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**Supplier Quality Requirements**

# Creation Technologies

## Supplier Quality Requirements

Valued suppliers:

The purpose of this document is to define the quality management system requirements for suppliers and supplying organizations who manufacture and/or supply parts/materials or services to Creation Technologies or Creation's customers.

Creation flows down requirements to suppliers via the Purchase Order and other procurement documentation, such as to C-0002987 – Creation Terms and Conditions and C-0002890 – Supplier Quality Requirements (this document). Seller's acceptance of the PO constitutes agreement to the flow down requirements.

Questions or concerns can be directed to your Creation Supply Chain Representative.

Please contact Creation to report and discuss exception to this document.

We look forward to working with you!





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## Supplier Quality Requirements

### 1.0 PURPOSE

This document defines the Supplier Quality Requirements for Creation's global supply base.

### 2.0 SCOPE

This document applies to suppliers providing product, materials, or services related to production for Creation Technologies.

### 3.0 DEFINITIONS

**END OF LIFE** - When a product enters the final stages it's lifecycle or existence.

**FIRST ARTICLE INSPECTION (FAI)** - A complete, in-depth inspection performed on one (or more) of the first part(s)/assemblies manufactured/purchased according to Creation's customer procurement specification; as a minimum, critical parameters are measured or tested. AS9102 is a type of FAI report

**INCOMING LOT ACCEPTANCE RATE (ILAR)** - This is a measure of the supplier part quality and is the number of lots accepted in a given period divided by the number of lots received in a given period x100.

**LAST TIME BUY (LTB)** - Product identified as End-Of-Life may be available for a purchase prior to being made obsolete.

**ON-TIME DELIVERY (OTD)** - Receipt of a PO line item by Creation within a specified window to the commit date.

**PRODUCTION PART APPROVAL PROCESS (PPAP)** - A standardized form of documentation used primarily in manufacturing supply chains to establish confidence in suppliers and their production processes. Actual measurements are taken from the parts produced and are used to complete the various test sheets of PPAP.

**PURCHASE ORDER (PO)** - A written or electronic order (including attachments) containing the applicable terms and specifications for a particular part, material, or service.

**SUPPLIER** - An organization that provides parts, materials, assemblies, systems, or services purchased by Creation. This includes sub-contractors, distributors, brokers, original equipment manufacturers, etc.

**SUPPLIER BUSINESS REVIEW (SBR)** - Periodic review with supplier to review performance, service, updates, quoting, financial etc.

**SUPPLIER CORRECTIVE ACTION REQUEST (SCAR)** - Formal request for corrective action for a specific non-conformance with supplier provided product, material, or service. The 8D methodology is preferred for SCAR response to Creation.

**COUNTERFEIT MATERIAL** – Counterfeit material means material that is or contains items misrepresented as having been designed and/or produced under an approved system, or specific brand or other acceptable method and includes Counterfeit Work. Counterfeit material poses a significant risk to the supply chain, potentially resulting in loss of material, mission, or life. “Counterfeit Work” means items, consisting of Electronic Parts delivered under an Order that are in the lowest level of separately identifiable items (e.g., articles, components, goods, and assemblies) that are or contain Counterfeit Electronic Parts or suspect Counterfeit Electronic Parts. “Counterfeit Electronic Part” means an unlawful or unauthorized reproduction, substitution, or alteration that has been knowingly mislabeled, misidentified, or otherwise misrepresented to be an authentic, unmodified electronic part from the original manufacturer, or a source with the express written authority of the original manufacturer or current design activity, including an authorized aftermarket manufacturer. Unlawful or unauthorized substitution includes used Electronic Parts represented as new, or the false identification of grade, serial number, lot number, date code, or performance characteristics.

**VOE** - Verification of Effectiveness



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### 4.0 FUNCTIONS RESPONSIBLE FOR THIS PROCEDURE/ROLES

The functions listed below have responsibilities detailed in this procedure:

- **Process Owner:** Sr. Global Quality Director
- **Procedure User:**
  - Supplier Quality, Quality Leader, Supply Chain Leader, Buyer
- **Contributors:**
  - Commodity Management, Supply Chain, Quality, Global Quality Shared Services

### 5.0 TRAINING

**Course Code:** COM\_SC\_SOP\_00033

The process owner and document author are considered trained by default because of their contribution in writing and reviewing/approving the document.

Procedure users must be trained on the major revisions of this procedure before executing their task.

Contributors do not require formal training, but the procedure users are responsible for informing the contributor of their requirement when they are engaged in their contribution.

### 6.0 EQUIPMENT / MATERIALS / SUPPLIES

Access to Creation's Supplier Website, email, specifications, and certifications.

### 7.0 CREATION REQUIREMENTS AND OBJECTIVES

Creation requires that materials and services used to manufacture products for our global customer base be of high-quality, procured in an ethical and professional manner, and delivered on time at competitive cost. See our Supplier Expectations and Code of Conduct at <https://www.creationtech.com/suppliers/>

Parts, material, and services are in compliance with the applicable procurement, regulatory, environmental, health & safety, as well as customer requirements. See Environmental Policy RoHS REACH TSCA at <https://www.creationtech.com/suppliers/>

The supplier is responsible to ensure that their organization is aware of the following:

1. Their contributions to product or service conformity
2. Their contribution to product compliance
3. Their contribution to the achievement of the quality objectives
4. The importance of ethical behavior

### 8.0 QUALITY MANAGEMENT SYSTEM REQUIREMENTS

Suppliers are required to have an established and effective quality management system (QMS) in place. A third-party accreditation such as ISO 9001, AS9100, ISO 13485, FDA 21 CFR Part 820, ISO 14001, etc., may be required depending on product market segment and customer requirements.

Supplier organizations will ensure personnel working within manufacturing, testing, or inspection are competent, qualified, and trained; and are aware of their contribution to product conformity and the impact to the product if defects are produced.



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### 9.0 EVIDENCE OF COMPLIANCE

It is the supplier's responsibility to be prepared to substantiate compliance and / or authenticity by providing copies of C of C, Certifications, Regulatory documentation, test reports, etc. as applicable by making records available to Creation or its customers upon request. It is the supplier's responsibility to ensure quality certifications are valid while manufacturing and shipping product to Creation. Creation reserves the right to request certification copies when required with a 24-hour target response time.

Certificates of conformance (CofC) or analysis (CofA), will be provided as Creation requires. Certificates of Conformance will be in accordance with C-0003247 - Creation Suppliers Certificate of Conformance Requirements at <https://www.creationtech.com/suppliers/>

If approved by Creation, a blanket Certificate of Conformance (CofC) may be provided.

### 10.0 INFORMATION FOR EXTERNAL PROVIDERS - CONFORMANCE TO REQUIREMENTS

Supplier will ensure the conformance of parts and material delivered to Creation comply with requirements specified in prints, drawings, part specifications referenced on the Purchase Order, acceptability criteria, appearance standard / golden sample, or other requirements where applicable. In the event a waiver or deviation is needed, contact your Creation Supply Chain Representative.

Requirements are flowed down and communicated through the purchase order and procurement documentation. By accepting Creation's purchase order, the supplier agrees to comply with the Creation Terms and Conditions and the requirements outlined in this document and at <https://www.creationtech.com/suppliers/>. The supplier is responsible to flow down requirements to sub-tier suppliers.

If sampling plans are used to determine product acceptance, including replacement or reworked product, it is based on an applicable industry standard. The supplier will ensure that valid statistical techniques are used and samples are selected in a random manner that represent the batch population. Use of sampling plans does not relieve the supplier of the responsibility to ship 100% conforming material.

Creation interfaces with the direct supplier as documented on the PO. The supplier is responsible to coordinate resolution and correction with sub-tier suppliers when needed.

The supplier is responsible to maintain capable processes, effective equipment and process controls with robust verification or validation methods, as well as, sub-tier supply chain management. The supplier will maintain a system of material identification and segregation to ensure that non-conforming material is not intermingled with accepted material.

The supplier may be required to provide test specimens for design approval, inspection/verification, investigation, or auditing.

When Creation requests a Return Material Authorization (RMA) for defective parts, the target to provide the RMA # is within 3 business days and disposition concluded within 30 business days. The supplier will ensure replacement product is expedited, if needed, to reduce risk of downtime.

Creation or designee may, at its discretion, deploy personnel to perform inspection or testing at the supplier's facilities. Source Inspection does not guarantee acceptance.

If the supplier is in communication with the end customer, include Creation in the communication.

In the event that requirements are not clear, reach out to your Creation contact for assistance.

As applicable reference, C-0002134 – Global Printed Circuit Board Procurement Specification at <https://www.creationtech.com/suppliers/>



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### **11.0 PRODUCTION PART APPROVAL PROCESS PPAP / FAI**

Where required, Creation may request the following documentation associated with PPAP or FAI:

- Material analysis and validation reports
- PPAP or AS9102 or First Article report with verification of measurement and inspection
- Test and inspection reports
- Other validation documentation as needed.

Reference C-0003027 – Global Supplier PPAP Forms and C-0003090 – Supplier PPAP Procedure at <https://www.creationtech.com/suppliers/>

A new FAI/PPAP may be required when there is a qualifying change. (i.e., new revision, lapse of orders, change of manufacturing location, etc.)

### **12.0 COUNTERFEIT PREVENTION**

Suppliers, including Sub-tier suppliers as applicable, are responsible to perform control and verification activities to prevent the use and introduction of counterfeit product, electronic or otherwise, in methods that align with standard industry guidelines.

Supplier will immediately notify Creation of issues related to counterfeit materials.

In the event that material delivered constitutes or includes counterfeit material, the supplier will, at their expense, promptly replace, remove, support field recall efforts, evaluate such material, or other action required to address and resolve the discrepancy and provide genuine conforming material to Creation. The measures contained in this paragraph are in addition to actions Creation may impose under the provisions of this document or the Terms and Conditions.

Parts provided by an independent distributor must be new, in original manufacturer's packaging, and have been stored according to manufacturer's recommendation(s).

### **13.0 FOREIGN OBJECT DEBRIS (FOD)**

Supplier will implement and maintain part cleanliness and handling practices to prevent the introduction of debris and contaminants. Tooling, test and handling equipment, fixtures, and jigs are maintained in a state of cleanliness sufficient to prevent FOD.

### **14.0 DFARS – SPECIALTY METALS**

Components for defense industry defined with quality type AS9100 on the purchase order are required to comply with DFARS 252.225-7014, preference for domestic specialty metals, Alt I. Specialty metals is defined as including Titanium or Stainless Steel. Raw material is melted in the United States (U.S.) or a Qualifying Country. Procuring raw material from a mill in the U.S. or Qualifying Country, does not guarantee its conformance to DFARS 252.225-7014. Supplier is to verify the sub-tier supplier's conformance via their Raw Material C of C and/or C of A.

### **15.0 RIGHT TO ACCESS**

The supplier will, with prior notice, grant Creation access to supplier facilities, documents, records, etc., including sub-tier facilities; for Creation, it's customers or applicable regulatory authorities. The supplier will notify Creation of safety, documentation, or other requirements prior to arriving onsite.





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### 16.0 TRACEABILITY AND IDENTIFICATION

The supplier will establish and maintain a system that provides traceability of raw materials, assembly components, and processes throughout product realization that can identify:

- raw material(s) composition or sourcing
- the material lot(s) used in the production or assembly of product.
- acceptance records of the production material
- Product manufactured from a given lot of material.
- Country/Countries of Origin

When required, traceability will maintain current revision, specification, and quality requirements from raw material through finalized product for materials, components and processes used by Creation, our customers, and its suppliers. Serialized parts / assemblies and detail parts used in assemblies will be traceable to the manufacturing lot(s) in which they were produced, as well as the material(s) used to produce them. Duplication of serial numbers for the same product supplied to Creation is prohibited.

### 17.0 RECORD RETENTION & DISPOSITION

The supplier will ensure records, including applicable sub-tier records, related to the design & procurement, manufacturing, services, and delivery of material to Creation are retained according to the defined requirements below and dispositioned accordingly.

Record Retention Table

Type/Industry	Retention Period
Aerospace (AS/IA 9100)	7 years unless otherwise required by Customer <i>(The organization shall communicate to external providers... the need to... retain documented information, including retention periods and disposition requirements)</i>
Finished Medical Device (FDA 21CFR Part 820.180 b)	Period of time equivalent to the design and expected life of the device, but in no case less than 2 years from the date of release for commercial distribution by the manufacturer.
Other Medical (ISO 13485)	3 years unless otherwise required by Customer <i>(Define the controls needed for the identification, storage, security and integrity, retrieval, retention time and disposition of records)</i>
All Others	3 years unless otherwise required by Customer

- Supplier is responsible to disposition and dispose of obsolete or expired records in accordance with customer, regulatory compliance, or certifying body requirements.

Note: Unless otherwise specified in customer, regulatory, or other certifying body requirements, Creation Technologies can provide direction upon supplier request for disposition and disposal of retained records.



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### 18.0 SUPPLIER EVALUATION

Supplier evaluation assesses process management and controls, manufacturing capability, quality management system, risk, or other element to determine business system maturity and the supplier's ability to meet Creation's or its customer's requirements. Evaluation results may include actions for the supplier to complete prior to approval or re-approval. A follow-up evaluation may be conducted as required by Creation.

Forms and resources are available on Creation's Supplier Website: <https://www.creationtech.com/suppliers/>

### 19.0 SUPPLIER CORRECTIVE ACTION REQUEST (SCAR)

A SCAR is issued to resolve a non-conformance and to promote continuous improvement.

Root cause analysis tools such as 3x5 Why, 6M, etc., ensure true root cause(s) are identified. Evidence will be provided to support containment, corrective, and preventative actions as well as verification of effectiveness. C-0003031 is available for 8D SCAR responses at <https://www.creationtech.com/suppliers/>.

Timely response to a SCAR is essential, the following targets are outlined to ensure that the situation is rectified in a timely manner:

- Acknowledgment of SCAR receipt, Initial Investigation, and Containment – target is within 3 business days from SCAR receipt.
- Root Cause Analysis and Corrective/Preventive Action Plan target is within 10 business days from SCAR receipt. Consultation of Corrective/Preventative Action Plan with Creation is recommended.
- Completed SCAR with VoE evidence that the issue was resolved – target to be provided to Creation within 30 calendar days from SCAR receipt.
  - Note: Response due dates may be adjusted if Creation returns product to the supplier for investigation or failure analysis.
  - Note: If further time is needed to implement and provide VoE, notify Creation of the requested commitment date.

When failure or destructive analysis is required to determine point of failure, product may be returned to the supplier and is managed through the Return Material Authorization (RMA) process. Additional support may also be requested to facilitate production needs, including replacement product, sorting support, onsite investigation support, etc.

### 20.0 PERFORMANCE MEASUREMENT AND SUPPLIER SCORECARD

Supplier Scorecards are used to monitor supplier performance. Poor supplier performance may trigger additional action including but not limited to; development plan, supplier audit, Focus Supplier Improvement Program, and / or other actions as applicable.

Supplier performance data will be a factor in calculating supplier score.

*Primary supplier performance metrics are:*

Primary Metrics	Goal
Supplier Corrective Action Request (SCAR)	0 SCARs in a quarter
Incoming Lot Rate Acceptance (iLAR)	99.6% quarterly average (unless otherwise specified)
On Time Delivery (OTD)	85% quarterly average (unless otherwise specified)





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## 21.0 SUPPLIER COPSQ AND CHARGEBACK

Creation reserves the right to recover costs incurred by Creation, or Creation's customer, as a result of supplier provided product that is non-conforming or fails to meet requirements.

Costs incurred may include, but are not limited to, the following items:

- Sorting, testing or rework labor costs.
- Production line down time (Creation or Customer)
- Containment costs
- Recall of material
- Storage
- Administrative costs
- Components
- WIP
- Costs associated with counterfeit parts / material

Creation will summarize the information and evidence of the actual costs incurred by Creation. Unless otherwise agreed by Creation and supplier, credit is the preferred method for reimbursement. See C-0003263 – Cost of Poor Supplier Quality Matrix and C-0003621 – Cost of Poor Supplier Quality Chargeback Notice at <https://www.creationtech.com/suppliers/>.

Creation reserves the right to pursue additional action if chargeback is declined.

## 22.0 SUPPLIER BUSINESS REVIEWS

Creation may schedule periodic meetings with the supplier to review performance (OTD, SCAR, ILAR), escalations, operational updates, org structure, quote activity, quoting performance, financial update, bond performance, site feedback, or other related topics.

## 23.0 PRODUCT CHANGE NOTIFICATION

Suppliers will notify Creation immediately of changes that may impact fit, form, function, quality, reliability, or regulatory requirements. Creation will determine if the change impacts the customer's finished product. Submit PCNs and/or ECNs to [pcn@creationtech.com](mailto:pcn@creationtech.com).

*A PCN is required for the following scenarios:*

1. Make change in supplier's processing or composition of part specifications, formulation, part, changes made by sub-tier vendor, equipment / process location change, manufacturing processes, or performance characteristics of part thereof (including labeling, packaging, shipping method, etc.).
2. Use temporary deviation or permanent change that affects the product including manufacturing process, cosmetic, dimensional specification, or tolerance, handling, or sterility of the part; or in the event product does not meet requirements but the defect does not affect fit, form or function, issue a temporary deviation.
3. Changes, including loss, to the supplier's certification standings (including, ISO, AS, UL, ITAR, CGD, FDA, CSA, CE, VDE, TUV, or others).

Written notice, including the details regarding such proposed change or action, and a sample of the affected part and other information, will be provided as requested by Creation. A change may not be implemented without Creation's written approval.

**The following actions are prohibited:**

1. Unauthorized Processing – Addition, revision, or deletion of thermal, chemical, or electrochemical processes in manufacturing when processes are subject to specification control by Creation or its Customers.





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2. Discard of Approvals – Change in process of Quality Assurance procedure that is subject to specific approval by Creation, or its Customers, without proper notification and re-approval.

### 24.0 END OF LIFE NOTIFICATION

If a supplier intends to end the production life of a part (LTB) or becomes aware of an End-of-Life Notification (EOL) notice to a subcomponent, this change will be communicated to Creation Technologies immediately. An Send an End-of-Life notification, with details for last time buy opportunities, to [pcn@creationtech.com](mailto:pcn@creationtech.com).

### 25.0 BUSINESS CONTINUITY PLANNING

#### **Labor Disputes**

The supplier will notify Creation in writing at least six (6) months in advance of the expiration of a labor contract(s).

The supplier will notify Creation of an actual or potential labor dispute or disruption that will delay, or threaten to delay, timely delivery.

#### **Contingency Plan**

A Disaster Recovery/Contingency plan is recommended, including backup capabilities, for quality, delivery, utility interruptions, labor shortage, succession planning for key executives, natural disasters, catastrophic events, facets of the manufacturing process, key equipment failure, field returns, legal issues, business disruption, or other circumstance that affects production flow of material to Creation.

Reference C-0003171 – Disaster Recovery Template at <https://www.creationtech.com/suppliers/>

### 26.0 HANDLING, LABELING, PACKAGING, STORAGE & SHIPPING

Material, parts, and assemblies will be packaged, stored, and transported as defined in specifications, standards, or industry best practices to prevent excess moisture, abrasion, nicks, dents, scratches, or other damage resulting in cosmetic or dimensional deformities or contamination. The supplier is responsible to ensure responsible handling and ESD practices are used to prevent damage or failure.

Shipping documents will be clearly marked, including Packing list, C of C / C of A, Validation documentation, and RoHS Compliance Certificate as required. Parts and assemblies will be protected from contamination, corrosion, or tarnish where applicable.

If packaging is customer owned or reusable packaging or crating, it is to be cleaned, previous labeling is to be removed and inspected for overall condition or wear. If reusable packaging is found to be damaged or unusable, the Creation Supply Chain Representative is notified.

Carton shipment greater than 40 pounds, is marked with the Gross, Tare Weight, and Net Weight.

Materials requiring shelf-life monitoring are delivered with a minimum of 80% of the total specified shelf life and the is documented on the supplier's packing slip and / or C of C. If circumstances, such as transportation delays, shortages, etc., will impact delivery and shelf-life acceptance, Creation is notified.

Unless otherwise specified, parts provided by an independent distributor are new, in original manufacturer's packaging, and have been stored according to manufacturer's recommendation(s).

Shipment labeling requirements are in accordance with C-0003229 – Supplier Shipment Label Requirement at <https://www.creationtech.com/suppliers/>.



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### **27.0 RISK AND OPPORTUNITIES**

#### Risks

1. Supplier does not review and / or adhere to the Supplier Quality Requirements as noted per the PO and T's and C's
2. Supplier takes exception to clauses in the SQR but does not obtain approval from Creation to deviate from the stated requirements.

#### Opportunities

1. Standardized SQR provides a unified message to suppliers.
2. Suppliers are informed and aware of requirements and are equipped to meet expectations.
3. Suppliers take guidance from the SQR to initiate improvement activities.

### **28.0 EXCEPTION AND DEVIATION**

Conditions Allowed	Action Required
Deviations from this procedure are allowed with the approval of the Sr. Global Director of Quality	Complete C-0003545 Process/Procedure Temporary Deviation Form and obtain required approvals

### **29.0 REFERENCED DOCUMENTS**

**Parent Document:** C-0002037 – Quality Management System Manual

#### 29.1 Standard and Regulatory Requirements

Standard/Regulation #	Clause/Sub Part # (Optional)	Document Name
ISO 9001	8.4.1, 8.4.2, 8.4.3	Quality Management System
AS9100	8.1.4, 8.4.1, 8.4.1.1, 8.4.2, 8.4.3	Quality Management System – Aerospace
ISO 13485	7.4.2, 7.4.3	Quality Management System – Medical Devices
21 CFR 820	.50	Quality System Regulation – Medical Devices

#### 29.2 Related Documents

Document #	Document Name
C-0002987	Creation Terms and Conditions
C-0002890	Supplier Quality Requirements
C-0002943	Supplier Expectations and Code of Conduct
N/A	Environmental Policy RoHS REACH TSCA
C-0003247	Supplier C of C Requirements
C-0002134	Global Printed Circuit Board Procurement Specification
C-0003027	Global Supplier PPAP Forms





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C-0003090	Supplier PPAP Procedure
C-0002929	Supplier Scorecard Performance
C-0003031	Creation Supplier Corrective Action request 8D Report
C-0003263	Cost of Poor Supplier Quality Matrix
C-0003621	Cost of Poor Supplier Quality Chargeback Notice
C-0003171	Disaster Recovery Template
C-0003229	Supplier Shipment Label Requirement
C-0003545	Process/Procedure Temporary Deviation Form
C-0002037	Quality Management System Manual

### 30.0 KEYWORDS

Supplier  
External Provider  
Quality  
Flow Down  
Requirements  
Evaluatuion  
SCAR  
Performance  
Chargeback  
COPSQ  
Change Notification  
Conformance  
Compliance  
Counterfeit  
Traceability





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### HISTORY OF CHANGES

Revision	Authored/ Revised by	Section # Changed	Summary of Changes	Reason for Change	Effective Date (YYYY-MM-DD)
0	John Gaspari	N/A	Initial Release	N/A	See DocBank
A	John Gaspari	15, 20, 21, 22, 26, 28	Added FDA compliance statement, clarified order of precedence, Updated the SCAR section with updated requirements and guidelines, added information around FAIR and PPAP, added Section 28, other general updates	General Improvement	See DocBank
B	Kelly Menze	8,11, 20, 23	Clarified Certificate of Conformance requirements, SCAR final response time, revised order of precedence, indicated latest directive of RoHs.	General Improvement	See DocBank
C	Kelly Menze	2-5, 7-28	Updated several sections to integrate and align non-legacy supplier requirements. Removed sections that are covered in the T's and C's	Integrate legacy and non-legacy supplier quality requirements.	See DocBank
D	Kelly Menze	5.0, 18.0	Corrected a typo in section 5, Updated the paragraph in section 18 to make it more general so evaluation requirements can be encompassed.	Make a correction and update section 18 to clarify and communicate evaluation requirements.	2023 04 17
D.1	Kelly Menze	20.0	Added SCAR response targets.	Minor change to insert specific requirements for SCAR response timing that aligns with 8D Report and training on SCAR response.	2024 03 11
E	Emmanuel Garcia Madrid / Kelly Menze	All Sections	Reorganized entire document, revised, and combined sections for better flow and clarity	Overall Improvement, reduce redundant sections and text.	2024 07 05
F	Kelly Menze	3.0-4.0, 7.0-11.0, 14.0, 17.0-21.0, 25.0-26.0, 28.0-30.0	Moved to current template. Clarified opening letter, added reference to documents and location on the Supplier website, included better direction for flow down to the supplier and sub-tier suppliers. Revised the record retention and disposition update to align with standard, added a table for easy reference, unless otherwise specified for supplier performance targets,	Updated record retention to align with the standard requirement. Overall updates and improvement to language and format. Included related documentation.	2025-11-13
F.1	Kelly Menze	17.0	Clarified language around record retention disposition requirements.	The requirement language was too strict and there wasn't a method to prove compliance	2025-11-21

