

COP from PIAD Precision Casting Corporation

07/26/2013

Human Rights

PIAD Precision Casting Corporation supports the idea of overall respect for and observance of human rights and freedoms for everyone.

PIAD has implemented the attached Business Ethics and Employee Conduct policy as part our employee handbook. In addition, we have the current Human Right's rules and regulations posted on all bulletin boards within the company.

The employee handbook is reviewed with the candidate by Human Resources during the pre-employment process so that they are informed regarding the company policies and their responsibilities prior to them accepting an employment offer with PIAD. The candidate is also required to complete an acknowledgement form stating that the employee handbook was reviewed with them and they understand the policies outlined in the manual. If the candidate accepts a position with PIAD they are provided with a copy of the manual which must be returned to PIAD if they would leave our employment.

In order to make sure that every employee is aware of our policies regarding Human Rights violations, to assist with reducing Human Rights risks and informing them of the repercussions of violating the policy; PIAD clearly states in the manual that compliance is the responsibility of every PIAD employee and that disregarding or failing to comply with the ethical standards of business conduct could lead to disciplinary action, up to and including possible termination of employment as well as legal action.

Any employee who suspects a violation of this policy or any laws and regulations should contact his/her supervisor or Human Resources immediately. They are also informed that the issue will be handled in a confidential manner so that they feel comfortable reporting a violation.

If an allegation that a Human Right's violation has occurred, PIAD would take immediate action and complete a thorough investigation of the situation and apply the rules outlined in our policy regarding any employee who violates the rules and regulations.

PIAD is proud to say that we have not had any Human Rights violations since our last COP submission and that we continue to proactively promote a healthy work environment free from those abuses.

Labour

PIAD Precision Casting Corporation supports the Labour principles of the UN Global Compact and upholds the freedom of association and the effective recognition of the right of the employee's to collectively bargain.

PIAD has the required current labor law posters informing employee's of their rights, the minimum wage and age law's posted on all our bulletin boards.

PIAD is a union facility and we have a three year union contract that became effective on May 1, 2011 and ends on April 29, 2014 with the IUE-CWA, The Industrial Division of the Communications Workers of America, AFL-CIO-CLC and Local 88643. Attached is a copy of the cover sheet of the new agreement.

Our contract with the union clearly states the employee rights and responsibilities and their compensation and benefits during the term of the agreement.

Part of our contract with the union includes an agreement between the two parties regarding how many union stewards will be assigned to each shift/department and how the grievance process will work. The union stewards report any issues to Human Resources and the President/CEO who will review the issue and follow the next step of action outlined in the grievance policy of the contract.

The President of the local union also is an employee at PIAD so we work together with him to ensure that all issues between the company and union are rectified quickly and effectively following the rules and regulations of the contract and legal rules.

In addition, PIAD follows all government rules and regulations regarding hiring and has in place the attached Nature of Employment and Equal Opportunity Policies.

Everything has been running smoothly since our last COP Submission and we have no labour issues to report.

Environment

PIAD is respectful to the environment and takes every precaution to conduct business without harming the environment and to put policies in place that help the environment thrive. In addition, PIAD is in compliance with all DEP rules and regulations and submits all required forms in a timely fashion.

PIAD has worked closely with our workers compensation healthcare insurance carrier to tour our facilities and conduct audits together to make sure that we are compliant with OSHA and DEP rules.

In addition, PIAD has contracted with East Coast Risk Management a consulting company who specializes in safety and the environment. East Coast Risk Management will be conducting an environmental assessment at PIAD in December of 2011.

We review and discuss the impact our business has on the environment during our annual training sessions with our employee's.

The environmental assessment completed by East Coast Risk Management in December of 2011 was positive and PIAD is compliant with all OSHA and DEP rules and regulations.

Anti-Corruption

PIAD Precision Casting Corporation takes the topic of corruption very seriously and any employee violating the attached Employee Conduct and Work Rules and Management Clause of our union contract will result in disciplinary action up to and including termination of employment.

PIAD pays close attention to what is occurring in our facility especially since the large amount of copper that we have in our foundry at any given time. In addition to the Management Commitment PIAD's union employees are also very committed to Anti-Corruption in the work place and informed the supervisor when they thought an employee was stealing copper from us. The supervisor confronted the employee who admitted that they had put copper in their bag but he said that he was not stealing it he was taking it to show to someone. The supervisor explained that this was company property and could not be taken off the premises without permission. The grievance process was followed and the IUE/CWA main union representative decided in our favor not to take the case to arbitration and allow PIAD to terminate the employee for stealing company property.

PIAD continues to commit ourselves to stopping corruption. Due to the efforts of our Management and our security guard there have been no further instances of corruption at PIAD Precision Casting Corporation. PIAD takes corruption seriously and if we catch anyone stealing from the company they will be prosecuted to the full extent of the law and the union contract.