Valley Fastener Group LLC

Valley Rivet Division Forgo Fastener Division North Coast Rivet Division ISO 9001:2008

Human Rights

Assessment, Policy and Goals

The Valley Fastener Group fully supports the Universal Declaration of Human Rights.

Implementation

The Valley Fastener Group has an open door policy defined in the employee handbook. We utilize a suggestion box to report incidents or issues anonymously as well as regular informational meetings for the employees. Human Resource provides the employees an EEOC and a clearly defined Harassment Policy in the employee handbook

Measurements and Outcomes:

The Valley Fastener Group monitors the suggestion regularly and reinvests annually to continually improve working conditions for its employees.

Labor Principles

Assessment, Policy and Goals

VFG's is an Equal Opportunity Employer and its policy as part of its employee handbook is not to discriminate against any employee or applicant because of race, color, creed, religion, national origin, citizenship, ancestry, sex, sexual orientation, age, marital status, mental or physical disability or any other status protected by law. Valley also provides a wide range of benefits that exceed most of our competition.

<u>Implementation</u>

VFG use a suggestion box, documented policies and an open door policy regarding Harassment and Discrimination for our employees to assure we are meeting their needs.

Measurement

Human Resource continually evaluates our policy to assure compliance with our posted company policies. VFG is a diverse organization with managers and supervisors from different countries and backgrounds. Any incidents are dealt with accordingly using the policies posted in the employee handbook.

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Environment

Assessment, Policy, and Goals

The VFG continually reviews the working environment for its employees in order to improve working conditions and increase productivity. Some of the improvements from 2011 included:

- 1. All plant lighting changed to T8 bulbs
- 2. 6S projects added shadow boards to headers for easier tool needs
- 3. Purchase of conveyors for high speed headers
- 4. Purchase of more smoke removal units
- 5. Purchase of mechanical sorting equipment for less material handling by employees
- 6. Double toggle switches were added to the headers to prevent possible severe injury accidents

Implementation

VFG installed 10 conveyors on its high speed headers to stop employees having to lift heavy pans which removed the chance for lifting injuries. T8 lighting has reduced energy consumption by 25% and brightened the work environment for the workers. Mechanical sorters allow workers to not handle heavy boxes reducing lifting injuries. Shadow boards provide a more organized work environment and double toggle switches keeps operators hands from moving machine parts that could cause severe injury.

Measurement of Outcomes

Improvements to Environment are measured with the following criteria:

- 1. Environmental impact
- 2. Cost savings
- 3. Quality enhancements
- 4. Productivity improvements

Additional safety improvements are submitted by the VFG safety committee made up of members from around the company. All ideas are reviewed by management using the above criteria before approval.

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Anti-Corruption

Assessment, Policy and Goals

VFG has a business ethics policy communicated to all employees and documented in the employee handbook.

<u>Implementation</u>

As a small company to constantly reinforce our anti-corruption policy in team meetings. Continuous improvement without corruption is key to our continued growth.

Measurement

All company expenses are reviewed and justified and there are no incidents of internal or external corruption.