

Date: 1/16/2025

To: Approved Supplier for FFC Floats and Fuel Cells

From: Bridget Pecoraro, Quality Manager

Subject: Annual Reminder of Basic Quality Requirements for FFC

# Dear Valued Supplier,

FFC has requirements that we request each supplier to confirm and follow each year. Please complete & return the attached supplier contact info and let the following serve as a reminder of several key process expectations.

- 1. Prompt response to the annual quality survey (<2 weeks), reasonable access & participation in onsite quality systems audit (when applicable).
- 2. FFC requires all suppliers to provide facility access to FFC, our customer's representative, and regulatory agencies, such as the Federal Aviation Administration (FAA).
- 3. FFC must be notified of any significant process, facility or organizational change that may affect the delivery or quality of product supplied to FFC. When in doubt, please notify ahead of such change.
- 4. Traceability of raw materials and maintaining records of traceability at the supplier location is a requirement of all FFC suppliers pursuant to FFC record retention requirements located in Supplier Purchase Order T.O. Cs section on www.ffcfuelcells.com.
- 5. All products must be manufactured to FFC's specifications, drawings, or P.O. requirements. It is the responsibility of the supplier to communicate P.O. requirements to their suppliers as applicable. Certificates of Conformance are expected with each shipment, attesting to the conformance of meeting those requirements.
- 6. Suppliers will notify FFC of any non-conforming product shipped to FFC within 24hours of realization of such non-conforming shipment. These may include such instances as out of calibration tooling or equipment discovered post-shipment as well as any items included in Suspected Unapproved Parts notices issued by the FAA. (ref. AC21-29, AS6174, GIDEP as applicable).
- 7. Suppliers may supply parts that are part of an Original Equipment Manufacturer (OEM) & are subject to the specific OEM requirements (Leonardo QRS 01, Bell Helicopter F 7 4.2, Robinson Helicopter) in addition to the standard FFC requirements as outlined in their Quality requirements. Questions about these requirements are directed to procurement for clarification.
- 8. For retention requirements, reference document PS 261.1 Record Control Matrix located in Supplier Purchase Order T.O.Cs section on www.ffcfuelcells.com.
- 9. For ethical conduct requirements, reference the Ethics & Behavioral Integrity article for AS9100 located in Supplier Purchase Order T.O.Cs section on www.ffcfuelcells.com.

As always, you are an important part of the supply chain, and we look forward to partnering to work together. If I can be of any assistance, please do not hesitate to reach out.

Regards, Bridget Pecoraro



| CONTACT                                 | INFORMATION UPDATE                                  |
|---|---|
| Company Name:                           |   |
| Address:                                |   |
| City State, Zip                         |   |
| Telephone:                              |   |
| Fax Number:                             |   |
| Suppliers Primary Products              |   |
| Number of years in business             |   |
| Quality System & Expiration             |   |
|   |   |
| Sales Contact:                          |   |
| Email:                                  |   |
| Telephone No:                           |   |
| Quality Manager                         |   |
| Email:                                  | 35.00   |
| Telephone No:                           |   |
|   |   |
|   | ey have received and reviewed Floats and Fuel Cells |
| Annual Reminder of Basic Quality Requir |   |
| Signature:                              | Date:   |



Date: 1/16/2025

To: Approved Supplier for FFC Services

From: Katie Stewart, Director of Quality

Subject: Annual Reminder of Basic Quality Requirements for FFC Services

Dear Valued Supplier,

FFCS has requirements that we request each supplier to confirm and follow. Please complete & return the attached supplier contact info and let the following serve as a reminder of several key process expectations.

- 1. Prompt response to the annual quality survey (<2 weeks) and reasonable access and participation in an onsite quality systems audit (when applicable).
- 2. FFC requires all our suppliers to provide facility access to our customer's representative, and regulatory agencies, such as the Federal Aviation Administration (FAA).
- 3. FFC must be notified of any significant process, facility or organizational change that may affect the delivery or quality of product supplied to FFC. When in doubt, please notify ahead of such a change.
- 4. Traceability of raw materials and maintaining records of traceability at the supplier location is a requirement of all FFC suppliers.
- 5. All products must be manufactured to FFC's specifications, drawings, or P.O. requirements. It is the responsibility of the supplier to communicate P.O. requirements to their suppliers as applicable. Certificates of Conformance are expected with each shipment, attesting to the conformance of meeting those requirements.
- 6. Suppliers will notify FFC of any non-conforming product shipped to FFC within 24hours of realization of such non-conforming shipment. These may include such instances as out of calibration tooling or equipment discovered at any point post shipment as well as any items included in Suspected Unapproved Parts notices issued by the FAA.
- 7. For retention requirements, reference document PS 261.1 Record Control Matrix located in Supplier Purchase Order T.O.Cs section on www.ffcfuelcells.com.
- 8. For ethical conduct requirements, reference the Ethics & Behavioral Integrity article for AS9100 located in Supplier Purchase Order T.O.Cs section on www.ffcfuelcells.com.

As always, you are an important part of the supply chain, and we look forward to partnering to work together. If I can be of any assistance, please do not hesitate to reach out.

Katie Stewart
Director of Quality



|                                    | CONTACT INFOR          | MATION UPDATE  |
|------------------------------------|------------------------|--|
| Company Name:                      |                        |  |
| Address:                           |                        |  |
| City State, Zip                    |                        |  |
| Telephone:                         |                        |  |
| Fax Number:                        |                        |  |
| Suppliers Primary Products         |                        |  |
| Number of years in business        |                        |  |
| Quality System & Expiration        |                        |  |
| <u> </u>                           |                        |  |
| Sales Contact:                     |                        |  |
| Email:                             |                        |  |
| Telephone No:                      |                        |  |
| Quality Manager                    |                        |  |
| Email:                             | 1                      |  |
| Telephone No:                      |                        |  |
| By signing below the Vendor confir | ms they have receive   | d and reviewed Floats and Fuel Cells Annual Reminder |
| of Basic Quality Requirements.     | ins they have received | a and reviewed Floats and Fuel Cells Annual Reminder |
| Signature:                         |                        | Date:  |



| PROCESS          | RECORD CONTROL MATRIX |              |            |
|------------------|-----------------------|--------------|------------|
| DOCUMENT NUMBER: | FFCM-100-01-0000093   | Page 1 of 6  | _          |
| REVISION STATUE  | REV. 3                | DATE REVISED | 07/26/2023 |

#### 1.0 PURPOSE

Outline the quality record / data maintenance system

#### 2.0 SCOPE

2.1 Applies to all quality records and data required to be retained by the FAA, AS9100 (As Revised), and customer specific regulatory requirements.

# 3.0 RECORDS

3.1 All records in the record retention matrix in section 7.0.

#### 4.0 ASSOCIATED DOCUMENTS

- 4.1 Document Control PS
- 4.2 FAA Manual; Document Control, Design Control

#### 5.0 **DEFINITIONS**

5.1 Definitions as defined in Document Control PS

# 6.0 RESPONSIBILITY

**6.1** The maintenance of quality records is performed by various positions within FFCM at the plant and corporate level.

#### 7.0 INSTRUCTIONS

- 7.1 The Quality Record Maintenance Matrix attached below defines the following:
  - 1.Type
  - 2.Identification
  - 3. Collection and Distribution
  - 4.Index
  - 5.Access
  - 6. Filing / Storage
  - 7.Maintenance
  - 8.Disposal
  - 9.Retention Period
- 7.2 Invalid and/or obsolete documents are promptly removed from all points of issue or use. Any obsolete documents retained for legal and/or knowledge preservation purposes are suitably identified.
- 7.3 Records maintained in storage containers shall be clearly marked as to contents, retention dates and department ownership. A record may be maintained past the required record



|                  |                       | ·            |            |
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retention date.

- 7.4 After the retention period, the applicable department within their designated period will dispose of all records if necessary.
- 7.5 Electronic backup files of quality records can be stored in any of the following locations:
  - 1. FFC/FFCM computer network
  - 2. Fireproof safe
  - 3. Off site
- 7.6 Any document not specifically listed in the matrix shall be kept a minimum of three years.



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|---|-----------------------------------|---|--------------------------------------|---|--|--|-------------------------------------|-------------------------------------|
| FIRST<br>ARTICLE  | PART #/<br>PROGRAM<br>NAME / DATE | ENGINEERIN G: PLANT SENDS COPY TO ENGINEERING DIRECTOR / ENGINEERING MANAGER) | PART #/ PROGRA M NAME / DATE         | READ<br>ACCESS<br>VIA FFC<br>SERVER<br>LINK OR E-<br>SYNERGY<br>LINK. | ENGINEERI<br>NG<br>OFFICES<br>MASTER<br>ONLINE AT<br>PLANT | ENGINEERING,<br>COPY SEND<br>THROUGH<br>ENGINEERING<br>DIRECTOR /<br>ENGINEERING<br>MANAGER) | SHRED/<br>ELECTRO<br>NIC BACK<br>UP | THROUGH<br>SERVICE, PLUS 2<br>YEARS |
| P.O.'s  | P.O. #                            | ACCOUNT<br>MANAGER<br>PROVIDE TO<br>ACCOUNTING<br>DATABASE.                   | P.O.#                                | ACCOUNTI<br>NG<br>CORP<br>ACCOUNTI<br>NG                              | ACCOUNTI<br>NG CLERK<br>FILE<br>CABINET<br>STORAGE         | ACCOUNTING   | SHRED                               | 5 YEARS                             |
| INSPECTION<br>AND TEST<br>RECORDS                           | PART #// DATE                     | PLANT<br>QUALITY DEPT.  | N/A                                  | QUALITY<br>DEPT.<br>PRO-JAN /<br>FILE<br>CABINET                      | QUALITY<br>DEPT.<br>PRO-JAN /<br>FILE<br>CABINET           | QUALITY<br>DEPT.   | SHRED /<br>DELETE                   | 3 YEARS                             |
| CONTROL<br>CHARTS /<br>SPC DATA IF<br>APPLICABLE<br>N/A     | PART # /DATE N/A                  | PLANT<br>SPC/QA   | PART #/<br>PROGRA<br>M NAME<br>/DATE | SPC / QA<br>DEPARTME<br>NT  | SPC/QA<br>OFFICES<br>N/A                                   | SPC/QA   | DELETE/<br>SHRED<br>N/A             | 3 YEARS N/A                         |
| PREVENTIVE<br>ACTION AND<br>CORRECTIVE<br>ACTION<br>RECORDS | PART #/DATE                       | QA /<br>PRODUCTION<br>DEPTS   | PART #/<br>PROGRA<br>M NAME<br>/DATE | QA/<br>PRODUCTIO<br>N   | QA /<br>PRODUCTI<br>ON DEPTS.                              | QA   | SHRED                               | 3 YEARS                             |



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| RECORD<br>TYPE  | IDENTIFIED<br>BY                              | COLLECTION/<br>DISTRIBUTION        | INDEX                                     | ACCESS   | FILING/<br>STORAGE  | MAINTENANCE   | DIS-<br>POSAL     | RETENTION<br>PERIOD      |
|---|---|------------------------------------|---|--|---|---|-------------------|--------------------------|
| Manageme<br>nt Review   | BINDER BY<br>MONTH.<br>ELECTRONIC<br>BY DATE. | DOCUMENT<br>CONTROL DEPT.          | E-<br>FILING<br>SYSTEM                    | DOCUMEN<br>T CONTROL<br>DEPT.<br>ADMISTRA<br>TOR /<br>AS9100<br>MR /<br>DIRECTO<br>R OF<br>QUALITY | DOCUMEN T CONTROL DEPT. ADMISTRA TOR / AS9100 MR / DIRECTO R OF QUALITY | DOCUMENT<br>CONTROL DEPT.<br>ADMISTRATOR /<br>AS9100 MR /<br>DIRECTOR OF<br>QUALITY | SHRED             | 3 YEARS                  |
| INTERNAL<br>QUALITY<br>SYSTEM<br>AUDITS   | AUDIT NO / DESCRIPTION / DATE                 | QA AUDITOR                         | AUDIT<br>No /<br>DESCRIP<br>TION/<br>DATE | DOCUMEN<br>T CONTROL<br>DEPT.<br>ADMISTRA<br>TOR /<br>MR /<br>DIRECTO<br>R OF<br>QUALITY           | DOCUMEN T CONTROL DEPT. ADMISTRA TOR / MR / DIRECTO R OF QUALITY        | DOCUMENT CONTROL DEPT. ADMISTRATOR / MR / DIRECTOR OF QUALITY                       | SHRED             | 3 Years                  |
| CONTRACT<br>REVIEW<br>RECORDS   | PART #/<br>QUOTE #/NEW<br>JOB NOTICE          | Synergy                            | Qиоте<br>#                                | ALL READ<br>ONLY   | ELECTRON<br>IC AND<br>HARD<br>COPY)                                     | SALES &<br>MARKETING  | SHRED /<br>DELETE | 5 YEARS                  |
| ENGINEER<br>ING<br>DESIGN<br>CHANGE,<br>CHANGE<br>NOTIFICA<br>TION<br>(ECR/ECN) | PART#   | EDB/ENGINEER<br>ING FILE<br>SYSTEM | EDB                                       | ALL<br>READ/<br>WRITE<br>MANAGE<br>MENT<br>APPT<br>OVAL  | ELECTRON<br>IC DATA<br>WEEKLY<br>WEEKLY<br>BACKUP                       | Engineering<br>Department   | DELETE            | THROUGH<br>SERVICE LIFE. |



PROCESS RECORD CONTROL MATRIX

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| RECORD<br>TYPE                                | IDENTIFIED<br>BY                     | COLLECTION/<br>DISTRIBUTION  | INDEX                                    | ACCESS  | FILING/<br>STORAGE  | MAINTENANCE  | DIS-<br>POSAL      | RETENTION<br>PERIOD  |
|---|--------------------------------------|--|--|---|---|--|--------------------|--|
| DESIGN<br>RECORDS                             | PART#/<br>PROGRAM                    | ELECTRONIC<br>ONLINE /<br>ENGINEERING<br>DEPARTMENT                | PART#/<br>PROGRA<br>M                    | READ<br>ONLY –<br>EDB<br>MANAGEM<br>ENT                                     | ELECTRON<br>IC DATA<br>BACKUP   | Engineering /<br>Design Dept /                                     | DELETE             | THROUGH<br>SERVICE LIFE.   |
| FFC/FFCM<br>MONTHLY<br>AUDITS AND<br>SCHEDULE | MONTHLY<br>SCHEDULE                  | MR /<br>QUALITY<br>MANAGER   | PART#<br>OR<br>PROGRA<br>M NAME          | MR /<br>QUALITY<br>MANAGER  | MR/<br>QUALIT<br>MANAGER<br>OFFICE  | MR / QUALITY<br>MANAGER  | SHRED OR<br>DELETE | 3 YEARS  |
| CALIBRATIO<br>N RECORDS                       | PART NO /<br>ASSET NO /<br>SERIAL NO | QUALITY DEPT   | PART NO<br>PROGRA<br>M NAME<br>DATE      | QUALITY<br>DEPT   | QUALITY<br>DEPT   | QUALITY DEPT   | SHRED              | KEPT FOR THE<br>LIFE OF THE<br>DEVICE; AFTER<br>REMOVAL FROM<br>SERVICE;<br>YEARS OR 2<br>CYCLES (THE<br>GREATER TIME) |
| TRAINING<br>RECORDS                           | EMPLOYEE<br>NAME                     | HR. / TRAINING<br>MANAGER /<br>EACH DEPT<br>MANAGER,<br>SUPERVISOR | EMPLOY<br>EE<br>NAME                     | HR./<br>TRAINING<br>MANAGER<br>/ EACH<br>DEPT<br>MANAGER,<br>SUPERVISO<br>R | HR./<br>TRAINING<br>MANAGER<br>/ EACH<br>DEPT<br>MANAGER,<br>SUPERVIS<br>OR | HR. / Training<br>Manager /<br>Each dept<br>Manager,<br>Supervisor | SHRED/<br>DELETE   | DURATION OF<br>EMPLOYMENT  |
| SUPPLIER<br>EVALUATIO<br>N RECORDS            | SUPPLIER /<br>PART NO /<br>PART NAME | PURCHASING<br>COORDINATOR /<br>QUALITY                             | SUPPLIE<br>R/PART<br>NO/<br>PART<br>NAME | PURCHASI<br>NG<br>COORDINA<br>TOR<br>PURCHASI<br>NG<br>QUALITY              | SYNERGY /<br>E-FILING<br>SYSTEM   | DOCUMENT<br>CONTROL  | SHRED /<br>DELETE  | MIN. DURATION<br>AS SUPPLIER   |



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| RECORD<br>TYPE       | IDENTIFIED<br>BY                 | COLLECTION/<br>DISTRIBUTION                                    | INDEX  | ACCESS  | FILING/<br>STORAGE  | MAINTENANCE                                 | DIS-<br>POSAL           | RETENTION<br>PERIOD |
| RECEIVING<br>RECORDS | PART#/<br>PROGRAM<br>NAME / DATE | RECEIVING /<br>ACCOUNTING /<br>QUALITY /<br>MACOLA /<br>PROJAN | PART #/<br>PROGRA<br>M NAME<br>/ DATE /<br>CMS | RECEIVING ACCOUNTI NG/ OUALITY/ MACQLA/P ROJAN                        | SYNERGY /<br>E-FILING<br>SYSTEM   | RECEIVING /<br>ACCOUNTING /<br>QUALITY      | SHRED /<br>DELETE       | 3 YEARS<br>MINIMUM  |
| S.O./M & IR          | P/N and S/N                      | Plant Quality<br>Dept/Document<br>Control                      | PART #/<br>PROGRA<br>M NAME<br>/ DATE          | READ<br>ACCESS<br>VIA FFC<br>SERVER<br>LINK OR E-<br>SYNERGY<br>LINK. | QUALITY<br>ASSURANC<br>E  | DOCUMENT<br>CONTROL DEPT./<br>QUALITY DEPT. | Trash<br>Collectio<br>n | 10 Years            |
| 8130-3               | PN/SN<br>Date                    | Airworthiness Approval Tag Inspection Quality Department       | PART #/<br>PROGRA<br>M NAME<br>/ DATE /<br>CMS | RECEIVING / ACCOUNTI NG / QUALITY / MACOLA/P ROJAN                    | RECEIVING<br>ACCOUNTI<br>NG/<br>QUALITY/<br>MACOLA/<br>SYNERGY/<br>E-FILING<br>SYSTEM | RECEIVING /<br>ACCOUNTING /<br>QUALITY      | SHRED /<br>DELETE       | 5 YEARS<br>MINIMUM  |

AEROSPACE QUALITY

# Ethics and Integrity

Building ethical behavior controls into QMS standards in a more explicit way by Amy Cochis and L.L. "Buddy" Cressionnie

he quality professional's role has changed significantly during the past decades as industry responds to lean, cost-cutting

and empowerment-minded leadership models. In the past, an independent quality verification would occur during production and services, including final checks before shipment.

Today, operator self-verification, direct ship and delegated product release verification techniques are used frequently. There is less redundancy with an increased reliance on personal accountability. This change intensifies the importance of ethical behavior and the need for integrity in the workplace.

Organizations don't purposefully hire bad people, but they hire people. People are not perfect. Some make mistakes, and some are dishonest and not trustworthy. Criminologists use the 10-80-10 rule that applies to ethics.' The rule assumes that 10% of people always are ethical, 80% of people may act unethically depending on the situation and the remaining

10% always are unethical.

The business must implement controls for the 80% who are susceptible to unethical behavior and the 10% who will behave unethically if given the

opportunity. The fraud triangle is constructed to understand the factors that influence the action of these groups.

The fraud triangle theory (Figure 1, p. 48) asserts that three elements must be present:

- Motivation is the pressure felt by an individual. This
  pressure can come from factors internal or external to
  the organization. Pressure from the organization can be
  applied in various manners, quotas, delivery objectives
  and financial goals. Not all pressure is negative, but when
  that pressure becomes excessive, it contributes to poor
  decision making.
- Opportunity includes availability. In today's operational environment, there are multiple opportunities for self-verification in which critical decisions are made without a secondary check.

3. Rationalization is the justification of actions taken by an individual who reasons that the behavior is necessary to succeed, everyone does it or it doesn't matter. In some cases, employees may believe mistakenly that their "method" is just as good or better than the method prescribed by the organization.

The fraud triangle illustrates the three factors that come together when employees make poor decisions that result in unethical behavior. Often, employees who exhibit this unethical behavior are motivated by either organizational or personal factors. Organizational factors include the employee's perception of being a hero and thinking that completing the task is more important than completing the task correctly. Personal factors include any perceived personal gain by the employee (for example, financial and time).

COVID-19, supply chain issues, world events and social unrest have intensified pressures. No documented system or set of controls can address all the possible scenarios that arise. That makes navigating the gray area of decision making critical. The documented system and internal controls are needed to affect the culture of how people respond under pressure situations.

# Critical for sustainability and success

Ethics and integrity within an organization's management system are critical for its sustainability and success. The industry wants quality management systems (QMS) to provide conforming and safe quality products and services on time in accordance with statutory, regulatory and customer compliance requirements. QMSs largely depend on employees being truthful and behaving ethically all of the time. Personal accountability and integrity are vital to an organization's ability to achieve

its desired results.

Today, ethical behavior in QMS standards is implicit in several areas—for example, context of the organization, leadership and commitment, and quality policy so the intent is to introduce ethical behavior controls in a more explicit way. Technical Committee 176, the group that writes ISO 9001, has ethics and integrity identified as an emerging trend for consideration in future standards development.

Aviation, space and defense (AS&D) organizations always have expected that an employee's stamp indicated a personal

warranty that the work was completed to excellent quality. In AS9100 Rev D, clauses 7.3h and 8.4.3m added the importance of ethical behavior as an awareness requirement after the industry encountered several industrywide escapes caused by individual ethical decision making. The developing IA9100 standard, which will replace AS9100 in the Americas, further develops the importance of ethics throughout the standard to develop internal controls.

Clause 0.1—Organizational culture and ethical behavior are critical to an effective QMS and the ability of an organization to achieve its intended results. The organization's culture and ethics are evident in the attitudes, behaviors, shared values and history.

Statement in IA9100 Introduction is to set the stage regarding the importance of ethical behavior to achieve intended results and organization sustainability. It is expected that an organization's ethics initiative permeates the organization such that employees understand the expectations for the performance of their work.

Clause 5.1.1.l—promoting an ethical work environment. NOTE: For example, policy, expectations of conduct, periodic training and awareness, reporting channels, investigation, resolution of concerns and ensuring no punitive action from reporting concerns.

Leadership is responsible for promoting and communicating ethical work environment expectations and establishing controls. Therefore, additional IA9100 requirements have been added to clause 5.1.1. Leadership is responsible for ensuring an effective and ethical work environment. and that it "walks the talk" and "leads by example" regarding ethical behavior and expectations. The note includes some of the key essentials for an effective ethics and compliance program (see Figure 2, p. 48).

communicates the organization's commitment to ethical conduct and sets a clear benchmark for employee behavior. This policy applies to everyone in the organization and must be equally enforced so everyone is held to the same standards.

■ Expectations of conduct—The expectation for an ethical work environment should be communicated to relevant interested parties (that is, customers, suppliers and employees).

The organization can positively influence its people, driving them toward making ethical decisions when under pressure, especially when navigating the gray area of decision making.

FIGURE 1

# Fraud triangle



- Customers should understand that the organization takes ethical behavior seriously as a basis of ongoing communications and relationship.
- Suppliers should understand that an independent reporting channel exists if any ethical issues must be addressed.
- Employees should understand these expectations as part of the hiring process with pre-employment background checks of applicants and during onboarding activities. Then, periodic training and awareness are needed to reinforce the expectation.
- ▶ Periodic training and awareness—Training and awareness activities should review the policy, expectations of conduct and reporting channels. Providing attendees with some actual real-world examples in which they can discuss approaches is beneficial. Awareness activities should include communication in newsletters, staff meetings and regular communications.
- Reporting channel—The organization should have a reporting process, including using a chain of command, HR, ombudsman or an independent ethics officer. Reporting should be available to relevant interested parties (that is, customers, suppliers and employees). Reported concerns should include relevant facts and specific details (who, what, when, where and how) as applicable.
- Investigation—A timely investigation should be conducted by a neutral, independent entity to determine

whether there is sufficient information to uphold the concern. The investigation summary should be shared with the originator so he or she can understand that due diligence was applied. The investigation should:

- Address all reported concerns.
- Collect all relevant information: face-to-face interviews, evidence gathering, field investigation and data analysis,
- Protect the information, maintain privacy and security, and limit access to those involved directly.
- Analyze and identify the causal factors and elements.
- Generate conclusions based on objective evidence.
- Gain support from appropriate leadership such as HR, management and supervision.
- Determine necessary actions: corrective and personal accountability.
- Formalize the investigation report.
- Resolution of concerns—The investigation should present a conclusion regarding the concern so leadership can perform a risk assessment and make decisions regarding actions. Actions can include:

FIGURE 2

# Ethics and compliance program key essentials



- Update and improve processes and procedures, and retrain employees as appropriate.
- Take disciplinary actions as appropriate.
- Include containment actions and preventive actions.
- Respond to the root cause directly.
- Implement sufficiently with responsible individuals in due time.
- Ensuring no punitive
  action from reporting
  concerns—Make it easy for
  employees to report suspicious
  activity anonymously and without
  fear of reprisals. An organization
  should:
  - Encourage employees to come forward with any potential ethical infractions or violations.
  - Have a safe, neutral place to report concerns.
  - Offer an "open door" with no retaliation policy but good faith, genuine belief and professional judgment.
  - Provide options to keep the reporter anonymous.
  - ▶ Promote the "see something, say something" policy to ensure ethical behavior is maintained across the organization.
  - Provide a mechanism for interested parties (partners, customers and suppliers) to come forward—even those with suspicions of ethical infractions.

Clause 7.1.4 NOTE: d. culture (for example, quality, ethical behavior, product and personnel safety, quality of work life).

An example of a suitable work environment has been added to IA9100, clause 7.1.4 for a culture that includes ethical behavior. Employees should work in a culture that includes the importance of ethical behavior so employees do the right thing. Emphasis should be placed on importance of doing things correctly, accurately and in accordance with the organizations' policies and procedures.

Completing the work correctly is more important than just completing the work. Organizations' rewards should be given consistently for performance while following requirements rather than taking shortcuts.

Authors of the International Aerospace Quality Group's Supply Chain Management Handbook<sup>2</sup> are developing guidance material on "Ethics & Compliance: Building a Program." This material will have information for organizations on the necessary aspects of an ethics and compliance program including code of conduct, culture, communication,

Completing the work correctly is more important than just completing the work. Organizations' rewards should be given consistently for performance while following requirements rather than taking shortcuts.

awareness, reporting, investigations and corrective actions, as well as supply chain flow down.

# Positively influence people

Some organizations do not recognize that an effective ethics and compliance program consists of more than an ethics policy, nor do they recognize the potential impact as a result of not having a robust ethics program in place (for example, safety, quality, costs, public image and loss of business).

The organization can positively influence its people, driving them toward making ethical decisions when under pressure, especially when navi-

gating the gray area of decision making. There must be an integrated, wholistic approach to ethics and integrity to combat the increase in ethical issues, fraud and falsification affecting the AS&D industry. **QP** 

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#### **EDITOR'S NOTE**

The references listed in this column can be found on the column's webpage at qualityprogress.com.



Army Cochis is the senior technical fellow for Quality Systems, with industry participation in International Aerospace Quality Group (IAQG) International Aerospace 9100 team, Americas Aerospace Quality System Committee (AAQSC), IAQG-1 Standards

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