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# **Stanley Industries, Inc.**

## **ISO 9001:2008 Quality Policy Manual**

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### **1. Introduction**

The purpose of this document is to outline the operational policies of STANLEY Industries, to define the company's quality management system (QMS) structure and to provide an overview of operational processes and support activities.

This Quality Policy Manual is based on the requirements of ISO 9001:2008. Wherever the reference is listed as ISO 9001, the reference is to the 2008 revision.

This quality manual is a controlled document and includes the company's quality policy statement. Process interaction diagrams for STANLEY's processes and supporting company procedures and work instructions have been established to support the Quality Management System.

### **2. Scope**

This Quality Policy Manual, in addition to referenced procedures and other documents, applies to all operations of STANLEY Industries. These documents, collectively referred to as the "Quality Management System", are in effect for all products, services and processes in use throughout the STANLEY organization.

This Quality Policy Manual has been developed to meet the requirements of an ISO 9001 Quality Management System, STANLEY's organization and their customers.

#### **Exclusions:**

All requirements of the ISO 9001 standard are applicable to STANLEY with the exception of Section 7.3 Design Control.

- The exclusion of Section 7.3 does not affect the organization's ability, or responsibility, to provide the service of fastener sales and distribution and does not affect any applicable regulatory requirements.

### **3. Business Operations & Organizational Overview**

#### **BACKGROUND**

STANLEY Industries was incorporated in 1979 and has grown to become a major fastener distributor. STANLEY Industries has over 35,000 square feet of inventory and prides itself on its long-term commitment to quality products and services.

STANLEY's Statement of Purpose is as follows:

1. Our claim is that we provide our customers with the best products available at a fair price.
2. Our goal is to be a company that our customers:
  - a) Realize our staff has a vast knowledge of fastener and its requirements
  - b) Knows that we will deal with them with integrity and honesty

3. To meet our goal –
- a) We must listen carefully to what our customers want. Our customer defines quality.
  - b) We must be aggressive in seeking out ways to serve our customers. Each of us contributes to the total effort and each of us is responsible for doing the best job we can.
  - c) We must not be afraid to take chances for our customers.
  - d) We must work as a team – we cannot do it alone, we must come together to better serve our customers.
  - e) We must try to make a valuable contribution to our community in which we live and work.
  - f) We must maintain a commitment to quality, service and dedication to our customers and keep our competitive advantage.
  - g) We must remember that excellence is achieved by preventing problems rather than correcting them after they occur.

### **4. Quality Management System**

#### **4.1 General Requirements:**

STANLEY Industries has established, documented, and implemented an operations management system that meets the requirements of the ISO 9001 Quality Management System Requirements. This system is reviewed, maintained and improved. Implementation of this system includes:

- a. *Determination of the processes needed for the effective operation of STANLEY Industries' Quality Management System*
- b. *Determination of the sequence and interaction of key activities and processes*
- c. *Determination of criteria and methods required to ensure the effective operation and control of processes*
- d. *Availability of resources and information necessary to support STANLEY's quality management system and to monitor key processes*
- e. *Measurement, monitoring and analysis of processes as applicable*
- f. *Implementation of actions necessary to achieve planned results and continuous improvement.*

Process Interaction Diagrams have been created for STANLEY processes. These processes are managed in accordance with the requirements of ISO 9001. STANLEY process interactions have been developed and include the following:

- *Sales*
- *Quality*
- *Top Management*
- *Purchasing*
- *Warehouse/Inventory*

If STANLEY Industries chooses to outsource processes, appropriate control is exercised over the supplier/vendor and the process outsourced. This level of control required is determined by the responsible department and/or management, and is identified in the supporting supplier/vendor documents.

#### **4.2 Documentation Requirements:**

STANLEY's Quality Management System has been documented through the use of this Quality Policy Manual. The type and extent of documentation is determined by the complexity of processes and the competence of assigned personnel. Documents, including records, used as part of STANLEY's Quality Management System are controlled, including:

- a. *Approval of documents for adequacy prior to issue*
- b. *Review, updating, and re-approval as appropriate*
- c. *Identification of the revision status*
- d. *Availability at all locations where needed*
- e. *Readily identifiable, retrievable and legible*

- f. *Inclusion of external documents, such as ISO standards, customer-specific manuals, regulatory standards, etc., determined necessary for STANLEY's planning and operation. These documents are identified and distribution is controlled.*
- g. *Identification and/or removal of obsolete documents from the point of use*

Records are established to provide evidence of conformance to requirements and of the effective operation of STANLEY's Quality Management System. Procedures are in place for the identification, storage, retrieval, protection, retention and disposition of required records. These records are maintained in a manner to ensure they remain legible, readily identifiable and retrievable.

## 5. Management Responsibility

### 5.1 Management Commitment

The Executive Management Team (EMT) of STANLEY Industries is responsible for providing evidence of commitment to the development and improvement of STANLEY's Quality Management System. This is accomplished by:

- a. *Communication to personnel throughout the organization of the importance of meeting internal and external customer requirements as well as regulatory and/or legal requirements.*
- b. *Establishment of a STANLEY Quality Policy Manual and specific quality goals and objectives*
- c. *Providing direction to ensure that operational goals and objectives are established*
- d. *Scheduled management reviews of STANLEY's Quality Management System (see Section 5.6)*
- e. *Provision of resources necessary to achieve STANLEY's quality objectives*

### 5.2 Customer Focus

The Executive Management Team, through direction and communication to department personnel, is responsible to ensure that customer needs and expectations are determined, integrated into internal operating requirements, and fulfilled with the aim of achieving customer satisfaction.

### 5.3 STANLEY Industries' Mission Statement (Quality Policy)

STANLEY's Mission Statement:

- a. *Is appropriate to the purposes of the STANLEY Industries organization*
- b. *Includes a commitment to meeting requirements and continual improvement*
- c. *Provides a framework for establishing and reviewing the company's quality objectives*
- d. *Is communicated and understood at appropriate levels in the organization*
- e. *Is reviewed for continuing suitability*

STANLEY Industries has established and published a quality policy statement and strives to ensure that the importance of this statement is discussed during employee training sessions and at the time of new employee orientation. All employees are required to know and understand STANLEY's quality policy statement.

### **QUALITY POLICY STATEMENT**

STANLEY's objectives for quality are to organize its operations via the following:

- *To implement a quality system that satisfies the provisions of ISO.*
- *To strive to meet and exceed our customers needs and expectations for quality products.*
- *To train our employees to understand and use the provisions of our quality system.*
- *To focus on continued effectiveness in areas of quality.*

We express these objectives in the following quality policy statement that is established, communicated and implemented throughout the organization:

***Quality Fasteners, Happy Customers, Constant Improvement.  
If it is to be, it is up to me!***

#### **5.4 Planning**

##### **5.4.1 Quality Objectives:**

STANLEY's Executive Management Team, in conjunction with department personnel, ensures that appropriate quality objectives are established throughout the organization. Quality objectives are measurable and consistent with STANLEY's Mission Statement and the organization's commitment to continual improvement. The objectives of STANLEY's Mission Statement are accomplished through employee awareness, involvement, and commitment. These objectives are measurable and include maintaining a 28 or greater STANLEY Customer Satisfaction Score.

##### **5.4.2 Quality Management System Planning:**

STANLEY's Executive Management Team, in conjunction with department personnel, is responsible to ensure that the resources needed to achieve the company's quality objectives are identified and planned. This includes planning for:

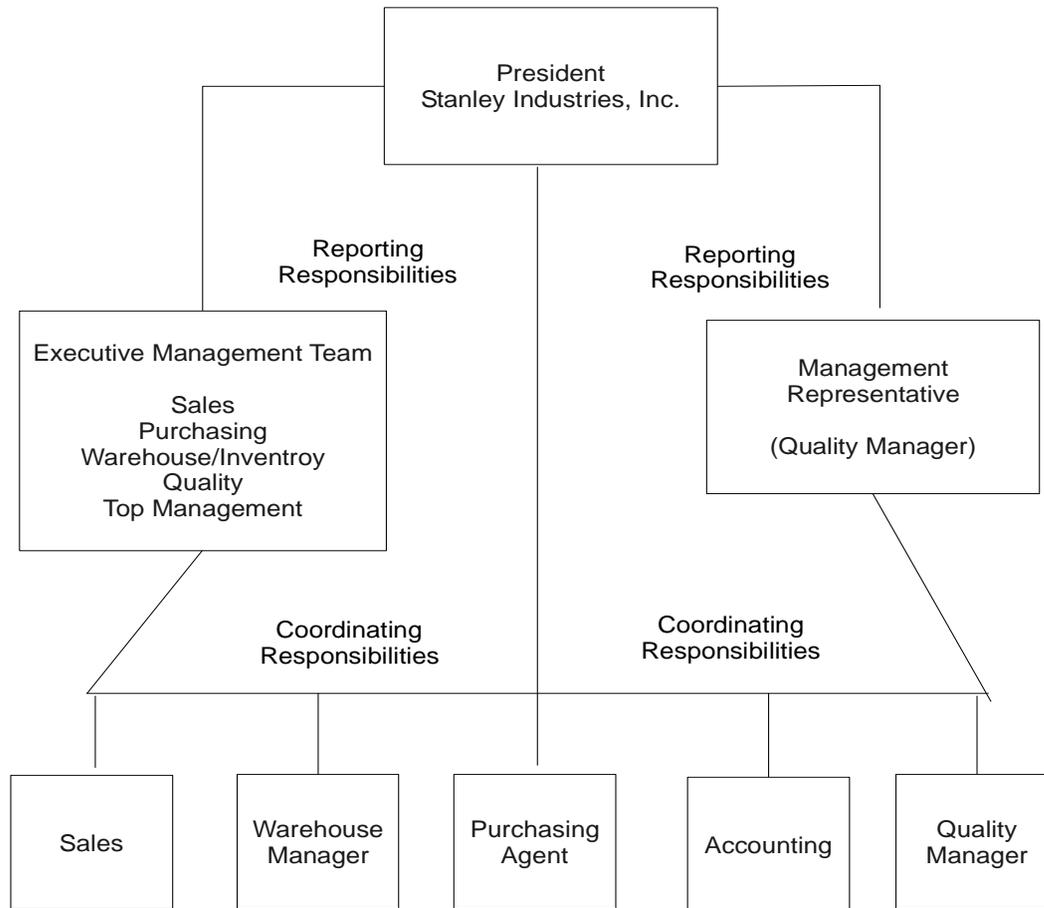
- Individual processes as defined and contained in the Quality Management System*
- Identification and provision of resources needed to achieve established quality objectives*
- Continual improvement of STANLEY's Quality Management System.*

Planning ensures that change is conducted in a controlled manner and that the integrity of STANLEY's Quality Management System is maintained during these changes.

#### **5.5 Responsibility, Authority & Communication**

##### **5.5.1 Responsibility & Authority:**

Responsibility and authority for key activities are defined in individual department procedures. STANLEY's business structure, along with key responsibilities and authorities, can be depicted as shown on the following page:



### 5.5.2 Management Representative:

STANLEY's quality Manager has been appointed as the Management Representative to oversee the company's ISO 9001 Quality Management System. Responsibilities of the Management Representative include:

- a. Ensuring that STANLEY's Quality Management System is effectively established, implemented, and maintained.
- b. Reporting to top management on the performance of the Quality Management System, including changes and improvements.
- c. Promoting awareness of customer requirements throughout the organization.
- d. Acting as liaison with external parties on matters relating to STANLEY's Quality Management System.

### 5.5.3 Internal Communication:

Individual department managers are responsible to ensure that communication between all levels and functions, regarding the processes of the quality management system and the effectiveness of these processes, is adequate and appropriate for the company's operations.

## 5.6 Management Review

### *5.6.1 General:*

The Executive Management Team reviews STANLEY's Quality Management System at predetermined intervals to ensure continuing suitability, adequacy, and effectiveness. These reviews evaluate the need for changes to STANLEY's Quality Management System, including established quality policies and objectives.

### *5.6.2 Management Review Input:*

Input to the management review includes:

- a. Results of internal and compliance audits*
- b. Customer feedback, including customer complaints*
- c. Key process performance measurements*
- d. Status of preventive and corrective actions*
- e. Follow-up actions from earlier management reviews*
- f. Changes that could adversely affect the company's Quality Management System*

### *5.6.3 Management Review Output:*

Outputs from management review include:

- a. Improvements to the Quality Management System, including recommendations for improvements to key business unit processes*
- b. Improvements of STANLEY's operations as they related to customer requirements*
- c. Resource needs*

Results of management reviews are recorded and maintained.

### **6. Resource Management**

#### **6.1 Provision of Resources**

STANLEY Industries determines and provides, in a timely manner, the resources needed to implement and enhance customer satisfaction by identifying and improving the organization's processes. Resource requirements are identified during management review meetings and/or during business planning sessions.

#### **6.2 Human Resources**

##### **6.2.1 General:**

Individual department personnel, with assigned responsibilities in STANLEY's Quality Management System, are competent and qualified based on applicable education, training, skills, and/or experience to ensure product and/or service conformity.

##### **6.2.2 Competence, Awareness & Training:**

In order to ensure that STANLEY's Quality Management System achieves both the organization's and the customer's objectives, STANLEY:

- a. *Determines the competence needed for personnel performing activities affecting quality and the company's business operations*
- b. *Provides training to achieve necessary competence*
- c. *Evaluates the effectiveness of training on a periodic basis*
- d. *Ensures that employees are aware of the relevance and importance of their activities affecting conformity to STANLEY's requirements and how they contribute to the achievement of the company's quality objectives*
- e. *Maintains appropriate records of education, training, skills, and experiences*

#### **6.3 Infrastructure**

STANLEY's management personnel are responsible to identify, provide, and maintain the infrastructure needed to achieve the level of product and service required to meet both the customer's and STANLEY's quality objectives. Infrastructure requirements include:

- a. *Buildings, workspace, and associated utilities*
- b. *Processing and service equipment, including hardware and software*
- c. *Supporting services, including transportation, communication or information systems*

#### **6.4 Work Environment**

STANLEY's management team is responsible to ensure that department personnel identify and manage the work environment needed to achieve conformity of the products and services provided by STANLEY.

### **7. Product Realization**

#### **7.1 Planning of Product Realization**

Product realization is the sequence of processes and activities required to provide STANLEY's Products. Planning of the product realization process is consistent with STANLEY's Quality Management System and is detailed in this Quality Policy Manual.

While performing product realization planning, the following are considered, as appropriate:

- a. *Quality and operational objectives for the sales and distribution of fasteners and related fastening products.*
- b. *The need for processes, documentation, resources, and facilities to provide STANLEY's products*
- c. *Verification, validation, monitoring, and inspection activities, including the establishment of criteria for acceptability*
- d. *The creation and retention of records that are necessary to provide confidence of conformity of STANLEY's processes and resulting products*

#### **7.2 Customer-Related Processes**

##### **7.2.1 Determination Of Requirements Related To STANLEY Industries Products:**

STANLEY Industries determines customer requirements, including

- a. *Requirements specified by the customer, including delivery activities*
- b. *Requirements not specified by the customer, but necessary for specified or intended use, where known*
- c. *Obligations related to STANLEY's services, including applicable product regulatory and legal requirements*
- d. *Any additional requirements consider necessary by STANLEY Industries, to be of critical importance to assure the consistency of the company's products*

STANLEY Industries reviews the customer's stated requirements in conjunction with standard industry practices and STANLEY's designated practices. This review is performed prior to committing to supply the requested products. Controls in place to ensure that:

- a. *Product and/or system requirements are defined*
- b. *Customer requirements are confirmed if there is no documented statement of requirements (i.e. a verbal order)*
- c. *Differences in contract or order requirements are resolved*
- d. *STANLEY Industries has the ability to meet all defined requirements*

Records of the customer's requirements and STANLEY's review are maintained.

Where changes in the customer's stated requirements occur, STANLEY ensures that relevant documentation is amended and that responsible personnel are notified of the changes.

##### **7.2.3 Customer Communication:**

STANLEY Industries identifies and implements arrangements for communications with customers relating to:

- a. *Product information*
- b. *Inquires, contracts or order handling, including amendments to these contracts or orders*
- c. *Customer feedback, including complaints*

### **7.3 Design and Development**

STANLEY Industries is not responsible for product design activities and has excluded Section 7.3 – Design & Development.

### **7.4 Purchasing**

#### **7.4.1 Purchasing Process:**

Purchasing activities are monitored and controlled to ensure that product, materials, and/or services purchased conform to requirements. The type and extent of control is dependent on the effect of the product, material, and/or service on the products provided by STANLEY Industries.

STANLEY evaluates and selects suppliers on the basis of their ability to meet the organization's requirements. Criteria for selection, evaluation, and re-evaluation are defined. Records of supplier evaluations and associated supplier issues are maintained by individual STANLEY departments.

#### **7.4.2 Purchasing Information:**

Purchasing documents describe the product, material, and/or services to be purchased including where appropriate:

- a. *Requirements for approval or qualification of the product, material, and/or service, including required procedures, processes, and/or equipment*
- b. *Requirements for qualification of personnel*
- c. *Quality Management System requirements*

STANLEY Industries ensures that specified requirements, as detailed in purchasing documents, are adequately reviewed prior to release to the supplier.

#### **7.4.3 Verification of Purchased Product:**

STANLEY Industries has identified, established, and implemented the process controls necessary for the verification of purchased product.

If STANLEY Industries or their customers propose to verify product at the supplier's facilities, the arrangements and methods of product, material, and/or service release is included in the purchasing document.

### **7.5 Product & Service Provision**

#### **7.5.1 Control of Product & Service Provision:**

STANLEY Industries plans and carries out the organization's servicing offerings through:

- a. *The availability and communication of information specifying the characteristics of the products to be provided*
- b. *The availability and use of procedures, and process-specific work instructions, as necessary*
- c. *The use and maintenance of suitable equipment & tools*

- d. *The availability and use of measuring and monitoring equipment, where appropriate*
- e. *The implementation of monitoring and measurement activities*
- f. *The implementation of defined processes for product release, delivery, and applicable post-delivery activities.*

### **7.5.2 Validation of Processes For Product & Service Provision:**

Where subsequent monitoring or measurement cannot verify the results of products or servicing activities, STANLEY Industries has established and implemented appropriate controls to ensure that these activities are monitored and controlled. This includes any processes where deficiencies become apparent only after the product has been delivered. STANLEY has established the appropriate process control systems to validate the ability of the company's processes to achieve the planned results. Validation arrangements include, as appropriate:

- a. *Defined criteria for the review and approval of processes*
- b. *Approval of equipment and qualifications of personnel*
- c. *Use of specific freight handling and coordination methods and procedures*
- d. *The creation and retention of records to support effective control of these processes*
- e. *Revalidation of processes where modifications and/or changes occur*

### **7.5.3 Identification and Traceability:**

Product, materials, and/or service operations are identified by suitable means throughout the implementation and servicing operations. The status of product, materials, and/or servicing operations is identified with respect to measurement and monitoring requirements.

Where traceability of product, materials, and/or servicing operations is a requirement, a unique identification of the item is established to ensure that control is maintained. Records of product traceability are maintained.

### **7.5.4 Customer Property:**

STANLEY Industries has established appropriate controls to ensure that the customer's property, including intellectual property, is protected from loss, damage, and/or inadvertent use/misuse while the property is under the STANLEY's control. Customer property is identified, protected and safeguarded from conditions that may cause damage. Any customer property that is lost and/or damaged is recorded and reported to the customer. Records of customer notification of property loss or damage are maintained.

### **7.5.5 Preservation of Product:**

Product and/or materials are preserved to the extent necessary to meet customer and STANLEY Industries requirements. This includes identification, handling, packaging, storage, and protection. Where appropriate, these activities include the preservation of product during the freight handling process.

## **7.6 Control of Measuring and Monitoring Equipment**

STANLEY identifies the monitoring and measurements to be made and monitoring and measuring equipment required to provide evidence of conformity of product to determined requirement. This is done during planning for product realization (see section 7.1).

STANLEY establishes inspection and test processes (see section 8.2) to ensure that monitoring and measurement can be carried out and are carried out in a manner that is consistent with the monitoring and measurement requirements of the product being provided.

Measuring and monitoring equipment is controlled to ensure that the equipment is:

- a. *Calibrated or verified at specified intervals, or prior to use, against measurement standards traceable to international or national measurement standards; where no such standards exist, the basis used for calibration or verification is recorded;*
- b. *Adjusted or re-adjusted as necessary*
- c. *Identified to enable the calibration status to be determined*
- d. *Safeguarded from adjustments that would invalidate the measurements result*
- e. *Protected from damage and deterioration during handling, maintenance, and storage*

STANLEY assesses and records the validity of previous measuring results when the equipment is found not to conform to established requirements. The organization takes appropriate action on the equipment and any product affected. Records of the results of calibration and verification are maintained. Software used for measuring and monitoring is validated prior to use and reconfirmed as necessary.

### **8. Measurements, Analysis, and Improvement**

#### **8.1 General**

STANLEY Industries plans and implements the monitoring, measurement, analysis, and improvement processes needed to:

- a. *Demonstrate the capability and conformity to the products and services provided*
- b. *Ensure the capability and conformity of STANLEY's Quality Management System*
- c. *Continually improve the effectiveness of STANLEY's Quality Management System*

These activities include the determination of the need for, and use of, applicable methods including statistical techniques.

#### **8.2 Measuring and Monitoring**

##### **8.2.1 Customer Satisfaction:**

Individual departments have established and use a variety of process monitoring methods to track customer satisfaction and/or dissatisfaction. The primary measures of customer satisfaction are defined by STANLEY's project Management Index and Service Level Agreement measurables.

##### **8.2.2 Internal Audits:**

STANLEY Industries conducts periodic internal audits to ensure operational compliance and to verify the effectiveness of the company's quality management system.

- *Audits are planned and scheduled based on the importance of the activity and/or area being audited and include the results of previous audits*
- *The audit scope, frequency, and methods are defined*
- *The selection of auditors and the audit process has been structured to ensure objectivity and impartiality of the audit process*
- *Audits are conducted by qualified personnel independent of the area and/or process being audited*

The designated Audit Program Manager coordinates the responsibilities and requirements for planning and conducting audits at STANLEY, including systems for reporting audit results and maintaining of records.

Management personnel within each department audited are responsible to ensure that corrective actions are taken to eliminate detected audit findings/nonconformities and the associated causes. Follow-up activities include the verification of the implementation of corrective action and the reporting of follow-up corrective action(s).

STANLEY has documented an internal audit procedure to define responsibilities and requirements related to audit activities, including records and reporting results.

##### **8.2.3 Monitoring and Measurement of Processes:**

STANLEY Industries has identified key process monitoring and measuring requirements that the company deems necessary to provide assurance of meeting the customer requirements. These monitoring and measuring requirements are tracked on a regular basis and are used to confirm the continuing ability of each process to achieve its intended purpose.

### **8.2.4 Monitoring and Measurement of Product:**

STANLEY Industries monitors and measures customer requirements to verify that these requirements are met. This is carried out at appropriate stages of the product service process.

- *Evidence of conformance, including acceptance criteria, is recorded.*
- *When planned results are not achieved, corrective and/or preventive action is taken, as appropriate, to address the issues and to ensure that subsequent product and/or services to be provided are capable of meeting both the company's and customer's expectations.*
- *Records indicate the authority responsible for release of product for delivery to the customer.*
- *The company's services and/or products are not designated as complete until all specified requirements and/or activities have been satisfactorily completed.*

### **8.3 Control of Nonconforming Products**

STANLEY Industries ensures that the products that do not conform to STANLEY's and/or customer's requirements, are identified, reviewed, and addressed to prevent recurrence. Nonconforming products are addressed by one or more of the following ways:

- a. *By taking corrective and/or preventive action to eliminate the detected nonconformity*
- b. *Obtaining authorization for its use, release or acceptance by a relevant authority and/or by the customer where applicable*
- c. *Through the implementation of problem solving/continuous improvement efforts to identify causes for nonconformance and to implement process improvement recommendations.*

Records of nonconformance, including subsequent action(s) taken, are maintained. When products are modified and/or corrected to address the reason(s) for nonconformance, the product is re-inspected to ensure conformance to requirements. If nonconforming product is detected after delivery, the department responsible will take corrective action appropriate to the effect, or potential effect, of the nonconformity and the customer shall be notified.

### **8.4 Analysis of Data**

STANLEY Industries collects and analyzes appropriate data to determine the suitability and effectiveness of the company's quality management system and to identify areas where improvements can be made. This includes data generated by measuring and monitoring supporting freight handling activities and/or through other relevant sources.

STANLEY Industries analyzes this data to provide information on:

- a. *Customer satisfaction/dissatisfaction*
- b. *Conformance to product and/or service requirements*
- c. *Characteristics and trends of processes and/or products, including opportunities for preventive action*
- d. *Suppliers*

### **8.5 Improvement**

### *8.5.1 Continual Improvement:*

Continual improvement of operational processes is a stated goal of STANLEY Industries. Continual improvement of STANLEY Quality Management System is centered on the monitoring and use of individual department operations and quality:

- *Policies*
- *Objectives*
- *Audit results*
- *Analysis of data*
- *Corrective and preventive actions*
- *Management reviews*

### *8.5.2 Corrective Action:*

STANLEY Industries takes action to eliminate the cause of nonconformities in order to prevent recurrence. Corrective action is appropriate to the impact of the nonconformance encountered. The corrective action process is documented and includes:

- a. *Reviewing nonconformities, including customer complaints*
- b. *Determination of the causes of nonconformity*
- c. *Evaluation of the need for actions to ensure that nonconformities do not recur*
- d. *Determination and implementation of the corrective action needed*
- e. *Recording of results of action taken*
- f. *Review of the effectiveness of the corrective action taken*

### *8.5.3 Preventive Action:*

STANLEY Industries has established and implemented a variety of internal processes and/or reviews to eliminate the cause(s) of potential nonconformities. Preventive actions taken are appropriate to the impact of the potential problems. Requirements for preventive action include:

- a. *Identification of potential nonconformities and their causes*
- b. *Determination of the degree of preventive action needed*
- c. *Recording of the results of preventive action taken*
- d. *Review of preventive actions taken*
- e. *Review of the effectiveness of the preventive action taken*

## **Document Approval**

<i>Name</i>	<i>Title</i>	<i>Date</i>
Jim Cash	President	9/30/09

**Document Revision Table**

<i>Revision</i>	<i>Date</i>	<i>Change Description</i>
0	2/28/97	ISO 9002:1994 Release
1	4/30/03	Updated to include ISO 9001:2000 requirements
2	9/30/09	Updated to include ISO 9001:2008 requirements