

Communication on Progress November 9, 2012

Self-assessment

- *General Fasteners Company supports the UN Global Compact, its initiatives and its 10 principles.*

Tim Farrell
President

Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights.

Principle 2: Make sure that they are not complicit in human rights abuses.

- *General Fasteners requires its employees to observe all laws of the United States and the Company handbook and affirmative action policies which address prevention of human rights abuses*
- Implementation
- *Affirmative Action Plans implemented (and reviewed by the US government), Company Handbook updates including open door policy process.*
- Measurement of outcomes
- *Discrimination and harassment training completed, training on prevention of workplace violence completed, no tolerance policy in effect. Reviewed by senior management. Employee Assistance Programs implemented through changes to our insurance coverage.*

Labour

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

Principle 4: The elimination of all forms of forced and compulsory labor.

Principle 5: The effective abolition of child labor.

Principle 6: The elimination of discrimination in respect of employment and occupation.

- *General Fasteners requires its employees to observe all laws of the United States, the company handbook and affirmative action policies which address employees' rights.*

- Implementation
- *Affirmative Action Plans implemented (and reviewed by the US government), Company Handbook updates including open door policy process. Monthly employee meetings to review and discuss all facets of company performance.*
- Measurement of outcomes
- *Affirmative Action Plans (implemented and reviewed by the US government), Company Handbook updates including open door policy process. All complaints are reviewed by Human Resources Department and senior management. Overall audit to ISO 9000-2008.*

Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges.

Principle 8: Undertake initiatives to promote greater environmental responsibility.

Principle 9: Encourage the development and diffusion of environmentally friendly technologies.

- *General Fasteners has implemented sustainability goals as focus areas for approaching environmental challenges.*
- Assessment, policy and goals
- *Observe and support all regulations of the government, environmental response plans in effect, lean initiatives on waste and recycling are active and effective.*
- *Sustainability web pages added to our website (www.genfast.com).*
- Implementation
- *Voluntary participants in the CARBON DISCLOSURE PROJECT starting July 2010.*
- *No tobacco use policy implemented on the premises of any Company facility or vehicle. Smoking Cessation programs funded and implemented.*
- *Implemented significant waste material reductions at all locations, especially metals, paper products, and plastics.*
- Measurement of outcomes
- *Carbon Disclosure Project reports completed, ongoing monitoring established.*
- *No tobacco use policy implemented.*
- *Existing environmental response plan, no legal cases, reviewed by management. Waste costs reduced substantially.*

Anti-Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

- *Company Handbook updates including zero tolerance policy. No instances in any of our operations.*
- **Implementation**
- *Covered by sections of our handbook, Human Resources Department would be responsible for investigating any potential instances. Open door policy is a mechanism for employee input.*
- **Measurement of outcomes**
- *No incidents, reviewed by senior management, no legal cases, rulings, fines, etc. Should an incident occur the Human Resources Department would be the investigative group.*