

QUALITY MANUAL ISO 9001:2015

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APPROVED BY:

James Osborn, CEO

1. INTRODUCTION

iCOVER (<u>www.icover-services.com</u>) specializes in Wholesale Background Screening Solutions for the global market. We are an international company with operational headquarters in Paris, backed by a network of offices worldwide, which offer strategic global reach for all your business needs.

Our expertise lies in data collection, research & verification of information, analysis and reporting. Our clients know that we are diligent, always prepared to go the extra distance to deliver compliant, accurate and timely results. Our service is dedicated, professional and reliable.

See Annex 1 – Organization structure

2. REFERENCES

The Quality Management system is developed according to the following standards:

- ISO 9000:2015 Quality Management Systems Fundamentals and vocabulary
- ISO 9001:2015 Quality Management Systems Requirements

3. CONTEXT OF THE ORGANISATION

3.1. Understanding the organization and its context

External and internal issues related to the objectives of the organization, and which affect its ability to achieve the desired results, are defined in the Context form, which is approved by the Manager. The review of the Context is performed by the Management of the company once a year, during the Management review. The update of the document is performed in case of change of the external or internal issues, or their impact.

3.2. Understanding the needs and expectations of interested parties

The needs and expectation of interested parties are defined in the Context form, which is approved by the Manager. The review of the Context is performed by the Management of the company once a year, during the Management review. The update of the document is performed in case of change of the needs and expectation of interested parties, or their impact.

3.3. Determining the scope of QMS

Scope of QMS:

Data processing in order to establish their authenticity, including but not limited to personal user and business data. Provision of services in the field of operational management and support in the form of a call center, information lines. Reputation assessment of physical persons and legal entities. Management consulting services.

Exclusions:

7.1.5 from ISO 9001:2015 – the company is not using monitoring and measuring resources

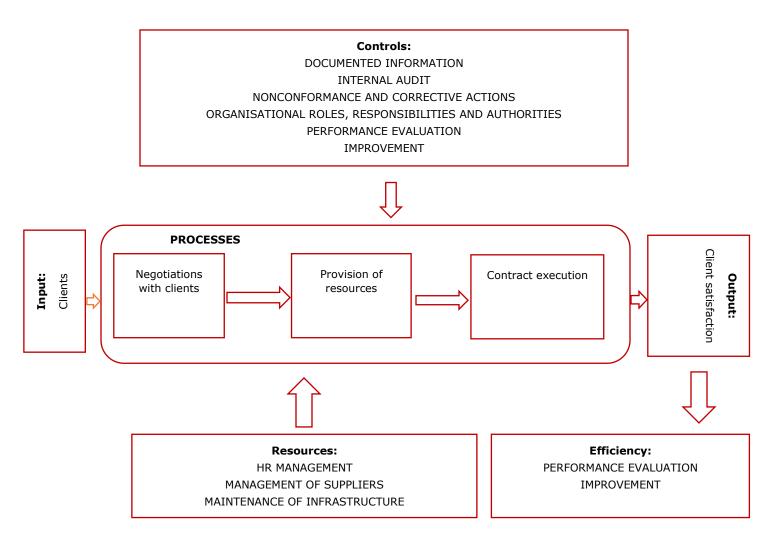
8.5.5 from ISO 9001:2015 – the company is not performing post-delivery activities

Addresses:

✓ iCover Bulgaria - 115G Tsarigradsko Shose Blvd. , Megapark Business Center, floor 15

- ✓ iCover UK 75 King William Street, London, EC4N, 7BE UK
- ✓ iCover Tunisia 6 rue de l'Artisanat, Charguia 2, Tunis
- ✓ iCover Mexico Río Danubio 80 Cuauhtémoc, 06500 Cuidad de Mexico, CDMX
- ✓ iCover France 16 rue Gaillon 75002 Paris
- ✓ iCover India Feroz Building, Prestige Infantry Court, N° 74 Cunningham Rd, Bengaluru, Karnataka, 560052

3.4. QMS and its processes



iCOVER scope of work per location:

BULGARIA (BG):

- IT Head of the department
- IT- employees
- Continuous Improvement Head of the department
- Continuous Improvement employees
- Delivery employees
- Business Intelligence/Compliance employees
- HR employees
- Product Management employees

FRANCE (FR):

- Product Management Head of the department
- Product Management employees
- Project Management Office Head of the department
- Project Management Office employees
- Partner Management Head of the department
- Partner Management employees
- Legal Head of the department
- Legal employees
- Business Intelligence/Compliance Head of the department
- Business Intelligence/Compliance employees
- Sales & Account Management Head of the department
- Human Resources Head of the department

SWITZERLAND (SW):

• Marketing - Head of the department

UNITED STATES OF AMERICA (USA):

- Delivery Head of the department
- Sales & Account Management- employees

INDIA (IN):

- Delivery employees
- Business Intelligence/Compliance employees
- HR employees
- Product Management employees

MEXICO (MX):

- Delivery employees
- BI employees
- HR employees

TUNIS (TUN):

- Delivery employees
- Business Intelligence/Compliance employees
- Partner Management employees

NOTE: USA, SW, and UK HR operational processes are covered by employees in FR.

4. LEADERSHIP

4.1. Policy

The policy defines the development strategy of the company in terms of quality. It is approved by the Manager and is formed as a separate document of the system. The policy is public. It is available for all employees of the company, as well as for the relevant external parties - on the wall in the office of the company and on the web page.

It is reviewed for adequacy at least once a year, during the Management review.

The Quality policy is the basis for defining specific quality objectives.

4.2. Organizational roles, responsibilities and authorities

By order of the company Manager, a Management Representative is appointed, with the respective delegated responsibilities regarding the Quality Management System.

5. PLANNING

5.1. Actions to address risks and opportunities

The risks and opportunities are defined in Register of risks and opportunities, which is approved by the Manager. The review, the effectiveness evaluation and update of the register are performed by the Management of the company once a year, during the Management review.

5.2. Quality objectives and planning to achieve them

They are defined according to the Quality Policy. Approved by the Manager. They are recorded in the Objectives form.

The Objectives are subject to review for implementation at least once a year, during the Management review. They are communicated to the staff by e-mail.

The objectives should:

- ✓ be consistent with the Quality policy
- ✓ be measurable (if possible)
- ✓ take into account the applicable requirements as well the risk assessment
- ✓ be communicated
- ✓ be updated as appropriate

5.3. Awareness

The Management representative is responsible for the distribution of the Quality Policy and Quality Objectives.

The Quality Policy is available on the wall in the offices of the company and on the web page.

The Quality Objectives are communicated to the employees by mail or on paper.

The employees are responsible to comply with the Quality objectives and Quality policy. Sanctions and consequences in case of non-compliance with the above shall be applied in accordance with the applicable legislation.

6. OPERATION

6.1. Operational planning and control

The company Management is responsible for the planning and provision of the services. The appropriate employees participate in appropriate activities, according to the procedures, work instructions and their job descriptions.

The procedures, concerning Purchasing, Non-conformance and corrective actions, as well the respective work instructions, contain information on:

- ✓ Services requirements
- ✓ Criteria for processes and services acceptance
- ✓ Required resources
- ✓ Appropriate controls
- ✓ Documented information to be maintained

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✓ Unforeseen changes and limitation of adverse effects

6.2. Customer and other external parties' property

Customers' and external parties' property must be identified and protected from loss or damage in a manner established by the appropriate external party.

If for any reason their property becomes unusable (damaged or destroyed), the external party is informed in writing. The relevant legal actions are taken. The company Management is responsible for this activity.

6.3. Change management

If the main activity of the company requires a change, this must be documented in an order, procedure or instruction. It must be reviewed and approved by the Manager.

7. PERFORMANCE EVALUATION

The company controls and measures the processes within the organization, as well as the services it offers.

Once a year, during the Management Review, the Management Representative provides the Manager with summary information on the following indicators:

N⁰	Process:	Objective:	Observation:	Measurement:
1	Management of documented information	Maintaining the documented QMS up-to-date and ensuring the electronic access for all employees. Maintaining records for compliance with the requirements of the QMS	Internal audits Document changes review by the Management Representative	Number of nonconformities in documents control
2	Quality policy and objectives planning	Preliminary analyze of opportunities for making the right decisions to ensure compliance of the service with customer requirements and regulations in the future. Implementation of the company's strategy.	Policy and objectives implementation review	Implemented measures
3	Management review	To ensure appropriate, adequate and efficient conditions and maintenance of QMS	Internal audits Analysis of corrective actions and changes after management review	Next management review
4	Internal communication	To achieve QMS efficiency and to fulfill the company goals by improving the communication	Internal audits Internal meetings	Number of nonconformities in records control



N⁰	Process:	Objective:	Observation:	Measurement:
5	HR Management	Providing resources necessary for the QMS process	Internal audit Personnel training	Audit report
6	Training	To provide the necessary level of competence of the staff	Internal audits Training protocol	Trainings' efficiency evaluation
7	Resources management	Providing appropriate infrastructure for the functioning of the processes	Infrastructure regular review Internal audits Comparative analysis of repair and maintenance costs by periods	Number of accidents / incidents Number of nonconformities Cost trend (up / down)
8	Work environment	Providing an appropriate working environment to achieve compliance with service requirements	Internal audits Regular review of the work environment	Number of nonconformities in work environment
9	Management of infrastructure	Preliminary analyze of opportunities for making the right decisions to ensure compliance of the service with the rules of QMS	Process control according to the procedures Internal audits	Number of nonconformities Number of complaints
10	Communication with clients	Accurate definition, review and fulfillment of customer requirements	Internal audit Customer satisfaction analyze Complaints analyze	Number of complaints
11	Sales and marketing	Increasing market share	Registering of new and retained old clients	Number of new customers and old retained clients
12	Purchasing	Providing resources in accordance with service requirements	Internal audits Suppliers' evaluation	Number of nonconformities
13	Internal audits	Regular collection of objective information on the compliance of the QMS with the planned measures, the requirements of the standard, its efficiency. Identification of actions	Internal audit results analyze Management review Comparison of results from the internal	Number of nonconformities after certification / annual audit



N⁰	Process:	Objective:	Observation:	Measurement:
		for elimination of the nonconformities.	audit and results from certification / annual audits	
14	Monitoring and measurement	Checking the correspondence between the characteristics of the service and the requirements.	Regular review of the registered nonconformities Internal audits	Number of nonconformities
15	Nonconformities management	Nonconformance prevention	Internal audits Number of complaints	Number of nonconformities
16	Corrective actions	Nonconformance prevention and improvement	Evaluation of corrective actions taken and efficiency improvement	Number of efficient corrective actions

The results of the measurements above are described in the Management Review protocol. They serve as a basis for analysis and evaluation by the Manager. Based on them, he makes decisions, which are documented in the Management Review protocol.

8. IMPROVEMENT

Decisions for continuous improvement are taken by the Manager, based on the inputs of the Management review.

9. ANNEXES

Integral part of this Manual are all QMS documents, which current versions are described in the Register of QMS documents.