



ABC Metals, Inc.

NONFERROUS METALS – PRECISION SLITTING

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Business Policy Manual

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Introduction

ABC Metals, Inc. is a service center specializing in distribution of catalog and custom precision slitting of ferrous & nonferrous metals. It is our mission to demonstrate our commitment to integrity and service in every relationship. With over 32 years in the metals industry, ABC Metals, Inc. is committed to providing consistent product that meets our customer's needs. ABC Metals Inc. consists of facilities in Logansport, In. Pharr and EL Paso Texas.

Scope & Purpose – Quality Management Systems Integration

ABC Metals Inc. -, has a strategically planned quality management system that conforms to ISO/TS 16949:2002. We have integrated our Quality Management System as part of our business. We are committed to excellence in quality and strive to maintain customer satisfaction as a foundation of our business. Our Quality Policy, Quality Manual, operating procedures, documents & forms are written in an easy-to-use manner to be a useful and relevant guide to our process integrated approach to conducting our business. Operating procedures are referenced in their relevant section as “(QOP-xx-xx)”, to give a more detail, definition, and clarify responsibilities for a process or procedure.

Throughout this manual, as well as other documents, the QMS is termed as a business management system or business system to encourage the integration of our QMS into day-to-day life of the business with no notable separation of the systems. This matured system provides the foundation to address our customer's expectations. However, we understand that it takes more than a foundation to demonstrate an ability to provide a level of excellence and consistent results that lead to overall customer satisfaction. That is why everyone at ABC Metals, Inc. is committed to skillful execution and continual improvement of our manufacturing processes including product, customer, corporate, and regulatory requirements.

This business policy manual gives our employees, customer, suppliers, subcontractors, and any other interested parties, an overview and outline of our business and the framework for the requirements, as discussed above. Our senior management team is dedicated to communicate the importance of meeting these requirements, as well as regulatory and legal requirements. Throughout this manual and our procedures, the terms *Senior Management* and *Top Management* are used interchangeably. We define our Senior /Top Management team from the President and C.O.O., to managers whom are responsible for all aspects of ABC Metals, Inc. including respects to financial, quality, & production (Figure 2)

Exclusions – Product Design & Development Activities

While ABC Metals, Inc. is focused on customer expectations, needs, and strives to excel beyond average service and provide exceptional products, we do not design or develop products. All product characteristics are specified by customers. We are committed to comprehension and delivering product that meets our customer requirements and understanding that our expertise and engineering activities are focused on best practices of the design and development of our manufacturing processes. Thus, in relationship to ISO/TS 16949:2002, ABC Metals, Inc. is excluded from product design & development as defined in clause 7.3 and any sub-clauses 7.3.1, 7.3.2, 7.3.2.1, 7.3.3, 7.3.3.1 or portion thereof, that defines requirements applicable to the design of products, including product design and verification and validation activities.

Process Approach - Flow & Interactions



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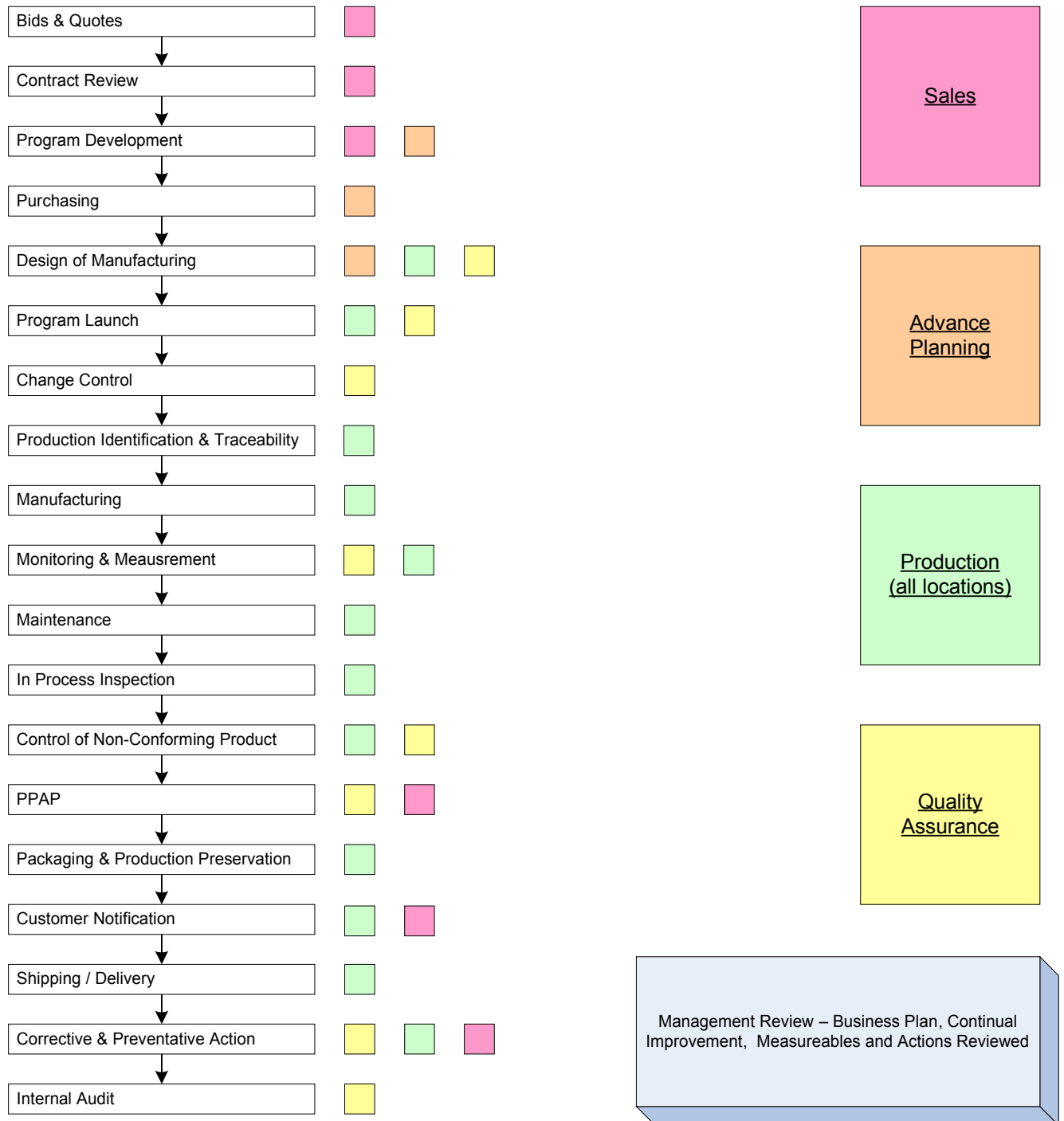
Our system is defined in terms of a process approach, flowing from the primary processes, or those that impact our customers: Sales, Advance Planning, Production, & Delivery, to those activities and processes that support or are used to manage effectively. For simplicity, the inter-relationships of our system are illustrated in Figure 1.



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Figure 1 - Business Process Flow / Interaction Overview





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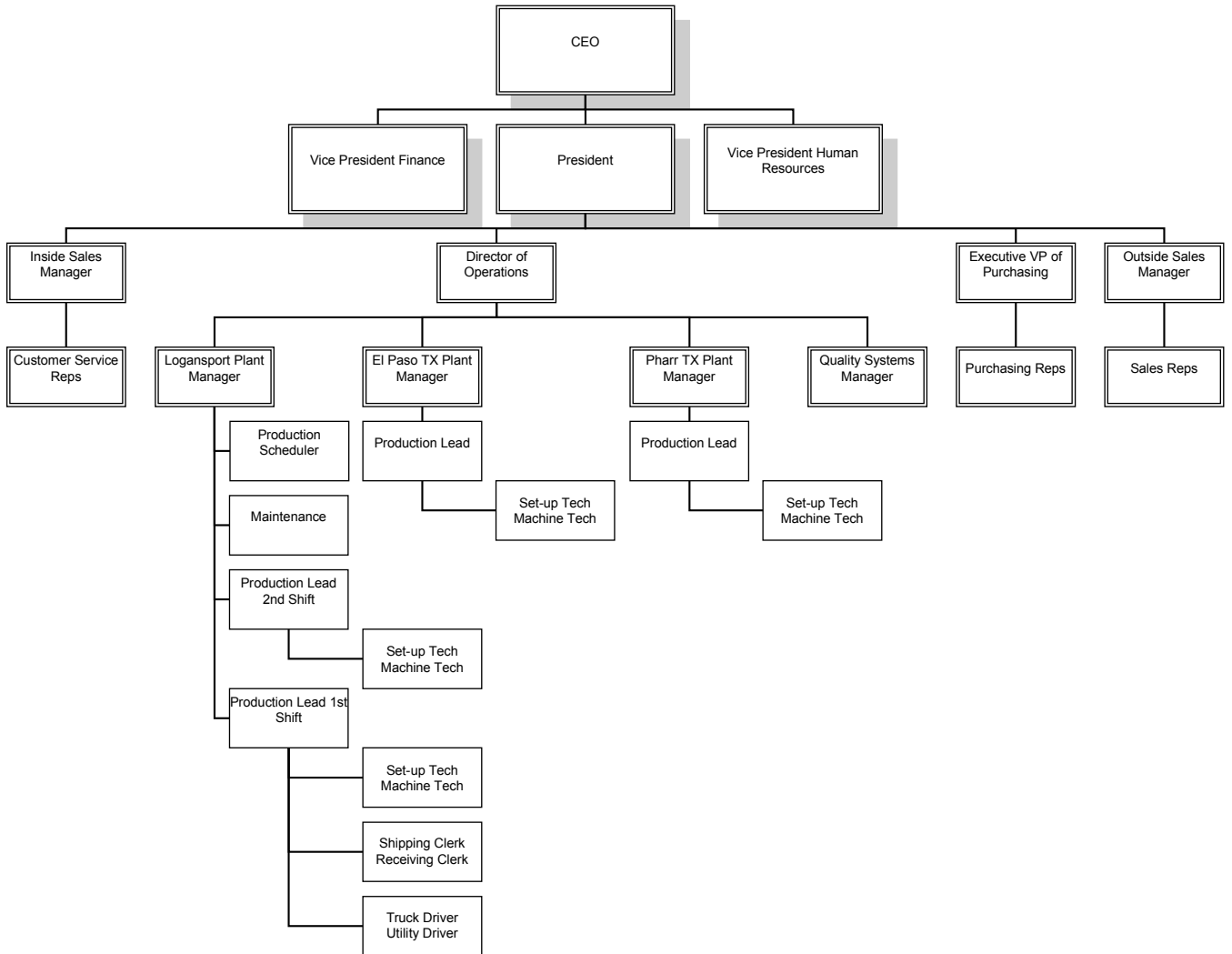
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Figure 2 - Organizational Structure





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Our Commitment to Excellence: Business Policy & Objectives

Meeting or surpassing customer requirements 100% of the time

Our objectives are to continually improve our products, processes, services, and business management system.

The main role of our business policy is to define the principal goal for our business in our pursuit for excellence. Senior management communicates the company's commitment and dedication to delivering a quality product to its customers. The policy is posted throughout the company, posted on the internet, explained during orientation training provided to all employees, and communicated to customers, suppliers, and other interested parties. In order to achieve our policy, ABC Metals, Inc. has established specific objectives.

Key indicators to continually monitor the company's stability & trends on meeting our objectives to enhance our customer's satisfaction include, but are not limited to:

- Results from Internal Audit program
- Customer Feedback
- Process & Product Conformity
- Status of Preventive & Corrective Actions
- Continual Improvement activities
- Delivery Performance
- Supplier Performance

Additional information on our procedures for planning and detailed indicators are outlined and maintained as part of the management review process. Senior management reviews the continued suitability of our policy statement, objectives, as well as the key indicators during our management review process.

Our Vision

Through the development and application of our core values of *integrity, commitment, and service*, ABC Metals, Inc. will be the preeminent service center in our market, providing superior value in our relationships with our customers, employees, owners and others.

What do our values mean to our customers?

Integrity

- doing the right thing

Commitment

- doing things right

Service

- doing things with the right attitude

ABC Metals, Inc. Operating Procedures Reference

QOP-42-02 Document & Data Control

QOP-42-03 Control of Records

QOP-62-01 Training & Awareness

QOP-82-02 Internal Quality Audits



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QOP-83-01 Control of Nonconforming Product
QOP-85-03 Corrective & Preventative Action