



## Valley Fastener Group LLC

ISO 9001:2008 Certified Company

1/1/2013

Secretary-General  
United Nations  
New York, NY 10017  
USA

Dear Mr Secretary-General,

I am pleased to confirm the Valley Fastener Groups continued support for the Global Compact and our ongoing commitment to the initiative and its principles.

Attached is our COP 1/1/2012-12/31/2012.

Sincerely yours,

Manny DeSantis  
President & CEO

**Valley Rivet Division   Forgo Fastener Division   North Coast Rivet Division**  
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2013 COP

## 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 suggestions regularly and reinvests annually to continually improve working conditions for its employees. Employees are offered competitive wages along with additional health and retirement benefits that make the Valley Fastener Group a desirable employer.

## 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.

### Implementation

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.

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## 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.

## **Environment**

### Assessment, Policy, and Goals

The VFG continually reviews the working environment for its employees in order to improve working conditions and increase productivity.

### Implementation

1. Completed purchase of conveyors for high speed headers reducing lifting requirements for plant personnel
2. Implementation of electronics recycling of obsolete computers
3. Paper recycling boxes installed at all facilities to promote environmental responsibility
4. Installed new high efficiency furnaces in offices and was able to remove multiple AC units saving energy
5. Oil recaptured and recycled into machines from air units in manufacturing facility

### 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.

### Implementation

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

### Measurement

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