



Business Management System Manual

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On behalf of
Stratton Products Ltd.

A handwritten signature in black ink, appearing to read 'P. Cripps', is written over the text 'On behalf of Stratton Products Ltd.'.

Compliance Manager
B. J. Cripps

On behalf of
Stratton Products Ltd.

A handwritten signature in blue ink, appearing to read 'B. J. Cripps', is written over the text 'On behalf of Stratton Products Ltd.'.



Stratton Products Ltd.

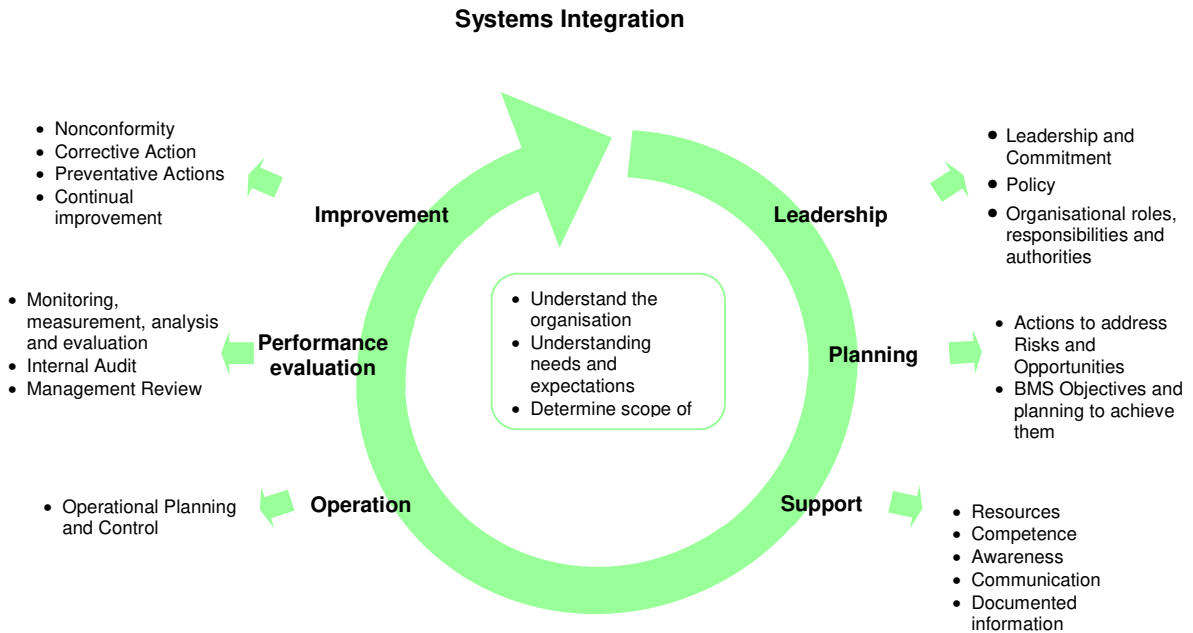
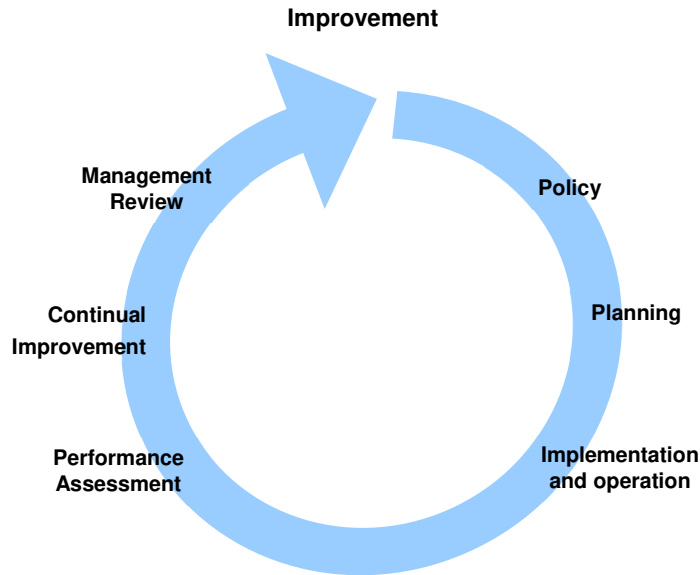
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Preface

This Business Management System Manual (BMS) summarises how the BMS and its interrelationships work, either by flow/activity diagrams or text where appropriate. The BMS Manual, by design, points the reader to the relevant procedures used by the organisation, which in turn form the back-bone of the BMS.



This document itself is subject to continual improvement, and any reader may suggest ways to make it better. Please forward your comments to the Compliance Manager.



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Revision History

Issue	Date	Incorporated by
1	2009-01-29	B. Cripps
2	2013-04-28	B. Cripps
3	2013-11-14	B. Cripps
4	2015-02-16	B. Cripps
5	2017-03-20	B. Cripps

Reviewed: 2019-03-22, BJC

Introduction

Stratton Products Ltd. (SPL) has established an integrated Business Management System (BMS) set forth in this document, which is designed to meet or exceed the requirements of our customers

Scope

These activities include:

- Transference of customer requirement to ISO9001 certified "Manufacturing Facilities" (MF) in the Far East
 - Manufacture, Testing, Quality Records Storage and Packaging of product is conducted by the (MF)
- Obtaining customer approval of samples provided by the (MF), prior to order acceptance
- Importation
- Storage
- Distribution

Products supplied: Are either manufacturers' standard product, or 'Customer Designs' with Product Part Approval.

Stratton Products Ltd. actively encourage the use of environmentally responsible practices on the part of all its employees (whether permanent or temporary), sub-contractors, suppliers of goods and services and end users of its products.



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Business Policy

Stratton Products Ltd. management unreservedly commit to the Business Policy and Objectives

As a responsible Distributor, we are committed to maintaining the highest standard of product, service and environmental management by continual improvement and operating in a responsible manner, meeting the requirements of our policies & objectives, the company shall:

General

- Plan, promote and develop management systems to improve the satisfaction levels of customers, employees, suppliers, and all other interested bodies.
- Promote continual review and improvement activities in every aspect of the business.
- To set realistic and achievable objectives and targets to develop and monitor company KPI's.
- Ensure compliance with applicable Legal, Statutory, Regulatory, and Other requirements subscribed to.
 - And maintain knowledge and understanding of its compliance status.
- Ensure all employees and contractors are trained and their competence is subject to routine assessment.

Health and Safety

- To assure the safety and wellbeing of all people on our site.

Environment

- To protect the environment from all negative impacts
- Monitor and control waste and continually strive to reduce both to the lowest practicable levels.

Quality

- Provide high quality, on time product and services that satisfy our customer needs.

Efficiency

- Identify and implement areas for improvement using all the means available to the Company.
- Assuring everything we do, is done in the most effective manner possible

Regulatory

- To comply with all relevant Legal or Regulatory requirements, including but not limited to, REACH, RoHS, CE,

Social & Ethical

- To assure Stratton Products Ltd and their Manufacturing Facilities are compliant in meeting their obligations regarding:
 - Conflict Minerals Reporting, as defined by the Dodd Frank Act, section 1502 on Conflict Minerals
 - Corporate Social Responsibility, at least the following the principles of:
 - Prevention of Child Labour
 - Prevention of forced, bonded or involuntary prison labour
 - Working Hours
 - Remuneration
 - Safe and Healthy Working Environment
 - Prevention of discrimination and harassment
 - Ensuring freedom of association and collective bargaining
 - Ethics and human rights

Business Objectives and Targets

The management review team establishes and routinely review the business objectives, targets, and plan the continual improvement of the company's performance and management system.

Progress towards targets is routinely monitored during Business Management Review meetings

This statement forms part of Stratton Products Ltd. Business Management System
Copies of this statement are available to the public

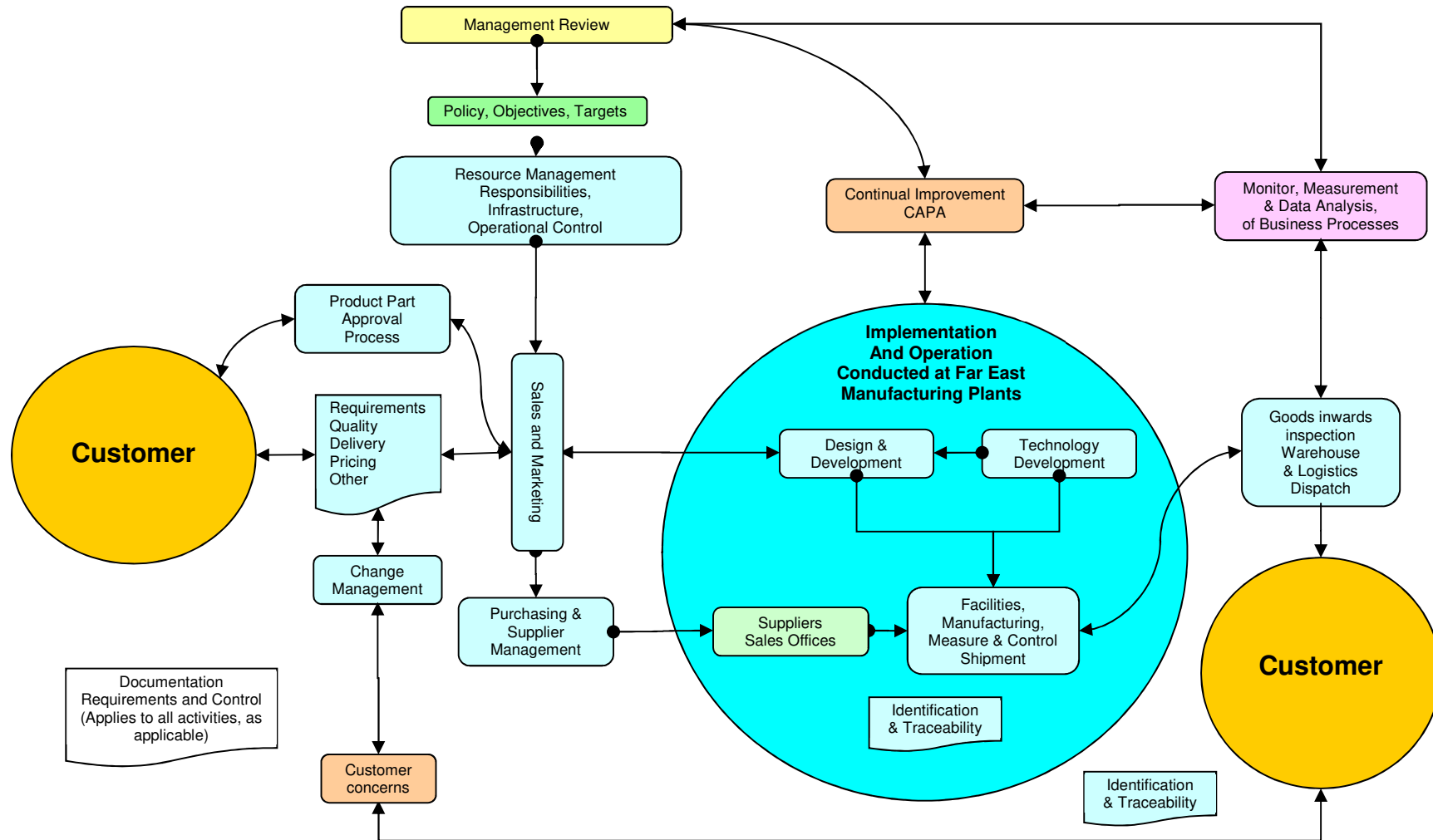
Signed:

On Behalf of
Stratton Products Ltd.

Stratton Products Ltd.

Business Management System (BMS) General Requirements

To ensure the implementation and achievement of the Company Policy Statement and Objectives



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Management Responsibility and Authority



Management Commitment:

Top Management defines and communicates the business objectives, and provides the resources and dedicated infrastructure necessary to accomplish those objectives, and monitors the performance of the organization's effectiveness and efficiency in meeting these objectives. This is done to ensure consistency in product and process quality and enable it to meet current and evolving customer requirements.

Customer Focus:

Management ensures that customer requirements are understood and are met.

Organisation and Responsibilities

The following job descriptions and definitions are not exhaustive, but define the core job requirements.

Managing Director:

To ensure that; Stratton Products Ltd. operates in a reputable and efficient manner.

The M.D. is responsible for:

- The Business Policy
- The acquisition and promotion of new business activity.
- Human Resources and Training. Assuring the company management team has defined training needs and have trained resources for performance of work and verification activities.
- Procurement activities

Production Facilities

Production is performed by companies in the Far East, and all responsibilities for site activities is wholly owned by the relevant supplier. Stratton Products Ltd. actively seeks ISO9001 certified manufacturing facilities.

Management Representative:

The Compliance Manager (CM): Irrespective of other responsibilities is responsible for all aspects of Quality and Environmental System maintenance, awareness and reporting (internal & external), and has the authority to suspend any suspect or non-conforming product or processes. The CM represents the Customer and Interested Parties on all Environmental and Quality related matters.

Quality Control Managers:

The respective manufacturing facilities have their own quality control managers for all aspects of production quality control, the calibration and control of all measuring devices. These QC Managers and their deputies have the authority to suspend the production of any suspect or non-conforming product.

Finance Manager:

Responsible to the M.D. for the administration of the company accounts

Account Managers:

Responsible for representing their customers within Stratton Products Ltd. including contract review and the setting of quality objectives related to those customers, including the determination of customer satisfaction.

Technical Manager(s):

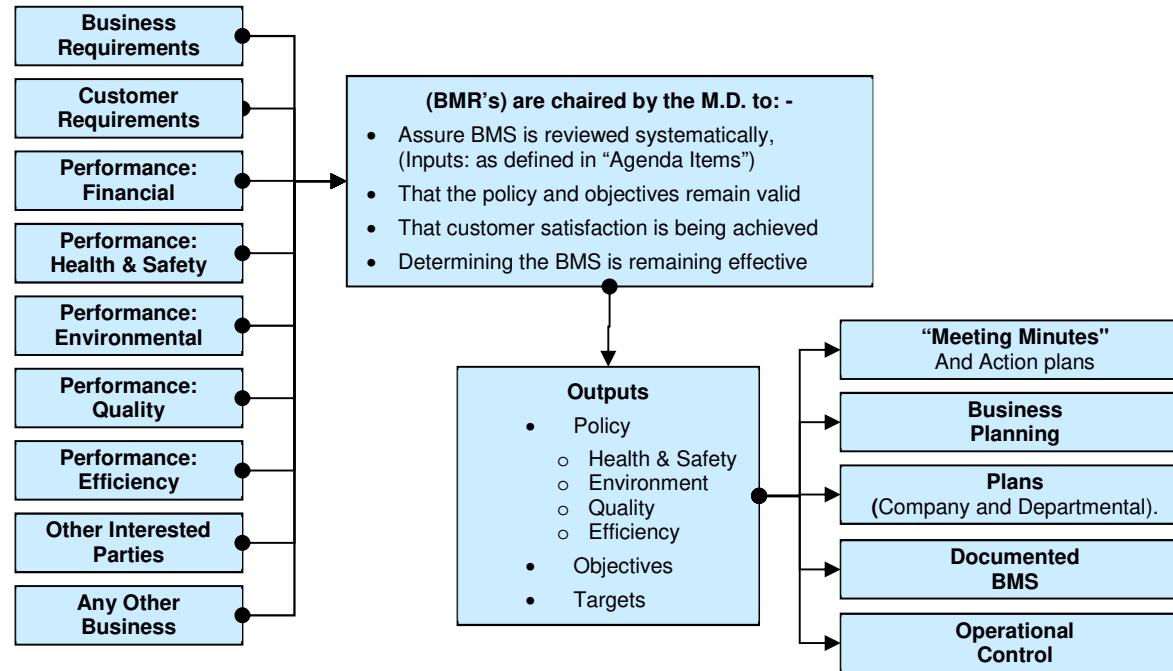
The respective manufacturers provide comprehensive technical support to both Stratton Products Ltd. and its customers.

Employees:

It is the duty of every member of staff whether permanent, temporary or sub contract, to;

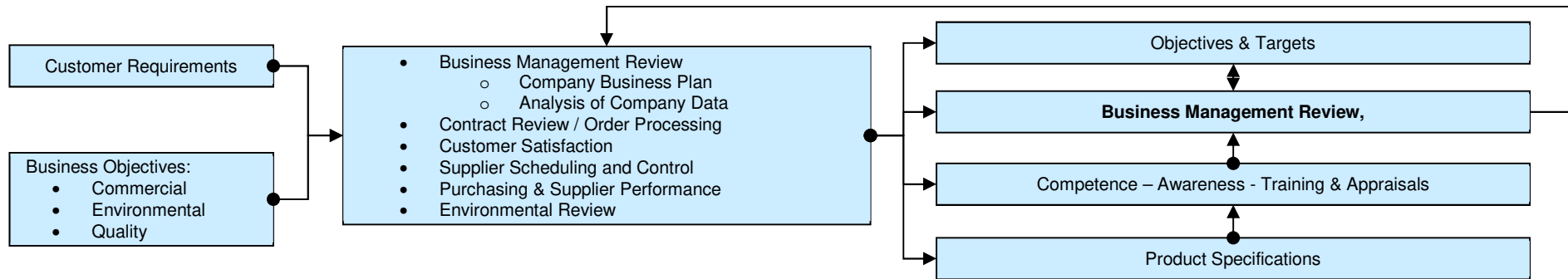
- Ensure that they are made fully aware of the Environmental and Quality aspects of the activities or processes that they are detailed to carry out
- Always act in accordance with the requirements of any applicable instructions, whether verbal or written, given to them by a competent authority.
- To report to their supervisor any occurrence which they consider may damage or present a threat to the environment, or business management system.

Business Management Review (BMR)



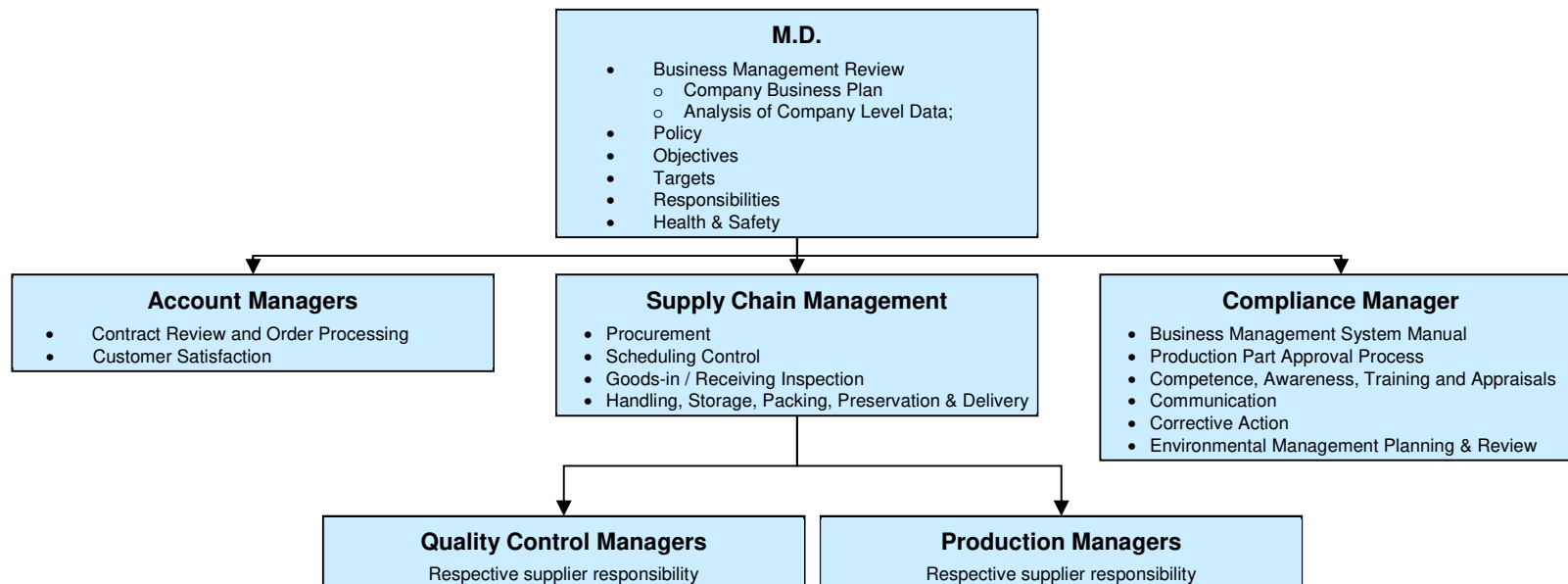
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Business Planning



Implementation and Operational Control (Process Ownership)

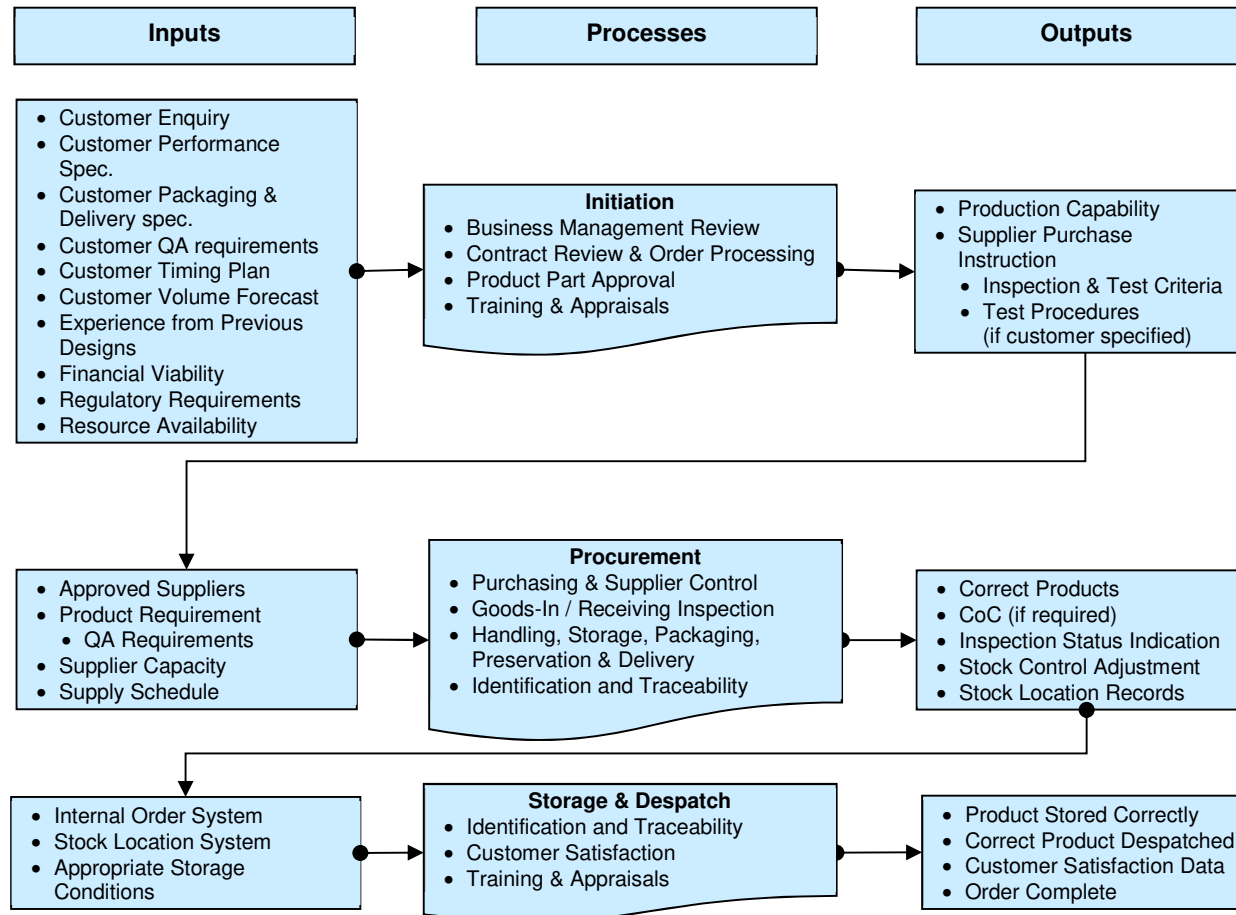
Day to day operational control is achieved by the use of formal procedures, work instructions, and process flow charts as necessary. These documents are detailed as part of the company's documented BMS, and roles and responsibilities are defined in the relevant BMS procedure.



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Product Realisation Process

Level 2: Procedures may have multiple occurrences, Level 4: (SOP's etc.) are not listed.



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Infrastructure

The business planning process determines, provides and maintains the infrastructure needed to achieve conformity to product requirements. Infrastructure includes:

- Buildings, workspace, equipment and associated utilities
- Supporting services (such as transport or communication).

Plant, facility and Equipment Planning

A multidisciplinary approach is used for developing facility and equipment plans. Where possible, layouts optimise material travel, handling and value-added use of floor space.

Work Environment

Working environments are suitable for all employees and are kept in states of order, cleanliness, and repair with appropriate environmental control of work-space, equipment and materials

Personnel Safety

Safety and the means to minimize potential risks to employees are addressed especially in the storage of product.

Confidentiality

All details of customer contracted developments, products and associated documentation and Information shall be treated with the strictest confidentiality and may only be passed to a third party with the prior written agreement of the customer.

Continual Improvement

Continual improvement is use in all activities as part of company culture; this is achieved by the constant application and monitoring of the documented BMS, the analysis of company level data, customer satisfaction reviews. The Company makes every effort to improve its continuous improvement methodologies and to disseminate this knowledge to all members of staff.

List of BMS Documents

Note, this list is subject to change at any time, and is correct when printed: 6 May 2019

For latest issue, refer to server:

Business Management System - Documents Master List	
Level 1 & 2	
Title	Rev.
Business Management System Manual (BMS)	20-Mar-17
BMS Organisation Chart	24-Jan-11
Business Management Review (BMR)	31-Jan-08
Calibration	31-Jan-08
Communication	22-Jan-09
Competance, Awareness, Training and Appraisals	31-Jan-08
Continuity Planning	21-Dec-09
Contract Review/Order Processing	31-Jan-08
Contractor Control	12-Aug-10
Corrective Action (CA)	05-Oct-15
Customer Property (Control of)	31-Jan-08
Customer Satisfaction	31-Jan-08
Design Control	18-Apr-09
Documentation Requirements and Control	12-Feb-08
Emergency Plan	11-Mar-09
Goods-in / Receiving Inspection	30-Jan-08
Handling, Storage, Packaging, Preservation & Delivery	25-Jan-10
Inspection and Test Status	17-Jan-10
Internal Audit	20-Jan-09
Non-Conforming Product (Control of)	10-Jan-09
Process Control and Operator Instructions	23-Jan-09
Product Identification and Traceability	17-Jan-09
Product Inspection, Test	23-Feb-09
Production Scheduling and Control	31-Jan-08
Purchasing & Supplier Performance	23-Feb-08

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