

TOPICS OF DISCUSSION

1. Required Certifications and Frequency

- 1. Conflict Minerals Certification
- 2. Reps and Cert Certification
- 3. OPSEC Certification
- 4. VSA Certification
- 5. Raw Material Certification
- 6. CMMC Readiness Certification
- 2. Reminder of AS9100 and ISO 9001 requirements
- 3. Why companies pursue AS9100 and ISO 9001?
- 4. Decertification of AS9100 and ISO 9001
- 5. United Rotorcraft Supplier Quality Requirements

BUSINESS CASE

Certification Package Training – Streamlined guidance for suppliers on required certifications.

GOAL

Minimize turnaround time and ensure consistent, compliant submissions.





Required Certifications

	TYPE OF CERTIFICATION6	COMMERCIAL CONTRACTS	DEFENSE CONTRACTS	FREQUENCY	WHY IS IT REQUIRED?
1	Conflict Minerals Certification	Not Required	Required	Every 12 months (annual)	See Slide 4
2	Reps and Cert Certification	Not Required	Required	Every 12 months (annual)	See Slide 5
3	OPSEC Certification	Not Required	Required	Every 12 months (annual)	See Slide 6
4	CMMC Readiness Certification	Not Required	Required	All Defense Shipments	See Slide 7
5	VSA Certification	Required	Required	Every 3 years (most suppliers) Every 2 years (machine shops)	See Slide 8
6	Certificate of Conformance (CoC)	Required	Required	All Shipments	See Slide 9
7	Raw Material Certifications (when applicable)	Required	Required	All Shipments	See Slide 10
8	Special Process Certifications (when applicable)	Required	Required	All Shipments	See Slide 11



Conflict Minerals Certification

Frequency

✓ Every 12 months (annual)

Why is it required?

- ✓ Mandatory Federal Regulation
 - Companies operating in the state in Colorado may be subject to federal regulations concerning conflict minerals, particularly under Section 1502 of the Dood-Frank Wall Street Reform and Consumer Protection Act.

Penalty to fail to provide certification?

- √ \$5,000 per violation, with each day of non-compliance
 - ➤ The state of Colorado regulate mining activities through the Colorado Mined Land Reclamation Act. This act mandates that mining operators obtain the necessary permits and comply with environmental and reclamation standards. Violations can result in civil penalties of up to \$5,000 per violation, with each day of non-compliance considered a separate offense.
 - Furthermore, if an operator fails to comply with a cease-and-desist order issued by the Colorado Mined Land Reclamation Board, the board may seek legal action through the attorney general to enforce compliance, which could include temporary restraining orders or injunctions.

Federal Regulation Summary

- ✓ Under Section 1502 of the Dodd-Frank Act, publicly traded companies are required to disclose their use of conflict minerals—specifically tin, tungsten, tantalum, and gold (often referred to as 3TG)—if these minerals are necessary to the functionality or production of a product manufactured by the company. The intent is to reduce the funding of armed conflict in the Democratic Republic of Congo and adjoining countries.
- The U.S. Securities and Exchange Commission (SEC) enforces this regulation. Companies found to be non-compliant may face enforcement actions, including fines, penalties, or legal proceedings. Additionally, noncompliance can lead to reputational damage and loss of business opportunities, as consumers and partners increasingly value responsible sourcing practices.
- ✓ Summary: While Colorado does not impose specific penalties for noncompliance with conflict minerals regulations, companies operating within the state must adhere to federal disclosure requirements under the Dodd-Frank Act.

- ✓ The buyer from United Rotorcraft shall provide such certification.
- ✓ In addition, it can be found in United Rotorcraft Supplier Portal:
 - ➤ Link: Our Supplier Portal | United Rotorcraft
 - Form Number: F200-QMS-SCL-1-3 | Revision IR



Reps and Certs Certification

Frequency

✓ Every 12 months (annual)

Why is it required?

- √ Mandatory Federal Regulation
 - Businesses operating in Colorado, these requirements are governed by federal regulations (FAR Part 4 subpart 4.12, and clauses 52.204-7, 52.204-8, and 52.212-3) and are not specific to the state. Any entity seeking to engage in federal contracts or grants must complete their Reps and Certs in SAM.gov, regardless of their physical location.

Penalty to fail to provide certification?

- ✓ Disqualification from contract awards
 - Completing and maintaining accurate Reps and Certs is crucial for eligibility in federal contracting opportunities. Contracting officers rely on this information to assess a company's qualifications and compliance with federal requirements. Failure to provide accurate or updated certifications can result in disqualification from contract awards or legal ramifications.

Federal Regulation Summary

- ✓ In the context of federal contracting, "Representations and Certifications" (often abbreviated as "Reps and Certs") are mandatory disclosures that businesses must complete and maintain in the System for Award Management (SAM.gov). These disclosures affirm a company's compliance with various federal regulations and eligibility criteria, such as business size, ownership status, and adherence to specific laws and policies.
- Entities must review and update their Reps and Certs annually to ensure accuracy and completeness, covering business size/status, compliance with laws and regulations, absence of federal tax delinquencies or felony convictions, and adherence to lobbying and drug-free workplace policies.
- Ensuring accurate and up-to-date Reps and Certs is a foundational step for any Colorado business aiming to participate in federal contracting opportunities.

- ✓ The buyer from United Rotorcraft shall provide such certification.
- ✓ In addition, it can be found in United Rotorcraft Supplier Portal:
 - ➤ Link: Our Supplier Portal | United Rotorcraft
 - Form Number: AS-128 | Revision B



OPSEC Certification

Frequency

✓ Every 12 months (annual)

Why is it required?

- ✓ Mandatory Federal Regulation
 - OPSEC Certification is not required by Colorado state law; it is a federal requirement (DoD 5205.02E, 5205.02, and NSPM-28) tied to U.S. government contracts, DoD directives, and agency policies.

Penalty to fail to provide certification?

- ✓ Loss of access, contract termination
 - Failure to complete OPSEC training can result in loss of access, clearance suspension, reassignment or termination, and potential contract termination, with consequences enforced administratively under federal regulations rather than state law.
 - ➤ It is enforced through contract terms and federal regulations—not state criminal penalties.

Federal Regulation Summary

- ✓ OPSEC (Operations Security) Training is required for individuals working on or with U.S. government contracts or operations involving sensitive information, including many federal contractors and employees—even in Colorado.
- OPSEC training, available through DoD, DCSA, contractors, and the CDSE website, is required annually or before sensitive assignments for military, government, federal contractors, and certain state/local personnel, with documentation needed for compliance.

- ✓ The buyer from United Rotorcraft shall provide such certification.
- ✓ In addition, it can be found in United Rotorcraft Supplier Portal:
 - ➤ Link: Our Supplier Portal | United Rotorcraft
 - > Form Number: AS-215 | Revision A



CMMC Cybersecurity Maturity Model Certification

Frequency

✓ Department of Defense (DoD) contracts mandate a United States company to be CMMC Certified for every shipment.

Why is it required?

- √ Code of Federal Regulations (CFR)
 - ➤ 32 CFR: Responsible for establishing and instituting the framework of the CMMC Program rule, defining cybersecurity requirements, and outlining the three certification levels (Level 1, 2, and 3).
 - ➤ 48 CFR: Responsible for enforcing the CMMC acquisition rule through DoD contracting via
 - ➤ DFARS 252.204-7025 Making the CMMC status a condition of eligibility for award
 - ➤ DFARS 252.204-7021- Disclosing the certification level required to be eligible for contract award

Purpose of CMMC

- ✓ Protect Sensitive Defense Information
- ✓ Raise the Cybersecurity Baseline
- ✓ Strengthen National Security
- ✓ Secure the Entire Supply Chain
- Enable Contracting Eligibility
- ✓ The purpose of CMMC is to protect U.S. defense information by verifying that all contractors and subcontractors meet the right level of cybersecurity, ensuring a secure, resilient, and trustworthy supply chain.

Penalty to fail to provide certification?

- ✓ Loss of Contract Eligibility
 - Immediate penalty: If a company cannot provide the required CMMC certification at the level specified in the contract, it is ineligible to bid or may be disqualified from an award.
- ✓ Suspension & Debarment
 - > DoD can **suspend or debar a company** from all federal contracting if they find willful misrepresentation or systemic noncompliance.
- √ Breach of Contract Damages
 - ➤ Even if not FCA-level fraud, failing to maintain certification or protect CUI can be seen as a breach of contract.



VSA Certification

Frequency

- ✓ Every 3 years for most of the suppliers
- ✓ Every 2 years for machine shops

Why is it required?

- ✓ Quality Management System (QMS) requirement
 - Vendor Self-Audits are mandatory when required by customer contracts, purchase order terms, quality management system requirements (e.g., AS9100, ISO 9001), or regulatory obligations, and failure to complete them can lead to loss of approved supplier status and other compliance consequences.
- ➤ It is a requirement of AS9100 and ISO 9001, section 8.4 (Control of Externally Provided Processes, Products, and Services).

Penalty to fail to provide certification?

- ✓ Loss of Approved Vendor Status
 - Failure to complete them can lead to loss of approved supplier status and other compliance consequences.
 - Failure to update Vendor Self-Audits can lead to loss of approved supplier status, halted purchase orders, increased oversight, contract penalties, and reputational damage.

QMS Requirement Summary

- ✓ Vendor Self-Audits are required to ensure suppliers maintain compliance with contractual, regulatory, and quality management system requirements (e.g., AS9100, ISO 9001, FAA, or customer-specific standards). They:
 - Verify that the vendor's processes, certifications, and documentation remain current and compliant.
 - Identify and address quality, process, or compliance gaps before they impact production or deliveries.
 - Support risk management by ensuring suppliers meet requirements for safety, quality, and regulatory adherence.
 - Provide documented evidence for customer, regulatory, and thirdparty audits.
 - Strengthen supplier—customer trust by demonstrating proactive compliance and accountability.
 - Up to-date Point of Contacts (Quality and Procurement)

- ✓ The buyer from United Rotorcraft shall provide such certification.
- ✓ In addition, it can be found in United Rotorcraft Supplier Portal:
 - ➤ Link: Our Supplier Portal | United Rotorcraft
 - Form Number: F200-QMS-SCL-1-1 | Revision E



Certificate of Conformance (CoC) in each shipment

Frequency

✓ Every shipment to United Rotorcraft

Why is it required?

- ✓ Required on UR Supplier Quality Requirements policy 400-QMS-QAS-2 Rev L
- ✓ Required on United Rotorcraft PO (Purchases Orders)
- ✓ It is a requirement of AS9100 and ISO 9001, 8.6 (Release of Products and Services), 8.4.2 (Type and Extent of Control), 8.4.3 (Information for External Providers), 8.5.1 (Control of Production and Service Provision), 7.5.3 (Retention of Documented Information), and 8.1.4 (Prevention of Counterfeit Parts)

Penalty to fail to provide certification?

- ✓ Rejection of Material: Shipments may be rejected if not accompanied by a valid CoC.
- ✓ **Loss of Supplier Approval**: Supplier may be suspended or removed from the Approved Vendor List (AVL).
- ✓ Delays in Production: Missing or incorrect CoCs cause inspection delays and quality holds.
- ✓ **Contract Non-Compliance**: May result in nonconformance reports, financial penalties, or breach of contract.
- ✓ Audit Findings: Failure to control certification can result in major findings during audits (internal, customer, or AS9100).
- ✓ Risk of Counterfeit or Unverified Material: Missing CoCs compromise product traceability and authenticity.

Purpose of Raw Material Certification

- ✓ **Traceability**: Establishes a documented chain between the manufactured part, its lot/batch, and the responsible manufacturer or distributor.
- Conformance Verification: Confirms that the part, assembly, or material meets all applicable drawings, specifications, and PO requirements.
- ✓ Regulatory Compliance: Demonstrates compliance with AS9100, ISO 9001, DFARS, FAA, and customer-specific requirements.
- ✓ Accountability: Identifies the organization certifying the material and the authorized signatory accepting responsibility.
- Quality Assurance: Provides evidence for product release approval and customer acceptance.
- ✓ **Risk Mitigation**: Prevents unauthorized shipments, counterfeit parts, or unverified materials from entering production.

REMINDER | AVOID Payment Transaction On-Hold:

✓ <u>Supplier will not receive payment transaction</u> until required documentation is received to update shipment from a non-conformance to a conformance status to be allowed to be inducted to inventory at United Rotorcraft. Failure to receive documentation and/or communication in a timely manner, parts are at risk to be rejected as non-conformance and RTV (Return To Vendor).

November 7, 2025



Raw Material Certification in each shipment

Frequency

✓ Every shipment (when applicable) to United Rotorcraft

Why is it required?

- ✓ Required on UR Supplier Quality Requirements policy 400-QMS-QAS-2 Rev L
- ✓ Required on United Rotorcraft PO (Purchases Orders)
- It is a requirement of AS9100 and ISO 9001, 8.4.3 (Information for External Providers), 8.6 (Release of Products and Services), 8.1 (Operational Planning and Control), 8.1.4 Prevention of Counterfeit Parts), and 7.1.5 (Monitoring and Measuring Resources).

Penalty to fail to provide certification?

- Rejection of Material: Shipments may be rejected if not accompanied by proper raw material certification.
- ✓ **Loss of Supplier Approval**: Supplier may be disqualified or removed from the Approved Vendor List (AVL).
- ✓ **Delays in Production**: Lack of proper documentation can delay manufacturing and customer delivery schedules.
- ✓ **Contract Non-Compliance**: May result in breach of contract or financial penalties.
- ✓ Increased Oversight: May trigger additional audits, inspections, or scrutiny by the customer or regulatory bodies.
- ✓ Violation of DFARS/ITAR: Can result in legal consequences or fines if materials are sourced from prohibited countries.

Purpose of Raw Material Certification

- ✓ Traceability: Ensures raw materials are traceable to the mill or OEM source.
- ✓ Conformance Verification: Confirms that the material meets applicable specifications or standards.
- ✓ **Regulatory Compliance**: Demonstrates compliance with DFARS clauses, including restrictions on country of origin and specialty metals.
- ✓ Quality Assurance: Provides test values or statements of conformity needed to ensure product quality and safety.
- ✓ Mercury-Free Documentation: Verifies that materials are free from mercury where applicable.
- ✓ Risk Mitigation: Helps prevent the use of counterfeit, substandard, or restricted materials.
- ✓ In short, raw material certification is critical for product integrity, regulatory compliance, and contractual fulfillment.

REMINDER | AVOID Payment Transaction On-Hold:

✓ <u>Supplier will not receive payment transaction</u> until required documentation is received to update shipment from a non-conformance to a conformance status to be allowed to be inducted to inventory at United Rotorcraft. Failure to receive documentation and/or communication in a timely manner, parts are at risk to be rejected as non-conformance and RTV (Return To Vendor).



Special Process Certification in each shipment

Frequency

✓ Every shipment (when applicable) to United Rotorcraft

Why is it required?

- ✓ Required on UR Supplier Quality Requirements policy 400-QMS-QAS-2 Rev L
- ✓ Required on United Rotorcraft PO (Purchases Orders)
- It is a requirement of AS9100 and ISO 9001, 8.5.1 (Control of Production and Service Provision), 8.5.1.2 (Validation and Control of Special Processes), 8.4.3 Information for External Providers), 8.6 (Release of Products and Services), and 7.1.5 (Monitoring and Measuring Resources)

Penalty to fail to provide certification?

- ✓ Rejection of Material: Parts may be rejected if process certifications or test reports are missing or incomplete.
- ✓ **Loss of Supplier Approval**: Supplier may be suspended or removed from the Approved Vendor List (AVL).
- ✓ **Delays in Production**: Missing process certifications delay receiving inspection and downstream assembly operations.
- ✓ Contract Non-Compliance: May result in breach of purchase order or regulatory obligations.
- ✓ Customer Escalation: Can trigger corrective actions, additional audits, or OEM notification.
- ✓ Safety or Airworthiness Risk: Missing or invalid process certifications can jeopardize product conformity and FAA traceability.

Purpose of Raw Material Certification

- ✓ **Traceability**: Links each special process to the approved processor, lot number, date, and specification revision.
- ✓ Conformance Verification: Confirms that all special processes (painting, anodizing, plating, testing) meet drawing specifications, methods, classes, and standards.
- ✓ Regulatory Compliance: Demonstrates compliance with customer and aerospace industry requirements (e.g., NADCAP, DFARS, FAA).
- Quality Assurance: Provides objective evidence that critical manufacturing processes have been controlled, verified, and accepted.
- ✓ Process Validation: Ensures that processes that cannot be verified by inspection (e.g., heat treat, plating thickness, adhesion) are validated through certifications.
- ✓ Risk Mitigation: Prevents the use of unverified or non-approved special processes, reducing the risk of substandard finishes, corrosion, or field failures.

REMINDER | AVOID Payment Transaction On-Hold:

✓ <u>Supplier will not receive payment transaction</u> until required documentation is received to update shipment from a non-conformance to a conformance status to be allowed to be inducted to inventory at United Rotorcraft. Failure to receive documentation and/or communication in a timely manner, parts are at risk to be rejected as non-conformance and RTV (Return To Vendor).



AS9100 and ISO 9001 Certified Companies

Additional information on mandatory requirement to provide required certifications to United Rotorcraft

- ✓ **Section 8.4.3 (Information for External Providers)** requires organizations to communicate to external providers all applicable requirements, including those from customers, statutory/regulatory bodies, and any additional requirements determined by the organization. If a customer specifies that a supplier must hold a certain certification that becomes a contractual requirement.
- Section 5.1.2 (Customer Focus) requires top management to ensure that customer requirements are determined, understood, and consistently met. This means if the customer requires a specific certification, the organization must address it.
- ✓ In practice, **compliance comes from meeting contractual and customer requirements**—if a customer mandates certification, <u>refusing could mean</u> <u>nonconformance</u> to AS9100D 8.2.2 (Determining the requirements for products and services) and 8.4.3 (Information to External Providers).

Reminder of AS9100 (and ISO 9001) for the supplier of United Rotorcraft on the topic of requirements:

- ✓ 5.1.2 Customer Focus
 - > Top management shall ensure that customer requirements are determined, understood, and consistently met.
- √ 8.2.2 Determining the Requirements for Products and Services
 - When determining the requirements for the products and services to be offered to customers, the organization shall ensure that: "the requirements for the products and services are defined, including applicable statutory and regulatory requirements, and those considered necessary by the organization."
- √ 8.4.3 Information for External Providers
 - The organization shall communicate to external providers its requirements for: "processes, products, and services to be provided;" "approval of products and services, methods, processes, and equipment;" "required qualification or approval of the external provider, including certification requirements;" "... (other applicable requirements)."
- √ 8.4.1 General
 - The organization shall ensure that externally provided processes, products, and services conform to requirements, including those from the customer.



Why companies pursue AS9100 and ISO 9001?

Customer and Market Requirements

- ✓ **ISO 9001** is the baseline global standard for quality management across industries.
- ✓ **AS9100** is the aerospace-specific extension of ISO 9001 adding requirements for product safety, risk management, traceability, and regulatory control.
- ✓ Aerospace OEMs (Boeing, Airbus, Lockheed Martin, Raytheon, etc.) require AS9100 certification as a condition to become or remain an approved supplier.
- ✓ Benefits:
 - Without AS9100 certification, a company cannot compete in aerospace, defense, or space markets.
 - > Without ISO 9001, many customers in manufacturing, healthcare, or automotive will not do business with you.

Customer Confidence and Credibility

✓ Increases customer satisfaction, strengthens reputation, and differentiates the company from uncertified competitors.

Regulatory and Legal Compliance

✓ **Protects the company** against regulatory or legal noncompliance and ensures readiness for audits or investigations.

Business Growth and Global Recognition

✓ Increases visibility, enables global partnerships, and opens doors to high-value contracts.

Other

- ✓ Operational Consistency and Efficiency
- ✓ Continuous Improvement and Risk Management
- ✓ Financial Benefits



Decertification of AS9100 and ISO 9001

Rules from IAQG and Certification Bodies:

- ✓ Certification bodies operate under the IAQG OASIS database rules.
 - ✓ IAQG = International Aerospace Quality Group
 - ✓ OASIS = Online Aerospace Supplier Information Systems
- ✓ If systemic noncompliance or repeated failures occur, the CB is obligated to withdraw your AS9100 and/or ISO 9001 certification and record it in OASIS.
- ✓ This affects your approval status with OEMs (United Rotorcraft, Boeing, Airbus, RTX, Collins Aerospace, Lockheed, etc.), since they all monitor OASIS.
- ✓ To prevent escalation, organizations must:
 - ✓ Implement a robust Corrective Action / RCCA system (Clause 10.2).
 - ✓ Conduct effective Management Reviews (Clause 9.3).
 - ✓ Ensure timely closure of NCs before certification body deadlines.



United Rotorcraft Supplier Quality Requirements

The traceability matrix below maps UR Supplier Quality Requirement codes to relevant clauses in AS9100 and ISO 9001. This helps ensure that supplier requirements align with international aerospace quality management standards.

UR CODE	DESCRIPTION	RELEVANT AS9100 AND ISO 9001 CLAUSES		
1.0	Certificate of Conformance Required	7.5.3 (Control of Documented Information), 8.4.2 (Type and Extent of Control), 8.5.2 (Identification and Traceability), 8.5.6 (Control of Changes), 8.6 (Release of Products and Services)		
2.0	OEM's, Distributors, Warehouses (Pack Slip)	8.4.2, 8.4.3 (Information for External Providers), 8.5.2, and 8.6		
3.0	Sub-Tier Management	8.1 (Operation Planning and Control), 8.4 (Control of Externally Provided Process, Products, and Services), 8.4.2, 8.4.3, 8.6, and 10.2 (Nonconformity and Corrective Action)		
4.0	Raw Material Certification	7.1.5 (Monitoring and Measuring Resources), 8.1, 8.1.4 (Prevention of Counterfeit Parts), 8.4.3, and 8.6		
5.0	Configuration Management	7.5 (Documented Information), 8.1, 8.1.2 (Configuration Management), 8.5.2, 8.5.6, and 8.6		
6.0	Traceability, Identification & Control	7.5, 8.1, 8.5.1 (Control of Production and Service Provision), 8.5.2, 8.5.6, 8.6, and 8.7 (Control of Nonconforming Outputs)		
7.0	Material Review Board (Nonconformance)	7.5, 8.5.6, 8.7, and 10.2		
8.0	Re-Submission of Rejected Material	7.5, 8.5.6, 8.7, and 10.2		
9.0	Packaging/Shipping	7.5, 8.1, 8.4.3, 8.5.4 (Preservation), 8.5.5 (Post-Delivery Activities), and 8.6		
10.0	Record Retention	7.5.3 (Control of Documented Information)		
11.0	Inspection	8.6, and 9.1.1 (Monitoring, Measurement, Analysis, and Evaluation)		
12.0	First Article Inspection (AS9102)	8.5.1, and 8.5.1.3 (Production Process Verification)		
13.0	Supplier Quality Control System	7.1.5, 9.1 and 10.2		
14.0	Source Inspection	8.4.2 and 8.6		
15.0	Military Specification Items	8.4		
16.0	FAA Repair Station	8.4 and 8.6		
17.0	Documentation Language (English)	7.4 (Communication) and 7.5.2 (Creating and Updating)		
18.0	Right of Access (Customer/Gov't)	8.4.2 and 9.2 (Internal Audit)		
19.0	Lead-Free Control Plan	8.1, 8.3 (Design and Development of Products and Services), and 8.5.1		
20.0	Safety, Compliance, Ethics Awareness	7.3 (Awareness), 5.1.1 (Leadership and Commitment), and 8.1.3 (Product Safety)		
21.0	Handling & Control of Government Property	8.5.3 (Property Belonging to Customers or External Providers)		
22.0	Source Control Drawings (COTS)	8.3.6 (Design and Development Changes), 8.5.6 (Control of Changes), and 8.4		
23.0	Shelf-Life Products	8.5.2 (Identification and Traceability), 8.5.4 (Preservation), and 8.6 (Release of Products and Services)		

UR Supplier Quality Requirement is based on AS9100 and ISO 9001 standards.

Where to find UR Supplier Quality Requirements?

➤ Link: Our Supplier Portal | United Rotorcraft

Form Number: 400-QMS-QAS-2 | Revision L

Concerns or Recommendations?

For any concerns or recommendations contact:

URQuality Assurance @ airmethods.com

