



Management System Manual

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The Orion Management Representative (MR) maintains absolute responsibility and authority for the distribution, maintenance and recall of this Policy Manual.

On demand, this manual must be returned to:

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INTRODUCTION

We realize that many people perceive audit experiences as confrontational, unpleasant or non value experiences that they would rather avoid. Orion was established to remove this notion and turn it into an enjoyable experience by understanding clients needs, setting mutual goals and delivering audit services in a fun and interactive manner.

Orion Assessment Services of Canada Inc. is a Canadian owned and operated 3rd party audit firm. We develop and implement audit programs to corporate, industry, international and internal standards. We comply with the international standard of ISO/IEC 17021:2011 Conformity assessment – Requirements for bodies providing audit and certification of management systems. This standard stipulates specific requirements for certification bodies and ensures our system operates in a competent, consistent and impartial manner. Our audit team includes bi-lingual auditors in Ontario, Atlantic Canada, Quebec and Western Canada with expertise in virtually all industrial sectors.

As the Canadian partner for Orion Registrar Inc., a management systems registrar based in Denver, Colorado we provide management systems registration /certification to ISO 9001, ISO 14001, AS9100, ISO 13485, HACCP, e3 and CE Marking for Medical Devices. Orion has issued over eight thousand certificates and employs auditors world wide. Accreditations include ANAB (The ANSI-ASQ National Accreditation Board) and RvA (Dutch council for accreditation).

Orion is the only Canadian firm accredited by:

- Austrian Standards Institute to provide ISO 17100 certification in Canada.
- ALLIA to provide certification to the CGSB-131.10 - Translation Services Standards throughout North America.
- Languages Canada to accredit their memberships to the Languages Canada Quality Assurance Scheme
- Allergen Control Group to offer Gluten Free Certification

Our strengths are in:

- Designing and managing cost effective industry standard programs
- Designing systems that address industry needs
- Delivering international audit programs with local, friendly and personal service



MANAGEMENT SYSTEM SCOPE

Scope Statement

This manual applies to all operations within Orion.

ISO

All activities are governed by the Orion US operating procedures. Orion Assessment Services of Canada have developed its own process for:

- Lead Generation / Sales and Marketing
- Tracking When Assessment are due
- Billing

After a contract is signed the delivery aspect is governed by Orion's operating procedures.

ISO 17100

All activities are governed by the Austrian Standards operating procedures. Orion Assessment Services of Canada have developed its own process for:

- Lead Generation / Sales and Marketing
- Tracking When Assessment are due
- Billing

After a contract is signed the delivery aspect is governed by Orion's operating procedures.

All Other Standards

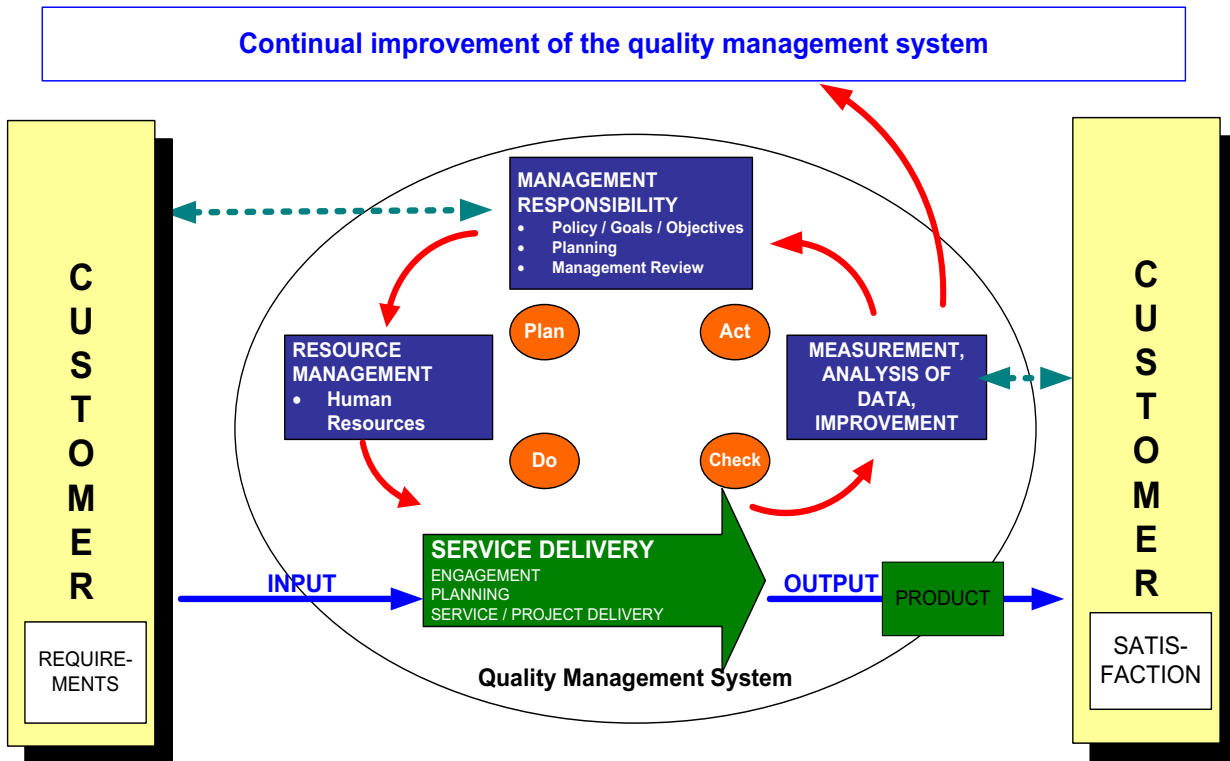
Orion has developed and owns the audit/evaluation scheme. Audits are conducted according to Orion's operating procedures defined in this manual

3.0 QUALITY SYSTEM

I Management System Approach

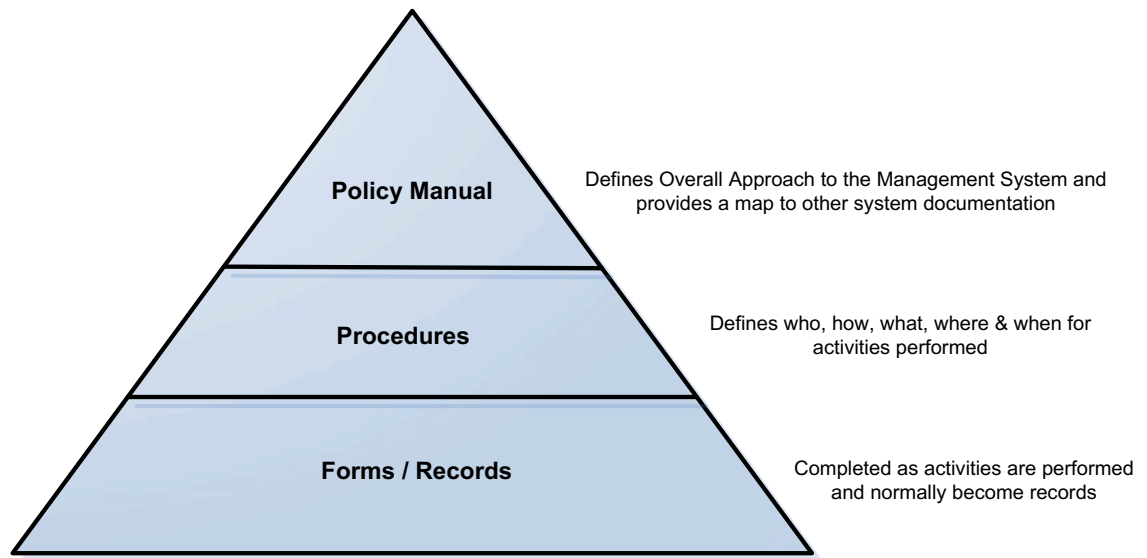
The following outlines Orion’s management system approach to quality. It is based on the “Plan, Do, Check, Act” approach and ensures a full understanding of the customers and Orion’s business.

- Plan Objectives and processes necessary to deliver the desired results are established by the management team.
- Do These processes are Implemented
- Check The results from the processes are measured and monitored against the objectives and desired outcomes
- Act Actions are identified and taken as necessary to improve performance



II Documentation Structure

To support the “Plan, Do, Check, Act” approach, Orion has documented key processes. Orion has defined who, how, what, where and when with the aim of ensuring policy commitments are met. The following diagram outlines the structure of the documentation. Please note that the Policy Manual services as our overall road map and references all relevant documentation. The flow chart in Section 6 Service Delivery references all relevant procedures within the management system program.



To ensure all documents within the system are controlled procedure 4.2 has been developed. This procedure defines the controls needed to:

- Review and approve documents
- Ensure only current documents are in use and obsolete versions are removed from use or suitable identified as being “obsolete”
- Ensure documents are available to all staff
- Documents of external origin are identified

III Records

Records are maintained to provide evidence of conformity to our procedures and to the effective operation of the management system. These records are legible, readily identifiable and retrievable.

Procedure 4.3 defines the controls needed for the identification, storage, protection, retrievable, retention and disposition of these records.

4.0 MANAGEMENT

I Policy Statement

To develop and implement second or third party assessment solutions for organizations striving to improve their operational performance. Our team will work with you to ensure they:

- Understand your needs
- Set and agree on mutual objectives prior to starting any activity
- Review activities to ensure you are 100% satisfied

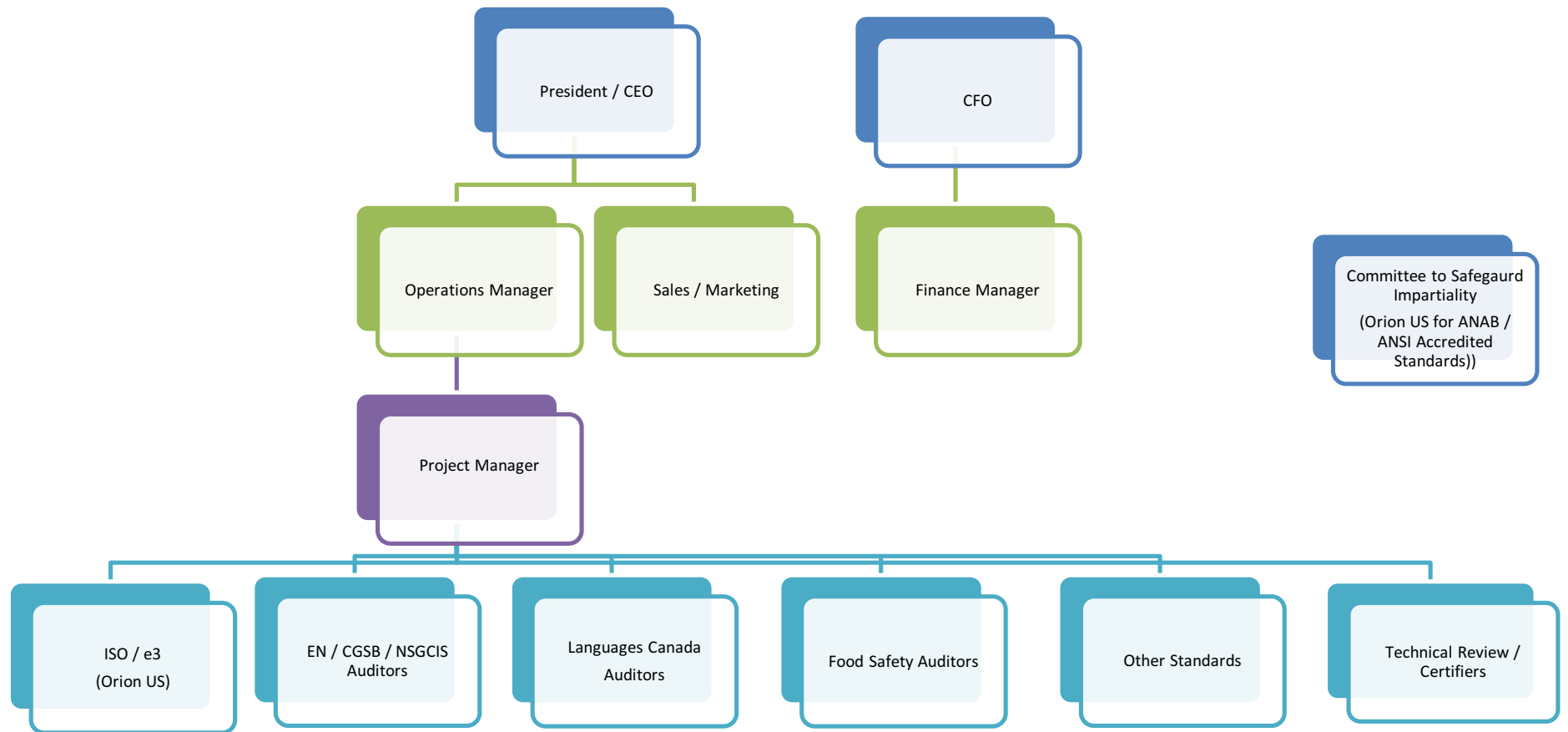
We have set and monitor operational goals with the intent on ensuring yours and our needs are met.



David Huebel

President

II Organization Chart



III Roles / Responsibilities and Communication

The organization chart outlines the structure of Orion's team. Specific roles and responsibilities are referenced within the management system documentation or relevant job descriptions where applicable.

The President has the overall responsibility for

- ensuring that management system is established, implemented and maintained,
- reporting on the performance of the management system and any need for improvement, and
- ensuring customer requirements are promoted and understood by member of the Ford account team.
- Identifying and mitigating any situations which may constitute a conflict or interest or infringe on Orion's efforts to safeguard impartiality.

Committee to Safeguard Impartiality

A committee has been set up to safeguard impartiality. The mandate is to:

- assist in developing the policies relating to impartiality of its certification activities,
- counteract any tendency on the part of a certification body to allow commercial or other considerations to prevent the consistent objective provision of certification activities,
- advise on matters affecting confidence in certification, including openness and public perception, and
- conduct a review, at least once annually, of the impartiality of the audit, certification and decision-making processes of the certification body.

Communication

Communication within the group takes on various forms such as emails, management meetings and staff meetings.

IV System Performance Review / Management Review

The Management Review Team meets on an annual basis to review the performance of the system. The agenda typically includes:

Sales / Marketing

Initiatives

Quote Log – won & lost business

Operations

Assessments Due

Assessments Completed

Customer Issues (if any)

Financial

Aged Receivables

Scheduling vs. Billing

Issues / Complaints / Corrective Actions / Preventive Actions / Improvements

Internal Audits (if completed in the last quarter)

Action items are identified in the minutes with dates for completion and responsibility.

5.0 RESOURCE REQUIREMENTS

III Resource Requirements

Orion provides all the resources needed to ensure all our policy commitments can be achieved. These include:

People

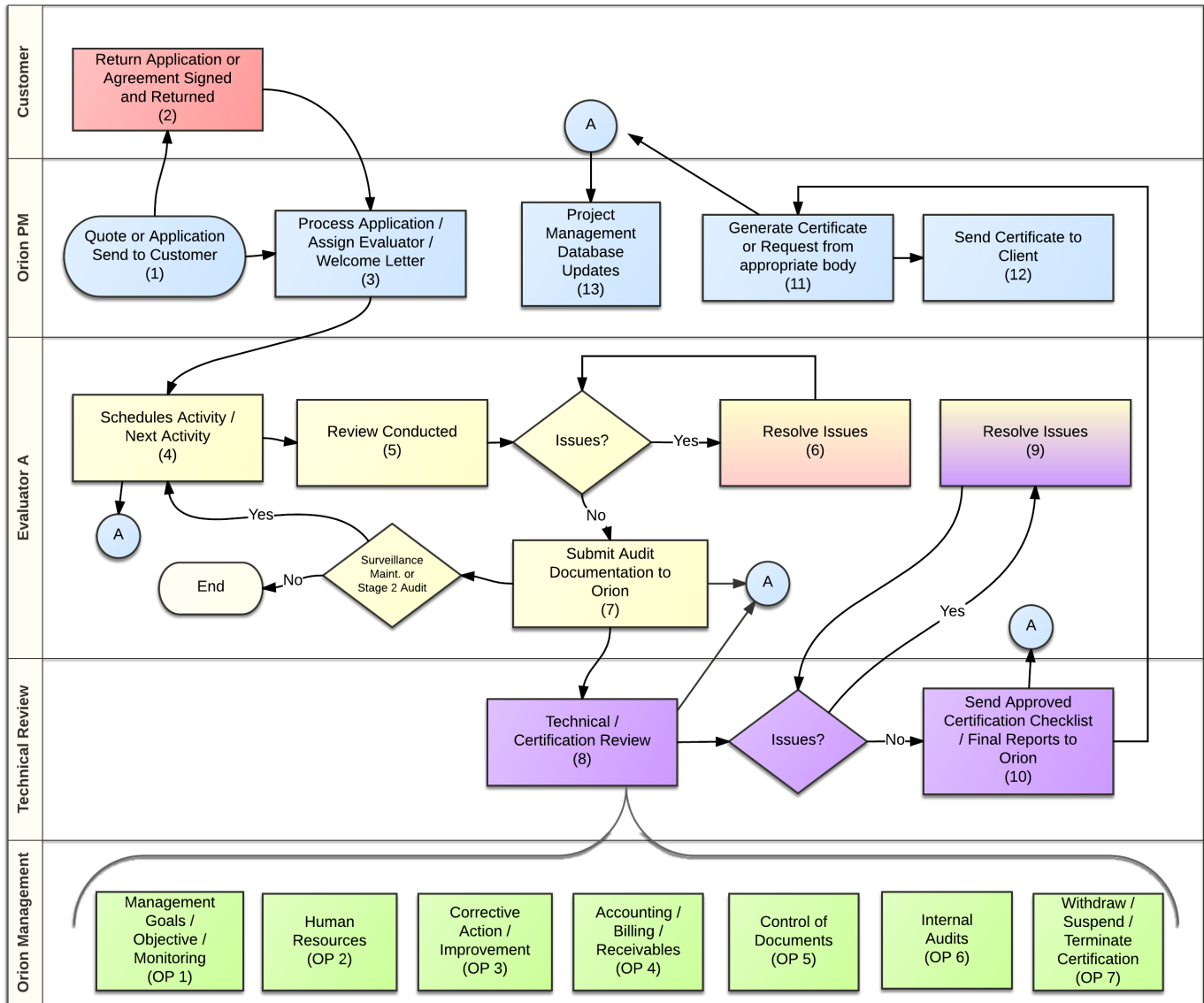
Orion has an extensive and effective human resources program to ensure personnel performing work are competent on the basis of education, training, skills and experience. As part of this program we determine the necessary competence required and then provide any training or actions required to satisfy these needs. Annual performance reviews will be done for all staff.

Infrastructure, Facilities and Work Environment

Orion corporate supports the infrastructure of all services lines within the firm. This includes buildings, workspaces and associated utilities, process equipment such as computers (hardware and software), printers, faxes machines etc. , and supporting services (such as technology support, couriers or communication). Orion's outsources its' IT activities. Some of their tasks include maintaining the servers, controlling back-ups and installing patches as appropriate to existing software.

6.0 SERVICE DELIVERY

The following figure defined over overall business flow and the interaction of all these processes. It references relevant procedures and servers as a "road map" to other management system documentation. The numbers in brackets i.e. (0.1) are the procedure numbers that support the process whereas the prefix OP refers to an operating procedure.



	Activity	Documents Generated Documents to Submit Notification by PM to Finance Auditor emails to PM
1	<p><i>Quote or Application Sent to Customer</i> The President is responsible for the preparation of all quotes. Once prepared they are entered into the Quotation Log for tracking. Once signed by the client they must be returned to the President for review.</p> <p><i>Standard Specific Guidance:</i> <i>ISO</i> For ISO quotes Orion will prepare a quote using the Orion Quote Template using the ISO Orion Quote. Orion Registrar’s Application for Certificate must be provided as well as this is the document that needs to be returned.</p> <p><i>Gluten Free</i> Orion will send the client appropriate Gluten Free Application. Note each template is the same but the fees vary.</p> <p><i>Languages Canada / CGSB and Other Standards</i> The appropriate application can be downloaded from Orion Web-Site.</p>	
2	<p><i>Return Application or Agreement Signed and Returned.</i> All standards except ISO quotes must be completed signed and return to Orion along with the deposit. Since on-line payment is available payment can be confirmed with accounting. <i>For ISO quotes the Application for Certification must be returned.</i></p>	<p>Quotation</p> <p>Signed Terms & Conditions or Application</p> <p>Quotation Log</p> <p>Deposit – Send to Finance</p>
3	<p><i>Process Application / Assign Auditor</i> The application is reviewed for completeness and entered into the Orion database (see Database Manual) and an Auditor along with the Final Reviewer is assigned.</p> <p>Two letters are sent out; one being a welcome letter to the client with an overview attached of the process / next steps and the other an Auditor assigned letter.</p> <p>If this is a LC client, a previously accredited client the Teachers Qualifications Summary from the last visit should be sent to</p>	<p>Enter contract details and assigned Auditor into Orion database</p> <p>Client Introduction Letter</p> <p>Auditor Assignment Letter</p>

	the client to update.	
4	<p><i>Schedule Activity / Next Activity</i></p> <p>Auditor contacts the client to set-up dates for the audit and answers any questions about the process. Documents required for this review are requested. Note these are sent directly to the auditor. The scheduled date must be communicated to Orion for entry and tracking.</p> <p>On a monthly basis, Orion’s Project Manager will send all Auditors a list of their clients detailing due dates (Scheduling Report). The Auditors must ensure all activities are scheduled prior to the Due Date and Orion notified of the date. Different standards have different audit frequencies as noted below:</p> <p>Languages Canada – full audit every 4 years and maintenance audits every 2 years. ISO & Gluten Free – annual for all standards CGSB 131 / ISO 17100 / NSGCIS – full audit every 2 years</p> <p>Note: LC – On-Site Audits must be done four months in advance of certificate expiry to allow time to clause any issues. All Other Standards – min of two months in advance of expiry date or no later than the Due Date on Surveillance activities.</p> <p><u>Standard Specific Guidance:</u></p> <p><u>All On-Site Audits</u> Upon confirming the schedule with the client an Audit Plan will be sent to the client confirming the details.</p> <p><u>Off-Site Audits(Preliminary Reviews / Documentation Review)</u> LC – for Languages Canada Preliminary Reviews or Maintenance Review or Preliminary Review Submission Checklist will be sent to the client to detail the submission requirements for this stage.</p>	<p>Auditor Scheduling Report</p> <p>Email or Verbal update to Orion Project Manager scheduled date</p> <p>Enter Start Date / Schedule date into Orion Database</p> <p>Audit Plan</p> <p>LC only: Preliminary Review Submission Checklist Maintenance Review Submission Checklist</p>
5	<p><i>Review</i> <i>Note 2 types of reviews</i></p> <p><u>1) Preliminary Review / Stage 1 Review</u></p> <p>A Preliminary Review / Stage 1 Review is conducted to evaluate the documentation and identify any major gaps prior to the On-Site Review. This is done by reviewing the client’s documentation and comparing it to the standard. Any issues are identified. The key deliverables from this stage include:</p> <ul style="list-style-type: none"> • Preliminary Review Report - Detailing positive aspects, 	<p>Preliminary Review or Stage 1 Report</p> <p>Email or Verbal update to Orion Project Manager when complete</p> <p>Update activity status into Orion Database</p>

<p>weaknesses and areas for improvement.</p> <ul style="list-style-type: none">• On-Site Review Plan – Confirming the details for the on-site visit including the proposed date and daily schedule. <p>Orion’s audit documentation must be sent to the Project Manager to upload into the Orion Server. (i.e. Audit Plan, Audit Report etc..)</p> <p>Project Manger must notify Finance the activity is complete and to bill.</p> <p><u><i>Standard Specific Guidance:</i></u> <i>Languages Canada</i> Items reviewed during this stage are identified on the LC QA Scheme Auditor Checklist.</p> <p><u>2) Certification / Precertification / Maintenance Reviews</u> The On-Site review is conducted to ensure the processes and documents examined during the Preliminary Review are in use and the system is implemented according to the requirements of the standard.</p> <p><i>Opening Meeting</i> At the start of an audit an opening meeting is conducted to review the audit plan and discuss the process. The Opening & Closing Meeting Agenda details the topics for discussion. Attendees are recorded on the Opening & Closing Meeting Attendees form.</p> <p><i>Audit</i> The audit is conducted according to the Audit Plan. Objective evidence is collected by interviewing staff, reviewing records and observing processes. Audit notes are documented on the Audit Checklist for the appropriate standard with any deficiencies being noted. Any issues are documented according to section 6.</p> <p><i>Closing Meeting</i> At the conclusion of the a meeting is held with the client to discuss the results of the audit (positive / Issues and Opportunities for Improvement). Items discussed are detailed on the Open & Closing Meeting Agenda.</p> <p>At the conclusion of the audit a copy of the report will be left with the note noting that the content of the report may change or the client may be requested to submit</p>	<p>Email billing Request</p>
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	<p>additional documented based on the technical review.</p> <p>Project Manger must notify Finance the activity is complete and to bill.</p>	
6 / 9	<p><i>Resolve Issues</i></p> <p><i>1) Auditor Identified Issues with Client</i> A non-conformance or issue(s) identified during an audit will be documented according the following:</p> <p><i>Standard Specific Guidance</i> <u><i>Languages Canada / CGSB131 / ISO17100 / NSGCIS</i></u> Issues will be documented in the Issues section of the report. Closure of the issues will be documented by the auditor in the issues section of the report along with notes of the objective evidence reviewed. LC allows 14 weeks for issues to be resolved. If the issue(s) involves a major legal non-compliance, a program fraudulently amending or hiding practices, or does not ensure student safety or protection, the client may immediately be terminated.</p> <p><i>Gluten Free</i> Issues will be documented on Orion’s Corrective Action Request form F001. The client must complete their sections as noted on the form and send it to the auditor along with objective evidence to prove that the issue has been closed. The auditor will then review and close accordingly. 28 days are allowed to close any issues.</p> <p>Note is some cases an additional on-site visit may be required by the auditor to close outstanding issues.</p> <p><i>2) Auditor Identified Issues with Auditor Submission</i></p> <p>Note there may be some back and forth clearing up issues. In some cases the Auditor may be asked to obtain additional information from the client.</p>	<p>Preliminary Review Report – revised</p> <p>Email or Verbal update to Orion Project Manager when complete</p> <p>On-Site Evaluation Report – amended with closure notes.</p>
7	<p><i>Submit Audit Documentation</i> After issues have been resolved (except ISO where minor issues are allowed) the auditor will submit documentation for review. Items for submission are identified on the Post Audit Submission Checklist.</p>	<p>Post Audit Submission Checklist</p>

8	<p><i>Technical / Certification Review</i></p> <p>The results from the Preliminary Review and On-Site Review are assessed by a Senior Auditor to ensure a proper recommendation has been made. Items to be reviewed are identified on the Certification Review Checklist. If there are any issues the Technical Reviewer (TR) will note them on the Certification Review Checklist. At this point the TR will send the deficiencies to the Auditor to correct. The audit must correct the issues and re-submit to the TR for review and final approval. At this point, approval is given to certify and issue a certificate or not certify / recertify.</p>	<p>Certification Review Checklist</p> <p>Email or Verbal update to Orion Project Manager status</p> <p>Update status in the Orion Database</p>
10	<p><i>Send Approved Certification Checklist to Orion</i></p> <p>Once all issues are cleared the Certification Review Checklist along with final copies of the report must send Orion.</p>	<p>Certification Review Checklist</p>
11	<p><i>Generate Certificate or Request from appropriate body (if required)</i></p> <p>The database details which accreditation body to request the certificate from.</p> <p><u>Standard Specific Guidance</u></p> <p><u>Languages Canada</u></p> <p>Orion will generate the certificate and notify LC the client has been accredited.</p> <p><u>AILIA Accredited Standards -- CGSB / NGSCIS</u></p> <p>An email must be sent to notify that the client has been granted certification and request a certificate. Required info is Company, Address and Date Cert is granted. This must be emailed to:</p> <p>AILIA T: 819-595-3849 ext.2 E-mail:</p> <p><u>Austrian Standards</u></p> <p>All audit documentation must be sent to the Austrian Standards to request a certificate.</p> <p>Peter Jonas Deputy Director Certification peter.jonas@as-plus.at</p>	<p>Certificate</p> <p>Email or Verbal update to Orion Project Manager</p> <p>Enter certificate details into Orion Database</p>

	<p><u>ISO</u> Certificate requests should be send to Orion US.</p> <p>certificates@orion4value.com</p> <p><u>Gluten Free Certification</u> Note for Gluten Free the GFCP Checklist must be sent and a certifiате will be relased after their internal review.</p> <p>auditreports@allergencontrolgroup.ca</p>	
12	<p><i>Send Certificate to Client</i></p> <p>NOTE: <i>For ISO Clients confirm with Finance that the client has paid prior to releasing certificate.</i></p> <p>The certificate will be signed and send to the client along with information on marketing their accreditation and information on the next steps. An electronic copy will be sent.</p>	<p>Certificate</p> <p>Congratulations Letter</p> <p>Email or Verbal update to Orion Project Manager</p> <p>ISO only - How to Market your Registration</p>
13	<p><u>Project Management Database Updates</u> The project management database is used to track key activities. The main entries are:</p> <p><u>Scheduled</u> The Scheduled Date is entered under the project management tab. This is date should not be later than the Due Date.</p> <p><u>Evaluator Report Date</u> When the audit is done the auditor will submit the audit documentation to Orion no later than 5 business days after the audit. The submission date is recorded along with Issues Due Date is any have been identiified.</p> <p><u>Final Review Date / Reviewer / File Reviewed checkbox</u> A reviewer is assigned and the file passed on for review. The reviewer has no more than 5 business days to reievew the file. The reviewed date and reviewed checkbox are entered when completed. The technical reviews along with the standards they can review can be found on the Staff Listing.</p>	

7.0 MEASUREMENT, ANALYSIS OF DATA, IMPROVEMENT

I System Performance Monitoring

Orion reviews the system performance during management reviews.

Data from the above processes are collected and analyzed during our management meetings to identify continual improvement initiatives.

Our management review continually monitors feedback from the above and takes action as necessary. In addition, a formal management review is taken to review our overall system.

II Action Tracking and Improvement

Action items are identified and tracked through various mechanisms within our management system. Day to day, minor items, are tracked through e-mails, meeting minutes, etc. Significant issues are documented and tracked on the management review action log..