

# SGC-MAN

## Quality + Environmental Manual

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<b>Update</b>	10/7/25
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CHANGES			
Version	Date	Scope	Comments
1	11/04/16	First Draft	Creation
2	13/05/16	Full revision / references	Public while official version
3	13/10/16	(see Paragraph )7	Addition of new register for infrastructures
4	30/09/17	Migration to ISO 9001:2015	New structure and scope
5	30/11/17	(see Paragraph 8.4)	Control of external processes
6	12/08/22	(see Paragraph 11.)	After Sales Services - Customer Support
7	16/01/18	Change of name	SGC-NCR: No conformity register now is REG-NCR
8	08/10/18	Planing	Details on market analysis Figure 2
9	18/04/19	(see Paragraph 7.1)	People / Employees
10	10/10/20	(see Paragraph 7.1)	Revision
11	21/09/21	(see Paragraph 8.5)	REACH, CLP and Regulatory Requirements declaration
12	12/01/22	(see Paragraph 7.4)	On line communications with employees
13	29/08/22	(see Paragraph 11.1)	After Sales Services
14	29/08/23	(see Paragraph 5.3)	New Business Structure
15	21/12/23	(see Paragraph Figure 6)	Organization char changes
16	23/10/24	All	Revision
17	12/05/25	All clauses affected	ISO 14001 integration
18	10/07/25	New Title of this document	Quality + Environmental Manual
19	10/07/25	New section (see Paragraph 8.8)	Emergency Preparedness and Response (ISO 14001)

AUTHORIZATIONS			
Function	Name / Signature	Position	Date
Editor	PCA	Quality expert	10/7/25
Approved	Jose M Caballero	General Manager	30/10/2017

**Distribution**

This document is only valid in its online version. Paper copies are not official.

According to ALBEDO Telecom, the system-supported manual complies with the requirements of ISO 9001:2015, ISO 14001:2015 and other referenced quality standards.

# Table Of Contents

0.0.1	Distribution	2
0.0.2	ALBEDO Commitment	5
0.0.3	Purpose	5
0.0.4	ISO 9001 + ISO 14001 integration	5
0.0.5	Approvals	6
<b>1</b>	<b>Scope [1]</b>	<b>6</b>
1.1	Company Background	6
1.2	Products and Services	6
<b>2</b>	<b>Normative References [2]</b>	<b>6</b>
<b>3</b>	<b>Terms And Definitions</b>	<b>7</b>
<b>4</b>	<b>Context of the organization [4]</b>	<b>8</b>
4.1	Understanding the organization and its context	8
4.1.1	Commitment to the Customer's Needs	8
4.1.2	Internal and External Parties	9
4.1.3	Wealth of Knowledge	10
4.1.4	Environmental Context and ISO 14001 Alignment	10
4.2	Understanding the needs and expectations of parties	11
4.3	Scope of the Integrated Management System	11
4.4	Quality Management Systems and its processes	12
4.4.1	General	13
4.4.2	Integrated System Structure	13
4.4.3	Control of Records	13
4.4.4	Policy and Performance	14
4.4.5	Metrics	14
4.5	Environment	15
<b>5</b>	<b>Leadership and Commitment [5]</b>	<b>15</b>
5.0.1	Management Commitment	16
5.1	Customer Focus	17
5.2	Policy	17
5.2.1	Establishing the Integrated Policy	17
5.2.2	Commitments within the Policy	17
5.2.3	Company Objectives	18
5.2.4	Quality Management System Planning	18
5.2.5	Communicating the Quality Policy	18
5.2.6	Internal Communication	19
5.2.7	Management Review	19
5.2.8	Review Input	19
5.2.9	Review Output	19
5.3	Organizational Roles, Responsibilities and Authorities	20
5.3.1	Interrelation Levels	21
<b>6</b>	<b>Planning [6]</b>	<b>21</b>
6.1	Actions to Address Risks and Opportunities	21
6.2	Quality and Environmental Objectives	22
6.3	Planning of Changes	23
6.4	Actions to address risks and opportunities	23
6.4.1	New Products	24
6.4.2	Product Road Maps	24
6.4.3	Determination of Requirements	24
6.4.4	Defined design review process	25
6.5	Quality Objectives	25
6.5.1	Design and Development Planning	25
<b>7</b>	<b>Support [7]</b>	<b>26</b>
7.1	Resources	26
7.1.1	People	26
7.1.2	Infrastructure	27
7.1.3	Environment for Operation of Processes	27
7.1.4	Monitoring and Measuring Resources	28
7.1.5	Organizational Knowledge	28
7.2	Competence	30
7.3	Awareness	30
7.4	Communication	30
7.5	Documented Information	31
<b>8</b>	<b>Operation [8]</b>	<b>31</b>
8.1	Operational Planning and Control	32
8.2	Products Requirements	32
8.2.1	Customer Communication	32
8.2.2	Design and Development Input	32
8.3	Product Design and Development	33
8.3.1	Design and Development Planning	33
8.3.2	Design & Development Inputs	33
8.3.3	Design and Development Output	33
8.3.4	Design & Development Changes	34
8.3.5	Design & Development Outputs	35
8.3.6	Design and Development Controls	35

8.3.7	Design and Development Validation	35
8.4	Control of Externally Provided Processes	36
8.4.1	Type and Extent of Control	36
8.4.2	Information For External Providers	36
8.4.3	Purchasing Process	37
8.5	REACH, CLP and RoHS	38
8.5.1	Hazardous substances	38
8.5.2	Categorization	38
8.6	Production	39
8.6.1	Control of Production	40
8.7	Control of Nonconforming Outputs	40
8.8	Emergency Preparedness and Response (ISO 14001 only)	41
<b>9</b>	<b>Performance Evaluation [9]</b>	<b>41</b>
9.1	Monitoring, Measurement, Analysis and Evaluation	42
9.1.1	Monitoring Customer Satisfaction	42
9.1.2	Traceability	42
9.1.3	Inspection and test	42
9.1.4	Product handling	43
9.1.5	Control of Test instruments	43
9.1.6	Evaluation of Compliance (ISO 14001)	44
9.2	Internal Auditing	44
9.2.1	Procedures Audits	44
9.2.2	Components and Product Inspection	45
9.3	Management Review	45
9.3.1	Management Review Inputs	46
9.3.2	Management Review Outputs	46
<b>10</b>	<b>Improvement [10]</b>	<b>46</b>
10.1	Applicable Requirement	47
10.2	Nonconformity and Corrective Actions	48
10.2.1	Identification	48
10.2.2	Analysis of Data	49
10.3	Continual Improvement	49
10.3.1	Statement	49
10.3.2	Corrective Action	49
10.3.3	Preventive Actions	50
<b>11</b>	<b>Customer Support [11]</b>	<b>50</b>
11.1	After Sales Service Procedure	51

## ALBEDO Commitment

ALBEDO is COMMITTED to the never ending quest for PERFECT QUALITY:

- NO Field Failures,
- NO Customer Returns,
- NO Reliability Failures,
- NO Yield Loss.

But General SATISFACTION.

## Purpose

This manual defines the ALBEDO TELECOM responsibilities for the company quality system. This manual is the foundation of the quality system, which is based on ISO 9001 striving for continual improvement.

Quality policy is to achieve sustained, profitable growth by providing services which consistently satisfy the needs and expectations of ALBEDO customers. Achievement of this policy involves all staff, who are individually responsible for the quality of their work, resulting in a continually improving working environment for all. This policy is provided and explained to each employee by the Managing Director or Quality Manager.

## ISO 9001 + ISO 14001 integration

Integrating ISO 14001 into ALBEDO's existing ISO 9001 Quality Management System (QMS) is a strategic move that can enhance operational efficiency and demonstrate a commitment to environmental responsibility. Here's a structured approach to achieve this integration:

Both share a unified High-Level Structure (HLS) known as Annex SL. This structure includes ten common clauses:

1. Scope
2. Normative References
3. Terms and Definitions
4. Context of the Organization
5. Leadership
6. Planning
7. Support
8. Operation
9. Performance Evaluation
10. Improvement

This alignment facilitates the integration of the Environmental Management System (EMS) into the existing QMS by allowing shared processes and documentation.

### Approvals

The General Manager has approved this manual within the document control database. Changes to this manual must also be approved by the GM.

## 1. SCOPE [1]

This Manual covers the all the procedures involved with the design, sales and support of ALBEDO products but do not cover the manufacturing that is being externalized.

### 1.1 Company Background

ALBEDO Telecom is a private company specialized on manufacturing test, measurement and monitoring solutions for the telecom industry. We facilitate mobile and telecom operators the installation, troubleshooting and maintenance of those infrastructures that are supporting voice, video, internet and data services.

### 1.2 Products and Services

ALBEDO core expertise range from PTP, IEC 61850, 5G, SyncE, GbE, E1, TDM, Jitter/Wander, QoS, SLA technologies that we have implemented on WAN emulators, filtering/aggregation Taps, hand-held Testers, and centralized managed Systems. ALBEDO telecom is represented by a distribution network covering more than 30 countries in all five continents.

## 2. NORMATIVE REFERENCES [2]

The following document, and supporting documents, are normatively referenced in the governing specification. Unless otherwise specified, ISO 9001:2015 or ISO 14001:2015 applies.

Other subordinate documents of this manual that contain references will provide the necessary referrals.

### 3. TERMS AND DEFINITIONS

For the purposes of this document, the terms and definitions of ISO 9001:2015 and ISO 14001 apply.

**Tabla 12**

*Sistema Integrado UNE-EN ISO 9001:2015 + 14001:2015. En cursiva los nuevos apartados MA*

Requisito del sistema de gestión de la calidad	Definición
<b>4. Contexto de la organización</b>	
4.1. Compresión de la organización y de su contexto	<ul style="list-style-type: none"> <li>• <i>Cuestiones int. y ext. de la calidad y el medioambiente</i></li> </ul>
4.2. Entender necesidades/expectativas de partes interesadas	<ul style="list-style-type: none"> <li>• Requisitos legales de las partes interesadas</li> <li>• <i>Cambio climático</i></li> </ul>
4.3. Definir del alcance del sistema de gestión de la calidad	<ul style="list-style-type: none"> <li>• <i>Manual integrado Q+MA</i></li> </ul>
4.4. Sistema de gestión de la calidad y sus procesos	<ul style="list-style-type: none"> <li>• Mapa de procesos</li> <li>• Indicadores y Objetivos Q+MA</li> </ul>
<b>5. Liderazgo</b>	
5.1. Liderazgo y compromiso	<ul style="list-style-type: none"> <li>• Responsabilidades de puesto de trabajo</li> <li>• <i>Indicadores y Objetivos Q+MA</i></li> </ul>
5.2. Política	<ul style="list-style-type: none"> <li>• <i>Política de Calidad y Medioambiente</i></li> </ul>
5.3. Roles y responsabilidades y autoridades en la organización	<ul style="list-style-type: none"> <li>• Organigrama</li> <li>• Definiciones de puesto de trabajo</li> </ul>
<b>6. Planificación</b>	
6.1. Acciones para abordar riesgos y oportunidades	<ul style="list-style-type: none"> <li>• Plan de riesgos y oportunidades</li> <li>• <i>Evaluación de aspectos ambientales</i></li> <li>• <i>Identificación de requisitos legales</i></li> </ul>
6.2. Objetivos de la calidad y planificación para lograrlos	<ul style="list-style-type: none"> <li>• <i>Objetivos Q+MA</i></li> </ul>
6.3. Planificación de los cambios	<ul style="list-style-type: none"> <li>• Control de la información documentada</li> <li>• <i>Normativa externa</i></li> <li>• <i>Consideración cambio climático</i></li> </ul>
<b>7. Apoyo</b>	
7.1. Recursos	
7.1.1. Generalidades	<ul style="list-style-type: none"> <li>• Determinación de los recursos necesarios</li> </ul>
7.1.2. Personas	<ul style="list-style-type: none"> <li>• Plan Formación</li> </ul>
7.1.3. Infraestructura	<ul style="list-style-type: none"> <li>• Mantenimiento de sistemas y equipos internos</li> </ul>
7.1.4. Ambiente para la operación de los procesos	<ul style="list-style-type: none"> <li>• Riesgos Laborales</li> </ul>
7.1.5. Recursos de seguimiento y medición	<ul style="list-style-type: none"> <li>• Calibraciones</li> </ul>
7.1.6. Conocimientos de la organización	<ul style="list-style-type: none"> <li>• Mapa de conocimiento</li> </ul>
7.2. Competencia	<ul style="list-style-type: none"> <li>• Responsabilidades de puesto de trabajo</li> <li>• Formación</li> </ul>
7.3. Toma de conciencia	<ul style="list-style-type: none"> <li>• Reuniones de equipo</li> <li>• <i>Conocimiento de la Política de Calidad y Medioambiente</i></li> <li>• <i>Sensibilización ambiental</i></li> </ul>
7.4. Comunicación	<ul style="list-style-type: none"> <li>• INT/EXT intranet / web / internet</li> </ul>
7.5. Información documentada	<ul style="list-style-type: none"> <li>• Control de la información documentada</li> </ul>
<b>8. Operación</b>	
8.1. Planificación y control operacional	<ul style="list-style-type: none"> <li>• Planificación de la producción</li> <li>• <i>Control operacional de gestión de residuos</i></li> </ul>
8.2. Requisitos para los productos y servicios	<ul style="list-style-type: none"> <li>• Gestión comercial</li> <li>• Plan de emergencia</li> <li>• Simulacros de emergencia</li> </ul>
8.3. Diseño y desarrollo de los productos o servicios	<ul style="list-style-type: none"> <li>• Diseño y desarrollo de productos y servicios</li> <li>• <i>Ciclo de Vida</i></li> </ul>
8.4. Control de procesos, productos suministrados	<ul style="list-style-type: none"> <li>• Gestión de las compras</li> <li>• <i>Seguimiento de proveedores</i></li> </ul>

Tabla 12

Sistema Integrado UNE-EN ISO 9001:2015 + 14001:2015. En cursiva los nuevos apartados MA

8.5. Producción y prestación del servicio	<ul style="list-style-type: none"> <li>• Propiedad del cliente</li> <li>• Creación y producción audiovisual para eventos</li> <li>• Control de la prestación del servicio</li> <li>• Validación cliente</li> </ul>
8.6. Liberación de los productos y servicios	<ul style="list-style-type: none"> <li>• Verificación del resultado</li> </ul>
8.7. Control de las salidas no conformes	<ul style="list-style-type: none"> <li>• Gestión de incidencias, no conformidades y reclamaciones</li> </ul>
<b>9. Evaluación del desempeño</b>	
9.1. Seguimiento, medición, análisis y evaluación	
9.1.1 Generalidades	<ul style="list-style-type: none"> <li>• <i>Indicadores de calidad y ambientales</i></li> </ul>
9.1.2. Satisfacción del cliente	<ul style="list-style-type: none"> <li>• Encuestas satisfacción clientes</li> </ul>
9.1.3. Análisis y evaluación	<ul style="list-style-type: none"> <li>• Revisión Dirección</li> </ul>
9.2. Auditoría interna	<ul style="list-style-type: none"> <li>• <i>Auditoría interna 9001+14001</i></li> <li>• Informe Auditoría interna</li> </ul>
9.3. Revisión por la dirección	<ul style="list-style-type: none"> <li>• Revisión Dirección</li> </ul>
<b>10. Mejora</b>	
10.1. Generalidades	
10.2. No conformidad y acción correctiva	<ul style="list-style-type: none"> <li>• Gestión de la no conformidad, acciones correctivas y mejora</li> </ul>
10.3. Mejora continua	<ul style="list-style-type: none"> <li>• Revisión Dirección</li> </ul>

By following this structured approach, ALBEDO can successfully integrate ISO 14001 into its existing ISO 9001 framework, enhancing environmental performance and demonstrating a commitment to sustainability.

## 4. CONTEXT OF THE ORGANIZATION<sup>1</sup> [4]

### 4.1 Understanding the organization and its context

**ALBEDO Telecom** offers a full range of products, systems and services to help you make the most of your investment on telecom applications and infrastructures. We are ready to partner with you to quickly roll out your network, maximising performance and minimising maintenance. Our technical advisors, network systems engineers and software developers will help you to design, build, manage and troubleshoot your network, making your business more profitable.

#### Commitment to the Customer's Needs

Our solutions and services integrate with your business ever since the beginning, and we will help you to get answers to questions such as:

- What type of application does your network support?
- How fast can your network go?
- How can I emulate real network conditions?

1. See SGC-CTX Context and Scope



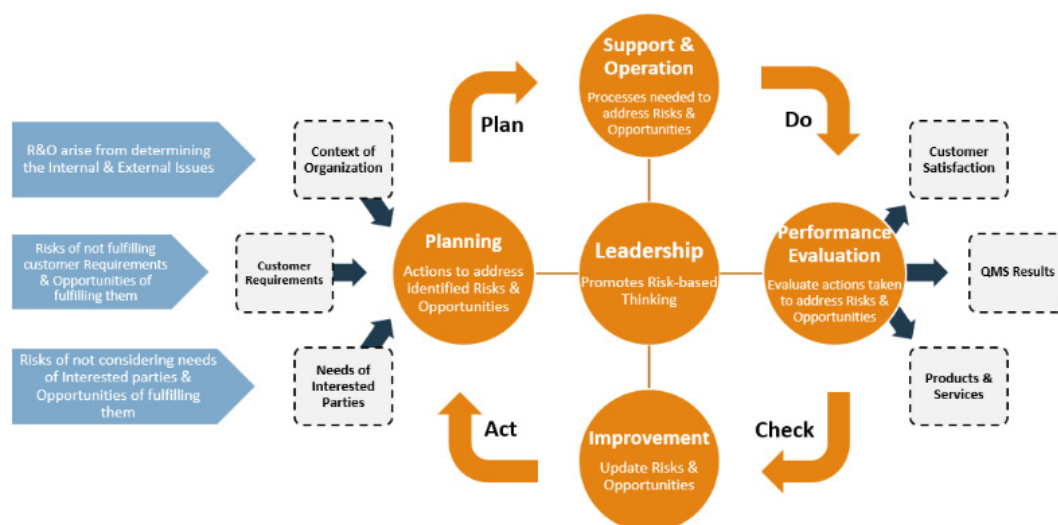


Figure 1 ISO 9001-2015

- Which tools do I need to install and trouble shoot my network?
- How can you train your engineers?
- Who can design this hardware I need?
- Where can I manufacture my complex electronics device?
- How can I test and you have test resources?
- What is the cost of downtime?
- Is the network ready for Voice over IP?
- How can monitor the new Sync-E network?
- Who can design a PTP synchronization approval test suite?
- How may I synchronize the Power Substatiion?

Our experts will help you to find the weak spots of your network, offer alternatives and advise you on what to do, when and why. At ALBEDO, we understand how essential networking is to your business. We also know that there are so many different technology solutions but only a few can really achieve the SLA you need. We can advise you to make the right decisions, to certify the quality of your network, or verify your provider is matching our requirements, therefore you will rest assured that your network investment is well protected.

### Internal and External Parties

Whether you need help with a specific network problem now, or you are still at the planning stage, ALBEDO has a solution for you. From the best market equipment to serve your particular network, to web-based monitoring systems offered to many professionals around the world.

ALBEDO Telecom can develop customized solutions that will be even manufacture in our premises in order to provide you a 100% guarantee of top quality. We are more than willing to share our know-how with your organization's system engineers.

## Wealth of Knowledge

From electrical to optical, from wide area to Gigabit, from core to edge - ALBEDO lives and breathes networking. Our team of instructors and engineers provide you with a network of knowledge that can be very profitable for your business. Our experts are constantly studying the market, developing new technology, solving problems for organisations worldwide, and giving a whole new meaning to efficient and secure network management.

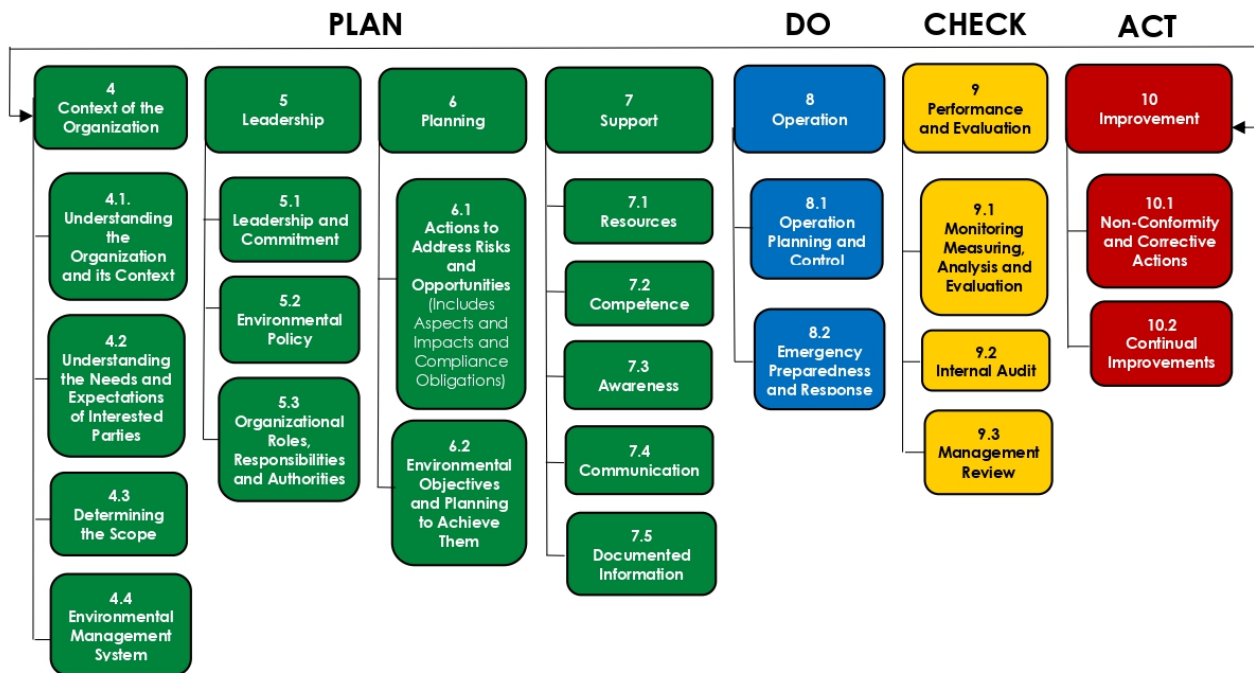


Figure 2 Market Analysis

## Environmental Context and ISO 14001 Alignment

In addition to our technological and commercial context, ALBEDO Telecom recognizes the growing global concern for environmental sustainability, climate change, and the responsible use of resources. These concerns are increasingly reflected in the expectations of our stakeholders, including partners, regulators, customers, and employees — many of whom require environmentally conscious practices and even ISO 14001 certification.

ALBEDO is therefore committed to integrating environmental responsibility into its strategic planning and daily operations. This includes reducing waste, improving energy efficiency, promoting the use of sustainable technologies, and complying with all relevant environmental legislation.

In this context, ALBEDO has launched in 2025 a project to implement a certified Environmental Management System (EMS) according to ISO 14001:2015, with the aim of aligning environmental objectives with our existing Quality Management System, and reinforcing our commitment to sustainable innovation and continuous improvement.

## 4.2 Understanding the needs and expectations of parties

(Aligned with ISO 9001:2015 + ISO 14001:2015)

ALBEDO Telecom identifies and evaluates all interested parties that are relevant to both its Quality Management System (QMS) and its Environmental Management System (EMS). These parties influence or are influenced by ALBEDO's activities, products, services, and compliance obligations.

Relevant interested parties include (but are not limited to):

- **Customers and end-users**, who demand reliable, innovative, and environmentally responsible products.
- **Distributors and partners**, who expect support, quality assurance, and sustainable supply chains.
- **Regulatory bodies**, who enforce environmental, technical, and safety compliance (e.g., CE, RoHS, EMC).
- **Employees and collaborators**, who value safe working environments, training, and ethical practices.
- **Local communities**, particularly near operational sites, who are affected by emissions, waste, and resource use.
- **Shareholders and executive management**, who expect legal compliance, risk control, and long-term viability.
- **Environmental and industry organizations**, who drive best practices, transparency, and sectoral influence.

ALBEDO monitors and regularly reviews the needs, expectations, and legal or voluntary obligations related to these interested parties. This ensures that both the QMS and EMS remain aligned with stakeholder requirements and support the organization's strategic direction.

Additional procedures and controls derived from these stakeholder needs are detailed throughout this Manual and supporting documentation.

## 4.3 Scope of the Integrated Management System

(Aligned with ISO 9001:2015 and ISO 14001:2015)

ALBEDO Telecom has established an Integrated Management System (IMS) that encompasses both quality and environmental requirements, based on the context of the organization and the expectations of relevant interested parties. The scope of this IMS includes:

- The design, development, manufacturing, and support of synchronization testers, network clocks, and telecom equipment.
- Activities conducted at ALBEDO's headquarters and production site in Barcelona (Spain).
- The provision of technical support, calibration, training, and remote services to global customers and distribution partners.

This scope applies to all products provided by ALBEDO Telecom under the brand name ALBEDO, and covers both internal operations and outsourced processes under the company's control. The system explicitly includes compliance with ISO 9001:2015 and ISO 14001:2015, and is focused on **delivering global solutions, precise engineering, and sustainable thinking**.

ALBEDO is committed to minimizing its environmental footprint, complying with relevant environmental regulations, and continuously improving both the quality and sustainability of its operations.

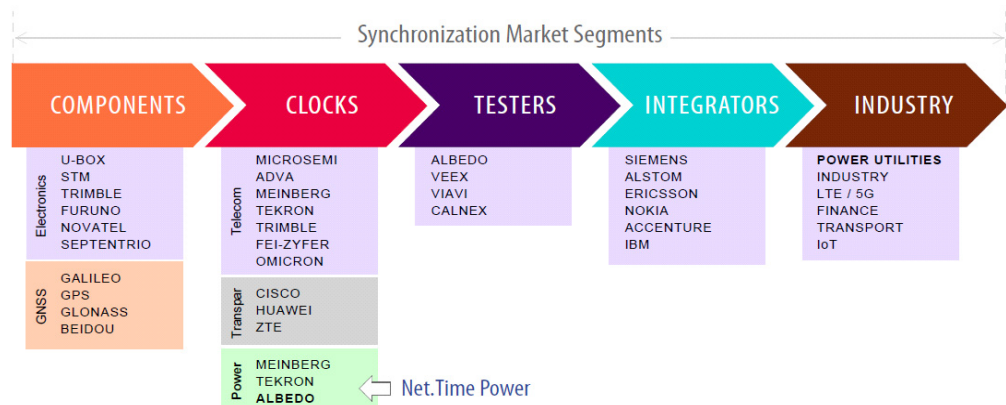


Figure 3 Market Analysis

#### 4.4 Quality Management Systems and its processes

(Aligned with ISO 9001:2015 + ISO 14001:2015)

ALBEDO Telecom has established, documented, implemented, and maintains an Integrated Management System (IMS) that addresses both the Quality Management System (QMS) and the Environmental Management System (EMS), in accordance with ISO 9001:2015 and ISO 14001:2015. The IMS supports our commitment to deliver high-quality products and services while minimizing environmental impact and ensuring compliance with all applicable regulations.

All processes necessary for the effective functioning of the IMS have been identified, sequenced, and documented. The interaction of these processes, including their criteria and methods of operation, is described in this Quality Manual and related documentation. Processes are measured, monitored, analyzed, and continually improved to enhance both performance and environmental sustainability.

## Documentation Requirements<sup>2</sup>

### General

All documentation is controlled on the company's quality server and is governed by procedures defined in the Quality Manual. This includes procedures, records, environmental policies, quality policies, and legal or voluntary obligations related to both quality and environmental aspects. Obsolete versions are retained for traceability and clearly marked as such.

### Integrated System Structure

The Integrated Management System applies to all activities of the Company and is structured at three levels:

1. Manual – This document describes ALBEDO's corporate policies on quality and environment, and outlines the structure of the IMS.
2. Operating Procedures – These describe the processes and controls that support both QMS and EMS objectives. Each procedure includes:
  - Process ownership and responsibilities
  - Inputs and outputs
  - Risks and opportunities (including environmental risks)
  - Legal and compliance requirements
  - Resources, training, and equipment
  - Environmental aspects and controls
  - Criteria for effectiveness (quality and environmental performance)
  - Change Control – A register of updates, change history, and continual improvement actions is maintained and reviewed periodically.

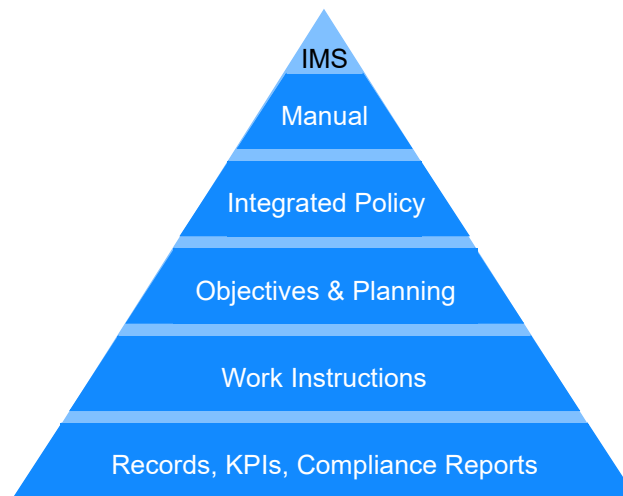
### Control of Records

All records generated as part of the IMS are controlled as evidence of compliance and effectiveness. This includes:

- Quality records (inspection results, nonconformities, audits)
- Environmental records (waste disposal, energy use, incident logs)
- Monitoring data, objectives, evaluations to both quality and environment

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2. Reference procedure: SGC-LST



**Figure 4** Quality in ALBEDO Telecom according integrated ISO 9001-2015 and ISO 14001-2015

- Legal and regulatory documentation
- Retention periods and access controls are defined in each procedure.

### Policy and Performance

ALBEDO's Integrated Policy expresses our dual commitment to quality excellence and environmental. To implement this policy, the IMS includes:

- Quality and Environmental Objectives
- Integrated Procedures and Work Instructions
- Training and Competency Plans
- Calibration and Maintenance Systems
- Supplier and Subcontractor Evaluations
- Document Control and Compliance Registers
- Internal Audits and Corrective Actions
- Reviews with cross-analysis of quality and environmental performance
- Metrics for both customer satisfaction and environmental impact (e.g., energy use, waste reduction, compliance rates)

### Metrics

Throughout the year, data is collected by process owners and analyzed during Management Review. This includes:

- Product and service quality indicators
- Precision and reliability metrics
- Environmental KPIs (waste reduction, resource use, energy efficiency)
- Audit results and regulatory compliance

- Progress on objectives and improvement actions

This performance data drives decision-making and supports the continual improvement cycle required by both ISO standards.

To define how ALBEDO's quality system shall be documented, implemented, and checked, to ensure it is understandable. All processes have been identified and documented within our quality system. The sequence and interaction of our operations are described in the Quality Manual.

The criteria and methods of operation have all been documented within the quality system with references to information as required. All processes are to be measured, monitored, analyzed and continually improved upon.

## 4.5 Environment

At ALBEDO Telecom, we are committed to delivering world-class engineering and technology solutions while actively promoting environmental responsibility. Our approach is grounded in continuous improvement, innovation, and strategic planning to ensure that our products and operations not only meet the needs of our customers but also minimize environmental impact.

We promote a culture of environmental awareness throughout the organization by fostering training, motivation, and active participation of our team. We uphold principles of integrity, ethics, and social responsibility, ensuring compliance with all applicable environmental regulations.

ALBEDO is dedicated to:

- Preventing pollution and reducing our environmental footprint.
- Efficiently managing resources and minimizing waste.
- Encouraging the use of sustainable technologies and practices.
- Supporting global efforts to mitigate climate change through responsible operations.

This commitment is integrated into every phase of our work, aligning our business excellence with our responsibility to the environment.

## 5. LEADERSHIP AND COMMITMENT [5]

(ISO 9001 + ISO 14001 Integrated Version)

At ALBEDO Telecom, senior management is fully committed to delivering excellence in product and service quality while acting responsibly toward the environment. This dual commitment is demonstrated through the effective implementation and continuous improvement of our Integrated Management System (IMS), in accordance with ISO 9001:2015 and ISO 14001:2015.



This commitment is expressed by:

- Taking care for the effectiveness of the IMS (quality and environment).
- Establishing and reviewing the Quality and Environmental Policy and Objectives to ensure alignment with the company's strategic direction.
- Promoting the integration of quality and environmental principles into core business processes.
- Ensuring resources, competencies, and infrastructure are available to meet quality and environmental goals.
- Ensuring customer satisfaction and compliance with applicable legal and regulatory requirements, including environmental obligations.
- Promoting the process approach and risk-based thinking across all departments.
- Communicating the importance of conforming to IMS requirements and delivering intended results.
- Engaging, directing, and supporting employees at all levels to contribute to system effectiveness.
- Promoting a culture of pollution prevention, sustainable resource use, and responsible innovation.
- Supporting continual improvement in both quality performance and environmental outcomes.

### Management Commitment<sup>3</sup>

ALBEDO management ensures the IMS is actively maintained and improved through:

- Periodic reviews of the Integrated Policy and related objectives.
- Provision of adequate infrastructure, tools, training, and support for both QMS and EMS.
- Monitoring compliance with customer, legal, and environmental requirements.
- Evaluating performance through metrics, audits, and management reviews.
- Ensuring that all levels of the organization are aware of their role in maintaining quality and minimizing environmental impacts.

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3. Reference Procedure: SGC-POL



## 5.1 Customer Focus<sup>4</sup>

Directors have to ensure that customer requirements are determined and are met with the aim of enhancing customer satisfaction. And more particularly the Business Development Director who is responsible of the traditional Tester division and the Vice-President who is responsible of the Network Clocks division.

## 5.2 Policy<sup>5</sup>

### Establishing the Integrated Policy

ALBEDO Telecom has established, documented, and implemented an Integrated Management Policy that reflects our commitment to both quality and environmental performance. This policy provides a framework for setting objectives, supports our strategic direction, and ensures compliance with customer, regulatory, and legal requirements.

The Integrated Policy is:

- Appropriate to the purpose and context of ALBEDO, including the nature, scale, and environmental impacts of our activities and products.
- A reflection of our commitment to customer satisfaction, product reliability, and environmental responsibility.
- Communicated to all persons working under ALBEDO's control, and made available to relevant stakeholders.
- Regularly reviewed during Management Review to ensure its continuing suitability.

### Commitments within the Policy<sup>6</sup>

ALBEDO's Integrated Policy includes the following commitments:

- To provide high-quality, innovative solutions that meet or exceed customer expectations and contractual requirements.
- To ensure compliance with all applicable quality standards and environmental legislation, including relevant obligations of our stakeholders.
- To promote the prevention of pollution, the responsible use of energy and materials, and the minimization of waste throughout the lifecycle of our products and services.
- To integrate environmental and quality considerations into all stages of development, manufacturing, and support.
- To provide the necessary training, resources, and support to employees and partners to fulfill this policy.

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4. Reference Procedure: PRC-SAT

5. Reference Procedure: SGC-POL

6. Reference Procedure: SGC-OBJ

- To continually improve the effectiveness of our Integrated Management System and enhance both quality and environmental performance.

## Company Objectives

Objectives for the company have been established to ensure that our business while quality policy is met. These objectives are realistic and continually monitored as part of review process. The Quality Manager shall publish measurable goals and objectives annually while goals have also been set as part of the product and quality specifications for each solution that we build.

## Quality Management System Planning

Each Department (BU), Manufacturing and Customer Support have the responsibility to meet our quality objectives and the general requirements of the ISO9001 standard. Changes occur every business day, which can affect our quality system and products. It is management's responsibility to plan for these changes. Some types of change can include, but are not limited to:

- Functional Specifications
- New Equipment in Manufacturing
- Changes in Procedure and Regulations

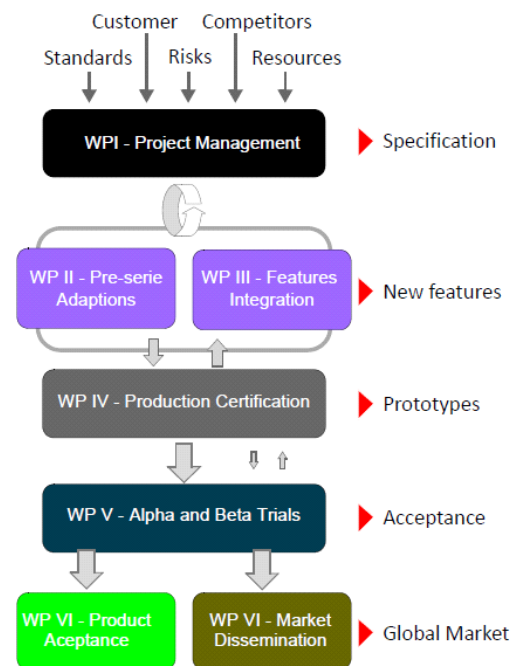


Figure 5 System Planning

## Communicating the Quality Policy<sup>7</sup>

All ALBEDO staff have their responsibilities defined within the procedures that we have set forth and has been assigned with the authority to carry out those responsibilities. Each procedure within our quality system clearly shows how each function of our operation interfaces with each other.

The Managers and Directors are designated as the management representatives for their respective sites and areas of responsibility and are responsible for ensuring that the processes needed for the quality management system are established, implemented, and maintained in accordance with this manual.

7. Reference Procedure: SGC-RRHH

## Internal Communication

Communication between personnel takes place on a regular basis in the form of informal meetings, management reviews and the company internet site. The management representative will also be responsible for checking the understanding of the Quality Management System and that it is communicated.

The Quality Policy shall be:

- Available and maintained as documented information
- Communicated, understood and applied within the organization
- Available to relevant interested parties, as appropriate

## Management Review<sup>8</sup>

To measure the continued suitability and effectiveness of our quality system, it will be reviewed by management on a twice yearly schedule against a prior set agenda. Minutes from this meeting will be kept and any actions resulting from this will be carried out in accordance.

## Review Input

The input to management review includes but not limited to information on:

- results of audits
- customer feedback<sup>9</sup>
- process performance and product conformity
- status of preventive and corrective actions
- follow-up actions from previous management reviews
- changes that could affect the quality management system
- recommendations for improvement

## Review Output

The output includes any decisions and actions related to:

- improvement of the effectiveness of the quality management system and its processes
- improvement of the product related to customer requirements resource needs

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8. Reference Procedure: INF-RVD  
9. Reference Procedure: PRC-SAT

### 5.3 Organizational Roles, Responsibilities and Authorities

ALBEDO Telecom's top management ensures that responsibilities and authorities for relevant roles are clearly defined, communicated, and understood within the organization. These roles are established to support the implementation, maintenance, and continual improvement of the Integrated Management System (IMS), which encompasses both quality and environmental requirements. Key Responsibilities Include:

#### Top Management (CEO and Board)

- Ensure that the Integrated Policy and Objectives are established and aligned with strategic goals.
- Promote the integration of the QMS and EMS into business processes.
- Ensure availability of resources for implementation and improvement.
- Demonstrate leadership for quality and environmental performance.

#### Quality and Environmental Management Representative (QMR / EMR)

- Oversee the development, implementation, and maintenance of the IMS.
- Monitor compliance with ISO 9001 and ISO 14001 requirements.
- Report to top management on IMS performance, nonconformities, and opportunities for improvement.
- Ensure promotion of awareness and competence regarding quality and environmental issues.

**Tabla 13**

*IMS Responsibility RACI (Responsible, Accountable, Consulted, Informed)*

	CEO	ISO Manager	Directors	Employees
Define Policy & Objectives	C	C	I	I
Implement Procedures	C	R	A	R
Ensure Legal & Regulatory Compliance	A	R	C	I
Monitor & Report IMS Performance	C	A	R	I
Internal Audits & Nonconformities	I	A	R	C
Promote Awareness & Training	C	R	R	R
Continual Improvement	A	R	R	C

#### Department Managers / Process Owners

- Ensure procedures and controls are implemented in their areas.
- Assign responsibilities and ensure staff are trained to meet quality and environmental obligations.
- Monitor and evaluate process effectiveness and compliance with both quality and environmental goals.
- Contribute to risk identification and corrective actions.

**All Employees and Collaborators**

- Understand and follow the IMS procedures relevant to their roles.
- Contribute to quality performance and environmental protection.
- Report nonconformities or potential improvements.

Responsibilities are maintained in job descriptions, training records, and the IMS documentation. Organizational charts and responsibility matrices are reviewed periodically to ensure alignment with evolving business and regulatory needs.

**Interrelation Levels**

ALBEDO Telecom defines the interrelation of staff at all levels through the use of lower tier Organization Charts. These charts are maintained by Human Resources and distributed to all department heads. Each department: Quality Assurance, Administration, Sales/Marketing, Operations, and Engineering are responsible for updating their department responsibilities, as the organizational structure of the company changes.

ALBEDO communicates these responsibilities and authorities and their interrelation are defined and communicated at all levels per at least annually.

**6. PLANNING [6]**

(Integrated for ISO 9001:2015 and ISO 14001:2015)

**6.1 Actions to Address Risks and Opportunities**

ALBEDO Telecom identifies and evaluates risks and opportunities related to both quality and environmental aspects. These actions ensure that:

- Intended outcomes of the Integrated Management System are achieved.
- Undesired effects (e.g., product failures, nonconformities, environmental incidents) are prevented or minimized.
- Opportunities for improvement and innovation are captured and pursued.

Risk and opportunity assessments are conducted during:

- Design and development planning
- Supplier selection and evaluations
- Environmental aspect/impact assessments
- Regulatory reviews
- Management Reviews

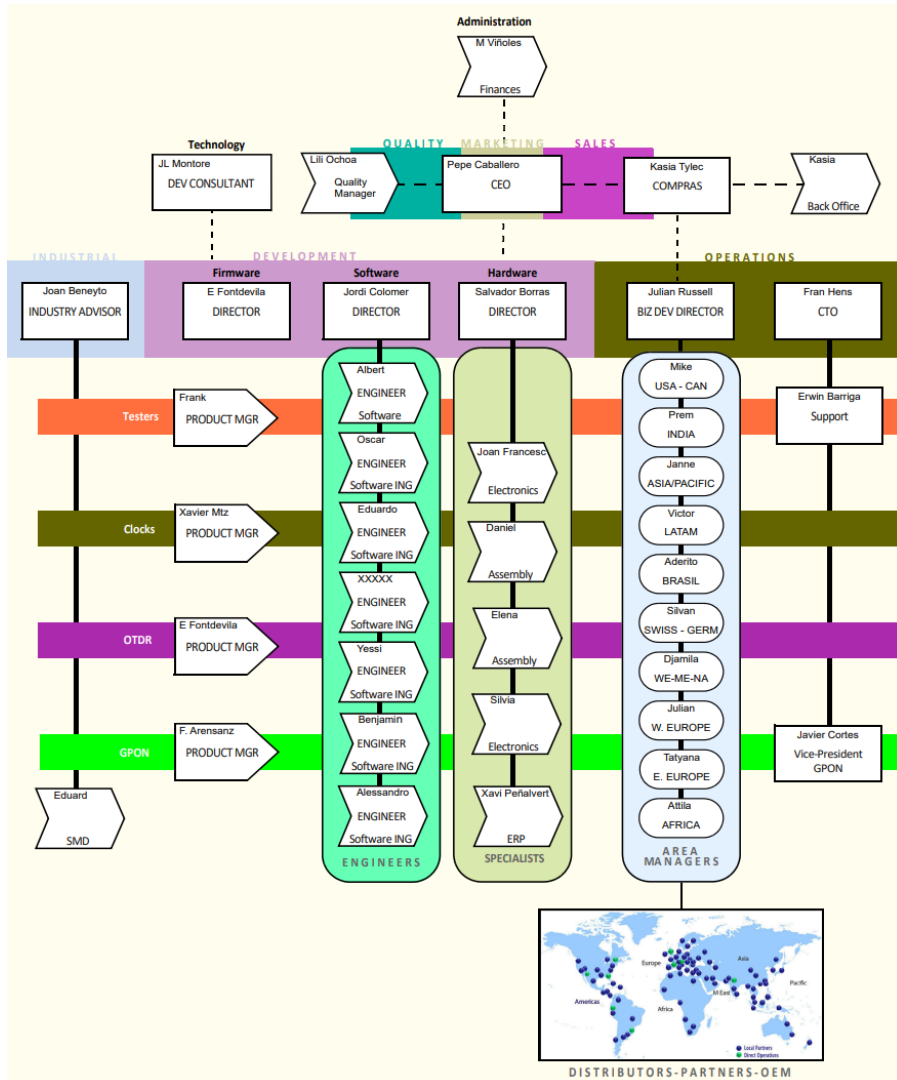


Figure 6 ALBEDO Organization Human resources / Organization (ver PRC-RYC Recursos y Competencia)

The company maintains a **Risk Register** where technical, commercial, and environmental risks are documented, monitored, and reviewed.

## 6.2 Quality and Environmental Objectives

ALBEDO establishes measurable objectives at relevant functions and levels, consistent with its Integrated Policy and strategic direction. Quality Objectives:

- Maintain customer satisfaction  $\geq 90\%$
- Achieve  $> 98\%$  on-time delivery
- Reduce RMA rate below 1% annually

Environmental Objectives

- Reduce energy consumption per unit produced by 10% by 2026

- Increase component recycling in production to 85%
- Maintain 100% compliance with environmental regulations
- Train 100% of staff on environmental awareness annually

Each objective includes:

- What will be done
- Required resources
- Responsible personnel
- Timeline and target
- Evaluation method
- Objectives are reviewed quarterly and during Management Review.

### 6.3 Planning of Changes<sup>10</sup>

Changes to the Integrated Management System are carried out in a controlled manner. ALBEDO ensures:

- The purpose and impact of the change is evaluated (including environmental impact if applicable)
- Resources and responsibilities are assigned
- Communication and training are provided when needed
- Records of change and approvals are maintained

Examples include changes to processes, equipment, regulatory requirements, or expansion to new product lines or regions.

ALBEDO Telecom considers risks and opportunities when taking actions within the Quality Management System, as well as when implementing or improving the system; likewise, these are considered relative to products and services.

Actions taken to address risks and opportunities shall be proportionate to the potential impact on the conformity of products and services.

### 6.4 Actions to address risks and opportunities

The Quality Management System of ALBEDO analyzes risks associated with programs and activities and looks for opportunities for improvement. The purpose is to:

- Give assurance that the Quality Management System can achieve its intended results.
- Enhance desirable effects.

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10. Reference Procedure: PRC-DES

- Prevent, or reduce, undesired effects.
- Achieve improvement.

### New Products

An assessment is prepared of the impact new products, projects, or contracts will have with regards to the following resources:

- IT: determine the computer hardware, software, and applications.
- Documentation: Engineering specs, Technical Requirements, Manufacturing
- Standards, Specifications and other manufacturing documents.
- Project Cost
- Equipment: servicing and inspection, measuring and test equipment.
- Human resources: ensure all staff has appropriate skills for each job/tasks.
- Parts: availability of raw materials, components, and manufacturing aids.
- Quality audits: planned audit(s) after activity completion.

### Product Road Maps<sup>11</sup>

Each Department, Manufacturing and Support Organization with responsibility for defining product requirements documents new and changed product and process introduction requirements. Necessary to plan, control, approve, monitor and set standards so as to prevent problems which may arise during order processing, design, production, inspection and shipping. These processes will be scheduled, planned and carried out under controlled conditions.

Consideration is given to activities from product design, development, incoming materials, manufacturing, shipping and warehousing, as appropriate, in meeting the specified requirements. The integration of material, processes and services which support the product will be identified during every single Purchase Order.

### Determination of Requirements<sup>12</sup>

ALBEDO will determine the requirements needed to fulfill the customers order. These requirements will include:

- Delivery times
- Specifications/Documentation
- Regulatory and legal requirements are identified, such as traceable clauses
- Inspection method selection
- Sequence of operations

11. Reference Procedure: PRC-DES

12. Reference Procedure: PRC-OPC



### Defined design review process

Before planning and committing factory resources or the acceptance of an order from a customer, the appropriate Planning and Manufacturing organization reviews such orders to ensure that:

- The manufacturing order requirements are adequately defined, documented and agreed to internally before acceptance
- Product and customer requirements are met
- Differences between the manufacturing order requirements and the factory's capacity plan are resolved
- Manufacturing organization has the capacity to meet the manufacturing order requirements and risk analysis

These reviews are always performed and records of these reviews are maintained. Changes to the original customer order are reviewed in the same manner as the original review.

## 6.5 Quality Objectives

### Design and Development Planning<sup>13</sup>

Each Department has developed a phase gate new product development and introduction process that describes:

- the different phase gate stages
- the activities associated with each stage
- the roles, responsibilities and authorities

The manager provides adequate resources for this activity. The plans are updated as product design evolves. A multidisciplinary approach is used during the product design and development activity including:

- the identification, finalization and monitoring of special characteristics
- the development of associated actions
- the development of control plans

All design changes are identified, documented, reviewed and approved by authorized personnel before implementation

- Records of changes during the development process are maintained
- Engineering are responsible for monitoring and ensuring that the changes do not adversely affect product quality, performance, or reliability
- Review of the changes include evaluation of the effect of the changes on the components and product already delivered

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13. Reference Procedure: PRC-DES

- Customers are notified of design changes affecting the form, fit, or function of a product. In addition and where contracted or mandated by contract, customer approval of design changes is obtained

## 7. SUPPORT [7]

(Integrated for ISO 9001:2015 and ISO 14001:2015)

In order to achieve quality objectives, ALBEDO management determines the capabilities necessary, human and physical resources, and needs to be obtained from external and internal providers. Specific resource requirements are analyzed and assigned during Management Reviews. Customer satisfaction is enhanced by meeting customer expectations.

### 7.1 Resources

ALBEDO Telecom provides all necessary resources — human, physical, environmental, and informational — to implement, maintain, and continually improve the Integrated Management System (IMS). These resources ensure product and service conformity, customer satisfaction, and environmental performance. Specific resource needs are:

- Identified during management reviews and process planning
- Aligned with quality and environmental objectives
- Provided internally or sourced from qualified external suppliers

Environmental considerations are integrated in resource selection, including energy-efficient equipment, recyclable materials, and low-impact suppliers where feasible.

#### People<sup>14</sup>

All personnel involved in IMS processes are selected based on qualifications, education, experience, or training. They receive appropriate support to meet both quality and environmental requirements in their tasks.

#### Competency and Training

We develop our most important resource; people, through training and reviews of their progress, and effectiveness of the training. Training will be carried out against identified requirements. Training will also be provided for the use, understanding and awareness of the quality system and the standards used at ALBEDO.

#### Employee empowerment

ALBEDO maintains a process to motivate employees to:

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14. Reference Procedure: LST-RRH

- achieve quality objectives
- make continual improvements
- create an environment to promote innovation

This process includes the promotion of quality and technological innovation.

#### Parity and Gender Equality

ALBEDO TELECOM is committed to the policies of both Parity and Gender Equality, as well as Family Reconciliation complying with current legislation.

The treatment and application of all these regulations in ALBEDO is reflected in the Equality Plan described in the procedure *PRC-IPC Equality, Parity and Conciliation (7.1.4)*, moreover it has been developed and circulated the Protocol *INS-ACO Protocol against labor, sexual and / or gender harassment*.

All ALBEDO employees must have knowledge of both documents.

#### **Infrastructure**

ALBEDO ensures its infrastructure — facilities, equipment, networks, and utilities — is adequate to:

- Achieve conformity of products and services
- Minimize environmental risks (e.g., spills, emissions, energy waste)
- Comply with relevant environmental regulations

Calibration areas and production facilities are maintained to ensure accuracy, cleanliness, and low energy consumption.

ALBEDO's facilities are maintained and in perfect use. There is adequate workspace and equipment<sup>15</sup> to perform all processes within the quality system. This includes annual control of the inspection and calibration areas and the production areas<sup>16</sup>.

#### **Environment for Operation of Processes**

A safe, clean, and supportive workplace is maintained with:

- Climate control between 21°C and 25°C
- Adequate lighting, workspace, and ergonomic furniture
- Waste segregation bins and paper reduction policies
- Environmental awareness posters and training visible across departments

The company promotes a healthy and socially engaging environment, including informal socialization and a team-based culture that encourages innovation and open communication. A well accepted coffee break at 11:00 for

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15. Reference Procedure: PRC-RME

16. Reference Register: LST-INS



**Figure 7** Socialization in ALBEDO 2 x Corporate parties per year.

casual talks and team games, such as *football-in*, during 30 minutes. Is the moment when and where all employees have the opportunity to talk with most of the managers and directors.

### Monitoring and Measuring Resources

Measurement and test equipment is:

- Calibrated or verified to ensure traceability and accuracy
- Evaluated under appropriate environmental conditions
- Labeled with calibration status
- Reassessed when deviations are detected<sup>17</sup>

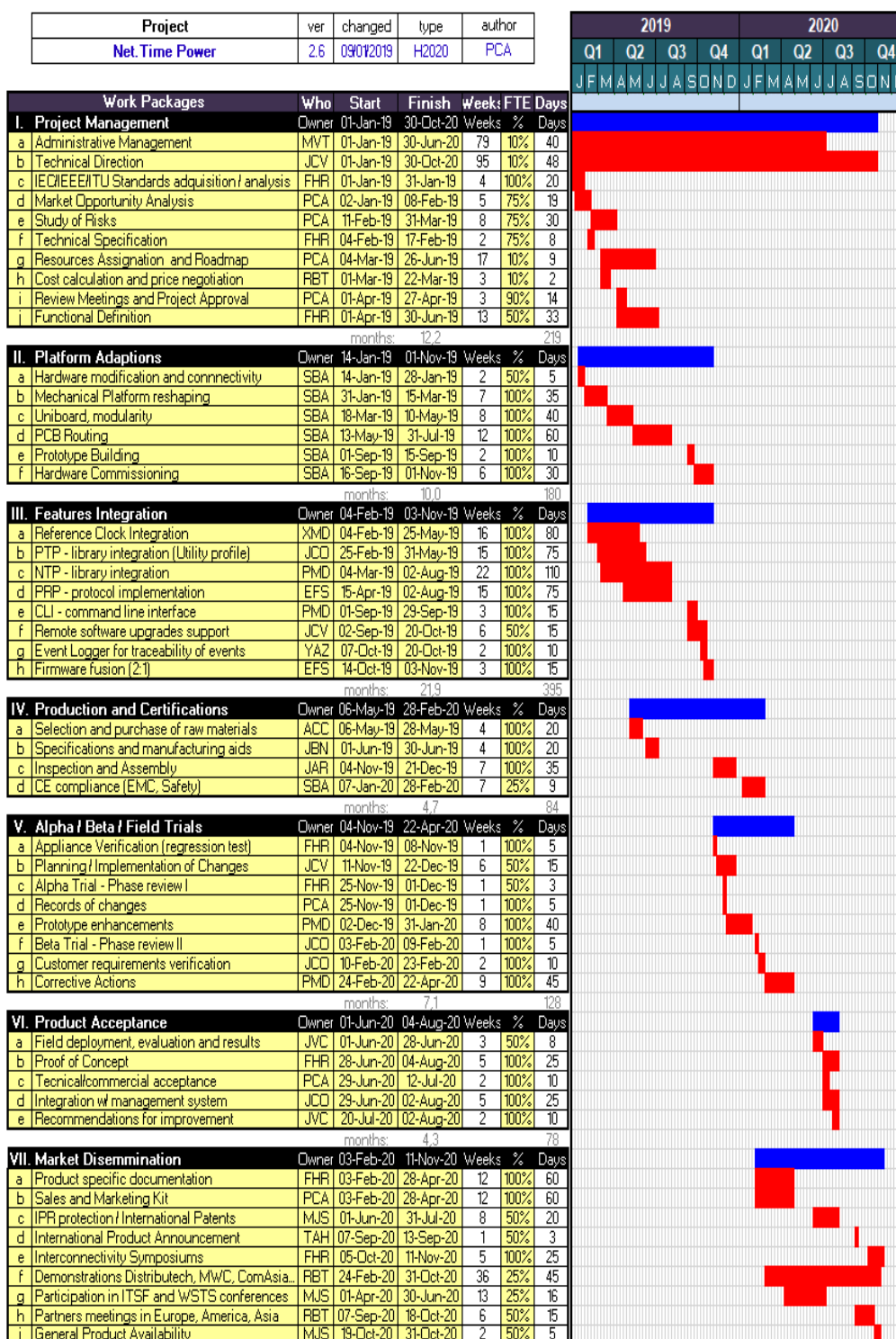
All calibration records are retained, and implications of out-of-tolerance equipment are analyzed and documented.

### Organizational Knowledge

ALBEDO identifies and maintains knowledge essential to its operations and compliance with IMS requirements. Sources include:

- Internal procedures, lessons learned, and test results
- External standards (e.g., ISO, IEC), suppliers, industry conferences
- Environmental compliance guides, regulatory bulletins, and customer feedback

17. Reference Procedure: PRC-RME



**Figure 8** *Development Gantt for ALBEDO products.*

Knowledge is reviewed when addressing new risks, regulatory changes, or product evolution. When addressing changing needs and trends, ALBEDO Telecom shall consider its current knowledge and determine how to acquire necessary additional knowledge and updates.

## 7.2 Competence

The methods for competency appraisal, quality awareness development, training provision, and evaluation are defined (Training Procedure OP-18). Records of employee education, skills, training, and experience are maintained.

All employees are trained in both quality and environmental responsibilities relevant to their role. Environmental competence includes:

- Pollution prevention practices
- Energy and material efficiency
- Waste handling and segregation
- Understanding legal and operational controls

Training effectiveness is evaluated through supervision, audits, and performance reviews.

## 7.3 Awareness

ALBEDO Telecom shall ensure that employees are aware of the Quality Policy, Quality Objectives, their contribution to the effectiveness of the Quality Management System (including benefits of improved performance), and implications of not conforming to the Quality Management System requirements.

ALBEDO ensures that all personnel are aware of:

- The Integrated Policy and their contribution to quality objectives
- Significant environmental aspects and impacts of their activities
- Legal compliance obligations
- Implications of nonconformity (quality or environmental)

Awareness is reinforced via onboarding, regular training, and internal communication channels.

## 7.4 Communication

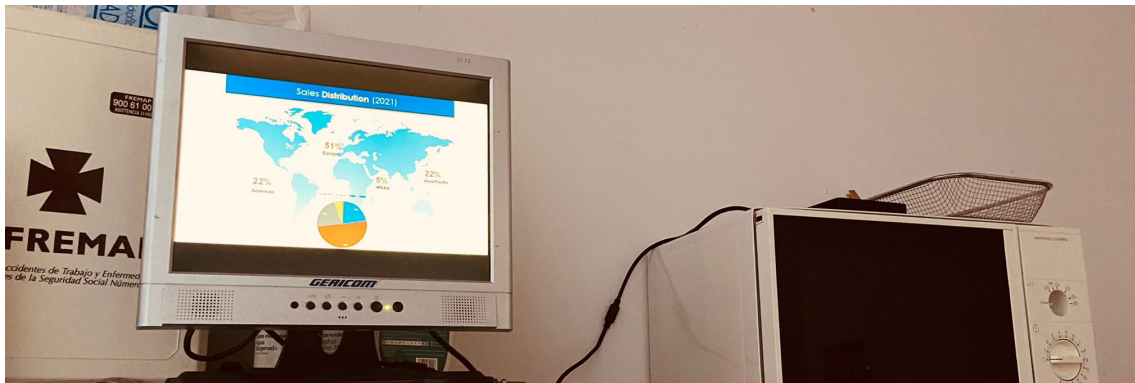
Effective and appropriate communications between functions and levels regarding QMS effectiveness are promoted by senior management. Communication may be initiated by any employee or external provider. Specific communications interfaces are defined within the company's Operating Procedures. Communication may include:

- Corrective or Preventive Action
- Meetings
- Internal audit results



- Data analysis
- Internal email
- Memos

However the most important communication media now is a terminal at the cafeteria that permanently displays the latest news.



**Figure 9** *On-line Communications with the employees.*

Internal and external communication is planned and executed to support the IMS. It includes:

- Quality and environmental performance reporting
- Incident or nonconformity notifications
- Legal updates or customer-specific requirements
- Communication with authorities or third parties as required

## 7.5 Documented Information

All documentation related to the IMS is:

- Controlled, versioned, and accessible as needed
- Updated as processes evolve
- Retained to demonstrate compliance and performance

Environmental records include compliance evidence, impact assessments, legal register updates, and environmental objectives tracking.

## 8. OPERATION [8]

(ISO 9001:2015 + ISO 14001:2015 Integrated)

## 8.1 Operational Planning and Control

ALBEDO Telecom plans, implements, and controls its operations to ensure:

- Product and service requirements are met
- Environmental aspects are controlled
- Legal and other applicable obligations are fulfilled
- Risks and opportunities are addressed
- Objectives for both quality and environment are achieved

Operational controls are defined in documented procedures and include:

- Process parameters, test criteria, and inspection steps
- Environmental controls (e.g., waste handling, energy use, emissions prevention)
- Competence, infrastructure, and calibration requirements
- Acceptance criteria and traceability for deliverables
- Criteria for monitoring suppliers, outsourced processes, and subcontractors

ALBEDO applies a life-cycle approach, considering environmental impact from product design, material selection, manufacturing, use, and disposal..

## 8.2 Products Requirements

### Customer Communication<sup>18</sup>

Customer requirements are identified, reviewed, and documented before commitment. This includes:

- Technical specifications
- Environmental or sustainability expectations
- Regulatory and industry compliance
- Lifecycle or disposal considerations (when required)

Changes to requirements are controlled, communicated, and reviewed with relevant parties.

### Design and Development Input

Each Department identifies, documents, and reviews product design input requirements for adequacy. Applicable statutory and regulatory requirements are included. Incomplete, ambiguous, or conflicting requirements are resolved with those responsible for imposing these requirements. Results of

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18. Reference Procedure: PRC-RMA and PRC-SAT



contract review activities are taken into consideration by the responsible design activity. Device and process simulation model robustness are validated periodically by the function responsible for maintaining the model.

### 8.3 Product Design and Development

ALBEDO designs innovative, standards-compliant products that serve critical infrastructure needs. The design process includes:

- Input review (customer, regulatory, internal R&D)
- Functional, environmental, and safety considerations
- Verification and validation (including environmental compliance)
- Design change control

Environmental considerations may include:

- Component recyclability
- Energy efficiency
- Firmware to reduce power consumption
- Materials that avoid RoHS-prohibited substances

#### Design and Development Planning

ALBEDO identifies documents and reviews product design input requirements including:

- customer requirements
- information gained from previous designs
- competitor analysis
- supplier feedback
- new industry standards

#### Design & Development Inputs

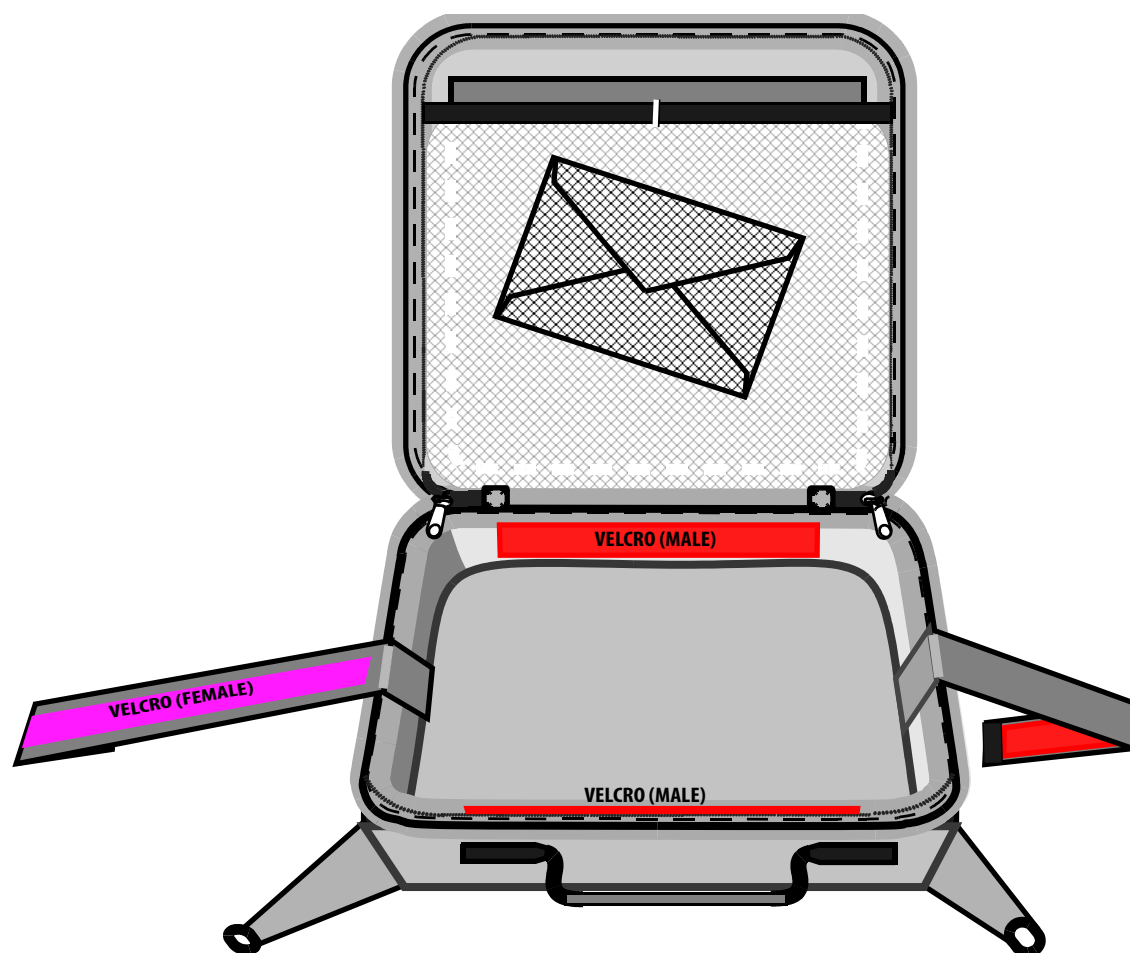
ALBEDO identifies, documents and reviews manufacturing process design input requirements including:

- productivity targets, process capability and cost
- customer requirements
- experience from previous developments

#### Design and Development Output

The design outputs are documented in a form that enables the verification against the design and development inputs. Design outputs include:

- Meeting the design input requirements including customer requirements



**Figure 10** ALBEDO Product Design

- Provide appropriate information required for manufacturing of the product
- Reference or contain product acceptance criteria
- Conform to documented industry, safety and regulatory requirements:
  - (a) Identify the characteristics of the product that are essential to the safe and proper use and handling of the product. (b) Identify appropriate manufacturing testing requirements. (c) Provide a method for recording manufacturing test results.
- Pre-launch control plans
- Reliability results

### Design & Development Changes

Each Department documents product design output and expresses the output in terms that can be verified and validated against design input requirements. Design output documents are reviewed by the appropriate cross-functional team before release. Each Department produces data demonstrating that each product has been characterized to the corners of the process or per customer requirements/applications.



Figure 11 ALBEDO Net.Time Omega

## Design & Development Outputs

Manufacturing process design output includes:

- specifications and drawings
- process flowcharts and layout
- process control plans
- work instructions
- process acceptance criteria
- quality and reliability data
- results of error proofing activities
- rapid detection and feedback methods of process non-conformities

## Design and Development Controls

Verification is confirmed through the provision of objective evidence of the following: Comparison of designed product to the product input requirements as defined by Evaluation of product against similar designs or against competitors products:

- (a) Testing to ensure compliance with product input requirements as defined in PRC-DES. These tests consider electrical and environmental stresses at least as severe as the design objectives.
- (b) Full review of documentation with respect to product input requirements and to any verification test results prior to issue.

## Design and Development Validation

Validation is confirmed through the provision of objective evidence:

- The requirements for a specific application have been fulfilled
- Validation is completed prior to the implementation of the product
- Maintain records of the results of validation or other necessary actions

- Engineering prototypes are subject to the validation
- Validation of manufacturing process

## 8.4 Control of Externally Provided Processes

ALBEDO Telecom ensures that all externally provided processes, products, or services, if required, conform to specified requirements<sup>19</sup>. Moreover, that external provider's services and subcontractors are controlled, dependent upon the effect that the services may have on the subsequent service delivered to the customer.

External provision of processes, products, and services, if applicable, is defined. External Provider records are maintained. The selection criteria and evaluation of external providers, if applicable, is define. Records of evaluation, performance, and corrective actions are maintained.

- Suppliers and subcontractors are evaluated and selected based on:
- Technical capability
- Quality performance
- Environmental responsibility (e.g., RoHS, REACH, energy-efficient packaging)

Environmental risks from outsourced activities (e.g., PCB assembly, transport) are assessed and managed. Contracts may include environmental clauses.

### Type and Extent of Control

Prior to use or delivery to the customer, ALBEDO Telecom verifies that all products or services, if applicable, meet specified requirements. Externally provided processes shall remain under the control of this Quality Management System and are subject to verification <sup>20</sup>.

### Information For External Providers

Prior to transmittal, ALBEDO Telecom ensures that all Purchases clearly specify requirements:

1. Approval at the subcontractor's facility prior service realization or delivery
2. Applicable specifications, standards, or quality requirements
3. Personnel qualifications
4. External providers' interactions
5. Control and monitoring of External Providers' performance
6. On site activities

19. Reference Procedure: PRC-SSE  
20. Reference Procedure: PRC-SSE

## Purchasing Process<sup>21</sup>

To ensure that ALBEDO receives supplied products and services to our specified and implied needs, a list of approved suppliers will be maintained and will also show the scope of each supplier/subcontractors approval. Our purchases will also take into account physical condition of material/service cost, availability and traceability. The purchasing system and the selection of suppliers will be reviewed to ensure its continued suitability and follow up action taken on vendor problems. Any subcontractors used and the quality of the work that they provide will be the responsibility of ALBEDO. All suppliers and subcontractors will be evaluated to ensure:

- They use customer approved sources for any special processes
- Those that fail to meet our requirements are disapproved as required by the Quality Manager

These reviews will be used to determine the controls required in place for each supplier/subcontractor.

### Purchasing Information

All purchase documentation used will clearly describe the material/service ordered, including where applicable:

- Quantities, condition, traceability, part numbers, type or other precise identification
- Inspection requirements which will be reported on a certificate of conformity where required. Also any standards/codes which may be referenced
- Any quality system standard to be applied to the product
- Any design, test, examination, inspection or customer acceptance requirement and its related instructions
- The right of access by ALBEDO and our customers and regulatory authorities to all facilities involved in the order and also access to all applicable records
- Any requirements for test specimens
- Any requirements to notify ALBEDO of any anomalies, changes in definition or approval for the process being used
- Any requirements which require to be followed down to sub tier suppliers will be identified on the Purchase Order
- All purchase documents will be reviewed for adequacy prior to issue

### Verification of Purchased Products<sup>22</sup>

All products received at ALBEDO will be verified in accordance with inspection procedures and may also include:

- Records to support the quality of the product from the supplier
- Inspection or auditing the supplier

21. Reference Procedure: PRC-PRO

22. Reference Procedure: PRC-SSE

7. Asking the supplier/subcontractor to complete inspection and certification.

## 8.5 REACH, CLP and RoHS

ALBEDO ensures controlled conditions for production and service delivery:

- Documented work instructions
- Calibrated test equipment
- Trained personnel
- Clean and temperature-controlled work areas
- Use of reusable packaging when applicable
- Proper disposal of electronic and chemical waste

Preventive maintenance and inspections reduce the likelihood of defects and environmental impact.

### Hazardous substances

The United States and the European Union have made significant changes to their legal requirements on hazardous substances in recent years. Both have promulgated several regulations, which are intended to protect human health and the environment, harmonizing the rules and criteria for the classification and labeling within its jurisdiction of substances, mixtures and certain articles.

Regulations such as the Registration, Evaluation, Authorization and Restriction of Chemical Substances (REACH) and on the classification, labeling and packaging of substances and mixtures (CLP), and Restriction Of the use of certain Hazardous Substances (RoHS) represent an ambitious and advanced legislative framework, which is also complex. They have a series of requirements that, for ALBEDO with the variety of its product portfolio, require a concerted effort. ALBEDO complies with all the obligations derived from this legislative framework and has collaborated on several occasions with clients and providers.

### Categorization

ALBEDO is a downstream user according to article 3 no. 13 of the Reach regulation and therefore not obliged to register its products / systems. Downstream users have to guarantee that they are using only registered substances.

Basis on which conformity is declared ALBEDO is aware of the Regulation (EC) No 1907/2006 of the European Parliament and of the Council of December 18th, 2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals and later corrigendum to it (REACH), and of the requirements imposed by the directive 2011/65/EU (8th June 2011) of Europe-



**Figure 12** ALBEDO Ether.Genius

an Parliament and of Council, and by delegated directives (EU)2015/863 (31th march 2015) and (EU) 2017/2102 (15th November 2017) on the Restriction Of the use of certain Hazardous Substances (RoHS).

According to article 31 of REACH the supplier of a substance or a mixture shall provide a safety data sheet where a substance or a mixture meets the criteria in accordance with Regulation (EC) No 1272/2008 and Directive 1907/2006/EC Annex II, XIII or Article 59.

Furthermore article 33 of the regulation obliges the supplier of a product which includes a substance of the “candidate list” in a concentration > 0.1 % (w/w) to inform its consumers with at minimum the name of the substance. Therefore ALBEDO controls on a regular basis whether its suppliers fulfil their obligations under the REACH regulation regarding ALBEDO products / systems.

Compliant with the requirements of REACH, ALBEDO hereby declares based on information provided by its suppliers that as a general rule the following substances are not intentionally used or added during the manufacturing of our products:

- Substances of Very High Concern for authorization updated by ECHA on 19th January 2021 Substances under authorization rules (Annex XIV of 18 h December 2021). If in individual cases these substances are contained in ALBEDO’ final products in concentrations above 0.1% ALBEDO discloses them in the specific technical documentation of that particular product.
- Compliant with the requirements imposed by RoHS, ALBEDO hereby declares based on information provided by its suppliers that our products falling under the scope of RoHS do not contain any of the hazardous substances restricted by RoHS in concentrations exceeding the maximum levels defined.

## 8.6 Production

Products are tested and verified against defined acceptance criteria. Release is authorized only when all quality and environmental requirements are fulfilled.

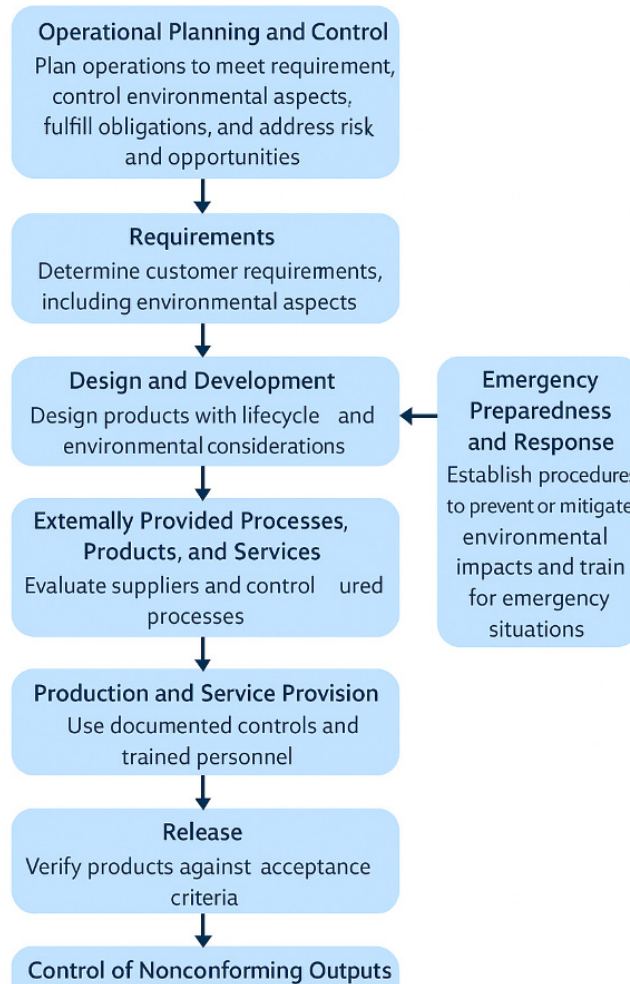


## Control of Production <sup>23</sup>

The production at ALBEDO are controlled to ensure:

- Technical data is available to verify the parts being manufactured
- Procedures have been documented for all processes
- Measuring instruments are used as required to verify product
- Monitoring of manufacturing processes
- Key points identified by the design are monitored
- Jobs are completed using attached documentation

The change of the documentation shall also be reviewed by the Quality Manager to ensure no adverse impact.



**Figure 13** ALBEDO's operational flow with quality + environmental controls

## 8.7 Control of Nonconforming Outputs

Nonconforming products or deviations are:

23. Reference Procedure: PRC-PRO



- Identified, documented, and segregated if necessary
- Evaluated for impact on the environment and customer
- Reworked, corrected, or scrapped under controlled conditions
- Tracked for recurrence and reported in management review

Environmental nonconformities (e.g., improper disposal, spills, packaging misuse) are treated with the same rigor.

## 8.8 Emergency Preparedness and Response (ISO 14001 only)

ALBEDO has identified a limited number of potential environmental emergencies due to the nature of its activities, which primarily involve product development, testing, and administrative functions. Nevertheless, the organization has established preventive actions and basic response measures to minimize environmental impact in case of such events. ALBEDO identifies potential emergency situations with environmental relevance (e.g., chemical spills, equipment fire, GNSS antenna fall with electrical hazard) and maintains documented procedures to:

- Prevent or mitigate adverse environmental impacts
- Train personnel in emergency response
- Test readiness through drills (as applicable)
- Coordinate with local emergency services

Emergency response procedures are reviewed and updated as necessary.

### Potential Emergency Situations

- Office or laboratory fire: Potential release of smoke and hazardous electronic waste (RAEE).
- Spillage of oil or maintenance fluids: Soil contamination risk during equipment servicing or cleaning.
- Power outage affecting test environments: Potential data loss or environmental control failures in testing scenarios.
- Improper temporary storage of waste or electronic devices: Risk of leaks or regulatory non-compliance.
- Service disruption by critical environmental providers (e.g., RAEE, recycling, transport): Potential environmental and legal impact.

### Preventive and Response Measures

- Emergency plans and fire evacuation procedures are in place and communicated to staff.
- Appropriate containers and storage areas are available for batteries, toner, and RAEE.

- Suppliers are selected based on their compliance with environmental regulations.
- RAEE and other hazardous waste are managed through certified third-party handlers.
- Periodic review of risks and environmental procedures is conducted under the Integrated Management System (QEMS).

Training and awareness sessions are held periodically to ensure personnel understand how to act in case of environmental incidents. Emergency response capability will be tested when applicable and reviewed in internal audits and management reviews.

## 9. PERFORMANCE EVALUATION<sup>24</sup> [9]

(Aligned with ISO 9001:2015 and ISO 14001:2015)

ALBEDO Telecom establishes, implements, and maintains procedures to monitor, measure, analyze, and evaluate:

- Product and service quality
- Customer satisfaction
- Process efficiency and conformity
- Achievement of quality and environmental objectives
- Compliance with environmental legal and regulatory requirements
- Environmental performance (e.g., waste, energy use, consumption)

Indicators (KPIs) are defined for each core process and are reviewed regularly to ensure alignment with both quality and environmental goals. These KPIs may include:

- RMA rates and delivery times
- Customer satisfaction index
- Nonconformities and corrective actions
- Waste reduction percentages
- Energy consumption per unit produced
- Training completion rates on environmental awareness

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24. Reference Procedure: PRC-NNC

## 9.1 Monitoring, Measurement, Analysis and Evaluation

ALBEDO will validate any processes for production, this includes processes where deficiencies become apparent only after the product has been in use, it includes:

- Criteria for review and approval
- Approval of equipment and qualification of personnel
- Requirement for records and documentation

### Monitoring Customer Satisfaction<sup>25</sup>

The Customer Survey will be used regularly to monitor customer feedback for positive and negative information. This information will be reviewed as part of the Management Review and corrective action system to implement continuous improvement.

#### Servicing and maintenance

Service and maintenance contracts are offered to all customers, and these activities are controlled in the same manner as Process Control.

### Traceability

Industrial Dept directly responsible for manufacturing:

- Identify product by suitable means from receipt and during all stages of production and delivery
- Including traceability information (e.g. raw material, tool, shift, process)
- establishes and maintains documented procedures for unique identification of individual product or batches and maintains identification records

### Inspection and test<sup>26</sup>

Department of manufacturing maintains the identification and test status of product and material throughout the production as defined by procedures.

Test of product is identified by suitable means indicating the conformance or non conformance with regard to inspection and tests performed and are recorded as quality records for traceability purposes. Only product that have passed the required inspections are released for further processing.

### Product handling

Responsible for product handling establish and maintain documented procedures for handling, storage, packaging, preservation, and delivery of product or material.

25. Reference Procedure: PRC-SAT and INF-SAT

26. Reference Procedure: PRC-PRO

Stock & Inventory<sup>27</sup>

Appropriate storage methods and designated areas or stock rooms are used to prevent damage or deterioration of product or material, pending use or delivery. The condition of product in stock is assessed at a predefined frequency. To optimize stock rotation, ALBEDO applies first-in-first-out inventory management system.

Appropriate methods for authorizing receipt to, and dispatch from such areas are specified. The condition of product or material in stock is assessed at appropriate intervals to detect deterioration.

Handling, Packaging and Labeling<sup>28</sup>

Methods of handling product or material prevent damage or deterioration, Proper Electrostatic Discharge (ESD) control are established and maintained.

Packing and labeling processes are controlled to the extent necessary to ensure conformance to ALBEDO requirements<sup>29</sup>. This requirement applies to transfers between ALBEDO and its subcontractors.

Transportation packaging meets ESD requirements, makes appropriate use of dry pack / desiccant and prevents product physical damage.

**Control of Test instruments<sup>30</sup>**

The measuring and test equipment which could affect the quality of the finished products will be calibrated by an external subcontractor. ALBEDO will also ensure that instruments are:

- Calibrated or verified at specified intervals against measurement standards
- Traceable to national measurement standards
- Identification in order to determine the calibration status
- Protected from damage during handling and storage
- Records of equipment, identification number, location, checking frequency and method, tolerances and what to do when equipment is out of specs
- Our equipment will be in a known state of calibration
- Records of calibration will be maintained

A list of all equipment shall be maintained within the computer system. Any calibration result that indicates that product may be non conforming will require that the Quality Control investigate the inspection/test and determine if it needs to be repeated. Gauges are recorded in the computer and will be recalled by the Quality Manager within a month of the due date.

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27. Reference Procedure: PRC-SSE

28. Reference Procedure: PRC-RME

29. Reference Procedure: PRC-OPC

30. Reference Procedure: PRC-RME

## Evaluation of Compliance (ISO 14001)

ALBEDO evaluates environmental legal compliance through:

- Regular review of the Legal and Other Requirements Register
- Periodic audits and inspections
- Monitoring changes in environmental laws or customer requirements
- Documented records of compliance evaluations and actions taken

Non-compliance incidents (if any) are investigated and corrected promptly.

## 9.2 Internal Auditing

ALBEDO conducts internal audits at planned intervals to verify the Integrated Management System conforms to ISO 9001, ISO 14001, and ALBEDO's internal requirements

- That it is effectively implemented and maintained
- That risks and opportunities are being addressed
- That environmental aspects are under control

Audits are based on process importance, past results, and risk levels. Auditors are independent of the audited areas. Audit findings are documented and followed up with corrective actions.

### Procedures Audits

Audits will be carried out against procedures in order to verify the effectiveness of our quality system ALBEDO has documented procedures to ensure:

- The schedule has also been set based on importance of areas to be audited
- Follow up action and the results of these audits
- Records will be maintained of the audits

Audits will assess ALBEDO compliance to procedures and the ISO 9001

### Components and Product Inspection<sup>31</sup>

All materials received, in production, inspected/tested, stored, packaged and shipped from ALBEDO will be inspected to procedures and a record of the results will be kept. Products will not be processed in the system until all inspections have been completed unless the customer approves otherwise.

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31. Reference Procedure: INS-001

If certificates of conformance/analysis are supplied for raw materials and are to be used by ALBEDO as acceptance of the parts, materials or service then these certificates are to be inspected to the specifications required by the purchase order and kept.

**Tabla 14**

*Integrated KPI Dashboard covering both quality and environmental performance indicators.*

Process	KPI	Target	Review	Responsible
Satisfaction	Customer Satisfaction Index (%)	≥ 90%	Annually	Sales Director
Product Quality	RMA (% of shipped units)	≤ 1.0%	Monthly	QA Manager
Environmental	Consumption per Unit (kWh/unit)	↓ 10% reduction	Annual	Facilities Manager
Training & Awareness	Environmental Training	100%	Annually	HR / QMS Coordinator
Regulatory	Non-Compliance Findings	0	Annually	Environmental Compliance
Efficiency	On-Time Delivery Rate (%)	≥ 98%	Half year	Operations Director

### 9.3 Management Review

Top management conducts formal Management Reviews at least once per year to evaluate:

- Status of quality and environmental objectives
- Results of audits and compliance evaluations
- Feedback from customers and stakeholders
- Process performance and product conformity
- Status of risks, opportunities, and improvement actions
- Adequacy of resources
- Effectiveness of the Integrated Policy

Outcomes of the review include decisions on:

- Changes to the IMS
- Resource needs
- Strategic initiatives
- Updates to objectives and targets
- Corrective and preventive actions

Records of each Management Review are retained as evidence of system oversight and strategic direction.

Management Reviews of the QMS are conducted annually to ensure continued system adequacy and effectiveness in achieving quality objectives. Reviews are planned by the Quality Assurance Manager, and attended by Senior Managers, and other relevant management or staff members.

**Management Review Inputs**

All aspects listed below are addressed during each annual Management Review cycle, in order to accurately assess current system performance and encourage improvement opportunities:

- Internal Audit results
- Customer feedback (including complaints)
- Achievement of Quality Objectives
- Process performance, product conformity results and review of measurement requirements
- Corrective and Preventive Actions
- Action Item results (from previous Management Reviews)
- Changing business and operational conditions that may affect the QMS
- Review of objectives and improvement recommendations
- Adequacy of Resources
- Effectiveness of actions taken to address risks and opportunities
- External Provide performance results

**Management Review Outputs**

Management Review minutes are recorded and made available to all attendees and other affected parties. In addition to documenting clearly indicate Action Items assigned, including:

- QMS improvement measures and effectiveness
- Process and service improvement measures
- Resource requirements to achieve improvement

**10. IMPROVEMENT [10]**

(Integrated for ISO 9001:2015 + ISO 14001:2015)

**10.1 Applicable Requirement<sup>32</sup>**

ALBEDO Telecom is committed to continual improvement of the Integrated Management System (IMS) to enhance:

- Product and service quality
- Environmental performance
- Customer satisfaction

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32. Reference Procedure: PRC-PER

- Legal and regulatory compliance
- Efficiency and innovation in processes

Improvement initiatives may be driven by data, audits, feedback, risk evaluations, environmental monitoring, or changes in market conditions and technologies.

**Tabla 15**  
*ALBEDO Register of Improvements*

Area	Action Description	Target Outcome	Responsible	Date	Status
Energy Efficiency	Upgrade lab equipment with energy-efficient models	Reduce electricity by 12%	Facilities Manager	15/12/2025	Planned
Customer Service	Implement ticketing system for tech support	Improve response time and client satisfaction	Customer Support Lead	01/09/2025	In Progress
Waste	Introduce paper-free invoicing and digital records	Cut office waste by 30%	Admin Manager	30/11/2025	Planned
Internal Audit	Automate audit follow-up reminders via IMS portal	Close 100% of findings within 30 days	Coordinator	15/07/2025	In Progress
Supplier Control	Establish supplier with environmental criteria	Improve supplier compliance and engagement	Procurement Manager	20/10/2025	Planned
Awareness	Launch e-learning module on ISO 14001 basics	Achieve 100% staff completion rate	HR & QMS Coordinator	31/08/2025	Planned

Each Department will plan and implement the measurement, monitoring, analysis and improvement activities used to assure conformance to product and customer requirements and continual improvement of the quality management system. Measurement, monitoring, analysis and improvement activities are supported by the best available methodologies for data recording and statistical analysis and fact based decision-making and communication technique:

- Identification of authorized persons
- Training and qualification requirements

Inspection documentation shall be maintained as evidence of product and process conformance, these records shall show:

- Acceptance and rejection criteria or reference to them
- The sequence of operations

## 10.2 Nonconformity and Corrective Actions<sup>33</sup>

When a nonconformity occurs — in quality, environmental, or compliance aspects — ALBEDO acts promptly to:

- Control and correct the situation
- Mitigate adverse environmental impacts (if applicable)
- Evaluate if similar nonconformities exist or could occur elsewhere

33. Reference Procedure: REG-NCR



- Implement effective corrective actions
- Review effectiveness after implementation
- Document the incident, actions, and outcome in the Corrective Action Log

Sources of nonconformity may include:

- Product or service defects
- Customer complaints
- Environmental incidents (e.g., spills, disposal failures)
- Internal audit findings
- Regulatory violations
- Supplier failures

ALBEDO maintains records for each case as part of the IMS documentation.

### Identification

The identification of non-conformance's and prevent them from being sent to the customer, ALBEDO has implemented a system procedure to:

- Detect nonconforming products and components
- Review the problem to determine what to do with the goods
- When this has been decided the persons concerned will be notified

Goods which are non-conforming will be reviewed, categorized and documented and action taken. If a customer needs to return items then a number will be issued to track the operations to follow.

- The cause of the non conformance is investigated and documented
- An action will be taken and documented to prevent its repetition
- Follow-up on the effectiveness of the action taken will be complete as part of the next internal audit

### Analysis of Data<sup>34</sup>

ALBEDO shall determine, collect and analyzes appropriate data to demonstrate suitability and effectiveness of the quality management system, and to evaluate where continual improvement of the quality management system can be made. This process will be within management's responsibility. Such data may include, but not limited to:

- Customer satisfaction
- Conformance to product requirements
- Characteristics, trends and opportunities

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34. Reference Procedure: SGC-KPI

- Suppliers

### 10.3 Continual Improvement<sup>35</sup>

ALBEDO continually improves the suitability, adequacy, and effectiveness of its IMS by:

- Analyzing performance trends and KPI results
- Reviewing objectives and targets for relevance and ambition
- Assessing innovation opportunities in technology, testing, and sustainability
- Promoting suggestions and engagement from employees
- Benchmarking against best practices and standards

Responding to environmental opportunities (e.g., renewable energy use, digital documentation, eco-packaging)

Improvement actions are tracked in the Improvement Plan Register, linked to management review decisions, project roadmaps, and strategic goals.

#### Statement

ALBEDO will continually improve the effectiveness of the quality management system through the quality policy, quality objectives, audit results, analysis of data, corrective and preventative action, and management review.

#### Corrective Action<sup>36</sup>

The Quality Manager and the involved Dpts. will take the appropriate actions to eliminate the cause of non conformities in order to prevent re-occurrence. Corrective actions are appropriate to the effects of the nonconformity encountered. The process requirements will include:

- Reviewing non conformities
- Determining the cause of non conformities
- Actions to ensure that non conformance do not recur
- Determining and implementing action needed
- Records of the results of action taken

#### Preventive Actions

ALBEDO will identify areas of potential improvement and actions to be taken to prevent non conformance. This will be done as part of our internal audit and management review process.

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35. Reference Procedure: PRC-NCC  
36. Reference Procedure: SGC-ACC



Figure 14 ALBEDO Zeus

## 11. CUSTOMER SUPPORT [11]

We have to meet the expectations and requirements of ALBEDO customers the T& business and synchronization a sophisticated goods that requires a lot of know-how and training. It is necessary to fulfill customer expectations at the highest level. Quality is an important tool in ensuring this satisfaction. The ability of ALBEDO to compete and succeed in global markets depends on the quality of our products and the support we provide. In general, many points from the conformity of the products to the specified Telecom, Transport, and Utility standards to the degree to which the needs and expectations are met, and even to the understanding of perfection, reflect the change in the viewpoints of the enterprises on the subject of quality. Support is then considered as a strategic tool in terms of competitive advantage.

Quality is not limited to the production of the testers or the clocks. After-sales service is another is a must in quality terms, because we are obliged to provide good support for years within a certain life span which is very long and to open authorized service points in the number, place and features to be determined according to the need and to have sufficient technical personnel organizes in several layers Tier1 which is provided locally, Tier2 provided by experts based in Barcelona, Toronto and Delhi to solve configuration and results analysis, and Tier3 in case of faults.<sup>37</sup>

37. Reference Procedure: PRC-ASS

## 11.1 After Sales Service Procedure

This procedure explains how to perform these activities in ALBEDO. The purpose is to ensure that the objectives of the after sales services conditions including training, support, RMA, upgrades, spare parts of the products sold. . ALBEDO fulfill these responsibilities to promote the market and increase the reputation of the company.

A sale from a customer is fundamental for increasing revenue, but this is not enough in ALBEDO we need to scale the business and if possible you to turn customers into repeat buyers. One way to do this is through quality customer service. Customers who received a high-quality After Sales Services and Support are more likely to repurchase or renew when offered the chance to switch to a competitor.

### Release of Products and Services

ALBEDO's management is involved in this process for which they must show commitment and leadership for its correct performance. The positions involved in the process -listed below- are aware of the opportunities presented and the risks assumed and therefore must adopt an approach that maximizes opportunities and reduces risk. These are the people responsible for the process:

- General Management: It is the owner and maximum responsible for compliance with this document.
- Business Development Manager: Is responsible for helping the channels to make the sale including management of offers and orders, discounts.
- Vice President: He is responsible for the network clock division.
- CTO: Responsible for technical support as well as training and solving customer problems.

Back-office: It is responsible for the configuration and assembly of the equipment, the supervision of the equipment according to the customer's request, packaging, provision of customs documents and the shipment of the product.

ALBEDO Telecom inc. - Registered in Florida (US) - Doc Num P16000012245 - EIN 811357755

QUALITY-ISO9001



## ALBEDO Telecom

ALBEDO Telecom delivers solutions that enable Telecom infrastructures of all sizes to troubleshoot, monitor, and migrate mission critical networks.

From the desktop to the data centre, from Access Network, Ethernet, Sync-E, PTP, Optical backbones, LTE, VoIP or IPTV applications.

On local segments and across distributed networks, ALBEDO enable Telecom Organizations, Telecom Installers, Network Operators, Internet Service Providers and Contents Suppliers to quickly check the health of your network, verify SLA, or find and fix problems.

## Benefits

**Results.** The ALBEDO Telecom to help Telecom industry to make the most of the investment on network infrastructure.

**Expertise.** ALBEDO trainers, auditors, engineers and consultants provide industry-leading knowledge to address the unique needs of customers.

**Integration.** ALBEDO integrates disparate telecom resources and applications, realizing new business efficiencies.

**Agility.** ALBEDO increases the ability of customers to respond quickly to new market opportunities and requirements.

**Coverage.** ALBEDO offers solutions that facilitates the migration and the roll-out to new telecom architectures.



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aims

- + **LEARN** from business models and case studies
- + **UNDERSTAND** the potential of interoperability with legacy services
- + **EXPERIENCE** specialised synchronization network solutions
- + **ASSESS** different solutions for installation and maintenance