

Measured Results - Improved Performance

Supplier Qualification Program Assessment Report

Makumiya Co., Ltd.









Report No: F_IAR_15246_SQP Audit Date: 25-Dec-2012 Kaohsiung City,Taiwan

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Supplier Qualification Program Assessment Report

| Report No | F_IAR_15246_SQP |
|-------------------|--|
| Audit Date | Dec 25, 2012 |
| Assessment Stage | Initial |
| Company Full Name | Makumiya Co., Ltd. |
| Audit Location | No. 24, Alley 53, Lane 2, Chung Shan Road, Sec. 2, Hu Nei District |
| City | Kaohsiung City |
| Country | Taiwan |
| Telephone No | 886 7 6996960 |
| Fax No | 886 7 6996912 |
| Auditor(s) Name | Johnson Lin |

Facility Performance Rating Participating Facilities: 1207 **High Performance** Meet Expectations. Facility demonstrates readiness to assume responsibilities for managing and monitoring compliance activities. Facility Score **Medium Performance Further Improvement Needed.** Global Score Moderate concern in facility's readiness to assume responsibilities for managing and monitoring compliance activities. **Low Performance** Significant Action Required. Significant concern in facility's readiness to assume responsibilities for managing and monitoring compliance activities. **Very Low Performance Urgent Action Required.** Severe concern in facility's readiness to assume responsibilities for managing and monitoring compliance activities.



Facility Profile

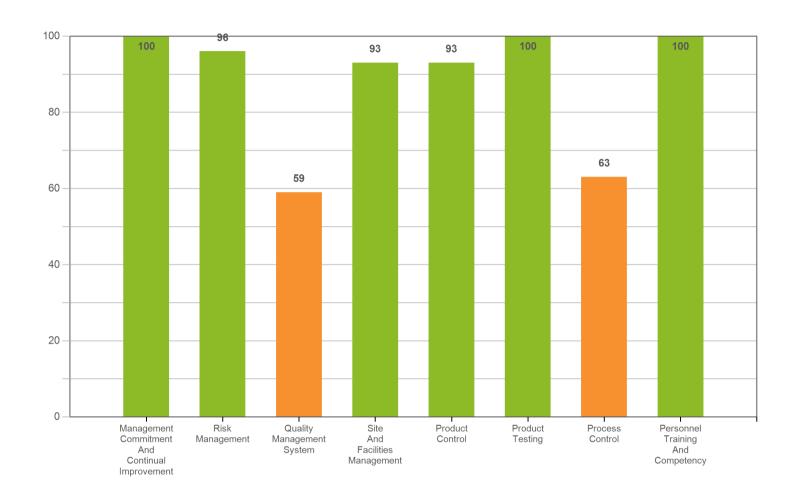
| Facility Name | Makumiya Co., Ltd. |
|--|--|
| Facility Legal Name | Makumiya Co., Ltd. |
| Contact Name, Title | Mr. Huang Yu-Feng - Manager |
| Industry | Accessories |
| Products Manufactured | Blind spot mirror |
| Production Processes | Cutting, Cleaning, Forming, Coating, Painting, Assembly & Packing |
| Total Number of Machines | 28 |
| Main Machine Types | Air compressor (4), Drill machine (1), Conveyer (5), Cleaning machine (1), Coating machine (1), Blister packing machine (1), Cutting machine (9), Gridning machine (1), Forming machine (1) and Edge forming machine (4) |
| Year facility began operations | The facility has started its operation since 1998 at the existing location. |
| Number of buildings the facility operates in | 3 |
| Range of total number of employees at the facility | 25 |
| Number of shifts and operating hours | The employees work for one week is 6 days in one shift and the normal working hour is from 8:00am to 5:00pm with 1 hour (from 12:00nn-1:00pm) lunch break |
| Person responsible for overall product safety and quality issues, Title: | Mr. Huang Yu-Feng - Manager |

Facility Overview

The facility is located in No. 24, Alley 53, Lane 2, Chung Shan Road, Sec. 2, Hu Nei District, Kaohsiung City, Taiwan. The total land area occupied by the facility is about 2376 square meters. The facility has started its operation in 1998 at the existing location. The main production processes are Cutting, Cleaning, Forming, Coating, Painting, Assembly & Packing. The main products manufactured by the facility is blind spot mirror. The capacity is about 100,000 pieces per month. The facility's main customers are located in USA and Europe. Based on the finding from the assessment, it is suggested that the facility should improve the product tracing system.



I. Facility Performance Summary



| | | Non Compliance (%) | | | | | | |
|---------------------|---------------|--------------------|------|-------------------|------|-------------------|------|--|
| Performance Summary | Overall | Major | | Moderate | | Minor | | |
| Torrormano Guillian | Compliance(%) | # of Questions | % | # of Questions | % | # of Questions | % | |
| Facility Summary | 82% | 1 | 3.8% | 9 | 8.4% | 15 | 5.5% | |

Very Low Performance(0 - 50)

Low Performance(51 -70) Medium Performance (71 - 84) High Performance (85 – 100)



II. Key Section Performance Analysis

| | Section | Compliance | Non Compliance (%) | | | | | | |
|---|-------------------|------------|--------------------|-------|-------------------|-------|-------------------|-------|-----------|
| Key Section Name | Section | Compliance | Ma | ijor | Mod | erate | Mi | nor | Questions |
| | # of Questions | % | # of Questions | % | # of Questions | % | # of Questions | % | |
| Management commitment and continual improvement | 21 | 100% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 21 |
| Risk Management | 29 | 96% | 0 | 0.0% | 1 | 4.3% | 0 | 0.0% | 30 |
| Quality Management System | 81 | 59% | 1 | 25.2% | 3 | 10.7% | 3 | 4.6% | 88 |
| Site and Facilities Management | 49 | 93% | 0 | 0.0% | 0 | 0.0% | 2 | 7.1% | 51 |
| Product Control | 49 | 93% | 0 | 0.0% | 0 | 0.0% | 2 | 6.7% | 51 |
| Product Testing | 11 | 100% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 11 |
| Process Control | 57 | 63% | 0 | 0.0% | 5 | 24.8% | 8 | 11.8% | 70 |
| Personnel Training and Competency | 8 | 100% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 8 |
| Overall Total | 305 | 82% | 1 | 3.8% | 9 | 8.4% | 15 | 5.5% | 330 |

Very Low Performance(0 - 50) Low Performance(51 -70) Medium Performance (71 - 84) High Performance (85 – 100)



III. Performance Trend Analysis



| Section Name | Current | Last | First | Change (Current-Last) | Change (Current-First) |
|---|---------|----------------|----------------|--------------------------|---------------------------|
| Management Commitment And Continual Improvement | 100 | Not Applicable | Not Applicable | Not Applicable | Not Applicable |
| Risk Management | 96 | Not Applicable | Not Applicable | Not Applicable | Not Applicable |
| Quality Management System | 59 | Not Applicable | Not Applicable | Not Applicable | Not Applicable |
| Site And Facilities Management | 93 | Not Applicable | Not Applicable | Not Applicable | Not Applicable |
| Product Control | 93 | Not Applicable | Not Applicable | Not Applicable | Not Applicable |
| Product Testing | 100 | Not Applicable | Not Applicable | Not Applicable | Not Applicable |
| Process Control | 63 | Not Applicable | Not Applicable | Not Applicable | Not Applicable |
| Personnel Training And Competency | 100 | Not Applicable | Not Applicable | Not Applicable | Not Applicable |
| Overall Score | 82 | Not Applicable | Not Applicable | Not Applicable | Not Applicable |

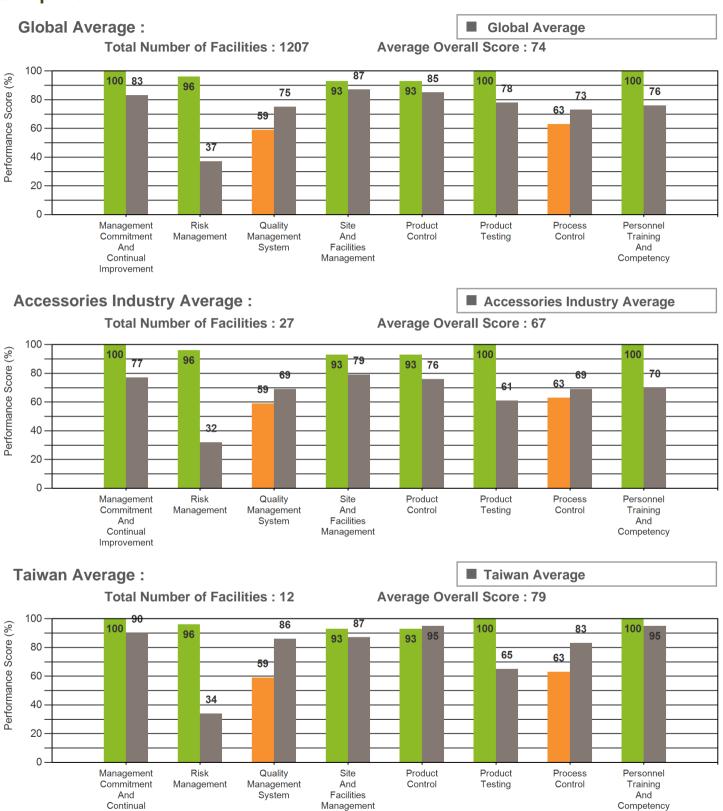
Decliner

Constant

Advancers



IV. Comparison Benchmark

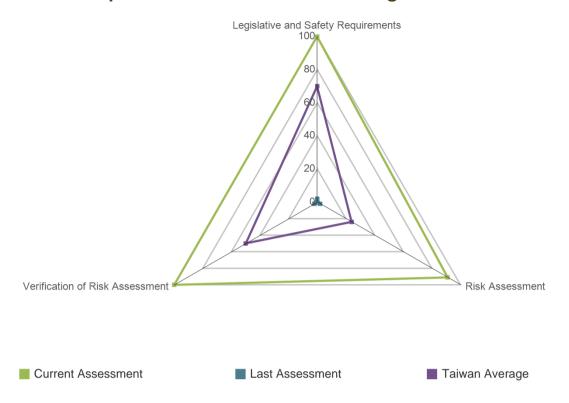


Very Low Performance(0 - 50) Low Performance(51 - 70) Medium Performance (71 - 84) High Performance (85 - 100)

Improvement



V. Sub Section Comparison Benchmark: Risk Management

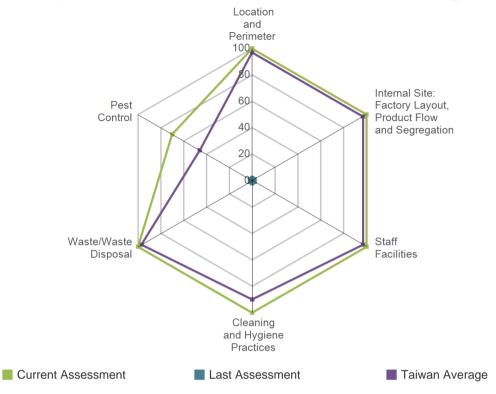


VI. Sub Section Comparison Benchmark: Quality Management System





VII. Sub Section Comparison Benchmark: Site and Facilities Management

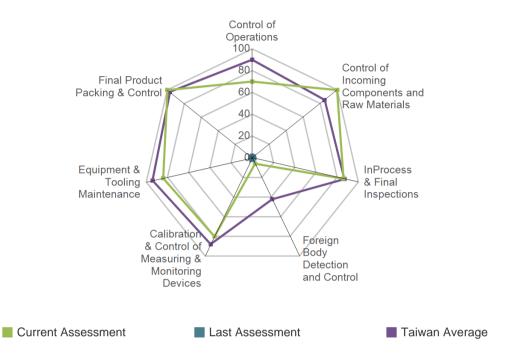


VIII. Sub Section Comparison Benchmark: Product Control





IX. Sub Section Comparison Benchmark: Process Control





X.Key Strengths and Challenges

| acility Strengths | Rating | Global Freq. of Compliance% |
|--|----------|--------------------------------|
| The company establishes a product risk assessment for each product or a group of similar products. | Moderate | 27% |
| The company conducts process risk assessment of hazards potentially introduced during the production, packaging or storage processes for its products. | Moderate | 28% |
| There is documented testing procedure/programme established for each product or a group of similar products. | Moderate | 58% |
| The product withdrawal and recall procedure is tested, at least annually. | Minor | 52% |

| Facility Challenges | Rating | Global Freq. of Compliance% |
|--|----------|--------------------------------|
| The specification does not include bill of materials. | Moderate | 97% |
| There is no procedure to handle the inspected goods regarding the policy/rule on returning inspected goods to production. | Moderate | 89% |
| The control plan does not identify the operating parameters for production equipment and tooling. | Moderate | 84% |
| Reference sample/production sample are not available for operators' reference at an accessible place or workstation. | Moderate | 84% |
| The process risk assessment does not address policies on microbiological contamination. | Moderate | 80% |
| Procedures are not established for disposal of excess stock or obsolete inventory where such situations routinely occur. | Minor | 96% |
| The company establishs a system of planned maintenance but a few production equipment and tooling are not covered. | Minor | 91% |
| There is no list to identify equipment used to make measurements in accept or reject activity relevant to product safety, quality and legality including those in-line monitoring devices. | Minor | 87% |
| Bait stations are neither robustly constructed, tamper resistant nor in good condition. | Minor | 85% |
| Fly-killing devices and/or pheromone traps are not correctly sited and not functioning. | Minor | 78% |



| Rating | Challenges | Facility Performance |
|----------|--|----------------------|
| Moderate | Sharp tools are not permanently attached to benches. | NC |
| Moderate | The company establish a product risk assessment but it does not completely cover the necessary elements. | С |
| Moderate | Technical dossier or package does not include risk assessment. | С |
| Moderate | The company does not conduct process risk assessment of hazards potentially introduced during the production, packaging or storage processes for its products. | С |
| Moderate | There is no documented testing procedure/programme established for each product or a group of similar products. | С |
| Moderate | The company does not establish a system to clearly identify the lots/batches of materials during all stages of receipt, production, storage and dispatch. | NC |
| Moderate | Incoming materials and components do not have test reports or certificates of compliance to demonstrate presence of hazardous substances / Substances of Very High Concern (SVHC) are below the threshold value for the country of sale. | С |
| Major | The company did not implement risk management systems based on a systematic risk assessment system to assure product safety legality and quality. | С |
| Moderate | The risk assessment is reviewed but the frequency exceeds one year. | С |
| Major | The company did not have a system to identify and trace raw materials through to finished goods, and vice versa. | NC |

| Rating | Challenges | Facility Performance |
|----------|--|----------------------|
| Moderate | Management review does not include risk management. | С |
| Moderate | The process risk assessment does not address calibration of equipment. | С |
| Moderate | The process risk assessment does not address policies on microbiological contamination. | NC |
| Moderate | The product risk assessment does not address user types. | С |
| Moderate | The process risk assessment does not address policies on foreign body contamination. | С |
| Moderate | Management review does not include statutory and regulatory requirements. | С |
| Moderate | The company establish a product risk assessment but it does not completely cover the necessary elements. | С |
| Moderate | The company does not conduct process risk assessment of hazards potentially introduced during the production, packaging or storage processes for its products. | С |
| Moderate | Control of jewellery wearing is not taken where there are product contamination risks. | С |
| Major | The company did not implement risk management systems based on a systematic risk assessment system to assure product safety legality and quality. | С |

| C Compliance NC Non Compliance |
|--------------------------------|
|--------------------------------|



XI. Opportunities for Improvement

Performance Rating

Medium Performance (71 - 84)

High Performance (85 - 100)



Section: Risk Management

Very Low Performance(0 - 50)

SubSection: Risk Assessment

| Current (25-Dec-2012) | Last (NA) | ID | Findings | Global Freq. of Compliance % |
|--------------------------|--------------|-------|---|------------------------------|
| Moderate | N/A | 29.06 | The process risk assessment does not address policies on microbiological contamination. | 80% |

Low Performance(51 - 70)



Section: Quality Management System

SubSection: Specifications

| Current (25-Dec-2012) | Last (NA) | ID | Findings | Global Freq. of Compliance % |
|--------------------------|--------------|-------|--|------------------------------|
| Moderate | N/A | 53.02 | The specification does not include bill of materials. BOM is not available. | 97% |

SubSection: Purchasing, Supplier & Sub-contractor Approval and Performance Monitoring

| Current (25-Dec-2012) | Last (NA) | ID | Findings | Global Freq. of Compliance % |
|--------------------------|--------------|-------|---|------------------------------|
| Minor | N/A | 75.00 | The company does not determine how exceptions are handled, where the use of products or services of unapproved suppliers are acceptable under emergency or unusual circumstances. The facility does not determine how exceptions are handled, where the use of products or services of unapproved suppliers are acceptable under emergency or unusual circumstances. | 60% |

SubSection: Identification & Traceability

| Current (25-Dec-2012) | Last (NA) | ID | Findings | Global Freq. of Compliance % |
|--------------------------|--------------|-------|--|---------------------------------|
| Moderate | N/A | 85.00 | The company does not establish a system to clearly identify the lots/batches of materials during all stages of receipt, production, storage and dispatch. The products identification system of lots/ batches during all production stages does not set up yet. | 43% |
| Moderate | N/A | 90.00 | Finished products (including re-work) do not have a full traceability from raw materials source to the customer, or vice versa. There is no effective tracking system from raw material to the customer or from the customer to the raw material. | 63% |
| Minor | N/A | 91.00 | The effectiveness of the traceability system regularly are not tested, at least annually. Effective tracking system is not available. | 38% |
| Major | N/A | 92.00 | The company did not have a system to identify and trace raw materials through to finished goods, and vice versa. The identify/ tracking system from raw material to finished goods is not set up yet. | 72% |



SubSection: Incident, Product Withdrawal and Product Recall

| Current (25-Dec-2012) | Last (NA) | ID | Findings | Global Freq. of Compliance % |
|--------------------------|--------------|-------|--|------------------------------|
| Minor | N/A | 94.00 | The company does not have a written agreements/consensus in place with relevant parties in the supply chain regarding the product withdrawal/recall. The written agreements/ consensus with relevant parties in supply chain regarding the withdrawal/ recall is not available. | 58% |



Section: Site and Facilities Management

SubSection: Pest Control

| Current (25-Dec-2012) | Last (NA) | ID | Findings | Global Freq. of Compliance % |
|--------------------------|--------------|--------|--|------------------------------|
| Minor | N/A | 177.00 | Bait stations are neither robustly constructed, tamper resistant nor in good condition. Bait station is not available in the facility. | 85% |
| Minor | N/A | 182.00 | Fly-killing devices and/or pheromone traps are not correctly sited and not functioning. Neither fly-killing devices nor pheromone traps are utilized in the facility. | 78% |



Section: Product Control

SubSection: Chemical Control

| Current (25-Dec-2012) | Last (NA) | ID | Findings | Global Freq. of Compliance % |
|--------------------------|--------------|--------|---|---------------------------------|
| Minor | N/A | 210.00 | The company does not record the usage of chemical substances or components during production to ensure traceability. No usage of chemical substance/ components records are available for trace purpose. | 74% |

SubSection: Stock Control and Product release

| Current (25-Dec-2012) | Last (NA) | ID | Findings | Global Freq. of Compliance % |
|--------------------------|--------------|--------|---|------------------------------|
| Minor | N/A | 240.00 | Procedures are not established for disposal of excess stock or obsolete inventory where such situations routinely occur. The disposal procedure of excess stock or obsolete inventory is not set up yet. | 96% |



Section: Process Control

SubSection: Control of Operations

| Current (25-Dec-2012) | Last (NA) | ID | Findings | Global Freq. of Compliance % |
|--------------------------|--------------|--------|--|------------------------------|
| Moderate | N/A | 283.04 | The control plan does not identify the operating parameters for production equipment and tooling. For cleaning process, lack of speed and temperature definition. | 84% |
| Moderate | N/A | 288.00 | Reference sample/production sample are not available for operators' reference at an accessible place or workstation. The client approved samples are keep in sample room only. | 84% |



SubSection: In-Process and Final Inspections

| Current (25-Dec-2012) | Last (NA) | ID | Findings | Global Freq. of Compliance % |
|--------------------------|--------------|--------|---|------------------------------|
| Moderate | N/A | 485.01 | There is no procedure to handle the inspected goods regarding the policy/rule on returning inspected goods to production. The rule on returning inspected goods to production is not set up yet. | 89% |

SubSection: Foreign Body Detection and Control

| Current (25-Dec-2012) | Last (NA) | ID | Findings | Global Freq. of Compliance % |
|--------------------------|--------------|--------|---|---------------------------------|
| Moderate | N/A | 494.00 | Sharp tools are not permanently attached to benches. As observed, knives are free placed on benches. | 40% |
| Moderate | N/A | 495.00 | Sharp tools are not controlled by a listing & registration procedure. The list and registration procedure of sharp tools are not available during the audit. | 75% |
| Minor | N/A | 506.00 | There is no list to register the location of all glass, ceramic and brittle- plastic material (except when used as part of the product) in raw material handling, preparation, processing, and packing and storage areas. | 40% |
| Minor | N/A | 507.00 | The company does not check the condition of glass, ceramic and brittle- plastic material at a defined frequency. | 62% |
| Minor | N/A | 508.00 | Checking, breakages and replacement record of glass, ceramic and brittle-plastic material are not maintained. | 56% |
| Minor | N/A | 514.00 | The company does not protect the light-bulbs and strip lights including those on electric fly-killer units when they constitute a risk to the products. | 44% |

SubSection: Calibration and Control of Measuring and Monitoring Devices

| Current (25-Dec-2012) | Last (NA) | ID | Findings | Global Freq. of Compliance % |
|--------------------------|--------------|--------|--|---------------------------------|
| Minor | N/A | 701.00 | The list for identifying equipment used to make measurements in accept or reject activity is not complete or up-to-date. The identified measuring equipment are calibrated to appropriate | 87% |
| | | | accuracy and precision. However, it's improper to define the scales are no need to calibrate. | |
| Minor | N/A | 703.00 | A few isolated cases are found that the identified measuring equipment are not calibrated before use and then at defined frequency. | 70% |
| | | | A expired lable was found on a cliper. | |

SubSection: Equipment & Tooling Maintenance

| Current (25-Dec-2012) | Last (NA) | ID | Findings | Global Freq. of Compliance % | | |
|--------------------------|--------------|--------|--|------------------------------|--|--|
| Minor | N/A | 709.00 | The company establishs a system of planned maintenance but a few production equipment and tooling are not covered. Tools/ gauges did not covered in maintenance system. | 91% | | |



| Minor | N/A | 710.04 | The maintenance system does not include the spare parts listings and replacements. | 760/ |
|-------|-----|--------|--|------|
| | | | Spare parts listing and replacement records are not available during the audit. | 76% |

Recommendation for Improvement Plan Timeline

| Finding Rating | Improvement Timeline |
|----------------|--|
| Major | Take action within 0 ~ 1 month to make necessary improvements |
| Moderate | Take action within 0 ~ 3 months to make necessary improvements |
| Minor | Take action within 0 ~ 6 months to make necessary improvements |



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