4613 N. Clark Avenue
Tampa, FL 33614

LEGACY COMPONENTS, LLC
QUALITY MANUAL

QM-001

LEVEL I

REVISION: M

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II MANUAL APPROVAL: This manual has been approved, released for circulation and is controlled by the identified authority.

Location	Controlled Copy Number	Number of Copies
Master held on Server		1

Management Signature –

President

III CHANGE CONTROL HISTORY:

LEGACY COMPONENTS, LLC

QUALITY MANUAL

This manual is controlled by the President and Management Representative, who is the designees for distribution of said manual and issue control. The statement in the footer "Controlled Document-verify current revision" indicates the most current. Verify against the Master List of Documents. If the Quality Manual is revised, all applicable sections and/or paragraphs shall reflect the latest changes. The portions that are changed are described in the table below. The approval of this Quality Manual is indicated by the signature and final approval for release by the President.

Original Date	Revision	Revision Date	Section(s)	Reason
04/15/2013	A	Initial Release	N/A	Initial Release
04/15/2013	B	07/17/2013	II	Removed Hard Copy
07/17/2013	C	09/10/2013	III, 1.2,2.1,4.2, 7.1.2,7.5.4	Removed Procedures manual, Added Cust. Satisfaction, Change Scope Back-up,"spacing", added "in writing"
09/10/2013	D	05/20/2015	4.2.1. d.	Removed "in the I, II, III, and IV Documents." Added "...between level I & level II Documents."
11/30/2015	E	11/30/2015	7.5.1.4	Added "7.5.1. Please See Clause 8.3 d and e, Control of Nonconformity Product process and Clause 8.5.2, Corrective Action Process"
08/26/2016	F	09/08/2016	4.1 Appendex B	Removed (2nd "Quality" box) as it is a redundant process. Added "-Internal Audit to existing "Quality" box.
08/26/2016	G	10/05/2016	8.2.2 B	Removed 2 from S.O.P. 8.2.2 as there is no S.O.P. 8.2.2
09/11/2017	H	09/11/2017	NEW STANDARD REVISION	AS9120:2009 Rev A./ISO 9001:2015 changed to AS9120:2016 Rev. B/ISO

				9001:2015
9/11/2017	I	09/11/2017	Added 7.5.1.1 Control of Equipment, Tools, and Software Programs	"Legacy Components is excluded from clause 7.5.1.1 as no (customer or vendor) equipment, tools, and/or software programs is ever used or housed."
9/11/2017	J	09/11/2017	Added 7.5.1.4 Post-Delivery Support:	Added required clauses for NEW STANDARD REVISION AS9120:2016 Rev. B/ISO 9001:2015
9/11/2017	K	09/11/2017	Added 5.6.3 "Review Output"	Added required clauses for NEW STANDARD REVISION AS9120:2016 Rev. B/ISO 9001:2015
9/11/2017	L	9/11/2017	Added 5.6.2 Review Input (a - h)	Added required clauses for NEW STANDARD REVISION AS9120:2016 Rev. B/ISO 9001:2015
9/11/2017	M	9/11/2017	Under 2.1, Added "Legacy has determined that under 7.3 Design and development that is not applicable to the organization. Legacy's justification is that it does not manufacture, design, or create any processes."	Added required clauses for NEW STANDARD REVISION AS9120:2016 Rev. B/ISO 9001:2015

1.0 QUALITY POLICY AND QUALITY OBJECTIVES

1.1 Quality Policy: Legacy Components, LLC strives to meet customer requirements by delivering quality products on time. We continuously look for ways to improve our quality management system.

1.2 Quality Objectives:

a) On-Time Delivery

b) Product Quality

c) Customer Satisfaction

All Legacy Components, LLC (herein referred to as Legacy) employees, whose work affects the quality of products are competent and responsible for the quality of their work and are hereby authorized and empowered to be free from any pressure that might affect the quality of their work.

It is the responsibility of Top Management to ensure that this policy is understood, implemented, and maintained at all levels Within Legacy.

2.0 SCOPE OF LEGACY AEROSPACE QUALITY MANAGEMENT SYSTEM (AQMS):

2.1 Legacy Components, LLC is a distributor of electronic components & aerospace products.

Legacy has determined that under Section 7.3 Design and Development or element 8.3 in AS9120:2016 Standard that is not applicable to the organization. Legacy's justification is that it does not manufacture, design, or create any processes. (see Section 7.3).

2.2 The purpose of this Quality Manual is to describe the policies, requirements and the processes including their interactions that make up Legacy AQMS. This Quality Manual enables Legacy to define the responsibilities, authorities, and the interrelationships of the key operating management segments and to provide the direction for each the functional activities including controls that ensure the requirements for quality will be met. This manual and its supporting procedures are structured along a process model approach.

2.3 The manual is divided into eight (8) sections that are correlated to elements 1 through 10 of the applicable elements of the ISO 9001:2015 and AS9120:2016 standards. Each section references the relevant Standard Operating Procedures, which are also listed in the Master List of Documents.

3.0 DEFINITIONS

3.1 The definitions below are in direct correlation to the ISO 9000:2015 Quality Management Systems Vocabulary:

a. Audit: Systematic, an independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which audit criteria are fulfilled.

b. Certificate of Conformity: A document that certifies product conformity to process, design and/or specification requirements; commonly referred to as a "Certificate of Conformance'.

c. Conformity: Fulfillment of a requirement.

d. Corrective Action: Action taken to eliminate the cause of a detected nonconformity or other undesirable situation.

e. Counterfeit Part: A product produced or altered to imitate or resemble a product without authority or right to do so, with the intent to mislead or defraud by passing the imitation as original or genuine.

f. Distributor: Organization carrying out the purchase, storage, splitting or sale of products without affecting product conformity. The term organization in the context of this standard means a distributor.

g. Management System: System to establish policy and objectives, and to achieve those objectives.

h. Nonconformity: Non-fulfillment of a requirement.

i. Preventive Action: Action taken to eliminate the cause of a potential nonconformity or other undesirable potential situation.

j. Procedure: Specified way to carry out an activity or a process.

k. Process: Set of interrelated or interacting activities, which transforms inputs into outputs.

l. Product: The result of a process (there are four generic product categories: services, software, hardware, and processed materials).

m. Quality: The degree to which a set of inherent characteristics (i.e., of a product, system or process) fulfills requirements.

n. Quality Characteristic: Inherent characteristic of a product, process or system related to a requirement.

o. Quality Management: Coordinated activities to direct and control an organization with regard to quality.

p. Quality Management System: To direct and control an organization with regard to quality.

q. Quality Planning: Part of quality management focused on setting quality objectives and specifying necessary operational processes and related resources to fulfill the quality objectives.

r. Quality Policy: Overall intentions and direction of an organization related to quality as formally expressed by top management.

s. Risk: An undesirable situation or circumstance that has both a likelihood of occurring and a potentially negative consequence.

t. Splitting: The division of product either physically or by batch quantity without affecting the product characteristics.

u. Suspected Unapproved Part: A product that might not have been or is suspected of not having been produced in accordance with applicable laws and regulations.

v. Test Report: Objective evidence provided by either the manufacturer or a certified testing facility that the product conforms with specific design requirements or properties.

4.0 QUALITY MANAGEMENT SYSTEM

4.1 General Requirements: Legacy has established this Quality Manual, as its documented AQMS. It has been designed, implemented and is maintained in order to meet all ISO 9001:2015 and AS9120:2016 standard requirements and customer specified requirements. It clearly defines how Legacy controls their' processes. Our AQMS addresses customer and applicable statutory and regulatory requirements. Implementation includes:

a. Determining and identifying all processes needed for our AQMS and the application of processes throughout Legacy.

b. The determination of the sequence and interaction of the processes (See Appendix B for details).

c. The determination of the criteria and various methods necessary for assuring that our operation and control of all implemented processes are effective throughout our organization.

d. Ensure that all necessary resources and information that is required to support Legacy's operation and control of all processes are available.

e. Provide effective and accurate measurement, monitoring and analyzing of all implemented processes throughout the organization.

f. Implement all necessary actions in order for Legacy to achieve their planned results and continual improvement of these processes.

Legacy's management ensures that our system established and defined in this Quality Manual effectively manages its processes in accordance with the requirements of AS9120:2016.

When Legacy chooses to out-source any process that affects product conformity to requirements, the organization shall ensure control over such processes. The type and extent of control to be applied to these outsourced processes shall be defined within the AQMS.

Note 1: Processes needed for the AQMS referred to above include processes for management activities, provision of resources, product realization, measurement, analysis and improvement.

Note 2: An "outsourced process" is a process that the organization needs for its AQMS and which the organization chooses to have performed by an external party.

Note 3: Ensuring control over outsourced processes does not absolve the organization of the responsibility of conformity to all customer, statutory, and regulatory requirements. The type and extent of control to be applied to the outsourced process can be influenced by factors such as

- The potential impact of the outsourced process on the organization's capability to provide product that conforms to requirements,
- The degree to which the control for the process is shared,
- The capability of achieving the necessary control through the application of 7.4.

4.2 DOCUMENTATION REQUIREMENTS

Legacy procedures define the processes used to implement all elements of Legacy AQMS and are contained within this Quality Manual. They are listed in Appendix A. These procedures and all associated documentation ensure this AQMS will provide effective planning, and processing of all material including accurate records and record keeping.

4.2.1 General**: Legacy AQMS documentation includes:**

a. The establishment of Legacy Quality Policy and Objectives (see section 1.1 of this Quality Manual).

b. This Quality Manual is a Level I document.

c. Documented procedures per AS9120:2016 requirements.

d. All the required documentation needed by Legacy to ensure the effective planning, operation and control of all its processes are defined between level I & level II Documents.

e. Supporting records as required per AS9120:2016.

f. AQMS requirements imposed by the applicable regulatory authorities, when required.

Legacy ensures that personnel have access to, and are aware of, relevant AQMS documentation and changes.

Note 1: Where the term "documented procedure" appears with the AS9120 Standard this means that the procedure is established, documented, implemented and maintained.

4.2.2 Quality Manual: The **Quality Manual comprises Legacy's AQMS top tier document structure and includes:**

a. The Scope of the AQMS implemented at Legacy, reference section 2.1.

b. The documented procedures established by Legacy and are referenced in this Quality Manual, reference Appendix A.

c. A description of the Process of Interaction, reference Appendix B.

4.2.3 Control of Documents: Control of all documents as required per AS9120:2016 are maintained in accordance with this Quality Manual and applicable procedure. Records are considered a special type of document and are controlled according

to the requirements of SOP 4.2.4. Legacy has written a procedure that governs the controls necessary and this procedure is SOP 4.2.3 and established requirements for:

a. Approval of documents for adequacy prior to issue and enter on the Master List of Documents Form # LC-4.2.3-001.

b. Review and update as necessary and re-approve documents.

c. Ensure that changes and all current revision status of documents are effectively identified.

d. Ensure that relevant versions of all applicable documents are available at necessary points of use.

e. Ensure that documents remain legible and readily identifiable.

f. Ensure that documents of external origin determined by Legacy to be necessary for the planning and operation of the AQMS are identified and their distribution controlled.

g. Prevent the unintended use of any obsolete documents, and to apply suitable identification to them if they are retained for any purpose.

4.2.4 Control of Records: Legacy has established that all records are maintained per AS9120:2016 requirements in order to provide evidence of conformity and also effective operation of the AQMS. They will remain legible, readily identifiable and retrievable. This is accomplished in accordance with procedure SOP 4.2.4 and Master List of Records Form # LC-4.2.4-001, which defines the controls needed for the identification, storage, protection, retrieval, retention time, and disposition of records.

Records of product origin, conformity and shipment shall be maintained in accordance with customer, statutory and regulatory requirements.

Where records are stored in an electronic form, back-up procedures are defined, reference SOP 4.2.4. These electronic records shall be secured to prevent unauthorized alteration or change and shall not be corrupted due to software or system changes.

5.0 MANAGEMENT RESPONSIBILITY

5.1 Management Commitment

Records shall be available for review by customers and regulatory authorities in accordance with contract or regulatory requirements.

The President of Legacy shows evidence of commitment to the development and implementation of the AQMS through continual improvement by:

a. Communicating the importance of meeting the customer as well as statutory and regulatory requirements.

b. Establishing the Quality Policy.

c. Ensuring that all the Quality Objectives are established.

d. Conducting Management Reviews per the requirements set in this Quality Manual Section 5.6.

e. Ensuring the availability of all resources.

5.2 Customer Focus

Top management ensure that customer needs and requirements are determined and met with the target set at enhancing customer satisfaction, reference section 7.2.1 and 8.2.1. Top management ensures that product conformity and on-time delivery performance are measured and that appropriate action is taken if planned result are not, or will not be, achieved.

5.3 Quality Policy

Top management ensures that the Quality Policy which is communicated

throughout Legacy: a. Is appropriate to the purpose and goals of the

organization, reference section 1.2.

b. Includes commitment by all employees' to comply with all requirements and continually improve the effectiveness of the AQMS.

c. Provides a framework for establishing and reviewing Legacy's Quality Objectives as part of its desire for increased effectiveness.

d. Is communicated and understood by all Legacy personnel within the organization.

e. Is reviewed for continuing suitability during the Management Reviews.

5.4 Planning

5.4.1 Quality Objectives: Legacy's top management ensures that the Quality Objectives as stated in section 1.1 of this Quality Manual, including those necessary to meet product requirements are established, communicated and implemented at all relevant functions and levels within Legacy. These Quality Objectives are measurable and consistent with the Quality Policy with a focus set towards continual improvement. If targets for Quality Objectives are not being met during the Review of Analysis of Data, a CPAR will be initiated per SOP 8.5.

5.4.2 Quality Management System Planning: Legacy's top management ensures that:

a. The planning of the AQMS is carried out so that it will meet the requirements designated in section 4.1 with consideration to the permissible exclusions, as well as the Quality Objectives.

b. Integrity is maintained within the AQMS when changes to said system are planned and implemented.

5.5 Responsibility, Authority and Communication

5.5.1 Responsibility and Authority: Top management ensures that responsibilities, authorities are defined and effectively communicated throughout the organization to ensure that the AQMS and its associated processes are properly implemented per the set requirements of this Quality Manual, reference this Quality Manual, Procedures and Organizational Chart (on file with MR). The President has the ultimate authority for ensuring that, the Quality of Legacy's products and services are met. The President and senior level executives responsible for heading the Management Reviews and ensuring all changes when and if necessary are delegated to the responsible personnel.

5.5.2 Management Representative (MR): The Compliance Manager has been appointed the Management Representative, who irrespective of all other duties and responsibilities, shall be responsible and have authority that includes:

a. Ensuring that processes necessary for ensuring that the AQMS is established, implemented and maintained.

b. Reporting to top management on the performance of the AQMS and any necessary changes for improvement.

c. Ensuring that awareness of customer requirements is promoted throughout Legacy.

d. The organizational freedom and unrestricted access to top management to resolve quality management issues.

Note: The responsibility of a Management Representative can include liaison with external parties on matters relating to the AQMS.

5.5.3 Internal Communication: Top management shall ensure that appropriate communication processes are established within the organization and that communication takes place regarding the effectiveness of the AQMS.

5.6 Management Review

5.6.1 General: Top management reviews the AQMS at a minimum, once annually, to ensure its continuing suitability, adequacy, and effectiveness. This review can be conducted more often if management deems necessary. These reviews evaluate the need for changes to the AQMS, including the Quality Policy and Quality Objectives. These Reviews are documented on Form # LC-5.6.1-001

and records of the reviews are maintained in accordance with the requirements in SOP 4.2.4.

Review Input

The input to Management Reviews shall include information on:

Status of actions (open/closed) from previous meeting(s), ageing profile of open actions, e.g. 3 months, 6 months, 12 months, greater than 1 year

Changes arising from monitoring internal/external issues that are relevant to the QMS (see 4.1)

Identification and evaluation of changes to internal/external requirements, e.g. policies, processes, procedures, methods, instructions, contracts, regulation, legislation, that impact the QMS

QMS performance and effectiveness including:

Customer satisfaction and feedback from other interested parties, e.g. report cards, indicators, ratings, complaints,

Compliments, media reports

Achievement of quality objectives (see 6.2), including status of planned versus actual achievement

Organization and external provider process performance and product/service conformity (see 4.4, 8.4 and 8.6), e.g. flight decks, dashboards, scorecards, performance indicators, performance trends, right first time, on time delivery, escapes to the customer, complaint profile, returns/rejections

Nonconformity and corrective action (see 10.2) e.g. Pareto of nonconformity by type, process, area, root cause etc., read across to other parts of the organization or to external parties, update of risks (see 6.1 and 8.1.1), status of corrective action implementation

Audit results (see 9.2), e.g. achievement of the audit program(s), areas of good practice, nonconformity profile (number, type, process, area, significance), status of corrective action, audit close out, external audit findings

Adequacy of internal resources and external providers (see 7.1) including people (number, roles, competency etc.), infrastructure (buildings, equipment, systems, transport etc.), working environment (physical and human factors, monitoring and measuring equipment (availability, fit for purpose, maintained)

Effectiveness of actions taken to address risks and opportunities (see 6.1), e.g. risk profile, risk register(s), status of open/closed actions, ageing profile of open actions, evaluation of effectiveness (enhance desirable effects, prevent, reduce undesired effects, demonstrated improvement)

h. Identification of opportunities for improvement, corrective action, good practice, best practice, innovation, lessons

5.6.3 Review Output

The outputs from the Management Reviews include any decisions, and actions related to:

a. Improvement of the effectiveness of the AQMS and its processes

b. Improvement of product related to customer requirements

c. Resources needed

d. Risks Identified

6.0 RESOURCE MANAGEMENT

6.1 Provisions of Resources: Top Management determines and provides the resources necessary to:

a. Effectively implement and maintain the AQMS and continually improve its effectiveness.

b. Enhance customer satisfaction by meeting all customer requirements.

6.2 Human Resources, reference SOP 6.2

6.2.1 General: All personnel performing work that can affect conformity to product requirements directly or indirectly are competent on the basis of appropriate education, training, skills, and experience in accordance with the associated requirements defined in this, Quality Manual and applicable procedures. Personnel employed prior to 04/15/2013 have met and demonstrated the competency requirements necessary for initial employee qualifications.

Note: Conformity to product requirements can be affected directly or indirectly by personnel performing any task within the AQMS.

6.2.2 Competence, Training and Awareness: Legacy:

a. Determines the necessary competence for personnel performing work that affects product quality.

b. Where applicable, provide Provides training or take other actions to achieve the necessary competence.

a. Evaluates the effectiveness of the actions taken.

d. Ensures that personnel are aware of the relevance and importance of their activities and how they contribute to the achievement of quality objectives.

e. Maintains appropriate records of education, training, skills, and experience.

6.3 Infrastructure: Legacy determines, provides and maintains the infrastructure(s) necessary to achieve conformity to product requirements; infrastructure includes, as appropriate a. Buildings, workspace, and any associated utilities.

b. Process equipment (both hardware & software).

c. Supporting services (such as transportation, communication or information systems).

6.4 Work Environment: Legacy determines and manages the work environment needed to achieve conformity to product requirements.

Note: Factors that may affect the conformity of the product include humidity, lighting, cleanliness and protection from electrostatic discharge, etc.

7.0 PRODUCT REALIZATION

7.1 Planning Of Product Realization

Legacy plans and develops the processes needed for product realization. Planning of product realization is consistent with the requirements of the other processes of the quality management system. Product realization at Legacy is defined as purchasing electronic components & hardware, warehousing it, and then creating and delivering a Customer Order which meets the customer's requirements.

Product realization is a planned process at Legacy. Evidence of this planning are the procedures, records, and measurements currently in place. Product realization records are maintained in the Pentagon 2000 system and kept on file via the shared drive on the server. When further planning is needed, the Compliance Manager will set a policy which regulates product realization. All new policies will be reviewed with Departmental managers prior to permanent implementation.
Department managers will plan for product realization within the scope of their position.

In planning product realization, we determine the following, as

appropriate: a. Quality Objectives and requirements for the

product.

b. The need to establish processes and documents, and to provide resources specific to the product.

c. Required verification, validation, monitoring, measurement, inspection and test activities specific to the product and the criteria for product acceptance.

d. Records needed to provide evidence that the realization processes and resulting product meet requirements.

e. Configuration management appropriate to the product.

The output of our planning is suitable for the organization’s method of operations.

Note: A document specifying the processes of the AQMS (including the product realization processes) and the resources to be applied to a specific product, project or contract can be referred to as a quality plan.

7.1.1 Configuration Management:

Legacy has established, implemented, and maintains a configuration management process, (See SOP 7.2), that includes, as appropriate to the product a. Configuration management planning.

b. Configuration identification.

c. Change control.

d. Configuration status accounting.

e. Configuration audit.

7.1.2 Control of Work Transfers: Legacy has established, implemented and maintains a process to plan and control the temporary or permanent transfer of work (e.g., from one organization facility to another, from the organization to a supplier, from one supplier to another supplier) and to verify the conformity of the work to requirements.

7.2 Customer-Related Processes

7.2.1 Determination of Requirements Related to the Product: Legacy determines:

a. That requirements specified by the customer are met, which may include requirements for delivery and post-delivery.

b. That the requirements not stated by the customer but may be necessary for specified or intended use, where known.

c. Statutory and regulatory requirements that are related to the product.

d. Any additional requirements that are determined by Legacy Components.

Note: Post-delivery activities include, for example, actions under warranty provisions, contractual obligations such as maintenance services, and supplementary services such as recycling or final disposal.

7.2.2 Review of Requirements Related to the Product: Legacy conducts reviews all requirements related to the product. These reviews are conducted prior to final commitment to provide a product to the customer (e.g., submission of tenders, acceptance of contracts or orders, acceptance of changes to contracts or orders) and shall ensure, reference SOP 7.2: a. All product requirements are clearly defined.

b. The contract and/or product requirements differing from previous discussions are resolved.

c. Legacy has the capability to meet all of the defined requirements.

d. Risks (e.g., new technology, short delivery time scale) have been identified.

Records of the results of the review and actions arising from the review shall be maintained (see 4.2.4).

Where the customer provides no documented statement of requirement, the customer requirements shall be confirmed by the organization before acceptance.

Where product requirements are changed, the organization shall ensure that relevant documents are amended and that relevant personnel are made aware of the changed requirements.

Note: In some situations, such as internet sales, a formal review is impractical for each order. Instead the review can cover relevant product information such as catalogues or advertising material.

7.2.3 Customer Communication: Legacy has defined a process that ensures they have determined and implemented a plan which assures effective communication between the customer and Legacy in relation to: a. Product information.

b. Enquiries, contracts or order handling, including amendments.

c. Customer feedback, including customer complaints.

7.3 Design and Development

Design and development that is not applicable to the organization. Legacy's justification is that it does not "manufacture, design, or create any processes."

7.4 Purchasing

7.4.1 Purchasing Process: Legacy has established procedures that define how purchased product shall conform to specified purchase order requirements, reference SOP 7.4. The type and extent of control applied to the supplier and purchased product is dependent upon the product processed and/or manufactured and the product realization impact.

Legacy is responsible for the conformity of all products purchased from suppliers, including product from sources defined by the customer. Legacy evaluates and selects our supplier(s) based upon their ability to supply the product in accordance with our requirements. The basis for supplier selections, evaluation, and re-evaluation shall be established; and records of all results and/or actions are maintained, reference SOP 4.2.4., LC WI-P1 Vendor Approval.

Grandfather of all active vendors; as of 04/15/2013 all active vendors are considered approved as of this date and do not require approval by one of this listed criteria in SOP 7.4. After 01/31/2013 vendors are approved per one of the listed criteria. Suppliers falling into the Grandfather criteria still have to be re-evaluated per the SOP & LC WI-P1.

Note: One factor that can be used during supplier selection and evaluation is supplier quality data from objective and reliable external sources, as evaluated by the organization (e.g., information from accredited quality management system or process certification bodies, organization approvals from government authorities). Use of such data would be only one component of an organization's supplier control process and the organization remains responsible for verifying that purchased product meets specified purchase requirements.

Legacy shall:

a. Maintain a register of its suppliers that includes approval status (e.g., approved, conditional, disapproved) and the scope of the approval (e.g., product type, process family).

b. Periodically review supplier performance; the results of these reviews shall be used as a basis for establishing the level of controls to be implemented.

c. Define the necessary actions to take when dealing with suppliers that do not meet requirements.

d. Ensure where required that both the organization and all suppliers use customer approved special process sources.

e. Define the process, responsibilities and authority for the approval status decision, changes of the approval status and conditions for a controlled use of suppliers depending on the supplier's approval status.

f. Determine and manage the risk when selecting and using suppliers.

g. Implement controls to prevent the purchase of counterfeit and suspected unapproved parts.

7.4.2 Purchasing Information: Legacy mandates that all purchasing information shall describe the product purchased including where appropriate:

a. Requirements for approval of product, procedures, processes and equipment.

b. Requirements for qualification of personnel.

c. Quality management system requirements.

d. The identification and revision status of specifications, drawings, process requirements, inspection/verification instructions and other relevant technical data.

e. Requirements for design, test, inspection, verification, use of statistical techniques for product acceptance and related instructions for acceptance by the organization.

f. Requirements regarding the need for the supplier to:

- Notify the organization of nonconforming product
- Obtain organization approval for nonconforming product disposition

- Notify the organization of changes in product and/or process definition, changes of suppliers, change of manufacturing facility location and, where required, obtain organization approval
- Flow down to the supply chain the applicable requirements including customer requirements

g. Records retention requirements.

h. Right of access Legacy, their customer, and regulatory authorities to all facilities involved in the order and to all applicable records.

i. Requirements for a certificate of conformity, test reports, and/or airworthiness certificate.

Legacy ensures the adequacy of specified purchase requirements prior to their communication to the supplier.

7.4.3 Verification of Purchased Product: Legacy has established and implemented the Inspection process that ensures purchased product meets specified purchase requirements.

Note 1: Customer verification activities performed at any level of the supply chain should not be used by the organization or the supplier as evidence of effective control of quality and does not absolve the organization of its responsibility to provide acceptable product and comply with all requirements.

Note 2: Verification activities may include:

- Obtaining objective evidence of the quality of the product from suppliers and verifying the authenticity of the accompanying documentation (e.g., certificate of conformity from the manufacturer, airworthiness certificate, test reports, statistical records, and process control).

- Review of the required documentation. Inspection of products upon receipt.

Where the organization or its customer intends to perform verification at the suppliers' premises, the organization shall state the intended verification arrangements and method of product release in the purchasing information.

7.5 Production and Service Production

7.5.1 Control of Production and Service Provision: Legacy plans, carries out production and service provision under controlled conditions. Controlled conditions shall consider, as applicable

a. Availability of information that describes the characteristics of the product.

Note: This information can include drawings, parts lists, materials and process specifications.

b. Availability of work instructions, as necessary.

Note: Work instructions can include process flow charts, production documents (e.g., travelers, routers, work orders, process cards) and inspection documents.

c. Use of suitable equipment.

Note: Suitable equipment can include product specific tools (e.g., jigs, fixtures, molds) and software programs.

d. Availability and use of monitoring and measurement.

e. Implementation of monitoring and measurement.

f. Implementation of release, delivery and post-delivery activities.

g. Accountability for all product (e.g., parts quantities, split orders, nonconforming product).

h. Evidence that all operations have been completed as planned, or as otherwise documented and authorized.

i. Provision for the preventive, detection and removal of foreign objects.

j. Monitoring and control of utilities and supplies (e.g., water, compressed air, electricity, chemical products) to the extent they affect conformity to product requirements.

k. Criteria for workmanship, specified in the clearest practical way (e.g., written standards, representative samples, illustrations).

7.5.1.1 Control of Equipment, Tools, and Software Programs

Clause 7.5.1.1 as not applicable to Legacy because no (customer or vendor) equipment, tools, and/or software programs is ever used or housed.

7.5.1.4 Post-Delivery Support:

Legacy's post-delivery activities take into account:

a. Statutory and regulatory requirements are adhered to as applicable.
b. Undesired consequences – Legacy does not design anything, therefore this does not apply.

c. The nature, use, and intended lifetime of its products and services is considered.

d. Customer requirements e.g. contractual arrangements, installation, commissioning, handover, training, customer support

e. Customer feedback e.g. survey results, compliments, complaints, lessons learned, voice of the customer, satisfaction indicators/ratings, returns/rejections, warranty claims

Product/customer support is considered in the following examples:

- Queries e.g. points of contact, help line, call centers, frequently asked questions (FAQs)

- Training e.g. provision (classroom, e-learning), manuals, exhibits, webinars

- Warranties e.g. contractual obligations, service level agreements

- Maintenance e.g. manuals, training, service intervals, resources, spare parts provision, repair schemes, service bulletins

- Replacement parts e.g. attrition rates, service history, predicted usage, illustrated parts catalogues, line side stock

When problems are detected after delivery, Legacy will take appropriate action including investigating and reporting (see Clause 8.3 d and e), Control of Nonconformity Product process and Clause 8.5.2, Corrective Action process.

7.5.3 Identification and Traceability: Where appropriate, Legacy identifies the product by suitable means throughout product realization.

Legacy maintains the identification of the configuration of the product in order to identify any differences between the actual configuration and the agreed configuration.

Legacy identifies the product status with respect to monitoring and measurement requirements.

When acceptance authority media are used (e.g., stamps, electronic signatures, passwords), Legacy establishes and documents controls for the media.

Where traceability is a requirement, control and record the unique identification of the product is maintained, reference SOP 4.2.4.

Legacy maintains product identification and traceability by suitable means (e.g., labels, bar codes) from receipt; during splitting, storage, packaging, and preservation operations; and until delivery (including subcontracted handling or packing operations).

Note: Traceability requirements can include:

- Identification to be maintained throughout the product life.
- The ability to trace products manufactured from the same batch of raw material or from the same manufacturing batch, to the destination (e.g., delivery, scrap).
- For an assembly, the ability to trace its components to the assembly and then to the next higher assembly, and
- The identification of condition (e.g., new, repaired, altered or rebuilt) product in inventory.

Note: In some industry sectors, configuration management is a means by, which identification and traceability are maintained (reference 7.1.1).

7.5.4 Customer Property: Legacy exercises care with customer property while it is under our control or being used by us. We ensure it is properly identified, verified, protected and safeguarded when provided by the customer for use or incorporation into the product. If customer property is lost, damaged, or otherwise found to be unsuitable for use, we will notify the customer in writing via email by the next business day.

7.5.5 Preservation of Product: Legacy ensures that they preserve the conformity of all products during their internal processing and including delivery to intended destination. This preservation includes the identification, handling, packaging, storage and protection. It also applies to constituent parts of a product.

Preservation of product includes, where applicable in accordance with product specifications and/or applicable regulations, provisions for: a. Cleaning.

b. Prevention, detection and removal of foreign objects.

c. Special handling for sensitive products.

d. Marking and labeling including safety warnings.

e. Shelf life control and stock rotation.

f. Special handling for hazardous materials.

Serviceable parts are physically segregated from unserviceable parts.

7.6 Control of Monitoring and Measuring Equipment

Legacy determines the monitoring and measurement to be undertaken and the monitoring and measuring equipment needed to provide evidence of conformity of product to determined requirements.

Legacy maintains a register of our monitoring and measuring equipment and define the process employed for their calibration/verification including details of equipment type, unique identification, location, frequency of checks, check method and acceptance criteria.

Legacy establishes processes to ensure that monitoring and measurement can be carried out in a manner that is consistent with the monitoring and measurement requirements.

Legacy ensures that environmental conditions are suitable for the calibrations, inspections, measurements and tests being carried out. Where necessary to ensure valid results, measuring equipment shall:

a. Be calibrated at specific intervals, or prior to use, against measurement standards traceable to the National International Standards Testing laboratories (NIST). When no such standards exist, the basis used for calibration or verification shall be recorded.

b. Be adjusted or re-adjusted as necessary.

e. Be properly identified so that the calibration status can be easily verified.

d. Be safeguarded from adjustments that may invalidate the measurement result.

e. Be protected from damage and deterioration during handling, maintenance and storage.

f. Be recalled to a defined method when requiring calibration.

When measuring or monitoring equipment is found to be out of calibration, Legacy re-assess previous measurement results to assess whether or not processed product is non-conforming to customer requirements. Then appropriate action is taken on the equipment and affected product. Records of the results of calibration and verification are maintained, reference SOP 4.2.4.

When used in the monitoring and measurement of specific requirements, the ability of computer software used to perform inspection and or measurements shall be verified to conform. This is performed as necessary prior to any measuring or monitoring of processes.

8.0 MEASUREMENT, ANALYSIS AND IMPROVEMENT

8.1 General: Legacy plans and implements the monitoring, measurement, analysis and improvement processes necessary,

a. To demonstrate conformity of the product.

b. To ensure the AQMS conformance.

c. To continually improve the effectiveness of the quality management system.

This shall include determining the applicable methods, including statistical techniques, and the extent of their use.

8.2 Monitoring And Measurement

8.2.1 Customer Satisfaction: Legacy obtains customer feedback during sales visits to customer's facilities, visits by the customers, and information received verbally by phone. This feedback is documented on Customer Feedback Log Form # FRM-7.2.3-001 in-order to gather data that will enable them to determine the customer's perception of whether or not we have met the requirements. Methods and Records of this information/data collection is being documented and maintained.

Information to be monitored and used for the evaluation of customer satisfaction includes, but is not limited to, product conformity, on-time delivery performance, customer complaints and corrective action requests. Legacy develops and implements plans for customer satisfaction improvement that address deficiencies identified by these evaluations, and assess the effectiveness of the results.

8.2.2 Internal Audit: Legacy conducts internal audits at planned intervals to determine whether the AQMS:

a. Conforms to the requirements set in this Quality Manual and is also in accordance with applicable ISO 9001:2015 and AS9120:2016 requirements.

b. Is effectively implemented and maintained.

Legacy has defined an audit plan that takes into consideration the areas and processes importance in the product realization phase; as well the audit criteria, scope, frequency and methods that are used. Selection of the auditors and the audits to be performed will ensure impartiality for all audits. Auditors will not audit their own areas or work. This plan, responsibilities, and requirements for conducting the audits, as well reporting of results, are defined in procedure SOP 8.2. All detected non-conformances will be forwarded to the responsible department management and actions to eliminate the nonconformities shall be performed immediately, reference SOP 8.5.

Internal audits shall also meet contract and/or regulatory requirements.

8.2.3 Monitoring and Measurement of Processes: Legacy determines suitable methods to monitor, and where applicable measure AQMS processes. These methods shall demonstrate the capability of the processes to achieve the planned results, and when the planned results are not achieved correction and corrective action shall be taken, as appropriate to ensure conformity of the product.

In the event of process nonconformity, Legacy:

a. Takes appropriate action to correct the nonconforming process.

b. Evaluates whether the process nonconformity has resulted in product nonconformity.

c. Determines if the process nonconformity is limited to a specific case or whether It could have affected other processes or products.

d. Identifies and control the nonconforming product in accordance with SOP 8.3.

8.2.4 Monitoring and Measurement of Product: Legacy Components shall ensure that product characteristics are measured, monitored and controlled to ensure that customer requirements are met and are carried out at appropriate stages of the product realization process in accordance with planned arrangements (reference section 7.1). Evidence of conformity with the acceptance criteria shall be maintained. a. Criteria for acceptance and/or rejection.

b. Where in the sequence measurement and testing operations are to be performed.

c. Required records of the measurement results (at a minimum, indication of acceptance or rejection).

d. Any specific measurement instruments required and any specific instructions associated with their use.

When Legacy uses sampling inspection as a means of product acceptance, the plan shall be justified on the basis of recognized statistical principles and appropriate for use (i.e., matching the sampling plan to the criticality of the product and to the process capability).

Where required to demonstrate product qualification, Legacy ensures that records provide evidence that the product meets the defined requirements.

The release of product and delivery of service to the customer shall not proceed until the planned arrangements (reference section 7.1) have been satisfactorily complete, unless otherwise approved by a relevant authority and, where applicable, by the customer.

Legacy ensures that all documents required to accompany the product are present at delivery.

8.2.5 Evidence of Conformance – Certificate of Conformity: When required, Legacy provides the customer with evidence of the product's conformity to its technical specifications.

When splitting product, copies of original documents shall be annotated with the following information; amount delivered relative to amount received, purchase order number, customer's name, and supplier's name.

Where there is a formal agreement with the customer, Legacy may deliver a certifying statement created by the organization that references the original manufacturer's certificate of conformity and documents that are retained and traceable by the organization; and, if applicable, that defined requirements have been met throughout the organization's processes.

8.3 Control of Nonconforming Product

Legacy follows the procedure for processing nonconforming product. This is done to ensure that all products that do not conform to product requirements is properly identified and controlled to prevent its unintended use or delivery. The controls and related responsibilities and authorities for dealing with nonconforming product are defined in procedure SOP 8.3.

Note: The term 'nonconforming product" includes nonconforming product returned from a customer.

The organization's documented procedure defines the responsibility for review and authority for the disposition of nonconforming product and the process for approving personnel making these decisions.

Legacy shall process nonconforming product according to the

following steps: a.Taking the action to eliminate detected

nonconformity.

b. Authorizing its use, release or acceptance under the concession by the proper authority and, where applicable, by the customer.

c. By ensuring the correct action is taken to preclude its original intended use or application.

d. Taking action appropriate to the effects, or potential effects, of the nonconformity when nonconforming product is detected after delivery or use has started.

- Legacy notifies the customer within the next business day of delivered nonconforming product unless it is related to safety or an airworthiness issue, then the customer is immediately notified.

Note: Parties requiring notification of nonconforming product can include suppliers, internal organizations, customers, distributors and regulatory authorities.

e. Taking actions necessary to contain the effect of the nonconformity on other processes or products.

Note 1: Legacy has no authority to rework or repair product.

Note 2: Dispositions shall be limited to:

- Scrap
- Rejection for return to the supplier
- Rejection for revalidation by the manufacturer;
- Submittal to customer and/or design authority and customer for “USE AS IS” disposition

Product disposition for scrap shall be conspicuously and permanently marked, or positively controlled, until physically rendered unusable.

When non-conforming product is corrected it will be re-verified to demonstrate its conformance to all the customer requirements. When non-conforming product is detected after delivery or use has begun Legacy Components shall take the appropriate action to the effects, or potential effects, of the nonconformity.

Records of the non-conformities and any subsequent actions are taken, including concessions obtained, shall be maintained, reference SOP 4.2.4.

8.3.1

8.4 Analysis of Data

8.4.1 Legacy determines, collects and analyzes appropriate data to demonstrate the suitability and effectiveness of the AQMS so that thorough evaluation of the Management System can be performed providing data to ensure continual improvement of the effectiveness of the AQMS. This shall include data generated as a result of monitoring and measurement from other relevant sources.

The analysis of data shall provide Senior Management with relevant information relating to:

a. Customer satisfaction and/or dissatisfaction, (reference section 8.2.1).

b. Conformity to product requirements, reference section 7.2.1.

c. Characteristics and trends of processes and products including opportunities for preventive action, reference sections 8.2.3 and 8.2.4.

d. Suppliers (see 7.4).

8.5 Improvement:

8.5.1 Legacy continually improves the effectiveness of the AQMS through the use of the quality policy, quality objectives, audit results, analysis of data corrective and preventive actions and management review.

We monitor the implementation of improvement activities and evaluate the effectiveness of the results.

8.5.2 Corrective Action: Legacy takes the necessary actions to eliminate the cause of nonconformities and to prevent recurrence. Corrective Actions shall be appropriate to the level of the effects of the non-conformance.

Legacy procedure SOP 8.5 has established definite

requirements for: a. Reviewing non-conformities (including

customer requirements).

b. Determining the causes of non-conformances.

c. Evaluating the actions necessary to ensure that non-conformances do not re-occur.

d. Determining and then implementing actions necessary.

e. Records of the results of action taken, reference SOP 4.2.4.

f. Reviewing the effectiveness of the corrective actions administered.

g. Flow down of the corrective action requirement to a supplier, when it is determined that the supplier is responsible for the root cause.

h. Specific actions where timely and/or effective corrective action are not achieved.

i. Determining if additional nonconforming product exists based on the causes of the nonconformities and taking further action when required.

8.5.3 Preventive Action: Legacy determines actions necessary to eliminate the causes of potential non-conformities, in order to prevent their occurrence. These actions shall be equivalent to the effects of the potential problem. Legacy procedure SOP 8.5 establishes requirements for:

a. Determining potential nonconformities and their cause(s).

b. Evaluating the need for action to prevent occurrence of nonconformities.

c. Determining and implementing actions as needed.

d. Recording the results of the action(s) taken (see 4.2.4).

e. Reviewing the effectiveness of the preventive action taken.

Note: Examples of preventive action opportunities include risk management, error proofing, failure mode and effect analysis (FMEA), and information on product problems reported by external sources.

Appendix A

Procedure Number	Procedure Title	Department/ Owner	Clause Number
QM-001	Quality Manual	President	All
SOP 4.2.3	Control of Documents	Management Representative	4.2.3
SOP 4.2.4	Control of Records	Management Representative	4.2.4
SOP 6.2	Human Resources	Management Representative	6.1, 6.2
SOP 7.2	Customer Related Processes	Management Representative	7.2, 7.1, 7.5
SOP 7.4	Purchasing	Management Representative	7.4, 7.5, 8.2.4, 8.3, 8.5.2
SOP 7.6	Control of Monitoring and Measurement Equipment	Management Representative	7.6, 8.3, 4.2.3, 4.2.4
SOP 8.2	Monitoring and Measurement of Processes and Product	Management Representative	8.2.1, 8.2.2, 8.2.3, 8.2.4, 8.2.5, 8.4, 8.5.2, 4.2.3, 4.2.4
SOP 8.3	Control of Nonconforming Product	Management Representative	8.3. 4.2.3. 4.2.4
SOP 8.5	Improvement-Corrective/Preventive Action	Management Representative	8.5.2, 8.5.3, 4.2.3, 4.2.4

Appendix B

REVISION: M

LEGACY COMPONENTS, LLC
QUALITY MANUAL

Appendix B