taken; and

f) MOC (see 5.11) when the preventive action requires new or changed controls within the quality management system.

Records of the activities for control of potential process nonconformities are maintained (see 4.5).

6.5   Management Review

6.5.1   General

SPEIGHTS GROUP International's Quality Management System is reviewed at least every 12 months by our management team to evaluate the continued suitability, adequacy, and effectiveness of our QMS. This review includes assessing opportunities for improvement and the need for changes to the quality management system, including the quality policy and quality objectives (see OP 5.6).

6.5.2   Input Requirements

Per Paragraph 3.1 references and OP 5.6, the inputs to management review include, at a minimum:

a) effectiveness of actions resulting from previous management reviews;

b) results of audits (see 6.2.2);

c) changes that could affect the quality management system, including changes to legal and other applicable requirements (such as industry standards);

d) analysis of customer satisfaction, including customer feedback (see 6.2.1);

e) process performance [see 6.2.3 and 6.3 d)];

f) results of risk assessment (see 5.3);

g) status of corrective and preventive actions (see 6.4.2 and 6.4.3);

h) analysis of supplier performance (see 5.6);

i) review of the analysis of product conformity, including nonconformities identified after delivery or use (see 5.10); and

j) recommendations for improvement.

6.5.3   Output Requirements

The output from the management review includes a summary assessment of the effectiveness of the Quality Management System. The assessment includes any required changes (see 5.11) to the processes and any decisions and actions, required resources, and improvement to products in meeting customer requirements. This is outlined in OP 5.6 of our *Operating Procedures* manual.

Top management reviews and approves the output of management reviews. Management reviews are documented and records of these reviews are maintained (see 4.5).