QUALITY MANAGEMENT MANUAL

SCOPE

This manual captures the quality procedures and methods employed by Apex Translations, Inc. All of these procedures and methods are strictly compliant with the requirements of ISO 9001:2008 and EN 15038:2006. Apex was audited by the TÜV Rheinland (Technischer Überwachungsverein Rheinland), one of the world’s leading technical auditing institutions, and certified as ISO and EN compliant on April 13, 2013 (see certifications in Appendix 1).

APPLICABLE DOCUMENTS

- European Standard EN 15038:2006
- ISO Customer Oriented Processes (COPs)
- ISO Supporting Operations Processes (SOPs)
- ISO Quality Forms (QSs)
- ISO Quality Procedures (QPs)
- Apex Standard Work Instructions (ASWIs)

DEFINITIONS

‘Quality Assurance’ (QA) - all measures and processes that serve the purpose of preventing errors from being made.

‘Quality Control’ (QC) - all measures and processes that serve to detect and correct any errors that may have been made in spite of Quality Assurance (QA).

‘Quality Verification’ (QV) - all measures and processes that serve to measure the product of our services for the purpose of providing feedback to our quality system to continuously enhance our methods and processes.
‘Translation Error’ - any objective and verifiable linguistic error, or inaccurate content translation, as well as any objective and verifiable error concerning terminology, orthography, punctuation, or style. This concept explicitly excludes subjective preferences of terminology and style, retroactive changes to the meaning or structure of the original source text, and changes to a translation that are not supported by the original source text. The definition of ‘Objective and Verifiable Error’ is identical with the Error Categories of SAE J2450.

‘Native Speaker’ - a speaker of a language, who grew up with that language and culture, and who is intricately familiar with all facets and levels of writing and speaking that exist within that language. This does not mean that the person must have been born in a certain country or that his or her parents must have been natives of a certain country or nation; nor does it mean that the person must be a citizen of any specific country or state or reside in a specific country today.

‘Overall Document Weighted Score’ (ODWS) – a measuring tool for quantifying the quality of a translation objectively, using the method described in the SAE Recommended Practice J2450 (Translation Quality Metric).

‘Continuous Improvement’ - an ongoing effort to improve products, services, or processes. These efforts can seek "incremental" improvement over time or "breakthrough" improvement all at once. Delivery processes are constantly evaluated and improved in the light of their efficiency, effectiveness, and flexibility.

APEX’S OVERALL APPROACH TO QUALITY

Apex Translations, Inc. is certified to conform to the requirements of the ISO 9001:2008 and EN 15038:2006 quality standards. These Quality Management Systems provide us with a formal framework for managing and improving our processes and demonstrates our commitment to be a customer-focused company.

QUALITY ASSURANCE, QUALITY CONTROL & VERIFICATION

This framework comprises the basic building blocks such as Quality Assurance, Quality Control, and Quality Verification – all of which are bound together by the concept of “Continuous Improvement.”

It embraces everything we do to maintain quality excellence, including our employee training program, the way we structure our IT systems for minimum project management error rates, the 6-Sigma tools and principles that we employ in our daily work, as well as the way we measure key work activities, so we know where we must improve.
QUALITY MANAGEMENT MANUAL

Apex Translations, Inc. has developed this Quality Management System (QMS) in compliance with the applicable clauses and requirements of the current versions of ISO 9001:2008 and EN 15038:2006.

The Customer Oriented Processes (COP’s), Supporting Operational Processes (SOP’s), Procedures and associated instructions define the Translation Quality Management System (TQMS), and together they comprise the Quality Manual. The quality records provide direct objective evidence of compliance with the requirements of the TQMS.

NOTE: The Apex QMS is an electronic system. The electronic version is the controlling document and any printed copies are to be considered for reference only unless distributed under control in accordance with QP_4230_Documentation_Data_Control.

SCOPE OF THE QUALITY MANAGEMENT MANUAL

The scope of this QMS is applicable to the translation services provided to the customers of Apex Translations, Inc.

COMPANY PROFILE

Apex Translations, Inc. is a medium-size translation company, legally organized as a C-type Corporation under Indiana law. Apex was founded 1998 and has grown to be a highly competitive document translation firm, catering to small and large corporations, organizations, and government agencies in the US and Europe.

The company’s administrative headquarters is located in Columbus, Indiana; Apex’s production office is located in Plymouth, North Carolina. Apex also has regional offices in Germany and Austria. To this date, we have served more than 7,000 clients, providing translation services in more than 200 language pairs, using the linguistic and subject matter skills of more than 600 linguists. Apex Translations, Inc. is certified to conform to the requirements of the ISO 9001:2008 and EN 15038:2006 quality standards.

CONTACT INFORMATION

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123-B West Water Street
Plymouth, NC 27962
Phone: 1-800-634-4880
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ORGANIZATION

Brief Job Descriptions of In-House Apex Positions:

**CEO/CFO**
Responsible for the management of the entire Company and its finances. Also in charge of marketing and IT.

**CHIEF LINGUIST**
Responsible for the integrity of the production process and for the adherence to ISO QM standards and requirements. Complaint management.

**PROJECT MANAGER**
Manages translation projects from inquiry via proposal, translation, proofreading, and delivery.

**PROOFREADER**
Checks translations for linguistic and material mistakes and errors and corrects those if possible or initiates corrective action to be taken by translator via the PM.

**SALES REPRESENTATIVE**
Follows up on proposals.
QUALITY COMMITMENT

At Apex, we take quality seriously. Our goal is to continually meet or exceed client expectations. From order entry via production to order delivery, every member involved in the process is focused on optimizing quality because we realize that, for our clients, the quality of translations can mean the difference between success and failure in the global market.

Consumers see the quality of product documentation literature, such as service instructions or operator manuals, as a reflection of product quality itself. Poorly translated product literature equates to poor product image and lost sales.

Skillful and culturally competent use of translation is an essential element of product literature and of effective communication of product or service providers with their consumers and their service staff. At Apex Translations, we believe, this to be crucial.

QUALITY POLICY STATEMENT

Apex Translations, Inc. is committed to the development, implementation, maintenance, and ongoing improvement of its Quality Management System (QMS), and to compliance with the referenced international standards. This is accomplished by adherence to the QMS and verified through Internal Audits, Management Reviews and monitoring of the Quality Objectives. Apex Translations, Inc. will provide all the resources necessary to ensure success of its QMS.

This Quality Policy has been established and approved by the management of Apex Translations, Inc.

COMMUNICATIONS

The management of Apex Translations, Inc. communicates this intent through ongoing emails to all team participants and regular group meetings. All team members are required to participate in the process of managing quality and are encouraged to offer suggestions for process improvement.

COPs and SOPs

Customer Oriented Processes (COPs) describe our production process under the aspect of how we assure and control the quality of our translations. In temporal sequence, they also describe production flow. Supporting Operations Processes (SOPs) are processes that are not elements of the main stream of production flow but are needed under certain circumstances to assist the production flow in maintaining quality standards.
PROCESSES AND INTERACTIONS:

COP = Customer Oriented Process

SOP = Supporting Operations Process

Diagram:

1. Process: COP01 Request for Quote and Proposal
   Responsibility: Project Manager

2. Process: COP02 Translation Planning
   Responsibility: Project Manager

3. Process: COP03 Assignment of Translators
   Responsibility: Project Manager

4. Process: COP04 Translation Accomplishment
   Responsibility: Project Manager

5. Process: COP05 Proofreading Accomplishment
   Responsibility: Project Manager

6. Process: COP06 Project Manager’s Final Review
   Responsibility: Project Manager

7. Process: COP07 Delivery to the Customer
   Responsibility: Project Manager

8. Process: COP08 Project Completion for Accounting
   Responsibility: Financial Manager

- Process: SOP01 Client Issued Changes
  Responsibility: Project Manager

- Process: SOP02 DTP
  Responsibility: DTP Expert / PM

- Process: SOP03 Supplier Control/Evaluation
  Responsibility: Chief Linguist

- Process: SOP04 Customer Satisfaction
  Responsibility: CEO

- Process: SOP05 Management Review
  Responsibility: Executive Management
QUALITY PROCEDURES, STANDARD WORK INSTRUCTIONS, AND QUALITY FORMS

Quality Procedures, Work Instructions, and Forms are designated within each documented process. The letters preceding the number designates identification of each type of document:

QP – Quality Procedure
SWI – Standard Work Instruction
QF – Quality Form

QUALITY PROCEDURES

QP_4230 Documentation and Data Control
QP_4240 Quality Records
QP_6200 Training and Competence
QP_6224 Continuous Improvement
QP_7230 Customer Complaints and Concerns
QP_8220 Internal Quality Audits
QP_8300 Nonconforming Product
QP_8520 Corrective and Preventive Action

EXCLUSIONS

Apex Translations, Inc. excludes the following from the scope of its ISO QMS:

- 7.3. Design and development – Justification: Apex does not design or develop the product (translation). Product is developed, defined, specified, and controlled exclusively by the customer.
- 7.4 Purchasing – Justification: ISO purchasing is about purchasing “products”. Apex does not purchase translation services in the manner products are purchased. Translators are selected, qualified, and added to the TDB and the PM assigns translation projects to selected translators, which, if the translator accepts, constitutes the equivalent of a contract translation services.
- 7.6 Control of monitoring and measuring devices – Justification: No physical or derived measurements exist of the process or the final product delivered to the customer.

*Note: Apex Translation, Inc. recognizes that the only permissible exclusions to ISO 9001 are to be claimed under the requirements of clause 7 of the standard.
NORMATIVE REFERENCES

- ISO 9001:2008 – Quality management systems — Requirements
- EN 15038:2006 – Translation services – Service requirements
  (Ref. Appendix 1)

Detailed Description of the Apex Production and Quality Management Process
A) **COP-01: Request for Quote, Proposal, and Contract Review**

**Inputs:**
- RFQ, Inquiry, Request for Proposals, etc. from customer or prospect.
- Applicable customer specific documents (see QP 4230 – Document Control) and/or customer specific requirements.
- Previous translation and/or customer history
- Quality Records QP 4240

**PROCESS:**

**START**

- Request for Quotation (RFQ) or inquiry is received from customer by mail, email, carrier, or fax and is moved to the “ALL OPEN INQUIRIES” folder in Outlook.

- Project Manager chooses an inquiry and flags it with the appropriate color for the PM who is assigned to manage it.

- Request is reviewed along with customer specifications, documentation, customer requirements, and any current and/or previous customer project history.

- Obtain additional information from customer as required.

- PM sets up project in SDB to establish PN, and PM sends documents to Desk Top Publishing Provider (DTP) for analysis, turnaround time (TAT), and determination of DTP costs.

- PM determines source or target word count and TAT. PM enters project information into SDB and assigns a PN.

- Cont.
Based on all relevant information above, Project Manager determines project feasibility.

Feasible?

No

Notify customer of No Proposal END

Yes

Project Manager generates PDF proposal using Proposal Generator and submits it to customer by email.

PM sets up project folder in Outlook and moves all pertinent emails into the project folder.

Customer reviews proposal, including the terms and conditions.

If project has not been awarded within 24 hours after proposal the Apex Sales Rep calls client to follow up on proposal and to address any questions or problems client may have.

PM resolves issues with customer.

Customer Issues?

Yes

No

If customer issues a written "Go-Ahead" to Project Manager or submits Credit Card information through the CC link authorizing the project and accepting project, terms, and conditions PM proceeds accordingly.

COP02 Translation

Outputs:
- Proposal
- Project Folder in Outlook
- Updated Sales Database
- DTP Information
- Word Counts
- TAT
B) COP-02: Translation Planning

**INPUTS:**
- Information/data from COP01 Request for Quote, Proposal, and Contract Review
- Document and Data Control – QP-4230
- SOP01 Changes

**PROCESS:**

1. **COP01** Request for Quote, Proposal and Contract Review
   - Project Manager reviews proposal and gathers all documents, customer requirements, DTP extractions and any additional information required for successful project accomplishment and sets up project folder in Apex Client Files

2. Project Manager determines internal and/or external personnel requirements, technical expertise, and timeframes for the accomplishment of individual tasks, using the translator database.

3. Project Manager updates project as "awarded" in the Sales Database and adds job to AIMS*

**OUTPUTS:**
- Project File in Customer Directory
- Corrective and Preventive Action Reports (as applicable)
- Documentation required by customer (as applicable)
- Meeting minutes (as applicable)

*AIMS stands for “Apex Integrated Management System”. This system contains and processes all project and client related information."
C) COP-03: Assignment to Translators

**Inputs:**
- Information from COP02 – Translation Planning
- Training and Competence – QP-6200
- SOP03 – Supplier Control/Evaluation
- Document and Data Control – QP-4230

**PROCESS:**

Translation Planning COP02

Based on the determinations made in COP02, the Project Manager will select the appropriate translators for the project using the translator database. PM will make sure that Apex has NDA from translator on file in the TDB, which is indicated in the TDB.

The Project Manager will assess any special requirements, subject matter expertise, regional considerations, etc. when making the selection.

Translators will be selected based on the above criteria and the requirements of SOP02 – Supplier Control/Evaluation.

The Project Manager will send an inquiry to the preferred translator(s). Translator response is recorded in project folder in Outlook.

**Outputs:**
- Updated Project File
- Query email sent to Translators
- Translator confirmation
- NDAs for selected translators if not already on file
D) COP-04: Translation Accomplishment

**Inputs:**
- Project Schedule (Gantt Chart)
- Project Files
- Information/data from COP02 Translation Planning
- SOP03 Translator Control / Evaluation

**PROCESS:**

1. **COP03 Assignment of Translators**
   - Project Manager will ensure that translator(s) have all relevant texts, glossaries, instructions etc. required to perform the work assigned.
   - Translators will perform the work assigned in accordance with the requirements, instructions, and timeframes as determined by the Project Manager.

2. **Translator Questions?**
   - Yes: Project Manager takes appropriate action to answer translator questions.
   - No: On completion, the translator will forward the work to the Project Manager. The Project Manager will conduct a preliminary review of the work to check for obvious errors.

3. **Obvious Errors?**
   - Yes: At the discretion of the Project Manager, PM may make the corrections, ask the proofreader to make corrections, or return to the translator for correction.
   - No: COP05 Proof Reading Accomplishment

**Outputs:**
- Translation accomplished according to Contract and Project Timeline
E) COP-05: Proofreading Accomplishment

**Inputs:**
- Project Schedule Information/data from COP02 Translation Planning
- Project files

**PROCESS:**

- **COP04 Translation Accomplishment or SOP02 DTP Analysis (if applicable)**

  After the preliminary review by the Project Manager per COP04, the work will be forwarded to the appropriate proofreader.

  - **Expertise In-House?**
    - **Yes**
      - The assigned proofreader will perform full proofreading of the translation, making corrections or comments as required or appropriate.
      - If the target language is not English, the proofreader marks the status of proofread work as “approved.”
    - **No**
      - Select appropriate external proofreader

  - **Significant Errors?**
    - **Yes**
      - Contact the Project Manager immediately.
    - **No**
      - If necessary, proofreader corrects minor errors and returns work to Project Manager.

  - PM creates Proofread Folder + places proofread text into Proofread Folder in client files or if this is a second or the first proofreading step performed by CL then CL creates Proofread folder and places text into Proofread FLD or Proofread Final Folder.

**Outputs:**
- Updated Project files
- Proofread work
F) COP-06: Project Manager’s Final Review

**PROCESS:**

**COP06**
Proofreading Accomplishment

Upon receipt of final proofread versions, the Project Manager or Chief Linguist will review any comments and/or notes entered by Proofreader, take appropriate action, and place text into the appropriate folder.

**Project Complete?**

- **Yes**
  - Project Manager assembles files in preparation for delivery to the customer.

- **No**
  - PM takes whatever appropriate action is needed to complete it. If the files are exported from DejaVu, PM must verify that all rows have the green “Approved” check mark.

**Outputs:**

- All contract deliverables received and verified
- All internal and external issues and/or corrective actions if any closed.
- Full project review accomplished
- Project complete

**Inputs:**

- Information/data from COP02 Translation Planning
- COP05 Proofreading Accomplishment
- Project files
G) COP-07: Delivery to the Customer

**PROCESS:**

**Inputs:**
Completed project deliverables

**COP06 Project Manager’s Final Review**

Project Manager will ensure that all deliverables are in their final proofread version as specified by client.

- **Yes**
  - **Final?**
  - Project Manager will ensure that all files are present and file names are consistent with the Apex file naming convention.

- **No**
  - If project does not comply with any requirement, PM will ask for approval from Production Manager before sending.

**Outputs:**
Customer receipt for all project deliverables
H) COP-08: Project Completion for Accounting

**Inputs:**
- Information/data from COP02
- Translation Planning
- Sales Database

**PROCESS:**

1. COP07 Delivery to Customer

   Throughout the contract life cycle, the Project Manager is responsible to ensure that all required contract related financial information for billing or payment is entered into the Proposal Generator in the Sales Database.

   - Accounting will review information from the Project Manager and compare to project requirements.

   - Differences?
     - Yes
       - Accounting will solicit input from the Project Manager to reconcile accounting issues. The CFO will be informed of any unsettled issues and accounting will proceed as directed.
     - No

   - Accounting will accomplish invoicing and/or payment per their accounting policies and procedures.

   - Accounting will provide the Production Manager with monthly statements. Accounting will maintain all financial records according to their policies and procedures in cooperation with external CPA firm.

**Outputs:**
- Accounts reconciled
- Invoices sent
- Payments made
- Monthly accounting statements

**END**
The main SOPs supporting this process are the following five:

A) **SOP-01: Client Issued Changes**

**Inputs:**
- Notification or request from customer to change requirements of the proposal.
- New or revised source documents

**COP01 - Request for Quote and Proposal**

**PROCESS:**

**COP02 Translation Planning**

Change request is received through staff or the assigned Project Manager. Project Manager reviews the request from customer and determines if changes are properly authorized by client contact.

Project Manager reviews the price changes and any other relevant information. Revises Proposal from COP01 and sends to customer for go ahead.

**New Project?**

Yes

**COP01 Request for Quote or Proposal**

On go ahead by the customer and review by the Project Manager through COP01. An addendum is created and the Proposal Generator is updated per the new requirements.

**COP03 Assignment of Translators**

**Outputs:**
- Properly authorized request for change(s)
- New or revised proposal with project requirements.
- New or revised project file
- Current project costs
B) SOP-02: DTP (Desktop Publishing)

**PROCESS:**

**Inputs:**
Information from COP02 Translation Planning

**COP02 Translation Planning**
- Project Manager sends the proofread translation to DTP who re-imports the translation into their DTP software.
- DTP will create a PDF of the DTP document and sends to the Project Manager who sends the DTP PDF to the proofreader for review per COP05 Proofreading Accomplishment.
- Project Manager will send the proofread DTP PDF back to DTP if any corrections are required.

**Corrections?**
- Yes
- No

**The Project Manager will file the document in the Final Proofread Version file.**

**COP06 Project Manager's Final Review**

**Outputs:**
Deliverable(s) to Final Proofread Version file.
C) SOP-03: Translator Control/Evaluation

**Inputs:**
Need for new Translator.
Need for review and update of current translator information or performance records.
Approved Translator DB
QP-6200 – Training and Competence

**PROCESS:**

1. **COP03 Assignment of Translators**
   - The Project Manager is responsible for contracting translation services based on the Approved Translators in the Translator Database. CEO and Chief Linguist will develop and maintain the Translator DB.

2. Translators must comply with QP-6200 – Training and Competence. Translators must provide evidence of acceptable quality practices & controls, required certifications or licenses, and acceptable performance.

3. Suppliers complying with the above requirements will be added to the Approved Supplier List and remain there as long as they maintain an acceptable rating through the continuous supplier evaluation.

4. Translator who does not meet required standards is marked in the TDB as “Denied”.

5. **Acceptable performance?**
   - Yes: COP04 Translation Accomplishment
   - No: Translators

**Outputs:**
Approved Translator Database
Approved Translators
D) SOP-04: Customer Satisfaction

**Inputs:**
- Results of surveys, visits, or other forms of customer feedback.
- Customer complaints
- Customer Satisfaction Survey
- QP-7230 – Customer Complaints

**PROCESS:**

1. **COP07 Delivery to the Customer**
   - At a minimum, twice per year, a Customer Satisfaction Survey will be sent to all active accounts by the CEO.
   - If an unverified negative rating, and at the discretion of the CEO and/or Chief Production Manager, the Project Manager will be requested to follow up with the customer.
   - Any verified response that is unsatisfactory requires follow up per QP-7230 – Customer Complaints.
   - Data is synopsized and results are presented at Management Review Process SOP05.

2. **SOP05 Management Review**
   - Increased customer satisfaction.
   - Relevant information to Management Review SOP05.

**Outputs:**
E) SOP-05: Management Review

**Inputs:**
- Management review schedule.
- Results of audits in accordance with procedure QP_6220 Internal Quality Audits.
- Customer feedback in accordance with procedure QP_7230 Customer Complaints and SOP04 Customer Satisfaction.
- Corrective & Preventive Action in accordance with procedure QP_8520.
- Previous management reviews.
- Changes to the QMS.
- Recommendations for Continuous Improvement in accordance with procedure QP_6224.
- Certification audits
- Quality Policy
- Measurable Objectives

**Process:**

1. **Start**
   - Management review is scheduled in conjunction with the bi-annual customer-satisfaction-survey results.

2. The following inputs are reviewed and compared to goals:
   - Review of Quality Policy
   - Results of audits in accordance with procedure QP_8220.
   - Customer feedback in accordance with procedure QP_7230 and SOP04.
   - Preventive/corrective action in accordance with procedure QP_8520.
   - Previous management reviews.
   - Changes to the QMS (if applicable).
   - Recommendations for improvement in accordance with procedure QP_6224.
   - Measurable objectives
   - Other factors as determined by Top Management

3. Action items are assigned to address issues identified and records are maintained. Measurables, goals and objectives are revised as appropriate.

**Outputs:**
- Review of previous action items
- Determination of resource and training needs
- Action items to address issues identified.
- Revision of measurables, goals, and objectives as appropriate.

**Continuous improvement**

QP_6224
Quantification and Measurement of Translation Quality

Apex demands that its translators never deliver any translation that exceeds a 0.002 Overall Document Weighted Score (ODWS) according to the SAE J2450 Translation Quality Metric. To enforce this standard we do not rely on Quality Assurance alone. At Apex, there are several post-production checks and controls in place. These are:

100% of our translations go through final proofreading by a qualified linguist, who is not the translator. The proofreader checks for completeness and correctness of the translation, as well as for spelling, punctuation and syntax errors, or unusual style. Errors are either corrected by the proofreader or the translation is sent back to the translator for repair.

Approximately 30% of our translations are also proofread by a second proofreader.

Approximately 5% of our translations undergo random sample checks by our Chief Linguist. If any errors are found in these samples, the translation is returned to the proofreader.

Error scoring methodology and error limits:

SAE Recommended Practice J2450 (Translation Quality Metric) is a consistent and industry-wide recognized method for measuring translation quality.

Here is how the Metric works:

SAE J2450 has seven error categories. Each one is associated with two scoring levels: Serious and minor.

The following table is a summary of the error categories and their error points for the serious and minor scoring levels:

<table>
<thead>
<tr>
<th>Error Category</th>
<th>Error points serious</th>
<th>Error points minor</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cat. 1: Wrong term</td>
<td>serious 5 points</td>
<td>minor 2 points</td>
</tr>
<tr>
<td>Cat. 2: Syntax error</td>
<td>serious 4 points</td>
<td>minor 2 points</td>
</tr>
<tr>
<td>Cat. 3: Omission error</td>
<td>serious 4 points</td>
<td>minor 2 points</td>
</tr>
<tr>
<td>Cat. 4: Grammar error</td>
<td>serious 4 points</td>
<td>minor 2 points</td>
</tr>
<tr>
<td>Cat. 5: Spelling error</td>
<td>serious 3 points</td>
<td>minor 1 point</td>
</tr>
<tr>
<td>Cat. 6: Punctuation error</td>
<td>serious 2 points</td>
<td>minor 1 point</td>
</tr>
<tr>
<td>Cat. 7: Miscellaneous error</td>
<td>serious 3 points</td>
<td>minor 1 point</td>
</tr>
</tbody>
</table>

The assignment of minor and major error points to the various error categories that occur in a translation allows an accurate assessment of the Overall Document Weighted Score (ODWS), which is a quantitative assessment of a translation's overall quality.
The following equation applies:

\[ \text{ODWS} = \frac{\text{total number of error points}}{\text{number of words in the document}} \]

**For example:**

If a 500-word document as received from the translator contains

- 1 syntax error (serious),
- 2 punctuation error (minor)
- 1 wrong term (serious)

The total number of errors are 4 - 2 serious ones and 2 minor ones, resulting in a total of 11 error points according to the values in the table above.

This equates to an Overall Document Weighted Score of:

\[ 11 \text{ [error points]} \div 500 \text{ [words in the document]} = 0.022. \]

This score would not be acceptable.

Apex applies the following limits to their quality procedures:

**Error score: Action:**

- **Error score:** 0.02  
  **Action:** We guarantee that none of our translations provided to our clients will ever exceed this ODWS value. While we consider an ODWS score of 0.02 realistic due to the fact that language production is not precision engineering and must heavily rely on human work, focus, and attention, we consistently score significantly lower. Indeed, about 95% of our translations contain zero errors or very few minor ones (see below).

- **Error score:** 0.002  
  **Action:** Three occurrences of exceeding this limit will lead to the exclusion of an approved translator from our approved translator list.

- **Error score:** 0.002  
  **Action:** If a translation is received from a translator that has – after a cursory evaluation by the proofreader – errors that result in an ODWS score of > 0.002 the translation will be sent back to the translator for correction and re-submission before any additional proofreading is done on this translation. This data is entered in our database.

- **Error score:** 0.002  
  **Action:** Maximum permissible ODWS score for a test translation submitted by a new, unapproved translator.

- **Error score:** zero to 0.002  
  **Action:** ODWS Score after proofreading has been completed. 95% of the translations we deliver to our clients fall within this range.

- **Error score:** zero  
  **Action:** Zero errors are allowed during a random sample check by our Chief Linguist. If any errors are found in these samples, the translation is returned to the proofreader.
We also use the error definitions of J2450 as a definition of ‘objective and verifiable translation errors’ in contrast to subjective and preferential changes or changes to any of our translations that are not supported by the original source text we were given to translate.

Apex uses Standard Work Instructions (SWI), which provide detailed guidance to translators, proofreaders, and project managers on how to apply our QA/QS System in a system-conform manner. If you wish to receive any or all of these for your review, please contact us at your convenience. If you have any questions concerning our Quality Management System and/or Production Procedures, please contact our Chief Linguist, Florian Deltgen, PhD, PD, at 800 634 4880 ext. 25.

**RECRUITMENT AND VALIDATION OF TRANSLATORS, REVISERS, PROOFREADERS, AND REVIEWERS.**

**Apex Translators** must meet all competences required under EN 15038, 3.2.2, respectively, 5.4.1 and 5.4.2. Translators must be native speakers of the target language and have verifiable subject matter expertise (SME).

**Apex Revisers** must meet all competences required under EN 15038, 3.2.3, respectively, 5.4.3. Revisers must have linguistic competence. However, while SME is not required under EN 15038, all Apex Revisers must also have a reasonable level of SME.

**Apex Reviewers** must meet all competences required under EN 15038, 3.2.4, respectively, 5.4.4. While reviewers do not need to have knowledge of the source language under EN 15038, Apex Reviewers must have a reasonable level of understanding of the source language in addition to their SME and target language knowledge.

**Apex Proofreaders**, as defined in ASTM 2575-06, shall be competent to check a translation for linguistic correctness, i.e. spelling, syntax, punctuation, and grammar errors, correct formatting and proper flow and style. While proofreaders do not need to have source language knowledge or SME according to ASTM 2575-06 or EN 15038, Apex Proofreaders should have target language fluency, plus a reasonable level of source language knowledge and SME.

A reviser, reviewer, or proofreader must never be the same person as the translator for the same project. Apex’s requirements for revisers, reviewers and proofreaders meet and exceed those of EN 15038, ASTM 2575-6, and ISO 9001-2008. For practical reasons, Apex’s requirements for revisers, proofreaders, and reviewers are the same as those for translators: having all these capabilities present in translators, revisers, reviewers, and proofreaders allows Apex to combine checking for content completeness and correctness, proper subject matter area (SMA) terminology, and linguistic correctness such as grammar, spelling, punctuation, syntax, and style in one single process step and to use one and the same person to perform all of these control functions prior to delivery. This saves time and cost, and produces higher consistency levels. Internally, we call this function ‘proofreading’ and the person who performs it ‘proofreader’.
The following steps describe our **translator selection and validation process**. The qualification requirements for Apex translators are the same as for Apex ‘proofreaders’.

1. Apex contacts linguists via the Internet or email or is contacted by them via the Internet or email.

2. Translator is prompted to submit his/her data to the Apex Translator Database.

3. Translator accesses the Apex Translator Database and enters his/her capabilities / skills / experience / performance data into the pre-structured translator profile template provided by the Apex Translator Database.

4. Upon completion of the above step, the translator informs Apex that he/she completed entering his/her data into the Apex TDB.

5. The Apex Management (CEO, Chief Linguist or PM) will attempt to verify the information the translator submitted about his/her capabilities, skills, education, and experience. The first step of this attempt is a telephone interview. A qualified Apex representative will try to call the translator and discuss his/her qualifications on the phone. This interview may include conversation in one or several of the languages for which the translator claims proficiency.

6. **Verification Satisfactory?**
   - **NO.** Applicant will be barred for any use.
   - **YES.** Applicant will be sent a test translation that tests his/her capabilities for the translation direction and subject matter areas for which translator claims proficiency. Each test translation will be at least 1,000 source words long to allow statistical evaluation. The translator’s performance is judged based on SM and terminology competence, linguistic correctness and skills, as well as formatting capabilities. The performance is evaluated statistically, using the SAE J2450 Translation Metric.
MONITORING TRANSLATOR AND PROOFREADER PERFORMANCE

Independently working proofreaders are called upon to inform the Chief Linguist if they detect a significant or permanent drop in a translator’s overall performance. The Chief Linguist himself will perform random sample examinations of translations with the objective to detect any drop or discontinuity in translator and/or proofreader performance. If he detects any significant drop in translator or proofreader performance he will approach the translator or proofreader and bring the deficiencies to their attention asking for causal analysis and substantive assurance that and how the translator/proofreader will make sure that the fault identified will not be repeated. If a translator is found to exceed the Apex ODWS score of 0.002 for the third time, he may be temporarily barred from use by PMs. If no significant improvement is detected in the translator’s performance, the translator will be permanently barred from use for a specific task or SM or the translator may be permanently barred from use.
CERTIFICATE

TUV Rheinland of North America, Inc.
298 Foster Street, Suite 100, Littleton, MA 01460

Hereby certifies that

Apex Translations, Inc.
123-B West Water Street
Plymouth, NC 27962

has established and maintains a quality management system for

Foreign Languages Document Translation Services

An audit was performed and documented in Report No 3624. Proof has been furnished that the requirements according to

ISO 9001:2008 are fulfilled.

Further clarification regarding the scope of this certificate and the applicability of ISO 9001:2008 requirements may be obtained by contacting TRNA.

Certificate Registration No.
74 300 3624

Certificate Issue Date
April 13, 2016

Certificate Expiration Date
September 14, 2018
CERTIFICATE
of Conformance

TUV Rheinland of North America, Inc.
1300 Massachusetts Avenue, Suite 103, Boxborough, MA 01719

Hereby attests that

Apex Translations, Inc.
123-B West Water Street
Plymouth, NC 27962

has established and applies a Management System for
Translation Services for the scope of:

Foreign Languages Document Translation Services

An audit was performed and documented in Report No 3450.
Proof has been furnished that the implemented management system conforms to:

EN 15038:2006

Further clarification regarding the scope of this certificate of conformance and the applicability of
requirements may be obtained by contacting TRNA.

Certificate Registration No.
74 600 3450

Certificate Effective Date
April 13, 2016

Certificate Expiration Date
April 12, 2019

Revised 4/28/2016
Certification Decision Date 4/13/2013
Typical Apex workstation with multiple screens that allows synoptic view of up to 16 documents. This facilitates comparing documents and greatly enhances the proofreading and editing process.