PHOENIX TRANSLATIONS QUALITY MANAGEMENT SYSTEM

QUALITY POLICY

Phoenix Translations will earn customer loyalty by providing language services and client interaction experiences of the highest quality and greatest value. To achieve this result, we will:

1. Ensure that all of our services and deliverables comply with our Quality Assurance Plan (QAP).
2. Ensure that all of our services and deliverables meet or exceed client expectations.
3. Continuously improve our business management systems and processes to sustain and enhance our competitive position in the language services market.
4. Systematically monitor the quality of our client interactions in order to improve the total experience of our client base.
5. Establish quality requirements for contractors, partners and suppliers and hold them accountable for compliance.
6. Treat clients in accordance with the business conduct standards defined in our Employee Handbook.

Mission Statement

To provide compelling language services and solutions by delivering the highest quality translations at razor edge pricing 100% to deadline, while maintaining and improving our cost-effectiveness through the most competitive cost control model in the industry.

Vision Statement

We facilitate international communication and understanding in the business, science, technology and legal fields in an increasingly connected world by accurate and timely translation from and into a wide range of languages.

Management Systems

Project Management	Provision of a client single point of contact regarding translation jobs or projects. Overall supervision of the translation from initial receipt to final delivery.
Translator Management	Contract translator recruitment, training and quality assurance. Optimal assignment of translations to translators based on performance metrics covering language pairs and subject areas. Adherence to delivery targets committed by translators to meet overall client delivery schedules.

Editing Management	Editor and proofreader recruitment and training. Assignment and supervision of in-house translation, scientific, technical and other specialist editing, and proofreading.
Production Management	Recruitment, training and supervision of the production team performing document setup, correction and delivery. Complex and non-standard project management.
Process Improvement	Four cross-functional teams focused respectively on (1) Sales and Marketing, (2) Operations, (3) Translation and Editing, and (4) Project Management and Production.
Staff Meetings	Quarterly meetings of all Phoenix Translations staff to discuss management and workforce concerns, and process issues. An essential component of Process Improvement.

Operational Systems

Operational Process	A 54-step process table in the QAP defining the progress of a translation from initial receipt to final delivery. All management and operational systems contribute to this process in terms of either execution or improvement.
Online Tracking System	Shows current job status and document location. An essential tool for Project Management.
Translator Grading	Record of translator, grade (0 to 10) and subject area for each job. Average grades are computed to enable translator ranking. An essential tool for Translator Management.
Editing Master Schedule	A large format planner providing a "month-at-a-glance" picture of the overall workload and individual job details. An essential tool for Editing Management.
Inspection and Acceptance	Defined criteria for evaluation of Quality of Content (QC) and Quality of Presentation (QP). QC and QP are essential tools of Editing Management and Production Management respectively.
Linguistic Quality Assurance (LQA)	A quality assurance system applied to translations from English into foreign languages, when the target language is not spoken in-house. After receipt from the first translator, the translation is sent to an independent second translator for editing and proofreading of the foreign text. An essential part of Project, Editing and Production Management.
Back-translation	A quality assurance system applied to high integrity translations from English into foreign languages at the client's request. When the English source has been translated into the target language by one translator, the

foreign language version is sent to another translator for translation back into English. The English source and the English back-translation are then compared and any definitive differences examined and corrected in the back-translation, and in the foreign language intermediate if that is where the discrepancy arose. This process is called "reconciliation" and is an essential part of Project, Editing and Production Management.

Quality Management System Ownership

The Phoenix Translations Quality Management System (QMS) comprises the Quality Policy and subsequent paragraphs above, and the Quality Assurance Plan (QAP) below. Ownership of the QMS is vested in the Chief Executive Officer, who is responsible for its continuous monitoring and development.

PHOENIX TRANSLATIONS QUALITY ASSURANCE PLAN

This Quality Assurance Plan (QAP), which has been implemented to track the location and status of translation work in progress, to effect the timely completion of work ordered, and to assure that translations meet the quality standards defined by the client, is based on Phoenix Translations established operational process and consists of the steps described in Figure 1 below.

STEP	ACTION	RESPONSIBLE
	PHOENIX TRANSLATIONS - QUALITY ASSURANCE / STATUS OF WORK	
1	Receive translation document by email / fax / alternative delivery means	Project Manager
2	Identify document subject from WIPO code or by consulting editorial staff	Project Manager
3	Calculate delivery schedule from client priority	Project Manager
4	Perform online patent retrieval to obtain more legible copy if necessary (Note 1)	Project Manager
5	Log document into translation tracking system (see example Figure 3 on Page 5)	Project Manager
6	Create new job folder under Client on Phoenix server and save document in source sub-folder	Project Manager
7	Print document and insert with client purchase order in new manila job folder	Project Manager
8	Attach appropriate job folder cover sheet (white = into English / green = into foreign / gray = back-translation	Project Manager
9	Complete job folder cover sheet (see example Figure 2 on Page 4)	Project Manager
10	Note any special process and delivery instructions from purchase order on job folder cover sheet	Project Manager
11	Pass translation job folder to Translator Manager	Project Manager
12	Update job status in translation tracking system	Project Manager
13	Consult translator grade sheet (see example Figure 4 on Page 5) for source language / subject	Translator Manager
14	Select optimal translator and contact to negotiate availability and target date	Translator Manager
15	Email job to translator with any special process and format instructions	Translator Manager
16	Enter job details against delivery target date in Editing Master Schedule (see Figure 5 on Page 7)	Translator Manager
17	Update job status in translation tracking system	Translator Manager
18	Retain job folder under Jobs with Translators category	Translator Manager
19	Check daily in translation tracking system for jobs due from translator on following day	Project Manager
20	Check daily under Jobs with Translators for jobs due from translator on following day	Translator Manager
21	Email / call translator on day before target date to check job progress on schedule	Translator Manager
22	Receive translated document from translator	Translator Manager
23	Save translation under Client job folder in translation sub-folder on Phoenix server	Translator Manager
24	Print translated document and insert in manila job folder	Translator Manager
25	Complete translation job folder cover sheet	Translator Manager
26	Note translation arrived in-house on Editing Master Schedule	Translator Manager
27	Pass translation job folder to Production	Translator Manager
28	Update job status in translation tracking system	Translator Manager
29	Save translation under Client job folder in production sub-folder on Phoenix server	Production Staff
30	Set up translation where necessary revising format and keying graphics legends (per Production Handbook)	Production Staff
31	Complete translation job folder cover sheet	Production Staff
32	Pass translation job folder to Editing Room	Production Staff
33	Update job status in translation tracking system	Production Staff
34	Perform initial proofreading to verify sentences / paragraphs / numbers (SPAN) and identify omissions	Proofreaders
35	Complete translation job folder cover sheet	Proofreaders
36	Allocate document editing to optimal editor per language / subject / workload	Chief Editor
37a	Edit document (into English) for omissions / accuracy / terminology / language / style / conformity OR	Assigned Editor
37b	Edit document (into foreign language) as above (in-house languages - Note 2) OR	Assigned Editor
37c	Send document (into foreign language) for outside Language Assurance (LQA) (any language - Note 3)	Assigned Editor
38a	Complete job folder cover sheet / update translation tracking system when internal edit complete OR	Assigned Editor
38b	Complete job folder cover sheet / update translation tracking system when outside LQA complete	LQA Manager
39	Pass translation job folder to Production	Assigned Editor
40	Mark job edited in Editing Master Schedule / assign translation grade	Assigned Editor
41	Save translation under Client job folder in edits sub-folder on Phoenix server	Production Staff
42	Correct translation according to editing marks and insert any omissions (per Production Handbook)	Production Staff
43	Complete job folder cover sheet / update translation tracking system	Production Staff
44	Pass translation job folder to Editing Room	Production Staff
45	Perform final proofreading of document to verify all editing marks correctly applied and omissions entered	Proofreaders
46	Complete translation job folder cover sheet	Proofreaders
47	Pass translation job folder to Production	Proofreaders
48	Update job status in translation tracking system	Proofreaders
49	Correct translation for any errors marked during final proofreading (per Production Handbook)	Production Staff
50	Save translation under Client job folder in shipped sub-folder on Phoenix server	Production Staff
51	Complete job folder cover sheet / update translation tracking system	Production Staff
52	Determine translation delivery method (email / fax / magnetic media / alternative delivery means)	Production Staff
53	Send translation to client by required delivery method	Production Staff
54	Update job status in translation tracking system	Production Staff
Note 1	Phoenix offers online patent retrieval services at no additional cost to translation clients	
Note 2	In-house - Chinese/Japanese/French/German/Spanish/Portuguese/Russian/Bulgarian/Italian/Dutch/Indonesian	
Note 3	Phoenix has preferred subcontractor arrangements for fast turn LQA in all languages	**Figure 1**

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<u>Receipt of Translation Document</u>

When a translation document is received from a client via email or ftp site, the Project Manager acknowledges the project and will then go on to identify the document type, subject and delivery schedule, check for duplication, log the job into our translation memory system. We then print a hard copy of the tracking cover and place it on a new project folder. The tracking sheet on the front of a folder is a visual cue that acts as a check and balance system for our virtual project folders. An example of the cover sheet is shown in Figure 2 below.

JOB NO.:	LANGUAGE:	☐ STANDARD
CUSTOMER P.O. NO.:	TRANSLATOR / DELIVERY DATE	☐ FIRM
DATE RECEIVED:	WORD COUNT / DATE RECEIVED:	☐ RUSH

SUBJECT MATTER: _____ SPECIAL INSTRUCTIONS/NOTES: _____
_____

BEFORE WORKING ON THIS FOLDER AT ANY STAGE, READ THE CLIENT PURCHASE ORDER!!!

WORD PROCESSOR (1):	Date in:	Word count/Page count:	Time:	Date out:
SENTENCES PARAGRAPHS AND NUMBERS:	Date in:	Changes Omissions No Changes	Time:	Date out:
EDITOR: PATENT CLAIM LQA:	Date in:	Changes Omissions No Changes	Time:	Date out:
WORD PROCESSOR (2):	Date in:	Word count/Page count:	Time:	Date out:
PROOFREADER:	Date in:	Changes Omissions No Changes	Time:	Date out:
FINAL CORRECTIONS:	Date in:	Word count/Page count:	Time:	Date out:

FORMATTING
☐ Word   ☐ Excel   ☐ PowerPoint
☐ Other _____
_____

SHIPPING INSTRUCTIONS
☐ E-mail: _____
☐ Patent PDF (saved as): _____
☐ **Certify**   (pdf doc and certificate)
☐ First Class ☐ Overnight ☐ Fax (see PO)

Date sent: _____ Initials: _____

ADDITIONAL SPECIAL INSTRUCTIONS/NOTES:
_____
_____
_____
_____
_____
_____
_____
_____
_____

PATENT LOG: - YES or N/A   ESTIMATED WORD COUNT: _____

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Figure 2: Example of Job Folder Cover Sheet

Back-translations, when requested, are treated as two separate but related jobs in terms of tracking, and both the forward translation and the back-translation are equally subject to the 54-step Quality Assurance Plan. A series of back-translations of the same source text into and back from multiple languages are all identified and tracked as separate projects, but are kept physically together as they progress through the 54-step QA Process. This facilitates reconciliation in parallel and horizontal LQA in order to achieve consistency across the batch of translations.

Online Tracking System

As the translation moves through our overall operational sequence, the online tracking system is updated by the person responsible for the completion of each stage. This enables the job status to be reported and the physical document to be located whenever required by the client or by us. An extract of our online tracking system is shown in Figure 3 below. Our priorities are defined as follows: RUSH – as soon as possible; FIRM – on or before the date required by/agreed with the client; STANDARD – five to seven working days.

PRIORITY	CUST CODE	JOB	TRANSLATOR	LANGUAGE	TYPE	REC FM CLIENT	SENT TO TRANS	DUE FM TRANS	REC FM TRANS	WORD COUNT	SET-UP	EDIT	WP	PROOF	FINAL CORR	CLIENT DUE DATE	SHIP DATE
Standard	17	9460	Jacob B	German	Patent	1-Nov	1-Nov	7-Nov	7-Nov	1020	7-Nov	7-Nov	7-Nov	8-Nov	8-Nov	8-Nov	8-Nov
Standard	55	9489	Chris S	German	Patent	1-Nov	1-Nov	6-Nov	6-Nov	2540	6-Nov	6-Nov	7-Nov	7-Nov	7-Nov	7-Nov	7-Nov
Standard	55	9500	Gwen H	Japanese	Patent	1-Nov	1-Nov	6-Nov	6-Nov	5581	6-Nov	6-Nov	6-Nov	6-Nov	7-Nov	7-Nov	7-Nov
Rush	6	9511	Rich E	Dutch	Letter	1-Nov	1-Nov	2-Nov	2-Nov	850	2-Nov	2-Nov	2-Nov	2-Nov	2-Nov	2-Nov	2-Nov
Standard	6	9513	Polly D	French	Article	2-Nov	2-Nov	8-Nov	6-Nov	1415	7-Nov	7-Nov	7-Nov	8-Nov	8-Nov	9-Nov	8-Nov
Firm	6	9521	Nelda G	Spanish<<	Clinical	2-Nov	2-Nov	6-Nov	6-Nov	2550	6-Nov	6-Nov	6-Nov	6-Nov	6-Nov	6-Nov	6-Nov
Firm	3	9530	John M	Japanese	Claims	2-Nov	2-Nov	6-Nov	3-Nov	574	3-Nov	3-Nov	3-Nov	3-Nov	3-Nov	6-Nov	3-Nov
Firm	1	9537	Madelon M	Japanese	Patent	2-Nov	2-Nov	6-Nov	6-Nov	3460	6-Nov	6-Nov	7-Nov	7-Nov	7-Nov	7-Nov	7-Nov
Standard	6	9545	Charles H	Chinese	Patent	2-Nov	2-Nov	7-Nov	7-Nov	6784	8-Nov	8-Nov	8-Nov	9-Nov	9-Nov	9-Nov	9-Nov
Firm	6	9546	K B Choi	Korean	Patent	3-Nov	3-Nov	7-Nov	7-Nov	3838	7-Nov	7-Nov	7-Nov	8-Nov	8-Nov	8-Nov	8-Nov
Standard	6	9552	Mariann G	Russian	Patent	3-Nov	3-Nov	8-Nov	8-Nov	4360	9-Nov	9-Nov	9-Nov	10-Nov	10-Nov	10-Nov	10-Nov

Figure 3: Translation Tracking System

This tracking system example illustrates our use of customer codes to preserve client confidentiality, since some of the technical and legal material that we handle is extremely sensitive in nature. The << symbol following a language indicates that the translation is from English into the foreign language.

Allocation of Translator

A critical decision in ensuring translation accuracy is allocation of the best translator in terms of subject matter, and language pair and direction. To make this decision, our Translator Manager refers to an online translator grade spreadsheet that is maintained by the Editing Staff. The editors allocate a grade (0 low to 10 high) to every translation, broken out by translator, language, date and subject matter. This process provides metrics that indicate clearly the strengths and weaknesses of each of our translators with respect to knowledge domains, and allows the Translation Manager to select the best translator based on actual performance history. An extract from our online translator grade spreadsheet is shown in Figure 4 below. The format in the grade cells is YYMMDD-GG, representing respectively the year, month and day when the translation was edited, and the grade awarded. The grade cells are color coded to identify the editor.

The same criteria are applied to back-translation sequences, for which only the most experienced translators are selected. There is inevitable divergence between the source text and the back-translation from the intermediate target language. This divergence increases with greater linguistic dissimilarity between the members of the language pair involved. Some degree of divergence is expected and acceptable since it is not semantically definitive. Allocation of back-translation sequences to the most experienced translators reduces artificial divergence and minimizes the amount of reconciliation that is needed at the process back end.

TRANSLATOR	LANGUAGE	SUBJECT						
Jenny L	Japanese	Electrical/Electronics/Printing	060112-05	060130-06	060208-07	060217-08	060220-07	060223-06
Jenny L	Japanese	Chemical/Polymers/Resins	060117-06	060117-05	060130-06	060202-05	060213-05	060221-08
Jenny L	Japanese	Business/Legal	060124-05	060209-09	060830-06	060905-05	060905-05	
Jenny L	Japanese	Aerospace	060208-06					
Jenny L	Japanese	Fabric	060313-07					
Jenny L	Japanese	Contact lens	060328-05					
Jenny L	Japanese	Export control	060329-04					
Jenny L	Japanese	Mechanical	060331-07					
Jenny L	Japanese	Optics/Quartz	060905-06	060905-05				
Jenny L	Japanese	Medicine/Pharmacology	060811-06	060815-05				
Chris S	German	Chemistry/Materials	060112-09	060112-10	060130-08	060210-10	060213-07	060220-08
Chris S	German	Computing	060113-09	060425-05				
Chris S	German	Patent dispute	060116-10	060620-09	060807-08	060817-09	060822-08	
Chris S	German	Pesticides/Fungicides/Herbicides	060118-09	060130-07	060131-09	060202-08	060508-09	060509-08
Chris S	German	Engineering/Electrical/Technical/Mechanical	060123-09	060124-10	060210-10	060228-09	060329-09	060404-09
Chris S	German	Business/Financial	060127-08	060213-09	060531-09	060802-09	060829-09	060921-10
Chris S	German	Medicine/Radiology/Pharmacology/Oncology	060223-09	060223-09	060223-09	060301-09	060320-06	060323-09
Chris S	German	Multicolor printing	060307-06	060627-08				
Chris S	German	Legal	060310-08	060519-07	060705-09	060707-08	060921-08	
Chris S	German	Optics/math	060626-09					

Figure 4: Translator Grade Spreadsheet

Instructions to the Translator / Monitoring Progress

When the job is sent (normally by email) to the assigned translator, the Translator Manager will include the agreed target date for completion by the translator, which has been derived from the job priority and allows time after return for word processing, editing and proofreading. The source document will be accompanied by any special process and formatting instructions. The Translator Manager then enters the job details in the Editing Master Schedule (to enable the Chief Editor to prioritize and plan for workload fluctuation), retains the hard copy file under the Jobs with Translators category.

To monitor the approach of due dates for receipt back from translators, every morning the Project Manager performs a check of the online tracking system, and the Translator Manager performs a check of the files under Jobs with Translators. When a job is identified that is due back from the translator the following day, the Translator Manager will contact the translator by phone or email to verify that the translation is on schedule for delivery to Phoenix.

Receipt and Setup of the Completed Translation

When the completed translation is received by the Translator Manager from the translator, it is again logged into our online tracking system, saved to the Phoenix server, and the job file is passed to our Production Staff for setup. Its arrival in-house is communicated by the Translator Manager to the Editing Staff using an (H) annotation against the job on the Editing Master Schedule, which is described below.

Our setup process entails the Production Staff checking the document formatting, and reformatting as necessary to conform to the Production Handbook for each translation type or to the individual client specifications for the particular job, as well as scanning and inserting drawings, graphs and other illustrations, and keying translated legends. On completion, the set-up translation is saved back to the Phoenix server, a hard copy is printed out and inserted in the job folder, the job folder cover sheet is completed (see WORD PROCESSOR (1) in Figure 2), the job folder is passed to the Editing Staff for initial proofreading, and the job status in the online tracking system is updated (see Figure 3).

<u>Initial Proofreading</u>

After setup, the translation is passed to the Editing Staff for initial proofreading. This step is referred to by the acronym SPAN (<u>S</u>entences, <u>P</u>aragraphs <u>an</u>d <u>N</u>umbers), and is performed by a specialist proofreader who checks the translated document against the original, paragraph by paragraph together with a comparative sentence count, to ensure completeness, correct formatting, and presence and accuracy of all numbers, units, abbreviations, formulae and tables. The numbers and abbreviations check is a particularly important feature of initial proofreading since the absence in the translated version of a number or abbreviation present in the original usually reveals the omission of associated text. Where possible, the proofreader corrects errors in numbers, units, abbreviations, formulae and tables. Those errors requiring linguistic or scientific/technical knowledge, as well as omitted text or graphics, are flagged for the attention of the editor.

On completion of initial proofreading, the proofreader completes the job folder cover sheet indicating whether any errors or omissions were found (see SPAN in Figure 2), and passes the job folder on for editing.

<u>The Editing Process</u>

The Phoenix Translations Editing Staff consists of editors selected for their writing skills, the breadth and depth of their scientific, technical and other specialist knowledge, and their foreign language skills. Currently Phoenix Translations has in-house capability in Chinese, Japanese, French, German, Spanish, Portuguese, Russian, Bulgarian, Italian, Dutch and Indonesian.

The Chief Editor allocates editing tasks based on language, subject and workload. The assigned editor may be the Chief Editor. Editing is performed in manuscript on the hard copy translation, or online on the digital version, depending on client requirements. In either case there is an audit trail of the editorial changes made. The editing marks serve as the record for hard copy editing, as does the MS Word track changes function for online editing.

The assigned editor examines the translation and corrects spelling and grammatical mistakes, typographical errors, and poor text readability and comprehensibility, while taking care to remain true to the substance and sense of the translation content. The editing style will reflect the purpose of the translation. The editor will also rectify incorrect scientific, technical and other specialist terminology, and perform in-depth research and validation of terminological usage when the terms employed are unfamiliar or questionable.

In the case of languages in which we have in-house capability, the editor will refer back to the source text when the translation is unclear, and also deal with any errors and omissions identified during the initial proofreading, or subsequently during editing itself. With languages in which we do not have in-house capability, source text queries and translation errors and omissions are referred back by email to the translator, who will be alerted by a phone call to ensure immediate response.

Also in the case of languages in which we have in-house capability, and when handling a patent translation from one of those languages into English, the appropriate editor will perform a

Linguistic Quality Assurance (LQA) check to validate the translation of the patent claims. If the translation of the patent claims is found to contain serious errors, an LQA validation will be performed on the entire patent (see PATENT CLAIM LQA in Figure 2).

When the source text queries have been resolved, and any errors and omissions have been rectified, the editor completes the job folder cover sheet indicating whether any changes are required, which is almost always the case (see EDITOR in Figure 2), assigns the translation grade (see Figure 4), passes the job folder to the Production Staff for corrections to be applied, updates the job status in the online tracking system (see Figure 3), and crosses off the job on the Editing Master Schedule (see Figure 5).

In the case of back-translations, the job pair is handled as a single entity, with the forward translation file now inside the back-translation file so that the editor has access to the source English, foreign language target and back-translation English. At this point the three versions of the document(s) are reconciled. The editor compares the source text and back-translation sentence by sentence to assess the degree of divergence, some of which is so be expected and is acceptable. Specifically, the editor examines and corrects semantic differences that affect the definitive meaning of the text. If these are judged significant, they are corrected in the back-translation, as well as in the foreign language target if that is where the discrepancy arose. If the foreign language target is not within our in-house capability, the job pair will be returned to one or both of the translators for reconciliation.

Where a multilingual batch of back-translations is involved, the reconciliation is performed in parallel across the batch by one or more editors at the same time. This is termed "Horizontal LQA" and is designed to achieve consistency throughout the group of translations.

Word Processing

Prior to being SPaNned, the document is formatted per the source document in Word by the Production Department.

The Production Department is a specialist word processing team comprising operators who are highly experienced in multilingual text management, as well as complex formatting and graphics manipulation, in order to produce high quality, accurate documentation for the client. Their detailed procedures are documented in the Production Handbook.

On receipt of the edited translation document, the Production Staff will access the unedited, translated document (as received from the translator) on the Phoenix TMS, correct the translation and insert any omissions in accordance with the editing marks made and the omissions supplied by the initial proofreader and assigned editor, and save the corrected translation back to the Phoenix TMS. They then place the corrected file in a subfolder in the job folder, complete the job folder cover sheet (see WORD PROCESSOR (2) in Figure 2), pass the job folder back to the Editing Staff for final quality check, and update the job status in the online tracking system (see Figure 3).

<u>Final Proofreading</u>

On receipt of the corrected translation document from the Production Staff, a specialist proofreader will compare the corrected copy with the edited copy to verify that all the editing marks have been correctly applied, and will re-insert any editing marks that have been missed. Final proofreading also serves as an ultimate check for typographical errors that have been missed during earlier stages (which rarely happens). On completion, the final proofreader completes the job folder cover sheet (see PROOFREADER in Figure 2) in the TMS and passes the job folder to the Production Staff for any final correction, and updates the job status in the online tracking system (see Figure 3).

<u>Final Correction and Document Delivery</u>

On receipt of the job folder, the Production Staff will apply any additional editing changes made by the final proofreader, and save the final version to the Phoenix TMS in the appropriate format (MS Word, editable PDF or other format as required by the client). After completing the job folder cover sheet (see FINAL CORRECTIONS in Figure 2), the Production Staff will identify the appropriate delivery method (normally email, but also may be fax, magnetic media or alternative delivery means as required by the client). The Production Staff then executes the delivery, and updates the job status in the online tracking system (see Figure 3).

<u>Inspection and Acceptance Criteria</u>

Phoenix Translations applies defined inspection and acceptance criteria as an integral part of the Quality Assurance Plan. All editors and proofreaders are specifically tasked, within our existing rigorous editing process, to focus on assuring that these criteria are satisfied for every translation that they undertake. The Chief Operating Officer (responsible for production) and the Chief Editor will conduct checks of 10-20% of completed translations to confirm that our final products fully comply with these inspection and acceptance criteria, namely:

<u>Quality of Content (QC)</u>

1. The translation is an accurate rendering of the original.
2. The translation is expressed in the target language in comprehensible and idiomatic form.
3. The proper terms for the subject matter have been used.

<u>Quality of Presentation (QP)</u>

1. The format conforms to the specifications in the Production Handbook or otherwise as defined by the client.
2. No words, numbers, portions of text, or pages are missing.
3. The text is free of typographical errors.
4. The text and graphics are neat and professional.
5. The completed document is an electronic file in MS Word, editable PDF file type, or other format as agreed upon with the client.

Quality Checks

The Chief Editor will perform random checks after final proofreading of the translation document, and will specifically verify items QC 1, 2, 3 and QP 2 above, with emphasis on translation (correct understanding and rendering of source text), accuracy (absence of omissions and removal of any additions), terminology (correct adherence to applicable glossaries, correct abbreviations, terms correct in context), language (correct grammar, semantics, punctuation, spelling), style (general style, register/tone, language variants and colloquial usage), and country of origin (country standards, local suitability and company standards).

The Chief Operating Officer will perform random checks after final correction and prior to delivery of the translation document, and will specifically verify items QP 1, 3, 4 and 5 above, with emphasis on presentation (document in format defined in the Production Handbook/agreed with the client, translated text matched to format of original document, captions and labels translated, and drawings incorporated).

In the event that a randomly checked document fails to satisfy any of these quality criteria, it will be returned to editing and/or production (as appropriate) for the error(s) to be rectified. Editing and Production Staff will be briefed on any such errors that are identified during these quality checks, in order to provide a feedback loop and avoid future recurrence.

Where a multilingual batch of back-translations is involved, all jobs in the batch will undergo a final Horizontal LQA and overall quality check by either the Chief Executive Officer or the Chief Operating Officer.

Since these quality checks are applied only to a percentage of the total throughput of translation documents and are specifically performed by the Chief Executive Officer, Chief Operating Officer and the Chief Editor, they are not included as steps in the Quality Assurance/Status of Work table in Figure 1. The steps in the Quality Assurance/Status of Work table are defined as being applicable to all translation documents unless an individual job is specifically exempted.

Translations into Foreign Languages / Linguistic Quality Assurance

Our editing team can apply the above quality assurance process to translations from English into the languages in which we have in-house capability, specifically Chinese, Japanese, French, German, Spanish, Portuguese, Russian, Bulgarian, Italian, Dutch and Indonesian. When the editing workload is heavy, and with translations from English into other foreign languages, outside Linguistic Quality Assurance (LQA) is utilized, which is managed by the LQA Manager. The quality assurance process remains the same up to and including initial proofreading to check the translated document for completeness, correct formatting, and presence and accuracy of all numbers, units, abbreviations, formulae and tables. At that point, the translation will be sent to one of our preferred LQA subcontractors for proofreading in the foreign language and correction of any errors and omissions.

LQA subcontractors are instructed in the covering email with each job to proofread the text for errors, omissions and obvious misspellings, and to correct only what is wrong and thus diverges semantically from the source English. They are told specifically not to make preferential changes due to differing opinions on vocabulary or modes of expression. This is emphasized particularly in back-translation sequences where the client has made changes in an existing forward translation (foreign language) and requested validation and certification of the new version.

Phoenix Translations maintains preferred subcontractor relationships with certain translation partners to cover the requirement for fast turn LQA. The costs of this arrangement are covered by our quoted rates, and the proofreading turnaround time is included in the overall lead time for performing a translation. This process is therefore invisible to our client.

The LQA process is applied generally to all English into foreign language translations except back-translation sequences. A single back-translation sequence incorporates built-in quality assurance by virtue of the reconciliation process. The Horizontal LQA process is applied to multilingual back-translation batches where consistency across several jobs is essential.

Retention of Translated Documents

Phoenix Translations retains the hard copy job files of all completed translations for 18 months. During the hard copy retention period, electronic copies (both source documents and translations) are systematically archived to CD, and these are retained indefinitely.

Summary and Flowchart

This Quality Assurance Plan is based on our established operational process, which has been the subject of continuous improvement over the life of the company, and which satisfies the requirements of major international corporations and intellectual property law firms for which we regularly provide translation services.

The subject matter that we cover includes electrical, electronic and mechanical engineering, semiconductors, digital consumer products (both hardware and software aspects), chemistry, polymers, and other materials, nanotechnology, optics and optical devices, industrial production processes, scientific and technical papers and articles, biomedical, biotechnology and pharmaceutical documents, and legal material (including contracts and patent litigation).

This Quality Assurance Plan, which is intended to conform to the quality requirements of our client base, is defined in the Quality Assurance/Status of Work table in Figure 1, and explained in detail on pages 4-11. The steps listed, together with the Quality Checks described on pages 10-11, will efficiently track the location and status of client work in progress, effect the timely completion of work ordered, and ensure that translations meet consistently high quality standards. An overview of the total translation management process is provided in the form of a flowchart in Figure 6 on the following page.

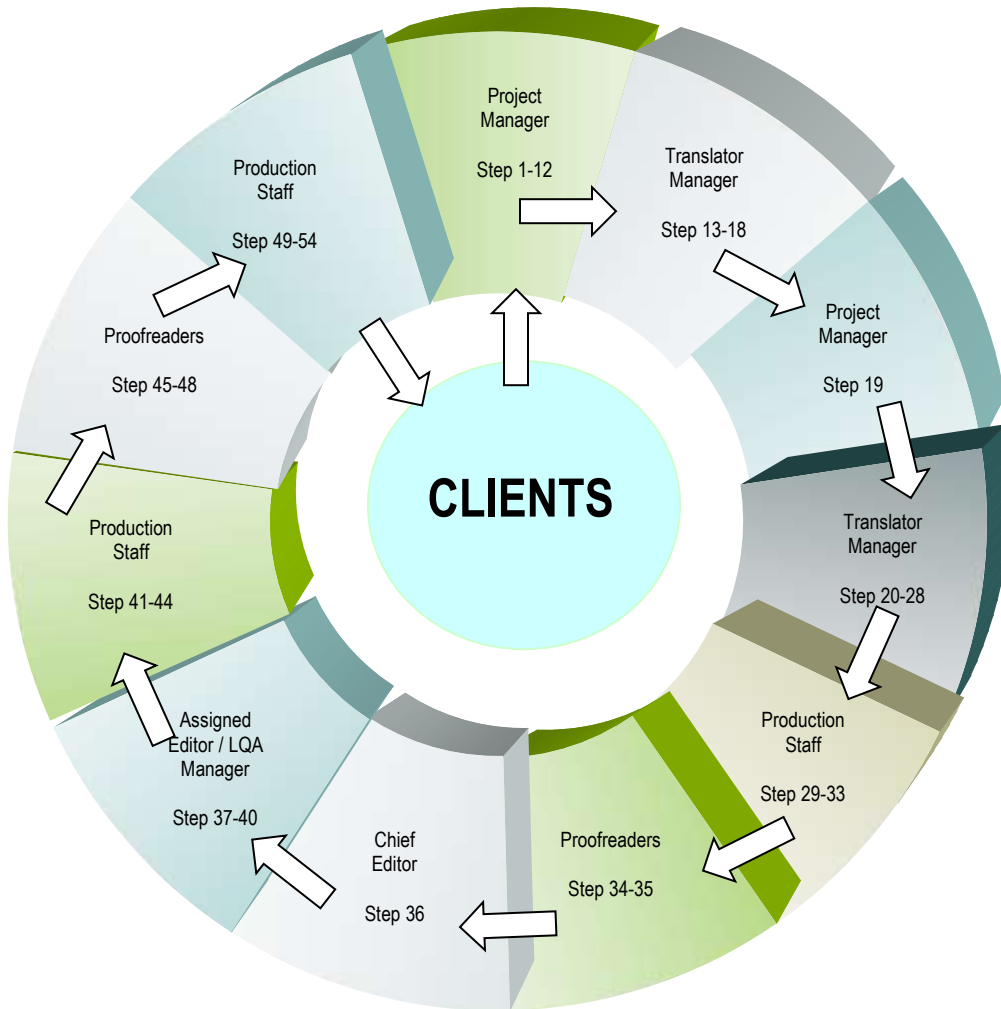Phoenix Translations – Quality Assurance / Status of Work – Summary Flowchart

Project
Manager

Step 1-12

Translator
Manager

Step 13-18

Production
Staff

Step 49-54

Project
Manager

Step 19

Proofreaders

Step 45-48

Translator
Manager

Step 20-28

CLIENTS

Production
Staff

Step 41-44

Production
Staff

Step 29-33

Assigned
Editor / LQA
Manager

Step 37-40

Chief
Editor

Step 36

Proofreaders

Step 34-35

Figure 6

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Quality Policy added	Revision 3.01	02/08/2008	CJF LINES	Chief Editor
Retitled QMS Ownership defined	Revision 3.02	02/18/2008	CJF LINES	Chief Editor
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