

# IMS Sadoff Iron & Metal Company

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## **INTEGRATED MANAGEMENT SYSTEM MANUAL**

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## 1 Introduction to Sadoff Iron & Metal

### 1.1 Sadoff Iron & Metal Company

In 1947 E. H. Rudoy began a legacy with his purchase of Block Salvage Company, a small scrap yard, in Oshkosh, Wisconsin. He changed the name to Block Iron & Supply Company to better reflect the scope of business he had planned. The company became a supplier of new steel and building supplies, and a recycler of scrap metals, servicing industry and supplying prepared scrap to the local foundries. His innovations in handling and processing scrap metals gained him a reputation within the industry, and was key to propelling the company's initial growth.

Expansion followed through acquisition, and Sadoff & Rudoy Industries was born in 1964 with the purchase of Sadoff Iron & Metal Company in Fond du Lac, Wisconsin. Mr. Rudoy's vision brought Wisconsin's first automobile shredder to Fond du Lac, along with key processing equipment that established the company as a major Midwest processor and supplier to both the foundry and steel mill industries. Additional acquisitions and new operations from 1964 to today have propelled the company to its current status of eight scrap metal processing operations in Wisconsin and two in Nebraska.

Sadoff & Rudoy Industries, LLP continues to grow today, with over 250 employees working to extend the high levels of quality and service that are the cornerstone and philosophy of the company and its founder.

Today, Mr. Rudoy's three grandsons are all working within the business, ensuring philosophies of the founder continue through the generations.



*As CEO of Sadoff Iron & Metal Company I would like to express my gratitude and appreciation to each and every one of our team members. Your hard work and dedication to quality has made us the 'preferred choice'. Thank you, team!*

*Mark Lasky  
CEO  
Sadoff Iron & Metal Company*



## 1.2 Organizational Structure

Organizational structure is well defined in org charts, procedures, and work instructions. All of which are available upon request. Please see Schedule 13-01

## 2 SRI's Vision

Our vision is to be the preferred choice in scrap purchasing, processing and selling, to be the preferred choice in employment and to be the preferred neighbor.

## 3 SRI's Mission

Our mission to accomplish this is to incorporate customer (internal and external) focus, attain operational excellence, find innovative solutions, and manage risk. We do this through investment in our people, teamwork, and adhering to the standards of excellence.

## 4 Context of SRI

### 4.1 Understanding SRI and its context

### 4.2 Understanding the Needs and Expectations of Interested Parties

Sadoff Iron & Metal determine external and internal issues that are relevant to its purpose and its strategic direction and that affect its ability to achieve the intended result(s) of its integrated management system (IMS). The external and internal issues identified are continuously being monitored and reviewed by top management and/or process owners.

INTERNAL ISSUES	EXTERNAL ISSUES
<ul style="list-style-type: none"> <li>• Structure of SRI</li> <li>• Roles and responsibilities of employees</li> <li>• Workforce                             <ul style="list-style-type: none"> <li>○ Stability, reliability, retention, training, levels, morale, hours, organizational knowledge</li> </ul> </li> <li>• External providers competence and availability</li> <li>• Culture within SRI</li> <li>• Governance, policies, objectives</li> <li>• Technologies and IT</li> <li>• Decision making processes</li> <li>• Standards, guidelines and adopted models</li> <li>• Root cause analysis skills</li> <li>• Implementing 14001 &amp; 18001</li> <li>• Relationship with interested parties</li> <li>• Contractual relationships</li> <li>• Strategies</li> <li>• Capabilities</li> </ul>	<ul style="list-style-type: none"> <li>• Contractual agreements</li> <li>• Competitive environment</li> <li>• Legislation</li> <li>• Regulations</li> <li>• Overall economic climate</li> <li>• Technology advances</li> <li>• Standardization within the industry</li> <li>• Relationships with external interested parties</li> <li>• Workforce</li> <li>• External inspections /audits</li> <li>• Availability of material</li> </ul>

INTERESTED PARTIES	REQUIREMENTS
Ownership	Good financial performance, legal compliance
Local residents	No complaints
Law enforcers / regulators / standards	Identification of applicable statutory and regulatory requirements for the products and services provided understanding the

	requirements, application and maintenance of them
Customers	Value, quality, expectations, on time, quick response, health and safety
Bank / finance	Good financial performance
Employees	Professional development, prompt and appropriate pay, health and safety, work life balance, security
Insurers	No claims, on time payments, risk management
External providers	Prompt payment, health and safety, working relationship
Union	Compliance

### SWOT

SWOT analysis are done within the company and are available upon request if applicable. The highest level SWOT is done by ownership and top management on an annual basis.

### Risk and Opportunity Management

Risks (i.e., weaknesses and threats) and opportunities (i.e., strengths and opportunities) that were identified through activities in this procedure are managed per Risk and Opportunity.

### Monitoring

We monitor information about these internal and external issues through various means including customer satisfaction surveys, financial analysis, and trade and industry publications. Inquiries and other communications received are documented by person receiving them and directed to appropriate personnel.



### 4.3 The Scope of the SRI Integrated Management System

The scope of our Integrated Management System covers the transportation and processing of both scrap materials and E-waste into defined commodities, per consumer and internal specifications, this includes other functions including purchasing, sales, maintenance, and administrative activities at the Sadoff facilities located at: 240 West Arndt Street Fond du Lac, Wisconsin; 3313 North 21<sup>st</sup> Street Sheboygan, Wisconsin; 1901 Lineville Road Green Bay, Wisconsin; 1600 South 26<sup>th</sup> Street Manitowoc, Wisconsin; 36 East 10<sup>th</sup> Avenue Oshkosh, WI; 4918 F Street Omaha, NE; 4400 West Webster Street Lincoln, NE; 12304 Cary Circle La vista, NE 68128.

Exclusions:

Material BOL will determine when SRI takes ownership of material. When not defined SRI is not responsible until material is off loaded on our premises or when material is off loaded at consumers location.

SRI scope is also available on our website and is available upon request.

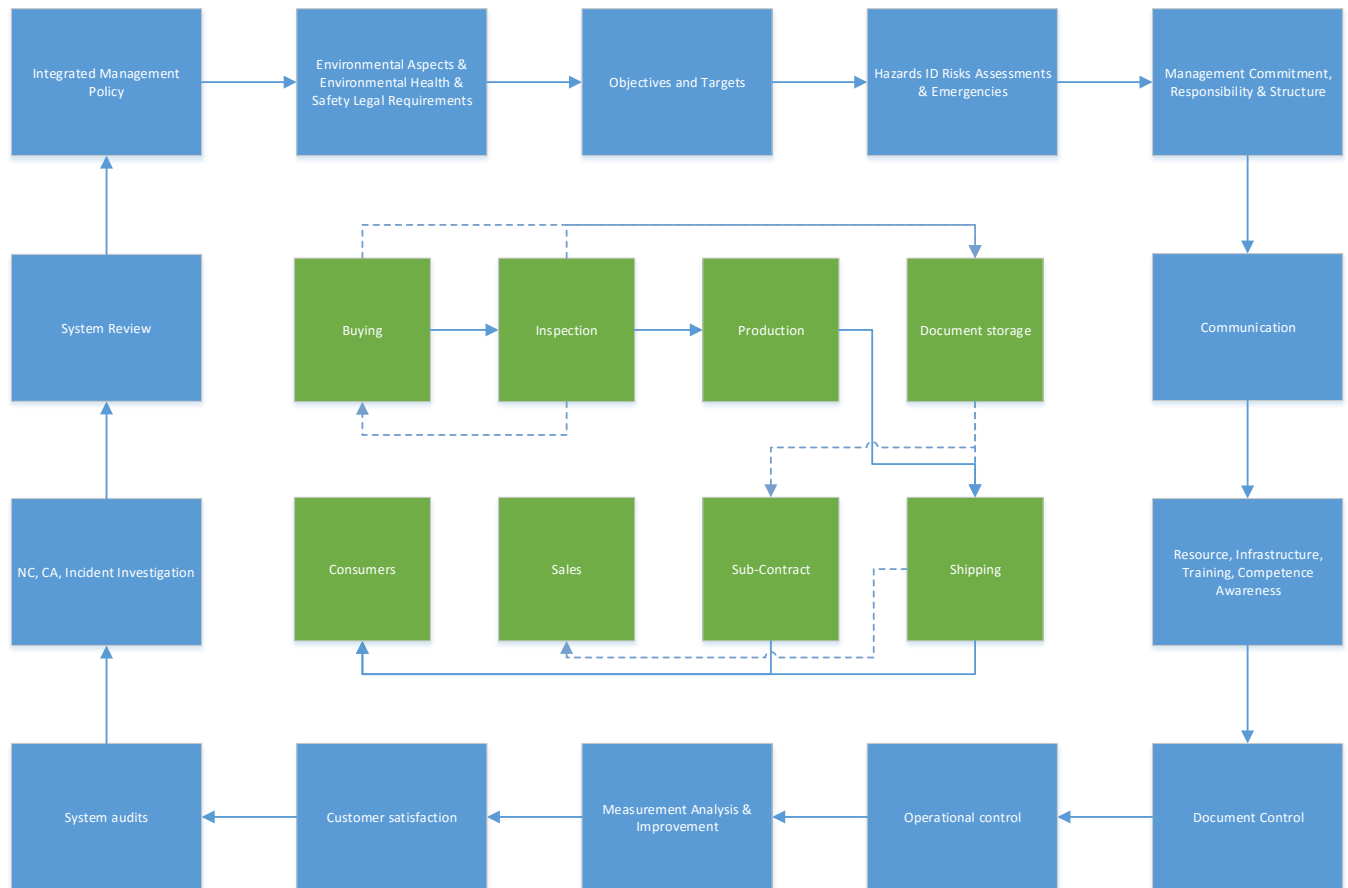
### 4.4 Integrated Management System and its Processes

Sadoff Iron & Metal Company has defined, documented, and implemented an integrated Quality, Environmental and Health & Safety system (QEHS) consisting of policies and objectives, process and procedures and measurements.

Sadoff Iron & Metal Company has made the strategic decision to adopt a formal integrated management system that complies with the ISO Standards 9001, 14001, & OHSAS18001.

The following represents a process map that describes the sequence and interaction of the key processes of SRI's integrated management system and their interface with our customers.

## Management



### 4.4.1 IMS and Process Management

#### Responsibility

- Top management is responsible for identifying key process owners of our IMS.
- Department managers are responsible for determining important processes in their departments and determining process owners.
- Process owners are responsible for defining their processes.
- Additional responsibilities are shown in the process documents.

## Procedure

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Every process that we formally defined is managed as follows:

1. **Resource Provision**
2. **Performance Evaluation and Correction**
3. **Addressing Risks and Opportunities**
4. **Improvement**
5. **Records**

## 5 Leadership

### 5.1 Leadership and Commitment

#### 5.1.1 General

### Responsibility

Top management is responsible for providing leadership regarding our integrated management system.

## Procedure

---

Top management of Sadoff Iron & Metal Company demonstrates leadership and commitment when it comes to developing, implementing and applying our integrated management system:

1. **Accountability for the integrated management system**  
QEHSPP 01, This manual, Org charts, Goals
2. **QHSE Policy and QHSE Policy objectives**  
Company goals that are rolled up into by all departments.
3. **Integration of the integrated management system**  
QEHSPP01, QEHSPP03, QEHSPP05, QEHSPP09, QEHSPP16, QEHSPP29, Aspect list,
4. **Process approach and risk-based thinking**  
All QEHSPP's, WIN, Goals, SWOT, CAR's

**5. Resources**

QEHSP01, this manual, QEHSP17, QEHSP03, monthly meetings, weekly meetings

**6. Promoting the integrated management system**

Memo, managers meeting, news letter

**7. Success of the integrated management system**

Company goals, CAR's

**8. Leading people**

QEHSP01, meeting minutes, memo, this manual

**9. Improvement**

QEHSP01, QEHSP17, QEHSP27, this manual

**10. Support of managers**

QEHSP01, QEHSP17, QEHSP27, this manual

**5.1.2 Customer Focus**

**Responsibility**

Top management is responsible for promoting customer focus and creating customer awareness by identifying internal and external customers, their requirements and by communicating them to SRI employees.

**Procedure**

Top management promotes a culture of customer focus (internal and external) in which our personnel is aware of our customers, aware of their utmost importance to the company, and aware of their needs and expectations. Top management accomplishes this as follows:

**1. Requirements**

Are defined in customer specs, internal procedures and all applicable statutory or legal requirements.

**2. Risks and Opportunities**

SWOT, CAR program

**3. Customer satisfaction**

Surveys (employee, consumer, NPS, CARs)

**5.2 Policy**

**5.2.1 Establishing the QHSE Policy**

**5.2.2 Communicating the QHSE Policy**

**QEHS Policy Statement**

“Safety, satisfaction and prevention of pollution for this we are all accountable.”

In our journey to be the preferred choice and meet our policy we are committed to:

- Comply with customer, legal, regulatory and other requirements related to products/services, process, environment, occupational health and safety and continually improve the effectiveness of the integrated management system keeping in mind the community, standards and technological advancements.
- Monitoring our performance through performance metrics to continually improve our processes and services.
- Promoting an understanding of our customers’ (both internal and external) needs and expectations, together with a culture of giving our customers an experience that leaves them feeling that Sadoff Iron and Metal is their preferred choice.
- Prevent or reduce pollution and waste, and conserve natural resources by responsible and efficient use in all our operations.
- Provide & maintain environmentally friendly, safe & healthy work facilities through operational procedures, safe systems and methods of work.
- Develop and maintain a highly motivated work force trained for effective management of health, safety and environment and emergency situations.

- Prevent unintended incidents and accidents at all company locations and job site facilities.
- Utilizing our integrated management system for all company processes everywhere, every time, without exception.

Mark Lasky  
CEO  
Sadoff Iron & Metal Company

July 24, 2017

Our QEHS Policy Statement guides our daily operations. Management on all levels communicates and explains our QEHS Policy Statement to employees so that all employees are familiar with the policy and its intent. Our policy is also available to all outside entities upon request.

### 5.3 Organizational roles, responsibilities and authorities

#### Responsibility

- Top management is responsible for assigning responsibilities for the integrated management system. Quality Manager is responsible for ISO9001, Safety Manager is responsible for OHSAS18001, Environmental Compliance Manager is responsible for ISO14001

#### References

- Additional procedures and work instructions assign responsibilities and authority.

#### Procedure

Per QSP17 Training

#### Organizational Charts

Organizational charts are used to define the reporting relationships of all positions at Sadoff Iron & Metal Company and held by HR.

## 6 Planning

### 6.1 Risks and Opportunities

#### Responsibility

Top management and process owners are responsible for management of risks and opportunities including follow up.

#### Procedure

Sadoff Iron & Metal Company uses a risk and opportunity management approach to appropriately address risks and opportunities that may have an impact on our company, our employees, the environment and our products and services.

#### Risk Management

SRI uses well defined risk management tools to determine risks and action items coming from risk analysis. Actions taken to address risks and opportunities depends on the impact on the conformity of product or service. The most impactful utilize the corrective action program.

Risks are identified by various means and at various times:

- a) As part of strategic planning
- b) As part of the definition of processes
- c) During Management Reviews
- d) At any time and by any employee

### 6.2 Company Objectives

#### Responsibility

- Top management is responsible for strategic & IMS objectives.
- Management at department levels are responsible for Departmental plans.
- Managers are responsible for setting employee performance objectives.

## Procedure

Sadoff Iron & Metal Company establishes strategic objectives to give all branches, departments and employees a common direction. Strategic objectives are established on the highest level, and then, as supporting objectives, trickle down through divisions, departments to the individual. All objectives support the next higher level to ensure that SRI's Strategic Objectives are achieved.

## Documentation and Communication

Our strategic objectives are documented in writing on our company goals and throughout the internal software system. As top management systematically reviews the strategic objectives and revises them as necessary, the changes are communicated to the relevant people in the organization.

### 6.3 Planning of Changes

## Procedure

Defined in QSP27 Change Management

### 7 Support

#### 7.1 Resources

##### 7.1.1 General

##### 7.1.2 People

## Procedure

Sadoff Iron & Metal Company allocates resources during business planning and budgeting, as well as throughout the year as needed.

## Identification of Resource Needs



To ensure that all resources are identified, Management identifies the processes and then the resource requirements for each process. Management also encourages employees to notify their supervisors of resource needs.

### 7.1.3 Infrastructure

#### Procedure

Defined in QEHSP06 – Maintenance, SCH06 Infrastructure

### 7.1.4 Environment for the Operation of Processes

#### Procedure

Sadoff Iron & Metal Company strives to ensure that their employees are provided with a safe work environment that supports the operation of processes and that is suitable to achieving product/service requirements and complying with environmental regulations. Responsible managers are defined in Schedule 06-01, QEHSP06 – Maintenance, Safety programs/procedures and HR policies.

### 7.1.5 Monitoring and Measuring Resources

#### Procedure

Defined in QSP07 Control of Inspection, Measuring & Test Equipment

### 7.1.6 Organizational Knowledge

#### Procedure

Sadoff Iron & Metal Company captures, maintains and distributes knowledge on products/services and processes as necessary to ensure that such knowledge will benefit our company's products/services and processes and be utilized in case of

changes to products/services and processes. This information can be found on the company intranet. Meeting minutes, Procedures, cross training, Tool box talks

## 7.2 Competence

## 7.3 Awareness

### Procedure

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Management works to attain that all positions are filled with individuals whose competencies meet the position requirements This can be achieved through:

1. Internal reorganization of individuals or positions
2. Training of employees defined in QSP17 - Training
3. Hiring of individuals that bring the necessary competencies to the company.

## 7.4 Communication

### Procedure

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Management throughout the company establishes internal communication channels to ensure that communication takes place with employees regarding:

- the company policies
- job requirements
- objectives and actual performance results and accomplishments

Communication channels *may* include the following:

- New hire orientations
- Intranet and email
- Company newsletter
- Employee recognitions and awards
- Notice boards and other postings
- Memos and handouts
- Staff meetings, pre-shift meetings, safety talks
- Employee surveys and other ways of generating feedback from employees

## 7.5 Documented Information

### 7.5.1 General

### 7.5.2 Creating and Updating

### 7.5.3 Control of Documented Information

## Procedure

Defined in QSP08 Distribution and Maintenance of Documents

## 8 Operation

### 8.1 Operational Planning

## Procedure

Local Management plan and develop the processes needed for production and service provision, while ensuring that all customer requirements and requirements of the integrated management system are met. Including environmental impact, safety impact and process impact.

In planning for production and service provision, local management considers the following:

- **Requirements**  
Many of the requirements come directly from the customer (supplier, consumer and regulatory); other requirements and objectives are based on objectives of our company.
- **Processes**  
Do we need to create any processes or do the necessary processes already exist?
- **Responsibilities and Authorities**  
Define who has responsibilities and authorities for the processes
- **Establishing Success**  
Verification, Validation, Monitoring, Quality Control Inspections
- **Records**

Inspection results, metrics, daily checks

### Written Plans

Local management along with Compliance Team decides if the outcome of the operational planning is formalized in writing or not. QEHSP03, QEHSP05, QEHSP27, QEHSP29, Aspects, MNT03 Equipment Evaluation Form.

### Emergency Preparedness

SRI works to mitigate and control impacts from emergency situations. When practicable we test these procedures and record results when necessary. Results of tests and after significant emergency events our process may be updated and altered. Below is a list of the emergency action plans we have in place (list not all inclusive):

- Emergency Action Plans for safety (Tornado, Fire, Adverse Weather,)
- SPCC
- SWPP
- Asbestos
- Mercury
- Flood (FDL Turning bins)
- Spill Control

## 8.2 Requirements for Products and Services

### 8.2.1 Customer Communication

#### Responsibility

Management is responsible for establishing communications channels.

#### Procedure

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Realizing the importance of good customer communication with both external and internal customers, management strives to establish communication channels as part of planning. All relevant external communication is recorded either in hard copy, scanned onto Sadoff intranet or saved in emails.

### Points of Contact at SRI

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Management determines points of contact on the side of our company and communicates them to the customers:

- **Supplier inquiries**  
Are directed to Traders assigned to buying material.
- **Consumer orders, contracts and order/contract changes**  
Are directed to Traders assigned to selling of product.
- **Feedback and complaints**  
All feedback positive or negative involving product or process is run through the Quality department.
- **Transportation (logistics) related**  
All transportation inquiries/complaints are directed to the Transportation Manager
- **Safety related**  
All safety inquiries/complaints are directed to the Safety Manager.
- **Environmental related**  
All environmental inquiries are directed to the Environmental Compliance Manager
- **Internal matters**  
All internal inquiries/complaints are directed to the VP Human Resources or direct manager.

## 8.2.2 Determination of Requirements for Product and Services

### Responsibility

The Trading Department leaders are responsible for price lists as well as inventory control.

## Procedure

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### Step 1: Preparation of Price Lists

The Trading Managers prepares price lists and makes them available to relevant positions within the company.

### Pricing

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All prices are determined in coordination between the Trading Manager and the CEO; additional personnel may be included when determining prices.

### Product/Service Descriptions

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The Trading Managers strive to ensure that product descriptions are accurate, not misleading, address customer needs and are easy to understand.

### 8.2.3 Review of the Requirements for Products and Services

### Responsibility

- The contract owner (Trader who is responsible for signing the contract, when applicable) is responsible for ensuring that the contract preparation is done per procedure, soliciting contract reviews, signing, communicating contract requirements and for records.

## Procedure Inbound

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These processes are defined in flow charts A-1 Scrap Purchase Industrial and A-2 Scrap Purchase Retail. (QEHSP03, Buy Sell Meeting, WIN59, MK08, MK055)

### Responsibility

- The manager receiving an order is responsible for order reviews, records, order confirmations and for communicating the order requirements to affected parties.
- Traders are responsible for entering order information prior to confirming orders.

## Procedure Outbound

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This procedure is defined in B-1 Scrap Sales flow chart. Shipping meeting, QESHPO3, Buy sell meeting, monthly meetings

Consumer orders may be received in various forms:

- In form of a written contract, Verbal custom order, Internet sale (Email).

### Verbal Consumer Orders

In case the customer’s requirements are only verbal and/or the customer chooses not to sign a written contract, the manager who receives the verbal order proceeds as follows:

1. If the order is accepted, the manager sends a written confirmation to the customer within 2 business days.

The confirmation includes:

- Requirements
  - Product/service requirements
  - Any delivery and post-delivery requirements
  - Additional requirements based on company requirements, implied requirements
  - Pricing
  - Terms of payment
  - Minimum volume commitment (if any)
- Terms and Conditions
- Term of the agreement
- Conclusion

2. The manager keeps a record of this confirmation in lieu of a signed contract.
3. The manager forwards a copy of the confirmation for retention in the central filing system.
4. The manager informs all affected functions as soon as the order is accepted.

### 8.2.4 Changes to Requirements for Product and Services

### **Responsibility**

The Trader accepting the contract change is responsible for review, records, confirmation and communication to affected functions.

### **Procedure**

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Changes to contracts and contract renewals undergo similar scrutiny and procedures as the original contract. And follow A-1 Scrap Purchase Industrial, A -2 Scrap Purchase retail and B-1 Scrap Sales flow chart.

### **Verbal Contract Change**

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In case the customer's requirements are only verbal, we provide the customer with a written confirmation.

### **Contract Renewals**

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Contract renewals are treated like new contracts as many factors may have changed, including our ability to extend fulfillment of order requirements or cost and pricing.

### **Communication**

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Signing management informs all affected functions as soon as the contract change is accepted. The contract changes or relevant requirements are made available to management of all functions who are directly or indirectly involved in meeting the changed contract requirements.

### **Contract File**

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Signing management keeps a record of the written contract change, or the confirmation in lieu of a signed contract, together with the review record.



## 8.3 Design and Development of Products and Services

### 8.3.1 General

### 8.3.2 Design and Development Planning

### 8.3.3 Design and Development Inputs

### 8.3.4 Design and Development Controls

### 8.3.5 Design and development Outputs

### 8.3.6 Design and Development Changes

#### Procedure

Sadoff Iron & Metal claims exclusion to clause 8.3 design and development at this time because this clause is not applicable to SRI. We not design product or services. In the event that SRI would design and develop a service or product at the beginning of the project SRI would run the project through QSP27 – change management.

## 8.4 Control of Externally Provided Processes, Products, and Services

### 8.4.1 General

### 8.4.2 Type and Extent of Control

### 8.4.3 Information for External Providers

QSP05 – Purchasing Equipment, Parts and Services, WIN91, Copper Chops, specs

## 8.5 Production and Service Provision

### 8.5.1 Control of Production and Service Provision

#### Responsibility

Management is responsible for identification and definition of processes, control of processes including establishing work instructions, and special processes.

#### Procedure

Local management strives to control processes through the following:

- Product or Service Characteristics (specs, WIN)
- Error Proofing (green belt)
- Qualified Personnel (QEHSP17)
- Proper Equipment (QEHSP05, QESHPO6)
- Monitoring and QC Inspections (daily inspections, Audits)
- Release (daily inspections, QEHSP22, ScrapRunner, SAI, Contracts)
- Delivery (ScrapRunner, SAI, Customer feedback, CARs)
- Post-Delivery Activities (CARs, Specs)
- Records (CARs, Contracts, QEHSP08)

#### Special Processes

QEHSP05, QEHSP27, QEHSP30, WIN72

### 8.5.2 Identification and Traceability

#### Procedure

Signs, tickets, labels, Daily inspection, QEHSP22, WIN's, SS programs.

### 8.5.3 Property Belonging to Customers or External Providers

QEHSP03, CARs

### 8.5.4 Preservation

#### Procedure

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SRI applies, to the extent necessary, various methods during production or service provision to preserve our outputs so that our products and services conform to requirements.

### 8.5.5 Post Delivery Activities

#### Responsibility

Quality Manger is responsible to help collect, log and analyze post-delivery activities. This is done through our internal corrective action program and cost of quality program.

### 8.5.6 Control of Changes

See section 6.3 Planning of Changes (QEHSP27, QEHSP15, New Equip Form)

## 8.6 Release of Products and Services

#### Responsibility

- Management is responsible for setting up QC inspections.
- QC inspectors and other designated employees are responsible for conducting QC inspections.

#### Procedure

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QEHSP05, QEHSP15, QSP22 – Material Flow and Inspection, QEHSP28

## 8.7 Release of Products and Services

## Procedure

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SRI controls nonconforming products and services to prevent them from unintended use or further processing, to handle them properly, and to create records as basis for improving effectiveness and efficiency of our processes. The entire process is spelled out in QSP04 Control of Nonconforming Material, products and services.

## 9 Performance Evaluation

### 9.1 Monitoring, Measurement, Analysis and Evaluation

#### 9.1.1 General

### Responsibility

Management on all levels are responsible for establishing metrics, for setting the framework for measuring, and for utilizing metrics within their area of responsibility.

## Procedure

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### Establishing Metrics

#### Who establishes metrics?

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- **Process owners**  
Process owners use metrics to measure the performance of those processes for which they are responsible.
  
- **Business unit and branch:**  
Business unit and branch management establishes comprehensive sets of metrics. Balanced scorecards usually cover metrics in the following categories:
  - Financial (e.g., revenue, profit, receivables)
  - Quality (e.g., rework, rejects, on-time delivery, supplier performance)
  - People (e.g., productivity, voluntary attrition)
  - Customers (e.g., customer complaints, customer satisfaction)

- Regulatory (e.g., Environmental, safety)

### Updating Metrics

As goals, customer requirements, products and processes, and external requirements change, management revises its metrics to ensure that they remain relevant in an ever-changing environment.

### Action

The analysis of metrics leads to decisions and actions. When planned results are not achieved or a worsening trend is detected, the process owner engages in corrective action, as appropriate, to achieve future conformity action (see chapter 10.4 Corrective and Preventive Action).

## 9.1.2 Customer Satisfaction

### Responsibility

- CEO has overall responsibility for customer satisfaction.
- Traders are responsible for monitoring supplier & consumer satisfaction.
- Front line employees are responsible for reporting satisfaction of retail customers.
- Quality Manager and Executive Management are responsible for identifying and documenting reports that are below documented levels.

### References

- Customer Survey (performed strategically) and consumer report cards

### Procedure

A formal plan for soliciting information on customer satisfaction and for the communication of results is established at the various levels according to the following requirements.

#### What are the tools and methods?

Possible tools and methods include:

- Questionnaires (e.g., mail, web based)

- Phone interviews
- Informal meetings and entertainment
- Lost business analysis
- Compliments
- Rejections
- Sector and industry studies

## 9.2 Internal Audit

### Procedure

Defined in QEHSP16 Internal Audit

## 9.3 Management Review

### 9.3.1 General

### 9.3.2 Management Review Input

### 9.3.3 Management Review Output

### Procedure

Defined in QSP01 Management Review

## 10 Improvement

### 10.1 General

### 10.2 Nonconformity and Corrective Action

### Procedure

Defined in QSP14 Corrective Action

### 10.3 Continual Improvement

The organization uses the results of analysis and evaluation, and the outputs from management review, to determine if there are needs or opportunities that shall be addressed as part of continual improvement. Some of the sources of our continual improvement are Significant Aspects List, HIRAC review, Corrective Action Trends, and employee suggestions. These sources along with the company goal of one project a year structures our continual improvement process.

Annually the “IMS Team” meets to review, analyze and improve the IMS system, meeting minutes and records are kept.

### Appendix B: Exclusions

### Appendix D: Revision and Approval

This Integrated Management System Manual has been prepared and revised as follows:

Revision Date	List of Changes	Author (Name)	Approval (Name & Date)
	Initial issue		