



# SUPPLIER QUALITY MANUAL

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# COMFORSA SUPPLIER QUALITY MANUAL

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### Modifications to the previous revision

| Revision | Modifications   |
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| 6        | <ul style="list-style-type: none"> <li>• General revision and restructuring of the Manual.</li> </ul>   |
| 5        | <ul style="list-style-type: none"> <li>• General revision and restructuring of the Manual.</li> <li>• Added point 3.5 "Conflict minerals".</li> <li>• Added point 3.6 "Certificate of legal compliance".</li> <li>• Added point 6 "Product integrity".</li> </ul> |



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## 1.- Introduction

The objective of this quality manual for Comforsa suppliers is to specify and explain the procedures and requirements that affect the cooperation between Comforsa and its suppliers, in order to ensure that they have the capacity to supply the processes, products and services with the quality and environmental requirements established by Comforsa.

This manual describes the minimum requirements for establishing business relationships with Comforsa. Any additional requirements are communicated for each particular case or dealt with in other documents related to the business activity, specific contracts, etc.

### Comforsa's vision of quality

Comforsa plans to maintain its commercial strength and generate exceptional value for its customers through excellence in quality. A broad and flexible supplier base, which understands Comforsa's requirements and acts with the same urgency that our customers demand, is a key part of this philosophy. Our positioning assumes the idea that quality is the task and responsibility of "everyone", considering that within this "everyone" we must include the active participation of our suppliers through close, open and constructive relationships.

Comforsa believes that the quality of the processes, products and services it acquires from its suppliers has a decisive influence on the quality of its own products.

Comforsa's policy is to achieve a clear competitive advantage through continuous improvement in quality, service, delivery, and costs of all members within the value-added chain.

This vision is based on three simple principles:

- **Getting it right the first time** through planning, preparation, and training to provide quality processes, products, and services.
- **Always get it right** by ensuring that we continuously deliver quality processes, products, and services through the resolution of all deviations.
- **Continuously improve** through proactivity to improve the quality and value of processes, products and services.

In order to guide our suppliers so that they collaborate with us in the materialization of these priorities, Comforsa has the necessary Quality, Engineering and Laboratory staff.

We believe that Comforsa cannot achieve success without excellent quality, costs, service and technology as a result of close cooperation from its suppliers.

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## 2.- Comforsa Organization

Comforsa departments responsible for attending to the different communications with the supplier are:

### Purchasing-Suppliers

- Negotiation of contractual conditions.
- Financial aspects regarding the non-quality costs generated by non-conformities or non-compliance of the supplier.
- Everything related to supply conditions, including renegotiation for changes in processes, products and services.
- Communication of the result of the supplier's evaluation and targets for the new year.

### Quality Suppliers (SQA)

- Communications, notifications, and questions regarding the procedures and requirements contained in this document.
- 2nd party audits at the supplier's facilities, for outsourced machining and painting processes.
- Monitoring and performance of the supplier of outsourced machining and painting processes.

### Quality Plant

- Incidents related to quality and compliance with product specifications.
- Communication and management of non-conformities detected in Comforsa or in the end customer.
- 2nd part audits at the supplier's facilities, for forging and crankshaft accessories for our Comforsa-4 plant.
- Follow-up and performance of the raw material supplier (forging and crankshaft accessories) for our plant Comforsa-4.

### Laboratory

- 2nd party audits at the supplier's facilities, for raw materials (steel) and for outsourced heat treatment processes.
- Incidents with quality, compliance with specifications and management of non-conformities applicable to raw materials (steel) and heat treatments.
- Monitoring and performance of the supplier of raw materials (steel) and heat treatments.



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## Technical Department

- Communication of all technical, legal and regulatory requirements, and special product and process characteristics, applicable to the processes, products and services to be supplied by the supplier.
- Homologation of new processes, products and services, including raw materials (steel, forging and crankshaft accessories) and outsourced processes.
- Management of process changes proposed by the supplier, and written communication of their acceptance or rejection.
- Technical implementation of process, product or service changes proposed by Comforsa.
- Feedback during product development to ensure on-spec manufacturability.

## 3.- Types of suppliers

Comforsa's suppliers are classified into 4 types:

### **Type I: Products and services intended to be incorporated into Comforsa's own products and services.**

- Raw material: steel, crankshaft forging.
- Crankshaft accessories.

### **Type II: Outsourced processes.**

- Machining.
- Heat treatment.
- Painting.

### **Type III: Products and services provided directly to customers on behalf of Comforsa.**

- Transport to customers.

### **Type IV: Products and services that affect customer requirements.**

- Packaging.
- External calibration.
- Auxiliary products.
- Internal transport.

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## 4.- General requirements

### 4.1 Environmental, social and corporate governance commitment in the supply chain

Comforsa requires that all its suppliers involved in the supply chain comply with the requirements of the Environmental, Social and Corporate Governance Commitment.

This ESG Commitment affects employees, business partners and any person or company with a contractual relationship with Comforsa.

You can consult our ESG Commitment on our website: [Comforsa](https://www.comforsa.com).

### 4.2 REACH

European Regulation (EC) No. 1907/2006 on the registration, evaluation, authorization and restriction of chemicals (REACH) came into force in June 2007.

Suppliers must comply with all current REACH requirements on the products they supply to Comforsa.

Comforsa expects suppliers to maintain a dialogue with its supply chain and with Comforsa on all aspects of REACH.

### 4.3 IMDS

In order to ensure compliance with legal and customer requirements, Comforsa requires its suppliers to provide information on the materials of the components they supply for entry into the **IMDS** (International Materials Data System) platform. This information is required as part of the PPAP process as described in Chapter 6 of this manual.

### 4.4 Conflict minerals

European Regulation (EU) 2017/821 regarding supply chain due diligence obligations for EU importers of tin, tantalum and tungsten, their ores and gold from conflict-affected and high-risk areas (Conflict Minerals), came into force in May 2007.

Suppliers of raw materials (steel) must comply with all current requirements regarding Conflict Minerals, for those steels that they supply to Comforsa.

To do this, they must fill in the "RMI\_CMRT" form in its latest version, and available on the website: [Conflict Minerals Reporting Template](#).



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## 4.5 Certificate of Legal Compliance

Comforsa requires all its suppliers of processes, products and services to comply with all applicable legal and regulatory requirements, and for this purpose they must send at the request of Comforsa's Purchasing Department, a certificate issued by themselves, evidencing such legal and regulatory compliance.

Comforsa informs the supplier if special controls are necessary for certain products with legal and regulatory requirements, and requires them to be carried out as agreed.

## 5. Product Integrity - Critical Product Features

**Product Integrity** is defined as:

### **Product Safety + Product Compliance**

Comforsa only manufactures products that do not put people's health and safety at risk, under conditions of normal and expected use, as well as foreseeable use.

Comforsa communicates to the supplier the critical characteristics of the product, which particularly affect the function and safety of the product and Comforsa's customer satisfaction. These characteristics are indicated in the drawings, specifications and/or purchase order.

For characteristics that affect product safety, the supplier must have documented processes for the management of products and production processes relevant to safety, including at least the following points:

- Identification of relevant product safety features.
- Identification and controls at the production station of the characteristics linked to the safety of the product.
- Approvals by Comforsa of control plans and process FMEAs.
- Reaction plans.
- Definition of responsibilities, escalation process and flow of information to the level of senior management and notification to Comforsa.
- Specific training of personnel linked to products and processes relevant to product safety.
- Process modifications must be approved prior to execution, and an assessment of the potential effects on product safety arising from such process modifications must be included.
- Broadcast of product safety requirements throughout the supply chain, including Comforsa's designated sources of supply.
- Product traceability by manufacturing batch throughout the supply chain.
- Lessons learned for new product start-ups.

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For those products that include characteristics that affect the safety of the product, Comforsa defines annual KPIs with their corresponding targets, as well as a special process audit program that is communicated to the supplier, and in which the KPIs are also reviewed.

## 6. Homologation of suppliers

The homologation process for suppliers of processes, products and services consists of the following requirements:

### Suppliers Type I and II

- **Quality system homologation**

The supplier has to be IATF 16949:2016 or ISO 9001:2015 certified by an accredited third-party body.

- **Product homologation (PPAP process)**

The PPAP process is applied for the approval of both new products and processes, as well as modifications to them.

Comforsa requires by default a PPAP level 3 for the approval of samples, unless another level is specified.

For suppliers of raw materials (steel), the Comforsa Laboratory specifies the approval requirements for each grade of steel to be supplied.

PPAP application examples:

- Production of a new product.
- Implementation of changes in processes.
- Moving existing processes to new production plants.
- Implementation of modifications in drawings, specifications or materials.
- Changes made by second-tier suppliers to critical subcomponents or materials.

If the result of the evaluation is conforming, the supplier is transferred to the status of **Approved** and recorded in the Comforsa supplier database.

If the result is non-conforming, the supplier remains as **Non-Approved** and an action plan is required.

Once the plan has been closed with the evidence of effective implementation of the actions, the supplier becomes **Approved**.

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### Suppliers Type III and IV

In this case, no approval requirements apply, but special monitoring is made on the first 3 purchases of the product or service.

If the result of these purchases is conforming, the supplier is transferred to the status of **Approved** and is recorded in the Comforsa supplier base.

If the result is non-conforming, the supplier remains as **Non-Approved** and an action plan is required.

Once the plan has been closed with the evidence of effective implementation of the actions, the supplier becomes **Approved**.

### 7.- Management of deviations

At the time of receiving a notification from Comforsa for any deviation in quality or deliveries, suppliers must implement a containment action within a maximum of 24 hours.

Likewise, within a maximum period of 10 business days, unless Comforsa specifies another period, suppliers must submit a corrective action plan.

The deviations generated by Comforsa are classified as critical, major or standard.

At the time of receiving a critical deviation notification, unless otherwise specified, suppliers must carry out a detailed 8D report, identifying containment measures, root cause analysis, and root cause elimination.

The supplier must immediately notify Comforsa, upon discovering that it may have shipped a non-conforming product or suspected of being non-conforming.

The notification must be addressed to the Quality Plant Responsible or Laboratory (in case of material) and to the SQA.

The supplier assumes all costs and expenses generated by any deviation or defect in the materials supplied for which they have been responsible.

The supplier must have a Product Liability insurance policy, which covers it in the event of a major quality incident.

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## 8.- Evaluation of suppliers

The evaluation of compliance to guarantee the conformity of products and processes is carried out through the assessment of the following indexes:

### Type I and II Suppliers

- Delivery performance.
- Non-conformities of product, process or service delivered.
- Disruptions at the customer's plant, including supply holds and stoppages.
- Customer notifications of special status for quality issues or deliveries.
- PPM.

### Type III and IV Suppliers

- Delivery performance.
- Non-conformities of the product or service delivered.
- Disruptions at the customer's plant, including supply holds and stoppages.

The result of this evaluation, as well as the compliance target for the new year, are communicated annually to the supplier by Purchasing-Suppliers.

The result of the evaluation can be:

- Level A: EXCELLENT performance, which fully meets our requirements.
- Level B: GOOD performance, we encourage your company to achieve Level A.
- Level C: SUFFICIENT performance, improvement plan is required within the next 20 business days.
- Level D: INSUFFICIENT performance, action plan is required within the next 10 business days.

## 9.- Management of changes in processes or products

To carry out a change in processes or products, suppliers must submit a change request to Comforsa's Technical Department and obtain approval before implementation.

Verbal requests are not accepted and changes are not implemented without having received written approval from Comforsa's Technical Department.

These changes include, for example: changes in sub-suppliers of critical components, changes or modifications in materials, off-line rework or recovery of products, etc.

The supplier must deliver the validation data, including dimensional reports, performance tests, and pre- and post-process parameters, that support the change to demonstrate proper change control.

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For products with safety features, each change in the engineering level of Comforsa's customers requires the review of the engineering technical specifications together with the supplier to establish a final agreement.

The consequences of uncommunicated or unauthorized and implemented changes to the supplier's or sub-supplier's process may result in the following actions:

- Issuance of a non-conformity.
- Implementation of immediate containment measures with an external company or Comforsa itself.

All costs generated by a change in the process not authorized by Comforsa are invoiced to the supplier.