THE CLARUS NETWORKS GROUP

CLARUS NETWORKS LTD

Quality Policy

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Approval

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1) Introduction

The Clarus Networks Group (including Clarus Networks Limited) is a provider of specialist connectivity solutions.

The Group operates within the UK, EU, USA and Middle East and exports globally.

As a modern, forward-looking business, the Group recognises at senior levels the need to ensure that its business operates smoothly and that its products and services satisfy requirements for the benefit of its customers, shareholders and other stakeholders.

In order to provide such assurance, the Group has implemented an Integrated Management System (IMS) in line with the international standard for quality management systems, ISO9001.

The operation of this IMS has many benefits for the business, including:

- Protection of revenue streams and group profitability
- Ensuring goods and services meet customer requirements
- Maintenance and enhancement of shareholder value
- Compliance with legal and regulatory requirements

It is important to understand which areas of the business are currently within the umbrella of the IMS and which are excluded. The boundaries of the IMS as implemented within the Group are defined within the document entitled *IMS Context, Requirements and Scope*. It is recommended that this document should be reviewed in conjunction with this policy.

The purpose of this document is to define an overall policy with regard to quality management that is appropriate to the purpose of the Group, and includes:

- A framework for setting objectives
- A commitment to satisfying applicable requirements
- A commitment to continual improvement of the IMS

This IMS Policy is available in both paper and electronic form and will be communicated within the organisation and to all relevant stakeholders and interested third parties.

2) Quality policy

a) Setting objectives

The high-level objectives for quality management within the Group are defined within the document *IMS Context, Requirements and Scope*. These are fundamental to the nature of the business and are not be subject to frequent change.

These overall objectives will be used as guidance in the setting of lower level, more short-term objectives for quality planning within an annual cycle timed to coincide with organisational budget planning. This will ensure that adequate funding is obtained for the improvement activities identified. These objectives will be based upon a clear understanding of the overall business requirements and how they may change during the year.

Quality objectives will be documented in the *Quality Management Plan* for the relevant financial year, together with details of a plan for how they will be achieved. Once approved, this plan will be reviewed on a quarterly basis as part of the management review process, at which time the objectives will also be reviewed to ensure that they remain valid. If amendments are required, these will be managed through the organisational change management process.

b) Commitment to satisfying applicable requirements

Commitment to the delivery of quality management extends to senior levels of the organisation and will be demonstrated through this Quality Policy and the provision of appropriate resources to establish and develop the Quality Management System.

Top management will also ensure that a systematic review of performance of the programme is conducted on a regular basis to ensure that quality objectives are being met and quality issues are identified through the audit programme and management processes. Management Review can take several forms including departmental and other management meetings. Within the field of Quality Management, there are several key roles that need to be undertaken to ensure the success of the IMS and protect the business from risk.

The Compliance Manager shall have overall authority and responsibility for the implementation and management of the Integrated Management System, specifically:

- The identification, documentation and fulfilment of applicable requirements
- Assigning authorities and responsibilities for the implementation, management and improvement of quality management processes
- Integration of business processes with the IMS
- Compliance with statutory, regulatory and contractual requirements in the management of assets used to deliver products and services
- Reporting to top management on performance and improvement of the IMS

It is also the responsibility of the Compliance Manager to ensure that employees understand the roles they are required to fulfil and that they have appropriate skills and competence to do so. The Group will ensure that all employees involved in quality management are competent based on appropriate education, training, skills and experience.

The skills required to ensure business quality will be determined and reviewed on a regular basis together with an assessment of existing skill levels within the Group. Training needs will be identified, and a plan maintained to ensure that the necessary competencies are in place.

Training, education and other relevant records will be kept by the HR Department to document individual skill levels attained.

Full details of the responsibilities associated with each of the required roles and how they are allocated within the Group are given in a separate document entitled *IMS Roles, Responsibilities and Authorities*.

The Group makes use of various third parties, both internal and external, in the delivery of products and services to its customers. Where this involves the operation of a business process, or a part of the process on behalf of the Group, that falls within the defined scope of the IMS, this is identified in the *Quality Management Plan*.

In all cases, the Group will retain governance of the relevant quality management processes by demonstrating:

- Accountability for the process
- Control of the definition of and interface to the process
- Performance and compliance monitoring
- Control over process improvements

This will be evidenced by documents and records such as contracts, meeting minutes and performance reports.

c) Continual improvement of the IMS

The Group's policy regarding Continual Improvement of the IMS is to:

- Continually improve the effectiveness of the Integrated Management System across all areas within scope
- Enhance current processes to bring them into line with good practice as defined within ISO9001
- Achieve ISO9001 certification and maintain it on an on-going basis
- Increase the level of proactivity (and the business perception of proactivity) regarding the on-going management of quality
- Achieve an enhanced understanding of, and relationship with, the business units to which the IMS applies
- Review relevant metrics on an annual basis to assess whether it is appropriate to change them, based on collected historical data and feedback from relevant sources
- Obtain ideas for improvement via regular review meetings with stakeholders and document them
- Review ideas for continual improvement at regular management meetings in order to prioritise them and assess timescales and benefits

Ideas for improvements may be obtained from any source including customers, suppliers, employees, risk assessments and audits. Once identified they will be documented and evaluated by the staff member responsible for continual improvement.

As part of the evaluation of proposed improvements, the following criteria will be used:

- Cost
- Business Benefit
- Risk
- Implementation timescale
- Resource requirement

If accepted, the improvement proposal will be prioritised in order to allow more effective planning.

d) Approach to managing risks and opportunities

Risk and opportunity management will take place at several levels within the Integrated Management System, including:

- Quality planning – risks to the achievement of quality objectives
- Organisation-wide risk and opportunity management
- As part of the business change management process
- As part of individual business projects

High level risk and opportunity assessments will be reviewed on an annual basis, or upon significant change to the business environment. For more detail on the approach to risk assessment please review the document Risk and Opportunity Assessment Process.

Once in place, it is vital that regular reviews take place of how well quality management processes and procedures are being adhered to. This will happen at three levels:

1. Structured regular management review of conformity to policies and procedures within the Group
2. Internal audit reviews against the ISO9001 standard by the Group Quality Team
3. External audit against the standard in order to gain and maintain certification to ISO9001

Details of how internal audits will be carried out can be found in the Procedure for Internal Audits.

e) Control of documents and records

All quality management policies and plans that form part of the IMS must be documented. The way in which these documents are created and managed through their lifecycle is set out in *Procedure for the Control of Documented Information*.

All documents in the IMS are uniquely numbered and the current versions are tracked – see document *IMS Documentation Log*.

The keeping of records is a fundamental part of the Integrated Management System. Records are key information resources and represent evidence that processes are being carried out effectively.

The controls in place to manage records are also defined in the document *Procedure for the Control of Documented Information*.