Social and Environmental Responsibility (SER) Policy

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April 28, 2016

Revision 4.0

SER Commitment

VPI's Social and Environmental Policy is in alignment with its Quality Policy. VPI complies with all relevant laws and regulations, following the policies and practices defined in this plan. We:

- minimize the amount of waste generated
- reuse and recycle as possible
- use energy, water, and supplies efficiently
- monitor our environmental performance
- seek opportunities to improve on these principles

SER Scope

This SER:

- includes all operations occurring on-site at the plant
- includes waste disposal by evaluating on-site activities' environmental impacts; however VPI is not the final disposer of its waste.
- excludes the environmental impacts of finished products as VPI is not responsible for product design or lifecycle

SER Responsibilities

VPI has established a team with the following responsibilities:

- *SER Management Representative:* Operations Manager.
    - Responsible for the functioning of the SER.
    - Ensures that all tasks relating to the SER are:
        - Identified
        - Completed in a timely manner
        - Reported to top management.
- *SER Coordinator:* Quality Manager.
    - Works closely with the SER Management Representative to identify, assign, schedule, support and ensures completion of all tasks relating to this plan.
- *SER Committee*: President, Operations Manager, Quality Manager, Human Resources Manager, Engineering Manager, Controller and Business Development Manager.

Conducting Internal Audits

VPI completes periodic internal audits. Records are maintained by the SER Coordinator.

Management Review

VPI's SER Committee sets objectives to meet SER responsibilities. The committee meets periodically to solicit and discuss ideas for meeting these objectives. The committee considers the following:

- Social and environmental policies
- Applicable and potential laws or regulations
- Practical business criteria focused on SER objectives

Once objectives are chosen by the SER Committee, an appropriate manager is assigned for developing targets and creating action plans to meet the objectives.

Management reviews SER objectives as part of the Quality Management System Review and discusses the information presented. Management may direct changes to the SER based on the presented information in order to improve its effectiveness and business value.

SER Communications
VPI publically discloses the results of its SER program on its web page located at: www.visionplastics.com.

VPI also accepts the Electronic Industry Citizenship Coalition (EICC) Code of Conduct, see www.eicc.info. This Code of Conduct is also flowed down to our suppliers and vendors to ensure supply chain social responsibility is addressed.

Documentation and Document Control
VPI documents outcomes of SER in the company's Document Control System. SER documents include but are not limited to the Social Responsibility Policy and Environmental Policy.

SOCIAL RESPONSIBILITY POLICY

VPI operates in compliance with all relevant labor legislation and strives to use best hiring and employee management practices in all we do in accordance with our corporate policy objectives. We:

- Ensure that personnel are properly trained
- Ensure that personnel have appropriate safety and emergency equipment.
- Conduct audits and self-assessments of VPI's Social Responsibility performance.

Safety Program
VPI's Safety Program is in alignment with its Quality Policy. VPI's safety committee oversees the safety program. Every reasonable effort will be made in the interest of accident prevention, fire protection, and health preservation.

Department and shift managers are responsible for guiding employees on:
- Observing safe operating procedures
- Maintaining safe working conditions
- Protecting the safety and welfare of fellow employees

The safety committee or its designees:
- Investigate all accidents whether or not resulting in injuries
- Correct all unsafe conditions or activities

Training
General training is conducted throughout the year on topics related to safety, skill improvement and management/supervisory topics. Department managers are responsible for job specific training, conducted on an as-needed basis.

ENVIRONMENTAL RESPONSIBILITY POLICY

VPI complies with all relevant environmental legislation and strives to use environmental best practices in accordance with our corporate policy objectives. We act environmentally responsible in the community by:

Environmental emergency response:
- preventing air, water, and other pollution
- acting promptly and responsibly to correct incidents or endangering conditions
- developing and maintaining appropriate emergency and spill response programs
- reporting incidents to authorities promptly and informing affected parties as appropriate

Process and energy efficiency:
- improving efficiency and conserving energy
- using manufacturing processes that do not adversely impact the environment
- developing and improving operations to minimize waste
- minimizing environmental impact by purchasing recycled, recyclable or refurbished products based on availability, suitability and economic viability

Maintaining environmental focus:
- striving to continually improve VPI's Environmental management system and performance.
- conducting internal audits of VPI's compliance with this policy

Waste Management:
- reducing waste through re-using and recycling
- disposing waste safely and responsibly

Tracking of Greenhouse Gas Emission Equivalents
VPI tracks equivalent amounts of CO_2 that is released into the atmosphere from the energy and materials that are used in the facility. Data is collected and reported quarterly.

Solid Waste Recycle Program
VPI collects and disposes of waste from its processes. Our goal is to minimize the amount of waste that is ultimately delivered to the landfill.

Training
All new employees receive an introduction to VPI's SER.