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1.0 Introduction and Scope

This Manual describes the documented Quality Management System ("QMS") for OEC.

Although QMS is relevant to all locations globally, only companies within OEC Europe and at the locations listed below are under ISO certification scope. (ISO 9001:2015 4.3)

Risk & Compliance Team is the owner of this document and is responsible for ensuring that the manual is reviewed at least every 3 years.

The current html version of this document is available on the Organizations' Intranet (Pitstop), and that version should be considered correct and current. Editable version in Word document format and evidence of approval are kept by Risk & Compliance Team in SharePoint area.

The security classification for this document is Restricted, and its use and distribution are limited to company employees only. It may not be copied to outside organisations without prior approval from the document owner or a Senior Executive.

The manual is maintained by Risk & Compliance Team on behalf of the OEC CIO.

The key business activities covered by the QMS are:

- Product and project management;
- Software development and testing;
- Internal and external systems provision;
- Distance learning production;
- Data management services.

The QMS is intended to conform to ISO 9001:2015 Standard and generally applies to all of these activities performed by OEC at listed locations. The relevant clauses of the Standard covered in this Manual are indicated by "ISO 9001:2015" and the clause number in parentheses.

1.1. Exclusions

There is no measuring equipment requiring calibration used in the business areas or locations within scope of the certification. (ISO 9001:2015 7.1.5.2)

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2.0 Quality Policy

This **Quality Policy** Statement and Values are displayed on the intranet which is available to all employees. It is agreed by the Executive Team and shows the Group's commitment to its QMS. (ISO 9001:2015 5.1.1.a)

The high level objectives of the QMS are to:

- Provide a framework to consistently satisfy customers by using standard processes, quality checkpoints and audits of the organisations processes.
- Meet and where possible exceed customer expectations in terms of product delivery milestones, service level agreements and product & service quality.
- Improve the QMS using audit feedback for the benefit of both the organisation and their customers. (ISO 9001:2015 5.1.1.b)

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3.0 The Organization

3.1. **Issues affecting the Organization** (ISO 9001:2015 4.1)

3.2. **Interested Parties** (ISO 9001:2015 4.2.a)

3.3. **Requirements of Interested Parties** (ISO 9001:2015 4.2.b)

3.4. Companies and Locations

(For in scope business addresses See Appendix A)

Company	Certifications	Location	Registered Address
OEConnection LLC	27001:2013	United States of America Richfield	
OEC Holdings Limited	27001:2013, 9001:2015	United Kingdom - Chelmsford <i>(Scope excludes Financial Accounting Processes from ISO9001 as these are externally audited independently)</i>	1)
OEC Athoris Limited	27001:2013, 9001:2015	United Kingdom Chelmsford	1)
OEC Fleet Limited	27001:2013, 9001:2015	United Kingdom Chelmsford	1)
OEConnection GmbH	27001:2013, 9001:2015	Germany	2)
OEC sp. z o. o.	27001:2013, 9001:2015	Poland - Kraków	4)

3.5. OEC International Limited (Ultimate parent OEC Holdings LLC)

OEC International Limited is the European Holding Company for all the activities in scope but is not included within the scope of the QMS.

OEC LLC provides strategic direction to its group companies but is not included within the scope of the QMS. (ISO 9001:2015 4.3)

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3.6. Organization, Responsibilities and Authorities

OEConnection LLC owns OEC International Limited which in turn owns OEC Europe group of companies/Organizations to which this QMS applies. The long-term intention is that all OEC companies will use the same Management Systems and be certified under ISO9001 & ISO27001.

Therefore, there are various executives, who are not part of the European group who still have responsibilities under the QMS. The responsibilities for the QMS are shown in the **QMS Responsibilities Document**.

The **OEC Organization Chart** shows all employees of the companies and their teams and reporting lines. (ISO 9001:2015 5.3)

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4.0 The Quality Management System

4.1. Management and Staff Responsibility (ISO 9001:2015 5.3)

In order to achieve the aims of its **Quality Policy**, OEC has given the OEConnection CIO ultimate responsibility for the QMS and requires a total commitment to the QMS from its Executive Team.

Risk and Compliance Manager provides guidance on quality matters and is responsible for ensuring the annual Top Management Review meeting is effective.

The Quality Compliance Lead has responsibility for documentation and review of the QMS, for monitoring the performance of the QMS and for reporting their findings to Top Management Review meetings.

Representatives amongst Executive Team are responsible for strategic guidance on Quality matters, setting up Quality objectives, defining the policies and procedures to be followed in their respective disciplines and for participating in the annual Top Management Review meeting.

All Managers are responsible for setting procedures and policies at business level if appointed by Executive Team, ensuring that their staff are aware of and follow the Management System requirements within the areas that they manage. They are also responsible for reporting on the operation of the QMS in their business areas and support auditing processes.

All staff are expected to observe the requirements of the QMS, participate in internal and external audits and to report any difficulties to their line manager or the Risk & Compliance Team.

The successful operation of any Management System requires a positive commitment and input from everyone.

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4.2. Management Review

Management Review of the QMS is carried out as described in **Procedure 24 - Management Review**. (ISO 9001:2015 9.3)

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4.3. Documented Quality Management System Elements

There are 8 principal documented QMS elements as described below. (ISO 9001:2015 4.3)

- **Quality Manual.** This manual and its attachments.
- **Management System Policies (Quality Policies).** The Management System Policies identify at a high level the expectations that the Executive Team has in relation to the applicable business functions. They are strategic and generally change very little.
- **Quality Procedures.** These describe the processes undertaken within the company and provide the detail on how they should be performed. All Managers are required to ensure that their staff follow all Procedures relevant to their work.
- **Guidance Documents.** Guidance Documents provide further information on particular topics contained within the procedures, generally detailing how policies can be implemented and complied with.
- **Forms & Templates.** Forms and Templates are part of the management system and are used to document key information relating to the business processes undertaken. Completed forms and templates become Quality Records as defined within the **Document Control Policy**.
- **Work Instructions.** Any process that forms part of or leads to the production of a customer deliverable may be documented in the form of a Work Instruction. Generally, these should be developed and maintained according to the Document Control Policy where:
 1. There is an identified need as to ensure consistency in the delivery of a product or a service (ISO 9001:2015 7.1.6)

2. There is an identified need to retain the business knowledge to avoid interruption/disruption of a process or service due to the absence of knowledgeable staff. (ISO 9001:2015 7.1.6)
3. There is an identified need to regularly communicate the information relating to a product or service.
4. There is a customer requirement.

They are prepared under the direction of the manager of the area concerned and authorised appropriately.

- **Records.** Quality Records are routinely kept as per the requirements of Document Control Policy – Document Control and Quality Records. (ISO 9001:2015 4.4.2, 8.2.3.2, 8.3.3, 8.3.5, 8.3.6, 8.4.1, 8.5.3, 8.5.6, 8.6, 8.7.2, 9.2.2, 9.3.3, 10.2.2)

Confidentiality - All documents that form the management systems are classified as Restricted, are limited to use by company employees only and may not be copied to outside organisations without prior approval from the document owner or a Senior Executive.

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4.4. Quality Measurements and Continual Improvement

Customer satisfaction will be measured by individual business units using tools that are adequate to collect and assess feedback received from their customers.

Quality will be measured either by internally defined metrics that the area identifies as necessary for monitoring their services or processes or SLA type metrics that are defined by their customers.

The internal Audit Plan is used to validate, verify and improve the QMS. Progress of the Audit Plan and the results of the audits are presented as a part of quarterly communication and in annual Top Management Review meetings. The Plan may be adjusted during the auditing cycle in order to meet any organizational needs.

(ISO 9001:2015 5.1, 5.2.1, 6.1.2, 6.2, 8.2.1.c, 8.5.5.e, 9.1.2, 9.1.3, 9.2, 9.3)

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4.5. Infrastructure

OEConnection Europe is committed to providing the necessary infrastructure to support the business objectives and goals of the organisation and its customers.

Executive Team is responsible for assessing and addressing the needs for premises with local administration teams being responsible for maintenance and upkeep as appropriate.

Some areas of computer software, hardware and communications planning and maintenance fall within the ISMS **Doc A12 Operations Security** and **Doc A13 Communication Security** with the remainder tending to be driven jointly by the individual business areas and the Infrastructure and Operations Team with the latter being responsible for purchase and maintenance. (ISO 9001:2015 7.1.3)

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4.6. Risk Management

Corporate risks are covered by the organisations risk assessment process (as a part of SWAT analysis) which includes both Quality and Security Risks. Business Continuity and Disaster Recovery Planning is covered as part of the **ISMS**. (ISO 9001:2015 5.1.1 d, ISO 9001:2015 5.1.2.b)

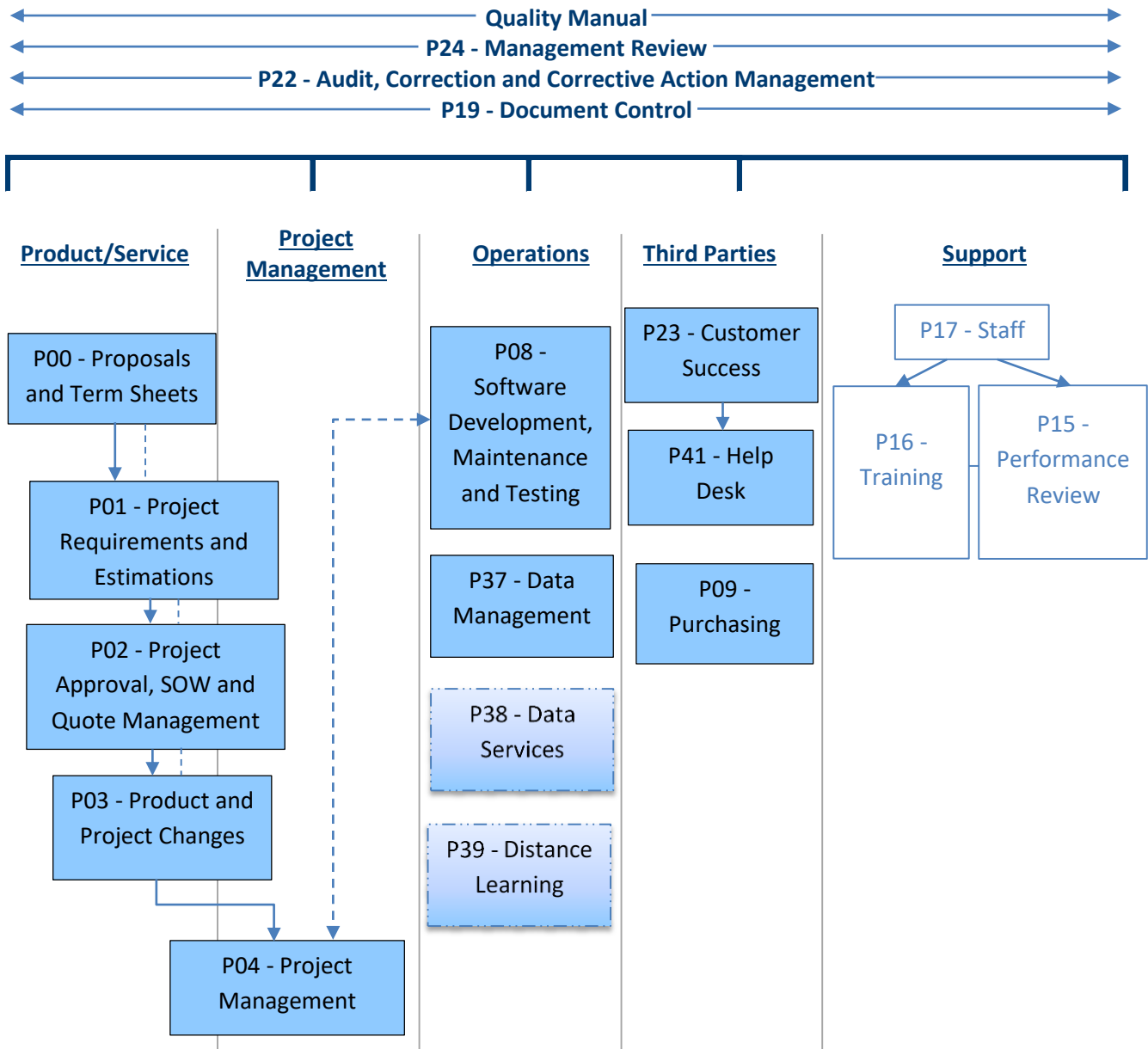
Quality risks associated with the day-to-day business processes of the organisation and risks to the management system themselves are maintained in Risk Manager on the IMS portal. The process is described in ISMS **Doc A2 Risk Management** (ISO 9001:2015 6.1)

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5.0 Processes and documented quality procedures

5.1. Process and Procedure Map

This Process and Procedure map shows the key business processes covered under the ISO9001:2015 certification, the controls which are applied to it and the resources which it uses. Identifiers such as "P09" refer to the Quality Procedures, for example P09 is the Procedure defining activities relating to purchasing. (See Section 5.3 QMS Availability and Communication) (ISO 9001:2015 4.4)



5.2. Interaction between Processes and Procedures

The Process and Procedure Map shows the Organization's Quality Procedures classified into groups of "Product/Service", "Project Management", "Operations", "Third Parties" and "Support". Some procedures belong to more than one group as some processes may overlap: for example, P01 - Project Requirements and Estimations. There are also procedures that perform a key role across the organization: for example, P19 - Document Control.

A similar product or service driven process applies to all work carried out by OEC. The process is as follows:

- Customer enquiries may be the result of Product and Project Changes (P03) or they may arrive independently.

- Proposals and Term Sheets (P00) are normally issued before any work commences. However, some speculative marketing work and repeat work may not require proposals or statements of work.
- All enquiries resulting in work for the company concerned are considered as potential projects and are initially subject to Project Management (P04), although, if they are considered low risk (typically repeat work), all or most of P04 is not applied.
- The core processes in the business are defined as Software Development, Maintenance and Testing (P08), Data Management (P37), Data Services (P38), Distance Learning (P39) and supporting Helpdesk activities (41).
- Statements of Work are managed following the provisions of SOW Management (P02) and Product and Project Changes (P03).

Provision of some services, Data Services for example, may involve the development of internal software systems, in these cases the Software Development, Maintenance and Testing policy is applied.

Finally, after work is complete, the customer is asked to formally accept the completion of the project in accordance with P04 - Project Management. There may also be unsolicited customer feedback received via the appropriate Customer Support desks, the handling of which is covered by Customer Feedback (P23).

(ISO 9001:2015 6.1, 7.1.5, 8.1, 8.2, 8.2.4, 8.5, 8.5.1, 8.5.2, 8.5.4, 8.5.5, 8.6)

A number of Procedures are followed to apply controls to those processes. These are:

- P09 - Purchasing controls the purchase of equipment, materials, goods and services. (ISO 9001:2015 8.4)
- The Document Policy defines the control of documents and records. (ISO 9001:2015 4.3, 4.4.2, 5.2.2, 6.2.1, 7.1.5.1, 7.2, 7.5, 8.1, 8.2.3.2, 8.2.4, 8.3.3, 8.3.4, 8.3.5, 8.3.6, 8.4.1, 8.5.1, 8.5.2, 8.5.3, 8.5.6, 8.6, 8.7.2, 9.1.1, 9.2.2, 9.3.3, 10.2.2)
- P22 - Audit, Correction and Corrective Action and P24 - Management Review controls the QMS which applies to all work. (ISO 9001:2015 9.2, 10.2)

Some of the procedures also apply controls, especially in the areas of corrective action and risk management.

A number of procedures are followed to supply the resources needed by the Operational Processes. These are:

- P09 - Purchasing supports the purchase of equipment, materials, goods and services.
- P17 - Staff supplies the staff needed to carry out the work.
- P16 - Training and P15 - Performance Review ensure the competence of staff.

(ISO 9001:2015 5.1.1, 7.1, 7.1.1, 7.1.2, 7.3, 7.1.3, 7.1.4, 7.2, 8.4, 9.1.3, 9.3.2)

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5.3. QMS Availability and Communication

This Quality Manual and all documented Procedures are available online via the company intranet. An [online index](#) provides links to all Procedures. Some Work Instructions and guidance documents are also held on the intranet.

“Formal” Work Instructions are controlled under the provisions of the Document Control Policy, which also defines Formal and Informal Work Instructions. (ISO 9001:2015 7.5.2, 7.5.3)

Communications Matrix (ISO 9001:2015 7.4)

Interested Party	What	When	How	Who
Customers Clients Partners	Contract Contract Changes	Contract initiation or change	During engagement at Service review	Product Manager
	SLA Performance	As requested	As agreed with the customer	Operations Manager
	Certification status	As requested	Phone Email Internet Webpage	Risk and Compliance Team
	Product & Service Release Details	Before release	Release notes demo	Product Manager
	Non-Confirming Inputs/Outputs	When found	Email/verbal	Product Manager or Operations Staff
Suppliers Partners Consultants	Contracts/Changes	Contract initiation or change	During engagement at service review	Supplier Relationship Owner
	Procedures	Contract initiation or procedure change	During engagement at service review	Supplier Relationship Owner
	Policies	Contract initiation or procedure change	During engagement at service review	Supplier Relationship Owner
	Audit Requirements	Contract initiation	During engagement	Supplier Relationship Owner
	Performance Reviews/Issues	During contract	Issues raised as appropriate or at Service review	Supplier Relationship Owner
	Supplier certification status	Contract initiation & during contract	During engagement at service review	Supplier Relationship Owner
	Non-Confirming Inputs/Outputs	When found	Email/Verbal	Supplier Relationship Owner or Operations Staff
Staff/Contractors	Procedures	At induction & on procedure change	Intranet, eLearning platform and emails	HR, Line Manager, Risk &

				Compliance Team
	Policies	At induction & on policy change	Intranet, eLearning platform and emails	HR, Line Manager, Risk and Compliance Team
	Quality Manual	At induction & on change	Intranet and emails	HR, Line Manager, Risk and Compliance Team
	Work Instructions	As required	Localised document storage	Line Manager, Colleagues
	Certification	At induction & on change	Intranet, eLearning platform and emails	HR, Line Manager, Risk and Compliance Team
	Audit Schedules	As required	Email, intranet, quarterly communication	Line Manager, Risk and Compliance Team
	Results of Audits	On audit completion	Audit report via email, intranet, IMS platform	Line Manager, Risk and Compliance Team
	Performance	Annually	Verbally and documented in HRIS	Line Manager
Regulatory bodies	No regulatory communication regarding the QMS is identified	-	-	-
Executives	Audit Schedules	Quarterly and annually	Email and Top Management Review Meeting	Risk and Compliance Manager
	Results of Audits			
	Management System Issues			
	Quality Office Issues			
	QMS Performance			

All external requests for information relating to the OEC QMS should be directed to the Risk and Compliance Team in the first instance. (ISO 9001:2015 7.4)

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5.4. QMS Maintenance

Responsibility for maintenance of the QMS is predominantly with the Risk and Compliance Team. Individual processes and procedures may have dedicated business owners who will describe the business processes and Risk and Compliance Team will be responsible for ensuring that these meet the requirements of the ISO Standard.

Before changes are made to any QMS document the document owner may conduct a risk assessment, particularly if the changes are likely to result in significant changes to processes or procedures.

All QMS documentation will be maintained in line with the Document Control policy and the relevant interested parties are consulted as part of the review process.

Where there have been no changes or revisions to a procedure or process in the previous 2 years the Quality Office will highlight the need for review and ensure it is performed. (ISO 9001:2015 6.3, 9.3)

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6.0 Document Review and Control

6.1. Revision History

<History of the document review (usually a regular event to make sure the procedure is up to date with the business process.)>

Date	Reviewer(s)	Outcome
1/11/2022	Katarzyna Szafraniec	Rewrite of the document resulting in v. 19.
05/09/2018	Chuck Rotuno Ike Herman Perry Charles Scott Christie Paul Johnson Kasia Szafraniec Jim Smith	Rewrite approved.
31/08/2018	Chuck Rotuno Ike Herman Perry Charles Scott Christie Paul Johnson Kasia Szafraniec Jim Smith	Final version 18 authorised and published.
10/08/2018	P Charles K Szafraniec J Smith	Revised Companies and Relationships (3.4, 3.5, 3.6) and added Business Address Appendix A
01/08/2018	I Herman P Charles P Johnson S Christie K Szafraniec J Smith	Review and minor changes to Policy Statement. Minor typo corrections. Discussion around Companies in scope and relationships. To be completed with Finance Director Europe and Asia Pacific. Discussion and agreement of renaming of Contracts to SOWs.

02/07/2018	I Herman P Charles P Johnson S Christie K Szafraniec	Minor changes to draft version 18. Change Chairman to CEO throughout Section 1 - Change Project Management Activity to Product Management Section 2 - Add Core Values
May 2018	J Smith	Review for 9001:2015
14/02/14	T Willingham	Changes resulting in version 17.

6.2. Version Control

<History of the document creation and changes pre- and post-publication.>

Version	Date	Author(s)	Details
19.0	1/11/2022	K. Szafraniec	Quality Policy extracted from the document. Hyperlink added. Hyperlinks for the context of the organization amended (3.0) List of companies and Appendix A updated. Roles and responsibilities updated (3.6 and 4.0) Management Review section (4.2) updated and hyperlink added. 4.4 Customer feedback section updated. 4.5 Hyperlinks to IMS policies added. 4.6 Risk Management section updated to reflect current process. 5.0 Processes and procedures updated; new graph added. 5.2 Updated to reflect relations among processes. 5.3 Communication Matrix updated. New communication channels added e.g. eLearning platform.
18.2	15/04/2019	J Smith	<ul style="list-style-type: none"> Removed Daventry Office from 3.4 & Appendix A Replaced Krakow Offices with New location in 3.4 & Appendix A Updated 4.4 in line with guidance from Senior European Executives. Added Communications Matrix heading and references to clause ISO9001:2015 7.4 Updated Security Classification in line with ISMS changes. Reviewed and corrected all standard references.
18.1	05/09/2018	J Smith	Removed 1.1 and added sentence on calibration to 1.0 due to notification that exceptions can only be from clause 8.
18.0	31/08/2018	Kasia Szafraniec J Smith	Rewrite for new version of the ISO 9001 standard and organisational changes.

17.0	14/02/14	T Willingham	Version and Revision information added. CT Holdings, Athoris Ltd, German and Polish branches added. References to ISO 9001 standard added.
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Appendix A

Registered Office Addresses

<p>1) OEC Europe Holdings Limited Springfield Lyons House Chelmsford Business Park Chelmsford CM2 5TH</p>
<p>2) OEConnection GmbH Siegfried-Leopold-Str. 58 53225, Bonn Germany</p>
<p>3) OEC s.a.r.l. 52 Boulevard de Sebastopol 75003, Paris France</p>
<p>4) OEC Sp z o.o. Wadowicka 3a 30 - 347 Kraków Poland</p>

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