Quality System Manual

DOC-QA-10000
Rev. J

APS Tech LLC
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1 Introduction

The Quality System Manual (QSM) specifies the policies of the quality system of APS Technology. These policies are used to control the processes that determine the acceptability of products we design, manufacture, sell and service. The policies of this manual are aimed primarily at the prevention and early detection of process and product non-conformities at all stages of a product's lifecycle, from design through servicing as well as the continual improvement of our quality system processes.

This manual is organized to follow the structure of ISO 9001 – 2015 (ISO 9001). ISO 9000, Quality Management Systems Fundamentals and Vocabulary is a normative reference document.

The Quality System Manual is reviewed by senior management on an annual basis as a minimum, and is revised accordingly to reflect changes, if any, to the quality system. This manual is controlled and maintained by our Engineering Change Order (ECO) process.

2 APS Technology: Who We Are

2.1 Determining our Strategic Direction

APS Technology Sr. Management Team has reviewed and analyzed key aspects of the business and its stakeholders to determine the strategic direction of the company. This involves:

- Understanding our core products and services, and scope of management system (see 2.2 below).
- Identifying "interested parties" (stakeholders) who receive our products or services, or who may be impacted by them, or those parties who may otherwise have a significant interest in APS Technology.
- Understanding internal and external issues that are of concern to APS and its interested parties; such issues are identified through an analysis of risks facing either APS Technology or the interested parties. Such issues are documented, monitored, and updated as appropriate. At a minimum, the context of the organization will be reviewed annually during a management review meeting to determine its continued relevancy and used to set the organizations goals and policy.

2.2 Scope of the Management System

APS Technology, LLC (APS) is a design, engineering and manufacturing company specializing in the development of oilfield drilling and evaluation products and services. APS's products include drilling optimization tools, formation evaluation (LWD), and measurement while drilling technology (MWD) with surface systems for delivery of data captured during the drilling process.

2.2.1 Facilities within the Scope

The quality system applies to all processes, activities, and employees of the following locations:

7 Laser Lane
Wallingford, CT 06492
(860)613-4450

2.2.2 APS Technology claims no exclusions from the ISO 9001 standard.

3 Quality Policy

APS Technology Quality Policy, ref: DOC-QA-10069, is as follows:

> **We are committed to providing products, solutions and services conforming to the highest technical and functional standards that will meet or exceed customer expectations on quality, performance, and delivery. We will continually improve the effectiveness of our Quality Management System to satisfy our customers at every opportunity**.

4 Management System Structure and Controls

4.1 Process Approach

4.1.1 Process Identification

APS Technology has adopted a process approach for its management system. By identifying the top-level processes within the company and their interaction with each other allows APS to manage and monitor the QMS to ensure product conformity and continuous improvement. These processes are reviewed to determine the process flow, what equipment and personnel are required, the input requirements and the output of the process. Support processes and document requirements are also identified along with process measurements to assist in our continuous improvement efforts.

The following top-level processes have been identified for APS Technology:

- Sales
- Product Development
- Purchasing and Materials
- Quality Assurance and Control
- Manufacturing /Operations
- Receiving, Warehousing and Shipping
- Support Processes

The interactions of these processes are illustrated in Appendix A.

4.1.2 Process Controls and Objectives

Each process has measurements established (metrics) to determine if the process is meeting expectations and used to measure our continuous improvement efforts. When a process does not meet expectations or an unexpected problem is encountered with a process, informal root cause analysis is performed and if warranted an internal Corrective and Preventive action process is initiated.

4.1.3 Outsourced Processes

Any process performed by a third party is considered an “outsourced process” and must be controlled. The company’s outsourced processes, and the control methods implemented for each are determined by individual APS specifications or standard industry specifications along with blueprint requirements, Work Orders (Job Travelers) and the processes used to control suppliers.

The type and extent of control to be applied to the outsourced process take into consideration:

a) The potential impact of the outsourced process on the company’s capability to provide products that conform to requirements.
b) The degree to which the control of the process is shared,
c) The capability of achieving the necessary control through the purchasing contract requirements.

4.2 Documentation and Records

4.2.1 General

APS Technology’s management system documentation includes both documents and records, collectively referred to as “documented information”.

The extent of the management system documentation has been developed based on the following:

a) The size of APS Technology
b) Complexity and interaction of the processes and products
c) Risks and opportunities
d) Competence of personnel

4.2.2 Control of Documents

Documents required for the management system are controlled in accordance with procedure DOC-DES-10012 Engineering Change Procedure. The purpose of document control is to ensure that all staff and employees have access to the latest, approved information, and to restrict the use of obsolete information.

4.2.3 Control of Records

A documented procedure (DOC-QMS-10002 Control of Records) has been established to define the controls needed for the identification, storage, retrieval, protection, retention time, and disposition of quality records.

These controls are applicable to those records which provide evidence of conformance to requirements; this may be evidence of Product or Service requirements, contractual requirements, procedural requirements, or statutory/regulatory compliance. In addition, quality records include any records which provide evidence of the effective operation of the management system.

4.3 Change Management

When APS Technology determines the need for changes to the management system or its processes, these changes are planned, implemented, and then verified for effectiveness per DOC-DES-10012 Engineering Change Procedure.

4.4 Risks and Opportunities

APS Technology considers risks and opportunities when taking actions within the management system, as well as when implementing or improving the management system; likewise, these are considered relative to products and services. Risks and opportunities are considered when approving a new development project and monitoring that project to release.

5 Management and Leadership

5.1 Management Leadership and Commitment

Senior Management of APS Technology provides evidence of its leadership and commitment to the development and implementation of the managements system and continually improving its effectiveness by:

a) Taking accountability of the effectiveness of the management system.
b) Ensuring that the quality policy and quality objectives are established and are compatible with the strategic direction and context of the organization.
c) Ensuring the quality policy is communicated, understood, and applied within the organization.
d) Promoting awareness of the process approach.
e) Ensuring that the resources needed for the management system are available.
f) Promoting continual improvement.
g) Supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility.

5.2 Customer Focus

Senior Management ensures that customer needs and expectations are determined, converted into requirements, and are met with the aim of enhancing customer satisfaction.

This is accomplished by assuring:

a) Customer and applicable statutory and regulatory requirements are determined, understood, and consistently met.
b) The risks and opportunities that can affect conformity of products and services are determined and addressed.
c) The focus on enhancing customer satisfaction is maintained.

5.3 Quality Policy

The Senior Management Team has developed the Quality Policy, defined in section 3 of this document that governs the day-to-day operations to ensure quality.

The Quality Policy is a standalone released document DOC-QA-10069.

5.4 Organizational Roles, Responsibilities and Authorities

Senior Management has assigned responsibilities and authorities for all relevant roles in the company. These are communicated through the combination of organizational chart and position/job descriptions.

APS Technology Organizational Chart

Appendix B.

Senior Management accepts responsibility and authority for:

a) ensuring that the management system conforms to applicable standards.
b) ensuring that the processes are delivering their intended outputs.
c) reporting on the performance of the management system.
d) providing opportunities for improvement of the management system.
e) ensuring the promotion of customer focus throughout the organization.
f) ensuring that the integrity of the management system is maintained when changes are planned and implemented.

5.5 Internal Communication

Senior Management ensures internal communication takes place regarding the effectiveness of the management system. The communications include:

a) Use of the results from data analysis.
b) Use of results from internal audits.

c) Regular company meetings.
d) Internal emails, memos.
e) Use of CAPA process to report nonconformities or improvement suggestions.

5.6 Management Review

Senior Management reviews the management system at planned intervals, to ensure its continuing suitability, adequacy, and effectiveness.

Management review frequency, agenda (inputs), outputs, required members, actions taken, and other review requirements are defined in DOC-QF-10013.

Records from management reviews are maintained.

6 Resources

6.1 Provision of Resources

APS Technology determines and provides the resources needed to:

a) Implement and maintain the management system and continually improve its effectiveness.
b) Enhance customer satisfaction by meeting customer requirements.

Resource allocation is done with consideration of the capability and constraints on existing internal resources, as well as needs related to supplier expectations.
Resources and resource allocation are assessed during management reviews.

6.2 Human Resources

APS Technology identifies training needs and provides training for all personnel performing activities which affect quality per DOC-HSE-10131 APS Training Policy:

a) Job descriptions are created for each position which identifies competency and training requirements.
b) Personnel are qualified based on appropriate education, training, and/or experience.
c) Periodic assessment of training needs is conducted by the relevant department.
d) Education and training to achieve the required level of performance is conducted.
e) Documented records of personnel training requirements and completed training are maintained.

6.3 Infrastructure

APS Technology determines, provides, and maintains the infrastructure needed to achieve conformity to product requirements.

Infrastructure includes, as applicable:

a) buildings, workspace, and associated facilities.

b) process equipment, hardware, and software.
c) supporting services such as transport.
d) information and communication technology.

Equipment is maintained per DOC-OPS-10050 Machine Maintenance Checklist.

Where equipment is used for critical measurement activities, such as inspection and testing, these shall be subject to control and either calibration or verification; see the procedure DOC-QA-10009 Calibration Procedure.

6.4 Work Environment

APS Technology provides a clean, safe, and well-lit working environment. Specific environmental requirements for products are determined during quality planning and are documented in procedures, work instructions, or job documentation.

APS Technology utilizes a formal Health and Safety Program which is administered by the facility Safety Coordinator. As part of this program, a Health & Safety Plan is created annually which summarizes prior year performance and outlines current year goals and objectives.

6.5 Organizational Knowledge

APS Technology determines the knowledge necessary for the operation of its processes and to achieve conformity of products or services. This may include knowledge and information obtained from:

a) Internal sources, such as lessons learned, new employee product introduction training, training from subject matter experts, and/or intellectual property.
b) External sources such as standards, academia, conferences, and/or information gathered from suppliers and customers.

7 Operations

7.1 Operational Planning and Control

APS Technology plans and develops the processes needed for product realization. Planning of product realization is consistent with the requirements of the other processes of the QMS. Such planning considers the information related to the context of the organization (see section 2 within this document), current resources and capabilities, as well as product and service requirements.

7.2 Customer-Related Activities

7.2.1 Capture of Customer Requirements

APS Technology reviews and documents all customer proposals in the APS Proposal Log in the QuickBase application database. This ensures that all requirements received from the customer are fully understood and that the current capability exists to meet all aspects of the customer requirements prior to the acceptance of the order. Contracts are reviewed prior to acceptance through a documented process.

This review verifies that:

a) The requirements are adequately defined and documented. This includes delivery and post-delivery requirements as well as product related statutory and regulatory requirements.
b) Where there is no written statement of requirement available for a verbal order, the requirements are agreed upon before the order is accepted.
c) Any differing requirements between the quote and the accepted order are resolved.
d) Capability to meet contract requirements is verified and maintained.
e) Program/order risks (new technology, short lead times, etc.) have been evaluated.

Contract amendments are reviewed and approved through a similar process and flowed down to appropriate functions.

Records of proposals, contracts and reviews are maintained per DOC-QMS-10002**.**

Customer inquiries and order handling are coordinated through the Sales Department and/or Program Management. Product quality issues are coordinated by Quality Assurance.

Records are maintained per Control of Records Document DOC-QMS-10002**.**

7.2.2 Customer Communication

APS Technology has implemented effective communication with customers in relation to:

a) Providing information relating to products and services.
b) Handling enquiries, contracts, or orders, including changes.
c) Obtaining customer feedback relating to products and services, including customer complaints.
d) Handling or controlling customer property.
e) Establishing specific requirements for contingency actions, when relevant.

7.3 Design and Development

The approval of a new product development project is determined by the New Product Steering Committee which is made up of a cross functional management team. An Engineering Request (ER), DOC-ENG-10031, is submitted for review by the committee. Once approved a determination is made if it is a DEV or ER project. DEV products are broader in scope while ER projects are usually enhancements to an existing product requested by a customer or determined to be needed by market research.

- APS Technology utilizes a Product Development Process, DOC-MTG-10017, to document the steps necessary to design and develop products that meet the requirements of our customers. The process insures:

    - key requirements (inputs) are determined,
    - outlines the required time and resources required,
    - determines verification and validation activities,
    - requires peer reviews, project plans and publishing of monthly updates.
    - requires control of the design during development.
    - Verifies the design meets the requirements.
    - Identifies risks and opportunities before and during the development process.
    - Develops all necessary documentation to manufacture, test and maintain the product when released.

- Records of design development are maintained per DOC-QMS-10002.

- All design changes and modifications are identified, documented, reviewed, and approved by authorized personnel prior to their implementation using the Engineering Change Order (ECO) process, DOC-DES-10012. This review includes an evaluation of the effect of the changes on constituent parts and products already delivered. Customer and/or regulatory agency approval is also obtained when required by contract and/or regulation.

7.4 Purchasing

- APS Technology ensures that purchased materials and subcontracted services conform to specified requirements. This includes all activities involved in purchasing products and services from suppliers including customer designated sources. Refer to procedure DOC-OPS-10028.

- APS Technology defines the type and extent of control exercised over subcontractors. This control is dependent upon the type of product, the impact of the purchased product on final product quality, and the quality audit reports and/or quality records of the previously demonstrated capability and performance of the subcontractor.

- Suppliers are assessed and selected based on their ability to meet requirements including quality system and quality assurance requirements. A formal supplier qualification program is used to review and approve potential suppliers, and an Approved Supplier List (ASL) is used to identify those suppliers qualified to provide production material, calibration services, testing or special processing. Refer to procedure DOC-QA-10041.

- Supplier performance is reviewed on a periodic basis by the Supplier Management Team (SMT), and supplier performance targets are determined annually by management. Supplier qualification and disqualification actions are coordinated through the SMT. Refer to Supplier Rating Procedure DOC-QA-10067.

- Purchase orders are reviewed and approved prior to release and clearly describe the products ordered. The purchase orders specify the:

a) Drawings, specifications, standards, procedures, and other relevant technical data required to define the product.
b) Requirements for test, examination, and inspection, as applicable.
c) Requirements for documentation/certifications, inspection/test data, special processes, nonconforming material control and source inspection.

- APS Technology utilizes a Receiving Inspection function to ensure compliance of purchased product with the specified requirements. Purchased product is not used until it is verified as conforming. Refer to Receiving Inspection Procedures DOC-QA-10011 & 10082.

    a) When purchased product is verified at the sub-contractor's premises, verification arrangements and product release methods are specified in the purchasing documents.

7.5 Production and Service Provision

7.5.1 Control of production and service provision

To control its provision of product or service, APS Technology considers, as applicable, the following:

a) the availability of documents or records that define the characteristics of the product or service as well as the results to be achieved.
b) the availability and use of suitable monitoring and measuring resources.
c) the implementation of monitoring and measurement activities.
d) the use of suitable infrastructure and environment.
e) the appointment of competent people, including any required qualifications.
f) the implementation of actions to prevent human error.
g) the implementation of release, delivery, and post-delivery activities.

7.5.1.1 Production Control system:

APS Technology identifies and plans the production, installation and servicing processes which directly affect quality. APS Technology also ensures that these processes are carried out under controlled conditions through documented procedures and instructions which define the manner of production and servicing.

Key components of the production control system include:

a) Work Orders (i.e., Job Traveler) which identify the steps required to manufacture the product, part configuration and order quantity.
b) Applicable set-up cards, Assembly & Test procedures with inspection plans, specifications, and drawings.

7.5.1.2 Production Documentation:

APS Technology uses specific documents to control the manufacture of products and to document the tests and inspections required to verify conformance to customer requirements. These documents include:

- Work Orders (i.e., Job Travelers)
- Assembly Procedures (AP)
- Engineering drawings (B/P)
- Test Procedures (TP)
- Specifications (SPEC)

7.5.1.3 Control of Production Process Changes:

Changes to production processes are reviewed, approved, and documented through the Engineering Change Order (ECO) process DOC-DES-10012.

7.5.1.4 Control of Production Equipment, Tools, and NC Machines:

Production equipment, including NC machines and associated software, is validated prior to use via First Article Inspection. A preventive maintenance program is utilized to ensure continued proper functioning of equipment. NC programs are maintained per DOC-OPS-10048 and maintenance per DOC-OPS-10050.

7.5.1.5 Validation of Processes:

Key processes are certified prior to implementation. These processes are those that are deemed critical by the organization and/or those where results cannot be completely verified by subsequent inspection and testing. Certification includes (1) documenting the process, and (2) qualifying and approving process documentation, equipment, and personnel. Processes are revalidated on a periodic basis as defined in the governing procedures, and records for all certifications are kept on file.

7.5.2 Identification and Traceability

Products are positively identified from receipt through all stages of production, delivery, and installation. As a minimum, the product is identified by part number and revision.

Where traceability is required by contract or regulatory requirements, products are provided with unique identification of individual products or batches to the extent specified contractually.

a) Status of product in stock is documented on Acceptance Tags, and status of in-process product is documented on product travelers.
b) Initials are used to provide evidence of approval and completion of manufacturing, test, and inspection operations.

The documented procedure, DOC-QA-10008, defines the method in detail.

7.5.3 Property Belonging to Customers or External Providers

APS Technology exercises care with customer or supplier property while it is under the organization’s control or being used by the organization. Upon receipt, such property is identified, verified, protected, and safeguarded. If any such property is lost, damaged, or otherwise found to be unsuitable for use, this is reported to the customer or supplier and records maintained.

For customer intellectual property, including customer furnished data used for design, production and / or inspection, this is identified by customer and maintained and preserved to prevent accidental loss, damage, or inappropriate use.

7.5.4 Preservation of Product

- Personnel handling materials and products use safe and adequate methods to prevent damage and deterioration including protection from electrostatic discharge (ESD). Refer to DOC-QMS-10018.

- Material with shelf-life requirements is stored in accordance with the manufacturer's storage recommendations and is assessed at appropriate intervals to detect deterioration and/or expired shelf-life dates. Material is consumed on a First-in, First-out (FIFO) basis. DOC-QA-10024 Shelf-Life Control Requirements details the process.

- Hazardous materials are handled in accordance with applicable environmental/regulatory requirements. Material Safety and Data Sheets (MSDS) are available for all materials classified as hazardous. The Hazmat program is maintained by APS Technology's Safety Coordinator in accordance with OSHA requirements.

7.5.5 Post Delivery Activities

Post-delivery requirements are established during the review phase and may include the following:

- Statutory and regulatory requirements
- Actions under warranty provisions
- Contractual obligations such as maintenance services
- Specific customer requirements

7.5.6 Control of Changes

APS Technology reviews and controls both planned and unplanned changes to products or services to the extent necessary to ensure continuing conformity with all requirements. Refer to DOC-DES-10012 Engineering Change Procedure.

7.5.7 Measurement and release of products and services

Acceptance criteria for products and services are defined in the appropriate APS subordinate documentation. This is done prior to the release of products and services.

Production material is verified to ensure conformance to all applicable internal and customer requirements using documented and approved inspection and test procedures.

a) Product is inspected and tested at various defined in-process verification points. The sequence of product assessments and tests is defined on the Work Orders (WO's), and products are held until all required inspections and tests are completed.
b) Final inspection is performed to verify that all specified inspections and tests, including those specified upon receipt of product or conducted in-process, have been completed/accepted and that the results meet specified requirements.

c) No product is shipped to customers until all activities specified in the applicable procedures are satisfactorily completed and associated data and documentation is available and approved. Products which fail to pass inspection and/or test are evaluated and disposition through the Nonconforming Material process described in section 7.5.8.
d) Inspection documentation may include such information as acceptance criteria, provisions for the recording of measurement results, and required measurement equipment.
e) Inspection Plans are utilized when key characteristics are specified by engineering drawing and/or customer contract.
f) Inspection and test records are maintained which provide evidence that products have passed all inspection and/or tests in accordance with defined acceptance criteria for all stages of production. These records also indicate the person(s) authorizing product release.
g) First Article Inspections (FAI's) are used to validate production equipment and processes prior to their full implementation. FAI's are performed during the initial production phase of each internally manufactured or procured component, subassembly, and final assembly. They are also performed following changes in product design, processes, and equipment.
h) Sampling Inspection is utilized throughout the facility where appropriate.

7.5.8 Control of Non-conforming products

Product and/or material found to be nonconforming is segregated and positively identified to prevent inadvertent use or installation per DOC-QA-10010 Non-Conformance Reporting Procedure.

Nonconforming product is reviewed by authorized members of the Material Review Board (MRB). Allowed dispositions are:

a) Rework.
b) Repair provided customer authorization is obtained when required.
c) Use-as-is, provided customer authorization is obtained when required.
d) Scrap (items disposition as scrap are permanently marked and positively controlled until they are physically rendered unusable)

Repaired and/or reworked product is re-inspected to demonstrate conformance to requirements.

Where required by contract, the use or repair of nonconforming product is documented and reported to the customer.

a) Nonconformance's which have been accepted and repairs which have been performed are described and recorded to denote the actual condition of the product.
b) Material shipped under a customer-authorized concession is properly identified and recorded per customer requirements.

When nonconforming product is detected after delivery, the affected customers, end users and/or regulatory agencies are notified in a timely manner and provided, as a minimum, information regarding the description of the nonconformance, parts affected, customer and/or organization part numbers, quantity, date codes/lot numbers and disposition instructions.

Records are maintained regarding the nature of non-conformances and any subsequent actions taken, including concessions obtained. This information is utilized to facilitate process improvement activities as well as to prevent recurrence of the conditions causing the nonconformance.

8 Improvement

8.1 General

APS Technology uses the management system to improve its processes, products, and services. Such improvements aim to address the needs and expectations of customers as well as other interested parties, to the extent possible.

Improvements shall be driven by an analysis of data.

8.1.1 Analysis of Data

Product and process data are collected on a continual basis to measure performance against established company objectives. The data are collected from a variety of sources and cover such areas as customer satisfaction, product conformance, process monitoring and supplier performance.

Performance is assessed and reported:

a) Process metrics identified for each major process and reported monthly.
b) The Failure Review Board convenes bi-weekly to review field failures and determine root cause. This data is used to determine product reliability and product improvements.
c) Operations Reviews are conducted monthly which provide an executive overview of company performance.
d) Quality Management Reviews are held annually, as a minimum, to provide a senior level review of the quality management system and its performance.
e) Supplier quality data is collected and reported monthly.

8.2 Customer Satisfaction

As one of the measurements of the performance of the management system, APS Technology monitors information relating to customer perception as to where APS has met customer requirements. The methods for obtaining customer information include:

- Recording Customer complaints (Q-Log)
- Product rejections and/or returns.
- Repeat orders for customers.
- Submittal of customer satisfaction surveys

Refer to procedure DOC-QMS-10019 Customer Satisfaction.

8.3 Internal Audits

APS Technology conducts internal audits at planned intervals to determine whether the management system conforms to its own quality management system and ISO 9001:2015. Internal audits also seek to ensure that the management system has been effectively implemented and is maintained.

a) Audits are scheduled based on the status and importance of the activity to be audited and are conducted by trained personnel independent of the areas audited.
b) Results of internal audits are documented and communicated to management personnel responsible for the areas audited, and timely corrective action is taken for deficiencies found during the audit.
c) Follow up activities are performed to verify and record the implementation and effectiveness of the corrective actions taken.
d) Audit results are a key component of the Quality Management Reviews.

These activities are defined in the document DOC-QA-10075 Internal Audit Procedure.

8.4 Corrective Action

A corrective action system is maintained to ensure that effective measures are taken to correct and prevent the recurrence of conditions which have or could have resulted in the manufacture or delivery of nonconforming product. This corrective action system is administered by the Quality Assurance department and extends to suppliers of production material and services. The system provides for:

a) effective handling of customer complaints and reports of product non-conformities.
b) investigating the causes of product, process, and quality system nonconformities; and the recording of investigation results.
c) determining the corrective action needed to eliminate the causes of nonconformities and prevent their recurrence.
d) verification that corrective actions are taken and are effective.
e) implementing and recording changes in procedures resulting from corrective and preventive actions.
f) submitting relevant information on actions taken to management for review.

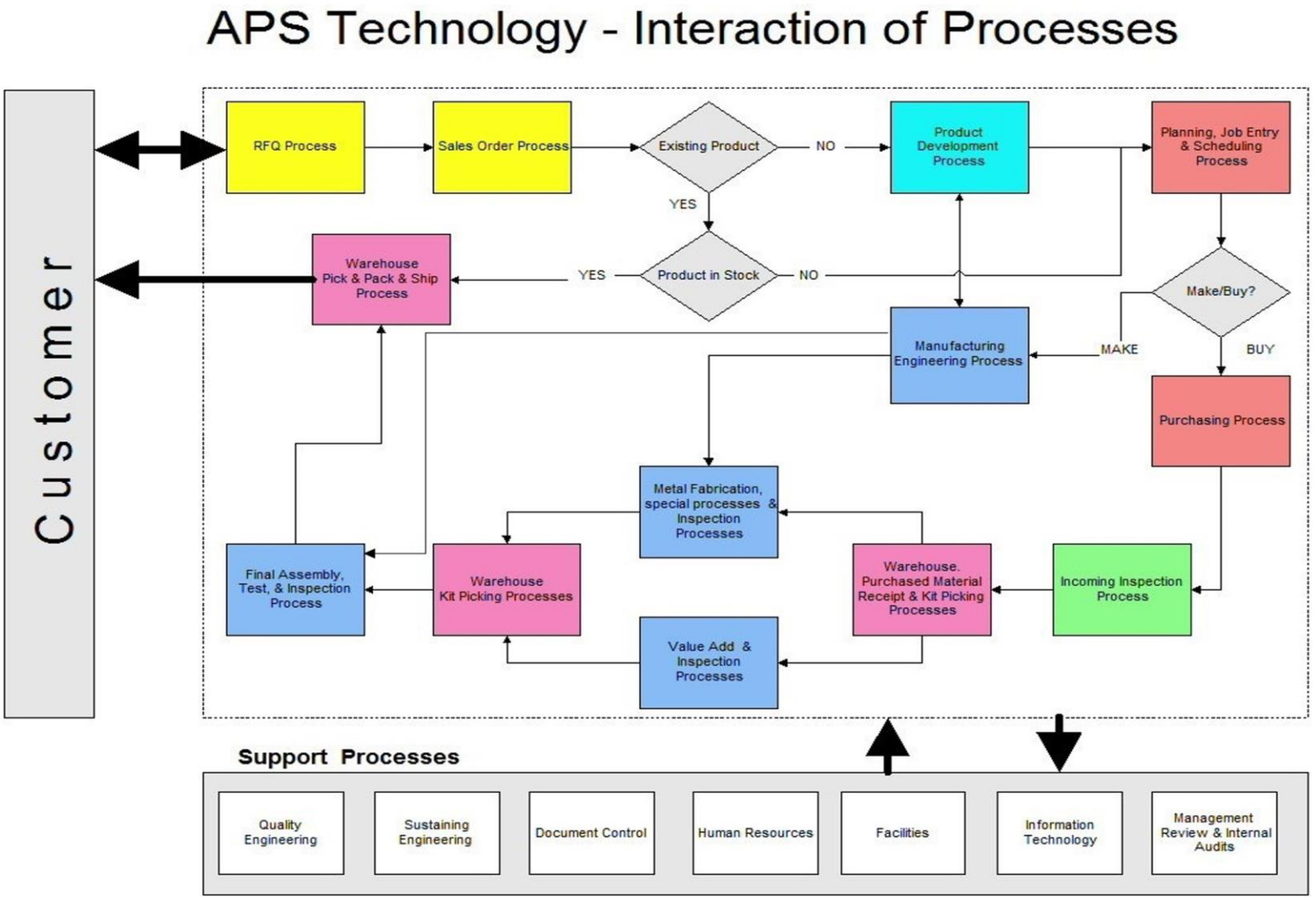
These activities are defined in the document DOC-QA-10068 Corrective and Preventive Action procedure.

9 History Revision

Table 1: Documentation Revision History

Rev	Date	Completed By	Description	ECO No.	Checked By
A	10/16/1998	W. Turner	Initial Release		
B	09/15/2011	D. Steig/ B. Joyce	Completely rewritten to conform to ISO 9000:2000, New Quality Policy added, legal disclaimer added (ECO-11-390)	11-390	W.Turner
C	1/8/2013	B Gowrie	Updated to conform to ISO 9000:2008, new org chart, new Quality Policy, updated record retention period. Added interactions diagram. Added reference procedures	13-004	W. Turner
D	8/3/2015	B. Gowrie	Updated Org Chart, Updated Logo, section 7.2.1	15-184	W. Turner
E	02/09/2017	B. Gowrie	Updated to conform to ISO 9001:2015	18-064	W. Turner
F	4/6/2021	G. Belair	5.4 Updated to reflect changes in management; 5.5 removed Weekly Newsletter; moved org chart to appendix B	21-084	V. Fonseca
G	5/5/2022	G. Belair	Removed 4 Laser Lane locations. Update Org Chart	22-115	V. Fonseca
H	10/6/2023	G. Belair	Sect 3 added DOC-QA-10069; 7.5.2 removed: Finished product is also provided with lot date information – no longer a requirement of SPEC-10008; Update org Chart; correct spelling and grammar throughout.	23-191	G. Belair
J	2/26/24	G. Belair	Revised company name (Inc. to LLC)	24-045	G. Belair

10 APPENDIX A – INTERACTION DIAGRAM



11 APPENDIX B – ORGANIZATION CHART