Sabbiatura, verniciatura, rivestimenti e riporti di metallizzazione

Blast-cleaning, painting, coatings, linings and thermal spray

Strada Provinciale,Via Rivoltana, 12
24040 Arzago d'Adda BG

T: +0039363879955

info@omrcoat.com

www.omrcoating.com

Officina Meccanica Rivoltana srl

Consulting Organization, Management and Control Model

Edition – January 2023

Organization, Management and Control Model (pursuant to Italian Legislative Decree. 231/2001).

Approved by Officina Meccanica Rivoltana Board of Directors during the meeting held on 23rd November 2010 and lastly updated on **23rd December 2022.**

The eighth edition of the Organization, Management and Control Model deals with the recent legislative changes and the reorganization of processes and functions of the Officina Meccanica Rivoltana, the alignment of our internal control system is deemed to be necessary. It also incorporates the new guidelines for the implementation of Organization Models, revised by Confindustria in June 2021.

Besides, the new edition of the Model incorporates references to:

- Italian Legislative Decree 8 November 2021, no. 184 on "Implementation of Directive (EU) 2019/713 of the European Parliament and of the Council of 17 April 2019 on the fight against fraud and counterfeiting of non-cash payment instruments and replacing Framework Decision 2001/413 / JHA of the Council ",
- Italian Legislative Decree 8 November 2021, no. 195 on "Implementation of Directive (EU) 2018/1673 of the European Parliament and of the Council, of 23 October 2018, on the fight against money laundering by criminal law",
- Italian Law 23 December 2021, no.238 on “Provisions for the fulfilment of obligations arising from Italy's membership of the European Union - European Law 2019-2020”,
- Italian Decree Law 25 February 2022, no. 13 on "Urgent measures against fraud and safety in the workplace in building industry, as well as on electricity produced by renewable energy plants",
- Italian Law 9 March 2022, no. 22 on “Provisions on crimes against cultural heritage”.

In addition, this Model originates from the recently released GRC system at Officina Meccanica Rivoltana srl .

Strictly reaffirming that the Company (as well as the whole Group) has a zero-tolerance approach towards any corruptive or collusive conduct, aimed at obtaining undue advantages of any kind, I invite you to respect the rules contained in this Organizational Model contributing to its dissemination at all levels.

Massimo Viganò

CEO Officina Meccanica Rivoltana srl

Officina Meccanica Rivoltana srl

ORGANIZATION CHART

The Direction, 31 July 2020

Officina Meccanica Rivoltana srl

QUALITY POLICY

MANAGEMENT RESPONSIBILITY

QUALITY POLICY

The Officina Meccanica Rivoltana S.r.l. has established as its policy to provide its customers with products and services that comply with the agreed requirements and are suitable for satisfying their requests.

The implementation of this policy is the task of all the staff and the responsibility of the Management, through the application of an effective Quality System according to the model of the UNI EN ISO 9001: 2015 standards.

To achieve the objective of the required quality, the Officina Meccanica Rivoltana S.r.l. has adopted the following policies:

- **Compliance with national and international regulations in force;**
- **Obtaining the required quality levels and on schedule;**
- **No compromise on product safety;**
- **Awareness, training and continuous updating of personnel at all levels;**
- **Continuous improvement through annual improvement plans.**
- **Display on the external bulletin board, on the website and in the presentation of the company's brochure to customers and suppliers**

The dissemination of this policy and awareness of Quality is implemented directly by the Management through periodic meetings with first-level collaborators and from these, in cascade, to all the employees.

The task of ensuring and verifying the application and suitability of the Quality System according to the aforementioned standards has been entrusted to the manager of the Quality Assurance Department.

THE DIRECTION

31 July 2020

Officina Meccanica Rivoltana S.r.l.

QUALITY MANUAL

☐ Controlled copy
☐ Uncontrolled coy

☐ Copy number

	Funzione	Il Responsabile
Editorial board	Quality control	R. Bussi
Check	Quality manager	M. Viganò
Approval	General direction	M. Viganò

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MANUAL REVISIO STATUS

N° sezione	Titolo Sezione	N° Revisione	Data Revisione
-	INDEX AND STATUS OF REVIEW	Rev. 0	07.05.2018
0	INTRODUCTION	Rev. 0	07.05.2018
1	PURPOSE AND FIELD OF APPLICATION	Rev. 0	07.05.2018
2	NORMATIVE REQUIREMENTS	Rev. 0	07.05.2018
3	DEFINITIONS AND ABBREVIATIONS	Rev. 0	07.05.2018
4	CONTEXT OF THE ORGANIZATION	Rev. 0	07.05.2018
5	LEADERSHIP	Rev. 0	07.05.2018
6	PLANNING	Rev. 0	07.05.2018
7	SUPPORT	Rev. 0	07.05.2018
8	OPERATING ACTIVITIES	Rev. 0	07.05.2018
9	PERFORMANCE EVALUATION	Rev. 0	07.05.2018
10	IMPROVEMENT	Rev. 0	07.05.2018

REVIEW REPORT

INPUT ELEMENTS

The survery and analysis carried out in 2016 led to the highlighting of the following data:

1. STATUS OF THE ACTIONS RESULTING FROM PREVIOUS REVIEWS

No action deriving from previous reviews.

2. CHANGES

a. Internal and external factors

During 2017, all the System documentation was revised in order to make it compliant with the new 2015 edition of the Standar.

b. Needs and expectations of interested parties

The interested parties wew identified and included in the context analysis prepared in 2017.

c. Risks and opportunities

For the first time, a mapping and analysis of corporate risks was carried out in 2017 to adapt the Management System to the new edition of the UNI EN ISO 9001: 2015 standars. In the face of the risk assessment carried out, no critical issues related to risks emerged and an opportunity emerged linked to the possession of the ISO 9001 Certification a san element of distinction for participation in tenders.

3. DEGREE OF ACHIEVEMENT OF THE OBJECTIVES

The targets set for 2017 relating to turnover and orders will certainly be achieved and exceeded. At 30/09/2017 the total turnover is 5.430.164 euoros. As suggested in the last audit carried pout within the indicator table, the percentages on total turnover relating to new products wew highlighted: notable leap forward in optical cables 31.30%, drop 16.75%, 10 mmq cable 21.97% and electronics 3.61%. Percentages that, we hope, will grow in the fourth quarter of 2017.

The objectives set for the year 2017 are in line with what is actually ascertained and in some cases such as turnover and search for new suppliers will bw exceeded. For their level of achievement, they are all achieved with exception of point 3 relating to the introduction of the bar code, point 4 relatng to the development of the organization model according to Law Decree n. 231/2001, of point 6 relating to ISO 14001 cerification which have been postponed to a date to be decided. Point 5 relating to the purchase of a new, more performing forklift has been eliminated. A separate note is for point 7 relating to the

achievement of a minimum turnover of 1200,000 in the electronic sector: the expected turnover that was to be brought by the sole agent wasn't achieved even in the face n. 36 new customers introduced.

4. INFORMATION ON THE PERFORMANCE OF THE ORGANIZATION

a. Non-conformities and corrective actions

As regards non-conformities, in the first nine months of 2017 a total of 24 were recorded, of which 7 related to complaints received from customers, 4 from inbound checks, 13 given by errors in the preparation of orders in the warehouse. Of the 7 customer complaints received, 2 bare attributable to the supplier Tunisie cables, 1 to the supplier Shangai CIIC Science & Technology, 1 to the supplier Shangai CIIC Tongda International Trade and 2 to the courier BRT spa.
In the first nine months of 2017, errors in the preparation of shipments proliferated during the first quarter and settled during the next to even if the final percentage is always reduced compared to the target set in 207, also given the amount of DDT issued. Therefore, the need to invest in the barcode system in order to avoid errors remains open. Such a system would be desirable for connectors / jumpers / JST material / Brady material. As announced, the warehouse worker resigned and a new one was hired. Company's desire that this warehouse worker can in the furure, given his capabilities, by equipping him with a computer with access to the system, to carry out the warehouse loads thus relieving RM, as reported in the previous review of 04/01/2017.
In the first nine months of 2017, no corrective actions were taken.
Also in the first nino months of 2017, no preventive actions were drawn up.

b. Results of monitoring and measurement

SECTION 0 INTRODUCTION

Section Index

	Function	The Manager
Editorial board	Controllo Qualità	R. Bussi
Check	Responsabile Qualità	M. Viganò
Approval	Direzione Generale	M. Viganò

SECTION 0 INTRODUCTION

Presentation of the company

0.1.1 History

Officina Meccanica Rivoltana S.r.l was founded in 1972 in Milan and its industrial activity was started in Arzago d'Adda (BG) in 1974. The main activity is the treatment of surfaces (sandblasting, painting, coatings, etc.). The company occupies an area of about 12.000 square meters covered on an area of 28.000 square meters and has equipment and areas used for handling, loading and unloading, packaging and storage of parts up to a maximum unit weight of 60.000 kg.

It currently employs about 20 people.

The company has been certified with DNV since 1999.

0.1.2 Fundamental business processes

As better specified in section 4, the ISO 9001:2015 Quality Management System applies to company processes which consist of:

Sandblasting, painting, coatings and metallization coatings.

The schematization of the processes described above and included under the control of the Quality Management System is found in section 4.

SECTION 1 PURPOSE AND FIELD OF APPLICATION

Contents of the section

	Function	The Manager
Editorial board	Quality Check	R. Bussi
Check	Quality Manager	M. Viganò
Approval	General Direction	M. Viganò

SECTION 1 PURPOSE AND FIELD OF APPLICATION

1.1 Purpose

The Quality System is implemented according to the UNI EN ISO 9001:2015 standards (Quality Management Systems- Requirements) the activities described apply to OMR S.r.l.

The purpose of this manual is to document the structure of the Quality Management System of OMR S.r.l. The main objectives of the Quality Manual are:

1. Document the Company's Quality Policy and provide all staff with references for the application and updating of the Quality System (business process management).

2.To guarantee customers the compliance of our company Quality System with the requirements of the standards for Quality Management Systems.

For the purposes of point 1, controlled copies of the Manual are provided.

For the purposes of point 2, where deemed appropriate in particular cases, uncontrolled copies of the Manual (not subject to controlled distribution) may be distributed to customers.

The procedures referred to in this Manual are to be considered confidential information of the Company and can therefore be distributed only after authorization, or if this is explicitly requested in the contract.

1.2 Field of application

What is described in the Manual applies to the activities headed by OMR S.r.l which consist of:

Sandblasting, painting, coatings and metallization coatings.

1.3 Requirements not applicable

Requirement 8.3 Design isn't applicable as the specifications are provided by the customers and requirement 8.5.1f after sales assistance which isn't contractually provided.

SECTION 2 NORMATIVE REQUIREMENTS

Contents of the section

	Function	The Manager
Editorial board	Quality Check	R. Bussi
Check	Quality Manager	M. Viganò
Approval	General Manager	M. Viganò

SECTION 2 NORMATIVE REQUIREMENTS

2.1 Reference regulations for activities

Applicable ISO standards

UNI EN ISO 9001:2015

ISO standards consulted for reference

UNI EN ISO 9000:2015

UNI EN ISO 9004:2009

2.2 Laws - Those in force on the date of edition of the Quality Manual apply.

D.lgs. 81/08	Consolidate Text on Safety
D.lgs. 152/06	Consolidate Text on Environment
Reg. 2016/679/UE	Code regarding the protection of personal data

SECTION 3 DEFINITIONS AND ABBREVIATIONS

Section Index

	Function	The Manager
Editorial board	Quality Check	R. Bussi
Check	Quality Manager	M. Viganò
Approval	General Manager	M. Viganò

SECTION 3 DEFINITIONS AND ABBREVIATIONS

3.1 Definitions and abbreviations in the sector

3.1 Definitions and abbreviations

For ease of reference, definitions and abbreviations typical of the language of quality and which can be found in various parts of the Manual or in the procedures listed are listed below.

3.1.1 Definitions

Corrective action: Action to eliminate the cause of a detected non-compliance or other undesirable situations detected;

Non-Compliance: Failure to satisfy a requirement;

Quality policy: Objectives and general guidelines of an organization relating to quality, formally expressed by top management;

Registration: Document that reports the results obtained or provides evidence of the activities carried out;

Traceability: Ability to trace the history, use or location of what is being considered;

Specification: Document that establishes the requirements.

3.1.1 Abbreviations

- Company: Officina Meccanica Rivoltana S.r.l.
- Management: The president and Director of Officina Meccanica Rivoltana S.r.l.
- Client: The Client
- User: The user of the finished product
- Supplier: Company that supplies raw materials, services or other components
- Subcontractor: Company that deals with parts on behalf of the Officina Meccanica Rivoltana S.r.l with material supplied by it in part or totally.

SECTION 4 QUALITY MANGEMENT SYSTEM

Contents of the section

4.CONTEXT OF THE ORGANIZATION

4.1 Understand the organization and its context
4.2 Understand the needs and expectations of interested parties
4.3 Determine the scope of the Quality Management System
4.4 Quality Management System and related processes

	Function	The Manager
Editorial board	Quality Check	R. Bussi
Check	Quality Manager	M. Viganò
Approval	General Manager	M. Viganò

SEZIONE 4. QUALITY MANAGEMENT SYSTEM

4.1 Understand the organizations and its context

OMR has determined the relevant internal and external factors that can influence its ability to achieve the expected results for its Quality Management System. OMR monitors and reviews these factors annually.

4.2 Understand the needs and expectations of interested parties

Since interested parties have or potentially cane have an effect on OMR's ability to regularly supply products that meet customer requirements and applicable mandatory requirements, OMR has determined:

- The interested parties relevant to their Management System
- The requirements of these interested parties for their own Management System OMR monitors and reviews these interested parties on an annual basis.

4.3 Determine the scope of the Quality Management System

Quality

OMR has determined the boundaries and applicability of its Quality Management System to establish its scope:

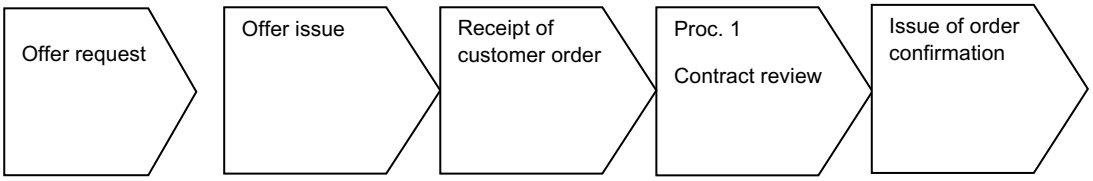
Sandblasting, painting, coatings and metallization coatings.

In determining the scope OMR took into account internal and external factors and the requirements of the relevant stakeholders.

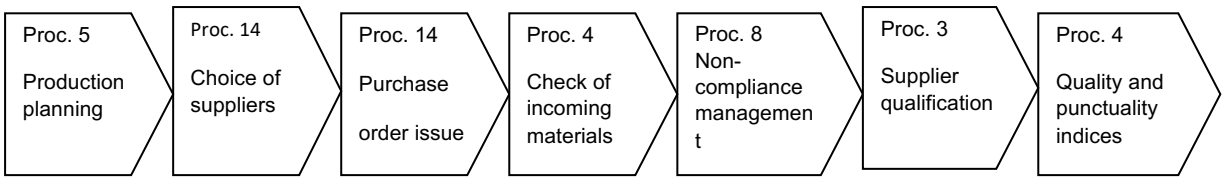
4.4 Quality Management System and related processes

OMR with the definition of its Management System ensures that its business processes comply with the requirement of the ISO 9001:2015 standard. The processes necessary for the Management System and their application within the System have been defined, these processes are:

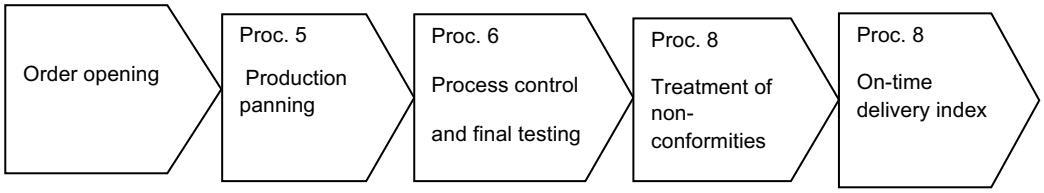
- **Business process**
  Responsible: Commercial



- **Procurement process**
  Responsible: Purchases



- **Production process**
  Responsible: Production



A Process Interaction Matrix was also developed which describes the interrelationships Process interaction matrix OMR S.r.l. (Annex 1 to this Manual).

The organization hasn't outsourced any process.

Documentation

Procedure Management of quality documentation.

SECTION 5. LEADERSHIP

Contents of the section

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Editorial board	Quality Check	R. Bussi
Check	Quality Manager	M. Viganò
Approval	General Manager	M. Viganò

SECTION 5 MANAGEMENT RESPONSABILITY

5.1 Leadership and commitment

This section of the Manual sets out OMR's quality policy and represents the formal commitment of the Management to the quality of its activities and operational processes. This commitment is reflected in the communication to the entire Company of the Company Policy for Quality and in the pursuit of compliance of products and services with both contractual and mandatory requirements.

The Commercial Department of OMR acknowledges the needs coming from the market and works in concert with the other competent operational functions in order to obtain customer satisfaction.

The re-examination of the contract is carried out by the employees of the Commercial Office. Carrying out the review means that all commercial, regulatory, technical, and qualitative aspects have been defined and documented and therefore it is possible to start the internal activities for the implementation of the service.

5.2 Quality policy

The Management considers the adoption of a correct quality policy in all sectors of the Company to be of fundamental importance. In fact, this policy will substantially contribute to guarantee customer satisfaction and company growth.

The Management pursues quality as a business management tool, which must bring advantages not only in terms of product but also in terms of productivity and cost-effectiveness of management.

The quality policy established by the top:

a) it's appropriate for the purposes of the organization,

b) includes the commitment to obtain the requirements and to continuously improve the effectiveness of the quality management system,

c) provides a framework for defining and reviewing the objectives for the quality,

d) is communicated and understood within the organization,

e) is reviewed to ascertain its continued suitability.

QUALITY POLICY

OMR S.r.l. considers it necessary to establish a Quality Management System in order to guarantee full satisfaction to its Customers through safe and reliable products, together with a regular and efficient service. Therefore, it believes it's establishing and following a strategy based on the following fundamental principles:

1. The quality of the products/services with which OMR S.r.l. reaches its customers must always be the one promised and expected by the customer, in compliance with internal specifications, laws and regulations in force.

2. The company intends to maintain constant and complete control of all business processes.

3. To achieve the objectives set, the company considers it essential to involve all functions and all employees in the understanding and implementation of the Quality Policy.

4. The management provides the resources necessary to introduce and develop the Quality System through corrective and preventive actions to pursue the objective of a continuos and constant Quality Improvement.

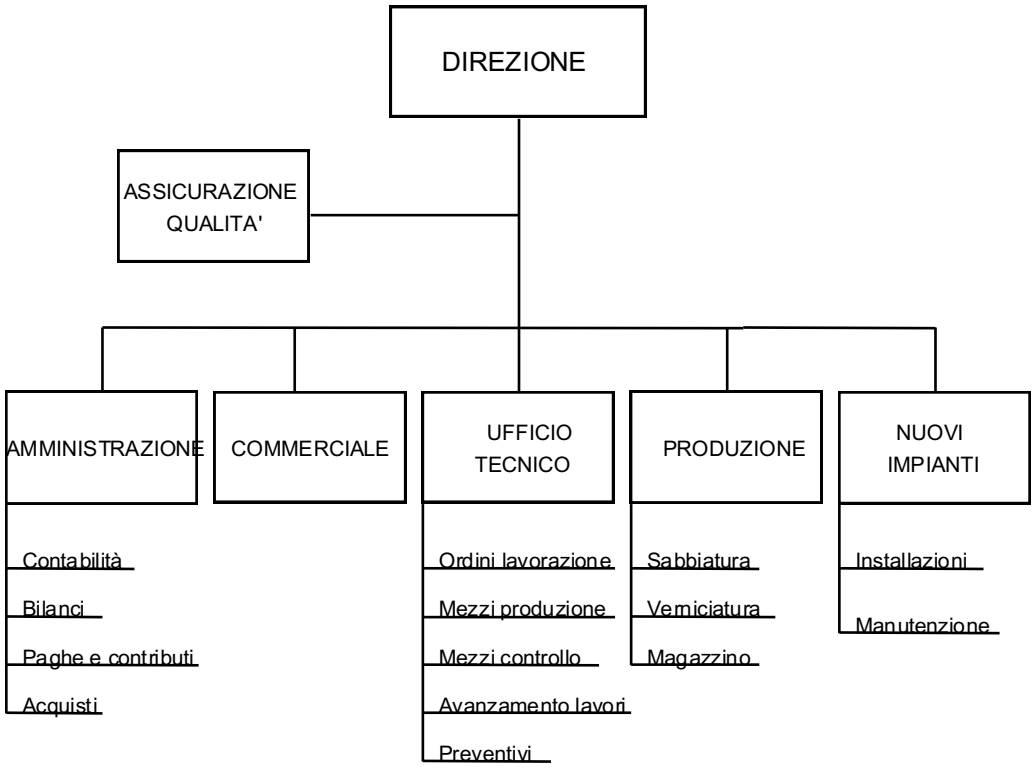
5. In order to better evaluate both internal improvement and customer satisfaction, the Management has introduced some quality indicators that are periodically checked during the review by the Management and which are the basis for setting quantifiable qualitative objectives.

General Direction

M. VIGANO'

5.3 Roles, Responsibilities and Authorities

Roles and responsibilities are described in the company organization chart below:



Corporate process responsibility matrix

Business processes described according to the points of the standard	**D.G.**	**A.Q.**	**U.A.**	**U.P.**	**U.C.**	**U.AM.**	**CQ**
4 Quality management system	R	C					C
5 Leadership	R	C					
7.1 Resources	R	C	C	C	C	C	C
7.2 Skills	R	C	C	C	C	C	C
7.5 Documented information		R	C				C
8 1 Planning and operational controls	R		C	C	C		
8.2 Requirements for products and services	R				C		
8.3 Design	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
8.4 Procurement	R		C			C	C
8.5 Production activity	C			R		C	
9.1.2 Customer satisfaction	R	C			C		
9.1.3 Analysis and evaluation	R	C	C	C	C	C	C
9.2. Internal Audits	C	R					
9.3 Management review	R	C					
10 Improvement	R	C	C	C	C	C	C
10.2 Non-conformities and corrective actions	C	C		C			R

R: Responsible **C:** Collaborator

SECTION 6 PLANNING

Section index

6.PLANNING

	Function	The Manager
Editorial board	Quality Check	R. Bussi
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SECTION 6 PLANNING

6.1 Actions to address risks and opportunities

OMR has determined the relevant internal and external factors that can influence its ability to achieve the expected results for its Quality Management System.

OMR monitors and reviews these factors annually.

6.2 Quality objectives and planning for their achievement

OMR has established the Quality objectives related to the relevant functions and levels, necessary for the Quality Management System.

The objectives have the following characteristics:

- define the necessary competence for personnel carrying out activities that influence compliance with product requirements;
- are consistent with the Quality Policy
- are measurable
- take into account the applicable requirements
- are relevant to product compliance and increase customer satisfaction
- are communicated and monitored
- are updated.

In defining the objectives, it is determined:

- what will be done
- what resources will be required
- who will be responsible for it
- when it will be completed
- how the results will be evaluated.

6.3 Planning of changes

OMR has determined that when a change to the Quality Management System becomes necessary, it is carried out in a planned manner.

OMR considers:

- the purpose of the change and the potential consequences
- the integrity of the Management System
- the availability of resources
- the allocation or reallocation of responsibilities or authorities

Documentation

PR Business Risk Management

SECTION 7. SUPPORT

Contents of the section

	Function	The Manager
Editorial board	Quality Check	R. Bussi
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SECTION 7. SUPPORT

7.1.1 General

Human resources are managed by the General Management which provides for an adequate assignment of roles and responsibilities as defined in Section 5.

Checks on the adequacy of available resources are carried out during the periodic Management Review and at any other time if deemed necessary (see section 9).

7.1.2 Person

This paragraph of the Manual defines the responsibilities and methods for identifying the training needs of personnel.

OMR considers the training of its personnel an element of primary importance to guarantee the quality and conformity of its product.

7.1.3 Infrastructure

The infrastructures are subjected to routine maintenance programs as well as to the necessary corrective maintenance interventions when necessary. All interventions are suitably documented in the case of external intervention. These activities are regulated by special maintenance sheets.

7.1.4 Work environment

The environmental conditions of the work premises are suitable for carrying out the activities and to guarantee the conformity of products and services in compliance with Law 81/08.

In particular, the conditions relating to some physical factors such as noise, temperature, humidity, lighting are kept under control.

7.1.5 Resources for monitoring and measurement

This paragraph of the Manual describes the methods for managing the control, measurement and testing equipment used by OMR. It is the responsibility of the R.Q. ensure that the means of proof are classified, checked periodically and used in the appropriate points of the process. The control equipment supplied to the R.Q. they are suitable for carrying out the measures defined by the control plans defined by the QAM. To the R.Q. the task of defining the characteristics of these vehicles in terms of accuracy class, specific performance or other characteristics during the purchase phase is entrusted. All the instruments or means of control that are subject to the regulations of this chapter are appropriately marked with a code for their identification and management according to the criteria defined by the specific Control Instruments Management Procedure.

An identification and calibration card is drawn up for each measuring instrument and a label is physically placed on the instrument which identifies the calibration status.

For each type of test means a verification methodology is established which can be implemented within the OMR or through external bodies or laboratories; the calibration is documented by a certificate issued by the body that carried out the verification. This is in order to guarantee the correct reading of the vehicle and the state of conservation and the reliability required by the tests, checks and tests.

If unacceptable deviations are found in the results of the test devices with respect to the reference standard, recalibration or repair is carried out at the manufacturer of the vehicle itself and subsequently recalibrated according to the appropriate procedure. In this case, the checks, provided for by the control cycles, are re-performed on all the production checked with these defective instruments and not yet delivered.

The documentation concerning the measurement and test equipment is considered documented information and therefore appropriately managed according to the provisions of the Quality Documentation Management procedure.

7.2 Skills

Based on the needs that emerged during the year, the Management issues and approves the Training Plan, the RQ informs the various functions involved and proceeds with the organization of training activities using internal or external resources.

OMR carries out the following activities for human resources:

- Defines the skills necessary for the personnel who carry out activities that influence the quality of the products;
- Provides training to meet these needs;
- Evaluates the effectiveness of the actions taken;
- Maintains appropriate records of the education, training and experience of personnel.

As regards newly hired personnel, training programs to be implemented "on the field" in the first period of presence in OMR are defined by sector or areas of employment.

The training activities carried out according to the Training procedure are recorded and reported on the Personal Card and on the Training Report which collects data relating to the professional training of personnel.

7.3 Awareness

The responsibility for the training process lies with the General Management which manages its coordination by defining resources and means according to the corporate objectives.

- Ensures that staff are aware of the relevance and importance of their activities and how they contribute to achieving the objectives.

7.4 Communication

In the Company, internal communications are guaranteed by the use of notices delivered to the interested party where relevant or displayed on the bulletin board for specific issues.

Where the subject requires it, the information is supported by a parallel and adequate training plan that is incorporated into the general training management.

7.5 Documented information

The OMR Quality Management System has been defined, made operational and documented by means of:

- Quality manual
- Management procedures
- Quality registration documents

This section documents the documentation management process (preparation, verification, approval, distribution and updating of the documentation generated internally, as well as the implementation and correct management of that of external origin, particularly if of a mandatory nature). The documentation control system is defined with the aim of proper business management in terms of:

- availability of valid editions of documents
- distribution to the relevant functions
- prompt elimination of outdated documents from all points of issue or use.

The above applies to all OMR documents, the responsibility for document management is defined according to the Quality Documentation Management procedure.

Document management includes the following steps:

- Preparation: consists in the conception and preparation of the document on the basis of the information in possession (data, requirements, regulations, regulations and applicable procedures)

- Verification: consists in ascertaining the adequacy, correctness and consistency with the data and specific reference requirements
- Approval: consists of verifying and certifying the validity of the document and authorizing its issuance as well as its appropriate distribution for competence and timeliness.
- Archiving: consists of keeping the original in an appropriate archive, as a corporate reference copy. The documents under control, which have become obsolete, are withdrawn and eliminated by the Quality Manager who archives a copy suitably identified in the relevant archive.
- Conservation: The competent function guarantees conservation and traceability for at least 10 years.

The quality registration documents are kept in special archives with controlled access.

Documentation

Training procedure

Control tools management procedure

Procedure Management of quality documentation

Procedure Management of quality records.

SECTION 8 OPERATING ACTIVITIES

Contents of the section

Reference documentation

	Function	The Manager
Editorial board	Quality Check	R. Bussi
Check	Quality Manager	M. Viganò
Approval	General Manager	M. Viganò

SECTION 8 OPERATING ACTIVITIES

8.1 Operational planning and controls

OMR's production processes consist of sandblasting, painting, coatings and metallization coatings. The treatments requested by the customer are planned, developed and reported on the information system from which the paper copy is extracted for use in the workshop. Treatment planning is consistent with the requirements of the other quality management system processes. The planning process is described in procedure no. 5, "Production Planning" which reports or refers to:

- quality objectives and product requirements;
- the documentation required in the various stages of planning;
- the required verification, validation, monitoring, inspection and specific tests for the treatments and the related acceptance criteria;
- the records necessary to provide evidence that the processes carried out and the respective products meet the related quality requirements.

8.2 Requirements for products

8.2.1 Communication with the customer

Relations with customers and the market in general are managed by the Commercial Office which also collects any complaints and works in collaboration with the Quality Manager in accordance with the non-compliance treatment procedure.

8.2.2 Determination of product requirements

OMR for each product establishes:

- the requirements specified by the customer, including those relating to delivery;

- the requirements not specified by the customer but necessary for the use of the product / service;
- any mandatory requirements applicable to the product / service.

OMR S.r.l. has prepared actions to review the contract in the event of requests for offers and the acquisition of contracts or orders.

Accepted orders are exclusively written.

8.2.3 Review of product and service requirements

The definition of the requirements assumes a prime importance in the realization of the products. It follows the need for the Commercial to proceed with an accurate analysis of the contractual data which leads to the clarification of:

- Application and use "needs" by customers;
- "expected" characteristics and qualitative performance;
- technical specifications of the product;
- technical and organizational skills to meet the requirements within the agreed time frame.

The requests for offers are received by the Commercial Department which reviews them in order to clearly identify the requested treatments, analyze the contractual conditions to be proposed, collect and document all the elements necessary for the compilation of the offers.

The commercial function is responsible for giving evidence of the re-examination of the orders and the filing and conservation of the relative registration.

For this purpose, reference is made to the criteria contained in the Contract Review Procedure.

The documentation relating to the contract review is considered quality registration documentation and is therefore treated according to the management and storage methods described in the appropriate section of the manual (section 7).

8.3 Design and development

This requirement is not applicable as the Company does not carry out its own projects but carries out surface and / or protective treatments on customers' products.

8.4 Procurement

8.4.1Generality

The Management ensures that the purchased products comply with the requirements specified on the basis of the Customer's or own requirements, if these are more severe, and of any mandatory standards applicable to the product or service purchased. To ensure the success of this policy, the Company turns to suppliers selected and qualified periodically by the Purchasing Department.

The Management considers the procurement process as primary: it is described in the Procurement procedure where the phases of:

- determination of the characteristics of the product to be purchased,
- procurement information,
- issuing the order.

And in the following other procedures:

- Supplier qualification
- Verification of incoming materials
- Production planning
- Treatment of non-conformities

The aforementioned procedures describe the phases of:

- evaluation and selection of potential suppliers,
- verification of the products supplied,
- supplier performance monitoring,
- the qualification of suppliers (based on the quality and punctuality of deliveries) and their periodic requalification.

The Supplier Evaluation is carried out both before the start of the relationship with a new Supplier and annually on already qualified Suppliers.

At the beginning of the relationship, the assessment is carried out trying to know as much as possible the Quality System adopted by the Supplier.

A Punctuality Index and a Quality Index are calculated annually for qualified suppliers, both of which combine to form a score that will serve to update the list of Qualified Suppliers.

The primary responsibility for the qualification of the Suppliers lies with the Purchasing Office which avails itself of the collaboration of the QA

It is up to the R.Q. keep updated the list of qualified suppliers that is signed by R.Q. and by the Purchasing Office.

8.4.2Type and extent of control

For each type of product purchased there is a purchase specification of the product itself which can be the one defined by OMR, generally based on the customer's specifications, or accepted by the supplier himself.

The specifications relating to the raw materials are reported in the same technical documentation of the industries supplying the material that OMR normally purchases.

The planning of purchase orders is carried out by the Purchasing Department, based on the data made available to the Commercial Department.

The purchase order must be drawn up on a prepared document duly completed in all its parts.

The Verification and approval of Purchase Orders is performed by the Purchasing Department which can delegate this activity for urgent reasons to another Body.

The approval of the order is understood with the affixing at the bottom of the signature of the person in charge.

Only after approval the Purchase Order becomes operational and follows its entire ordinary process.

Only within the List of Qualified Suppliers can the purchasing function choose the Supplier to which to place the purchase order for technical reasons and convenience.

All purchase orders issued by OMR report the requirements relating to codes, drawings, samples, specifications such as to make it possible to proceed with the verification of the conformity of the purchasing materials upon receipt.

The goods of the suppliers are entered into the production cycle only after the verification by the RM carried out according to the relative control plans.

It is only up to the R.Q. the authorization to accept supplies by way of derogation in cases where they do not meet the required requirements specified in the purchase orders.

8.4.3 Information to external suppliers

As for the issuance of purchase orders, the responsibility lies with the Purchasing Department.

Purchase documents contain information that clearly describes the ordered product.

They are verified and approved before their shipment to ensure the adequacy of the specified requirements.

When OMR intends to verify a purchased product with the supplier, it specifies in the purchase documents the provisions for the verification and the procedures for the release of the product.

When envisaged by the contract, OMR recognizes the customer the right to ascertain that what has been purchased complies with the specified requirements.

8.5 Production and provision of services

The production activities (surface treatment) are planned and carried out under controlled conditions to ensure the delivery of products treated in accordance with the Customer's requirements. In certain circumstances, when the final result of the process cannot be verified by subsequent monitoring or measurement activities, the process must be validated to demonstrate the ability to achieve the expected results. In this regard, see the procedure “Process control and final acceptance”.

The Management considers the production process to be primary; it is described in the "Production Process" procedure which describes the steps of:

- collection of information on product characteristics,
- collection of any necessary technical instructions,
- use of the necessary machines and systems,
- availability and use of monitoring and measurement devices,
- release and delivery of the product,
- possible review and approval of the process,
- identification and traceability during production
- eventual approval of the equipment,
- any personnel qualification,
- conservation of products,
- effectiveness and efficiency of the production process.

For the identification and traceability of products during the receipt of goods (raw materials and accessories), what is indicated in the "Verification of incoming materials" procedure applies.

All finished products are identified by labels placed on the packaging or on the products themselves. The order number, the quantity contained (if in a crate) and the name of the Customer are shown on the labels. From the label it is possible to trace the relative technical documentation and the records of the process control and final testing.

All materials returned for any reason by customers are identified not only by the original label but also by a photocopy of the non-compliance report sent by the customer.

With regard to the identification, protection and safeguarding of the Customer's properties, the provisions of the "Customer Property" Technical Instruction apply.

The Company pays particular attention to the conformity of products during transport and internal processing, up to delivery at destination.

8.6 Release of products and services

Before the release of the products, the characteristics of the same are monitored, measured to ascertain their conformity and recorded according to the procedures indicated in the procedure "Process control and final testing". The aforementioned procedure details what is necessary for the release of compliant products or, in the case of any concessions issued by the Customer.

8.7 Control of non-conforming outputs

This paragraph defines the methods for identifying non-conformities by identifying any corrective actions, in order to avoid their repetition and at the same time guarantee the segregation of the non-conforming product.

It applies to all product non-conformities found by OMR.

With regard to the responsibilities and authorities in the management of the non-compliant product, its identification, its isolation, its treatment and the verification of the effectiveness of and the possible management of non-compliant products detected after delivery, please refer to the appropriate Non-conformity treatment procedure.

Complaints from the market are considered non-conformities and are treated according to the same procedure.

The management of product / process non-conformities is carried out as described in the procedures and forms mentioned in the previous paragraphs: the progress of these non-conformities is monitored by analyzing the data.

All the results of the management of non-conformities are elements of evaluation for the Management Review.

Reference documentation

Procedure Review of the contract

Supplier Qualification Procedure

Procedure Verification of incoming materials

Production Planning Procedure

Procedure Control of production and final test

SECTION 9 PERFORMANCE EVALUATION

Contents of the section

	Function	The Manager
Editorial board	Quality Check	R. Bussi
Check	Quality Manager	M. Viganò
Approval	General Manager	M. Viganò

SECTION 9 POERFORMANCE EVALUATION

9.1 Monitoring, measurement, analysis and evaluation

9.1.1 General

This section of the Manual defines:

- the parameters to be measured;
- monitoring methodology;
- monitoring frequency;
- frequency of analysis of the results.

The definition of the parameters is reported in the Process Performance Indicators Matrix document which is compiled every six months by the QAM and is assessed annually by the Management during the Review.

9.1.2 Customer satisfaction

OMR guarantees the monitoring of the quality perceived by the customer both through direct and indirect methods.

Indirectly, this perception of the quality provided to the customer is measured in various ways:

- from a targeted analysis of the data arising from the management of returns
- from the correct management / analysis of complaints

The level of quality perceived by the customer is directly measured annually by sending questionnaires that allow the monitoring of his satisfaction and the results are screened during the Management review.

9.1.3 Analysis and evaluation

This section of the Manual aims to provide the general principles for the analysis and management of quality data and to define the responsibilities for the definition of statistical control methodologies.

The following elements are defined as being of relevance to OMR's activity:

- Data relating to the conformity of products / services
- Customer satisfaction
- Performance and effectiveness of the Management System
- Effectiveness of planning
- Effectiveness of the actions taken to address risks and opportunities
- Performance of Suppliers
- Need for improvements

It is the responsibility of the Management to define the most suitable analysis methodologies to be used and the appropriate indicators according to the company objectives. These indicators are represented in a separate table which constitutes a controlled document.

The results of these analyzes provide evaluation elements in the Management Review.

9.2 Internal audits

The purpose of this section of the Quality Manual is to describe the audit activities of the Quality System by means of an adequate Internal Audit program, through which it is possible to verify the correct application of the Company's Quality Program, in all its aspects and evaluate its adequacy.

The responsibility for planning and controlling the results of internal audits lies with the Management.

The internal audit aims to carry out a systematic and independent examination, aimed at determining whether all processes are in accordance with the reference standard

and with the procedures deriving from the Quality Manual and whether these procedures are suitable and effective to achieve business objectives.

The single verification can concern the Quality System as a whole, or a single process, in any case the overall annual plan embraces all the company processes.

They must be conducted by qualified personnel independent of the verified process. As regards criteria, scope, frequency and methods, refer to the internal audit procedure. To ensure a result consistent with the objectives set, some fundamental operational criteria are established.

QAM prepares an annual internal audit program defined on the basis of the status and importance of the activities being audited over the period of time considered. This program is approved by the Management and sent to the company functions subject to verification.

The audit report is drawn up by the auditor and contains the following information:

- name of the process being tested
- verification date
- name of the persons in charge of the process being audited
- reference documentation
- non-compliance
- remarks

This report is brought to the attention of the Managers of the audited processes for the adoption of any corrective actions necessary to correct the shortcomings found.

It is the responsibility of the Management to verify that the corrective actions envisaged are applied and effective with regard to the deficiencies found.

These checks are documented with the same forms used for audits. The conclusions of the internal audits are periodically presented to the Management Review.

The documentation connected with the internal audits is considered quality registration documentation and is kept at the Quality Manager.

9.3 Management review

Generality

On an annual basis, the Management carries out the Review of the Quality Management System in order to assess its continuous suitability, adequacy and effectiveness as well as its alignment with the corporate strategic guidelines.

Input items for review

In particular, these reviews take into consideration:

- the status of the actions resulting from previous reviews;
- changes in external and internal factors relevant to the Management System,
- information on the performance and effectiveness of the system which includes:

1. information on monitoring the satisfaction of customers and other interested parties;
2. level of achievement of quality objectives;
3. process performance indicators and conformity of products and services;
4. non-conformities and corrective actions
5. results of monitoring and measurement;
6. audit results;
7. performance of external suppliers;

- adequacy of resources;
- effectiveness of the actions taken to address risks and opportunities;
- opportunities for improvement.

The input data is provided by the various department heads each for their own competence and are summarized in the Review Report by RQ.

Output elements of the review

In the same office, the Management, evaluating the input elements, defines decisions and actions relating to:

- opportunities for improvement
- needs to modify the Management System
- necessary resources

The review is formalized with the issuance of the improvement plan which contains the objectives and actions relevant to the company functions involved.

The review is considered documented information and is kept by the Quality Manager.

Reference documentation

Internal Audit Procedure

Procedure Review by the Management

Section 10 Improvement

Contents of the section

	Function	The Manager
Editorial board	Quality Check	R. Bussi
Check	Quality Manager	M. Viganò
Approval	General Manager	M. Viganò

10.1 Generality

This section of the Manual defines the methods for determining and selecting improvement opportunities and implementing any necessary action in OMR to:

- improvement of products and services to meet requirements;
- correction, prevention and reduction of side effects;
- adopt mechanisms for continuous improvement of the performance and effectiveness of the Management System.

10.2 Non-conformities and corrective actions

This paragraph defines the methods for identifying non-conformities by identifying any corrective actions, in order to avoid their repetition and at the same time guarantee the segregation of the non-conforming product. It applies to all product non-conformities found by OMR. As regards the responsibilities and authorities in the management of the non-compliant product, its identification, its isolation, its treatment, the possible destination for other uses and the possible implementation of corrective actions with consequent verification of the effectiveness, reference is made the procedures for treatment of non-conformities and corrective interventions.

Complaints from the market are considered non-conformities and are treated in the same way. OMR, in order to eliminate the causes that generate non-conformities and to prevent the repetition of the same, implements corrective actions that are regulated by the Corrective interventions procedure. Corrective actions are defined according to the effects of the non-conformities found.

The aforementioned procedure defines the requirements for:

- the review of non-conformities (including any customer complaints),
- identification of the causes of non-conformities,
- the assessment of the need to take actions to avoid the recurrence of non-conformities,
- the identification and implementation of the necessary actions,
- recording the results of the actions implemented,

- the review of the corrective actions implemented.
- verification of the effectiveness of the actions implemented.

The management of product / process non-conformities is carried out as described in the procedures and forms mentioned in the previous paragraphs: the progress of these non-conformities is monitored by analyzing the data and used to update the risks and opportunities determined in the course of planning.

10.3Continuos improvement

OMR's Quality Management System is set up with a view to obtaining continuous improvement of its suitability, adequacy and effectiveness.

OMR, to determine needs and opportunities for improvement, considers the results of the analysis and evaluation and the outputs of the Management Review.

Reference documented

Non-conformity treatment procedure

Procedure Corrective actions