



Sept. 18, 2015

**United Nations Global Compact  
Communication of Progress for Greenwood Fabricating & Plating, LLC**

Greenwood Fabricating & Plating, LLC (GF&P) is a small manufacturing company located in Greenwood South Carolina, USA. In its 29 years of operation, our 100 employee company provides machined metal products as well as supplies electroplating services to larger Original Equipment Manufacturers

GF&P continues to support the Ten Principles outlined in the United Nations Global Compact. We believe, as a company, that we have an obligation to be good stewards of our people and our resources and we support the United Nations in the areas of Human Rights, Labor, Environment and Anti-corruption.

Timothy J Fender  
President  
Greenwood Fabricating & Plating, LLC



## **Human Rights Principles**

GF&P supports the Universal Declaration of Human Rights and through its policies and practices takes steps to insure that it is not complicit in any human rights abuses. GF&P has a written company policy stating our support for the Universal Declaration of Human Rights and a commitment to preventing potential abuses.

We ask our business partners to support this same commitment to human rights. In the coming year we will remain vigilant in our awareness of human rights issues as they are related to our supply chain and their suppliers. We will conduct awareness training for all employees regarding human rights issues and encourage their support.

## **Human Rights - Implementation**

As an electroplating company that supplies tin plated components to the electrical industry, Greenwood Fabricating & Plating (GF&P) promotes the traceability of these minerals and the transparency of the supply chain. GF&P will not purchase products that contain conflict minerals that directly or indirectly finance or benefit armed groups in the DRC or adjoining countries. GF&P supports the Electronic Industry Citizenship Coalition (EICC)/Global e-Sustainability Initiative (GeSI) position to insure these minerals are not being sourced from mines in the “conflict region”. GF&P expects its suppliers to these aspects of its business to only source minerals from responsible sources.

- GF&P expects our suppliers to source materials from socially responsible suppliers. This means we are sourcing from regular suppliers using sources from other regions.
- GF&P expects all its suppliers to comply with the Dodd-Frank regulation to provide all necessary declarations.
- Suppliers must pass this requirement on to their supply chain if they don't source directly from the smelter.



- Suppliers who are not compliant to these requirements shall be reviewed by GF&P for future business.

GF&P continues to maintain suggestion boxes throughout the work areas to serve as a grievance mechanism. We are also contracting through Global Compliance Company a 24 hour hotline. This service provides an anonymous hotline service for our employees to report any grievance with a focus on issues of ethics and compliance. They can do this through a 24 hour phone service or web-based reporting. Any reports through this system must be addressed by Senior management of the company and written follow-up is provided to the complainant. The use of these grievance mechanisms is covered with each employee and annual training is provided.

GF&P considers it the responsibility of each employee to remain aware of human rights issues as they are related to their co-workers and their community. Any grievance can be reported to the Human Resource Manager or to any member of management.

GF&P is a privately held, U.S. corporation and as such is we are governed by U.S. labor laws which are reviewed and audited by U.S. federal agencies. We are proud of our long record of compliance with these laws. Our employee manual, which is given to each employee upon hiring, spells out the specific rules and requirements of the company and the company's expectations of them with regards to performance and behavior. This policy manual also addresses issues involving human rights such as; discrimination based on race, religion, sex, national origin, handicap, or disability. It also addresses harassment and intimidation in the workplace. It clearly spells out the responsibilities of the employee with regards to these issues as well as the complaint and grievance procedures.

### **Human Rights - Outcomes**

GF&P continues to have an excellent record in regards to human rights. We have had no past incidence to be dealt with. There have been no legal actions, rulings, or fines regarding human rights issues with the company.

### **Labor Principles**

As stated in page 4 of GF&P Employee manual, we are strongly committed to complying with the requirements of Title VII of the Civil Rights Act, the Age Discrimination in Employment Act, the Equal Pay Act, the Pregnancy

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Discrimination Act, the Americans with Disabilities Act, the Immigration Reform and Control Act, and the Uniform Services Employment and Reemployment Rights Act. This policy is intended to comply with the requirements of these federal statutes and confers no further rights or remedies on employees other than those conferred upon them under these federal statutes.

The federal statutes outlined above prohibit discrimination and harassment based on a person's race, color, religion, sex, pregnancy, national origin, citizenship, handicap, disability, veteran status or age in any aspect of employment opportunity. The prohibition against discrimination applies to all aspects of employment, including, but not limited to, recruitment, hiring, promotions, compensation, benefits, transfers, layoffs, and terminations.

GF&P also recognizes the right of employees to discuss openly, without penalty, issues regarding the workplace. We also respect the employee's right to collectively bargain. This is addressed in page 6 of our employee manual.

GF&P participates in regional roundtable discussions with other employers with regards to employees' risks, rights and benefits.

GF&P's goal for the coming year is to operate with no cases of infringement of an employee's right regarding discrimination and harassment.

### **Labor Rights – Implementation**

GF&P has placed suggestion boxes in the plant that are accessible to all employees. Relevant suggestions are reviewed by senior management. In 2009, GF&P instituted the "Alertline" anonymous hotline to allow for complaints, grievances or report of abuses. We feel this provides adequate access for all employees. Each report to the "Alertline" goes directly to the Managing Partners of the corporation and then is forwarded to the president of the company for his senior staff to review and resolve. All findings are then reported back to the corporate officers in writing for review. As of September 2015 GF&P continues to maintain this hotline.

GF&P maintains a company Safety Committee that is composed of management and factory employees. This committee meets monthly and addresses issues of worker safety and safety compliance throughout the company.

GF&P addresses the pay for employees through the administration of specific job descriptions. These job descriptions spell out duties, scope of the job, and the

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skills required. Pay is based on performance relative to the job description and the performance of the employee without regard to race, sex, color, or other attribute.

It is the responsibility of all members of management to insure that labor rights are maintained in the workplace. The principle responsibility for organizing and maintaining the company's policies falls to the Human Resource Manager. Any new policies are reviewed and approved by senior management.

### **Labor Rights – Outcomes**

If there are any allegations of violation of labor rights, either directly or through the Alertline, GF&P management reviews and makes disposition of each case. In instances where the allegation has been made to an outside party, the company will provide adequate and appropriate documentation as necessary to support the company's position.

As a result of the company's Safety Committee and our commitment to safety, GF&P has gone 479 days without a lost time accident. This is an extraordinary accomplishment for our workers and we are very proud of our record. This achievement has been posted for review by our shareholders.

GF&P Board of Directors receive a periodic review of all "Alertline" reports. There have been no reports in 2015

### **Environmental Principles**

GF&P supports a proactive approach to the companies environmental challenges as a manufacturing facility. We are compelled to meet a number of state and Federal requirements regarding our facilities. These requirements include a wastewater discharge permit, air discharge permit, and regulations regarding the handling and disposal of hazardous waste.

GF&P is acutely aware of its environmental footprint. We are required to regularly monitor our water discharge quality as well as maintain an air discharge system for proper ventilation of manufacturing processes. We have in place a number of policies and procedures in place to insure the proper operation of the equipment and to insure compliance with all regulations.

### **Environmental Principles - Implementation**

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GF&P is constantly investigating new chemical technologies that will limit any negative impact to the environment. We use a range of chemistries in our manufacturing processes and stay abreast of new developments that would be more “eco-friendly”.

GF&P evaluates its business partners with regards to how they manage their businesses. If it is determined that they are not being environmentally conscience or do not have good environmental practices in place GF&P will not do business with them. In 2015, we have done 2 supplier audits.

GF&P’s goal for 2015 is to go through the entire year with less than 2 wastewater discharge violations. This goal was met in 2012, 2013, 2014.

#### **Environmental Principles – Outcomes**

In 2009, GF&P had only one minor violation in its wastewater discharge monitoring. For this we were awarded the “Silver Award for Pre-treatment” from the Greenwood Metropolitan District, the regulatory agency that oversees regional water quality. In 2010, we had only two violations. GF&P received awards in 2011, 2012, 2013, and 2014. We are very proud of our record in this area and are very committed to maintaining this relationship.

All GF&P employees are given awareness training for the proper handling of the different waste streams that the company has and the importance of the employees role in insuring that we maintain sound practices. When the employee is assigned specific duties they receive additional training as it relates to their specific work areas whether it be chemicals and chemical handling, various metals and their separation for scrap and recycling, or other solid waste disposal.

In the last decade, GF&P eliminated all solvents used in manufacturing. They were replaced with organic based cleaners that have no potential as carcinogens or as ground water contaminants. We have also incorporated the use of non-sulfurized water soluble coolants for our cutting and machining processes.

In 2011, GF&P implemented a significant process change that eliminates our use of 10,000 gallons of Nitric Acid annually. This change also eliminated the discharge of nitrates in our wastewater stream that was result of our pretreatment of the acid. This was a significant improvement in the quality of our discharge and was a result of our on-going pursuit of environmentally friendly products.

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In the last 5 years GF&P went through a full Environmental Protection Agency Phase II environmental Audit. This audit was conducted by an independent environmental audit group. There were no negative findings as a result of this audit.

GF&P submits documentation upon request regarding RoHS compliance as well as REACH documentation demonstrating a commitment to good environmental practices.

GF&P continues to measure data with regards to sustainability initiatives. Two of those metrics are water consumption and Hazardous Waste generation. These metrics are attachments to this report.

Environmental issues are a standing agenda item for GF&P's quarterly Board meetings and are included in the quarterly report.

### **Anti-Corruption**

GF&P believes that businesses should work against corruption in all of its forms including bribery and extortion. GF&P takes its position on anti-corruption seriously. As a company that is owned by a private equity group, we are obligated to protect the interest of our shareholders with regards to the negative impacts of corruption.

#### **Anti-corruption - Implementation**

During the course of GF&P's annual financial audits, the independent auditing firm will conduct a series of "corruption and fraud " interviews. These interviews are conducted with members of the senior management team, as well as lower level managers, one on one to investigate any potential for fraud or corruption.

All employees are encouraged to bring issues of fraud, corruption or bribery to the attention of management so that it can be appropriately addressed. All employees are encouraged to directly report by way of suggestion box or Alertline to bring any issues and concerns to senior management.

#### **Anti-corruption - outcomes**



In 2009, GF&P incorporated the use of “Alertline”, an anonymous hotline service for our employees to report any grievance with a focus on issues of ethics, compliance, and corruption. Employees can report their concerns through a 24 hour phone service or web-based reporting. Any reports through this system must be addressed by senior management of the company and written follow-up is provided to the complainant. We feel that this service provides us with another mechanism for awareness and protection from fraud or corruption throughout the company.

To date, Oct 2015, GF&P has not had any instances of fraud, corruption, or bribery to address.

Respectfully submitted:

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