

# CORPORATE SUSTAINABILITY REPORT

2024FY



# A MESSAGE FROM OUR PRESIDENT & CEO



As the newly appointed President and CEO of ClarkDietrich, it’s my pleasure to share our Corporate Sustainability Report for Fiscal Year (FY) 2024. In reflecting on this moment, I feel truly excited to build on the sustainability efforts of our retiring CEO Jim Collins. Our ambition is to become the greenest manufacturer of cold-formed steel framing in the industry.

## A Focused Strategic Direction

In the full sense of the word, sustainability has staying power. It’s also ever-evolving and continuing to grow. Recognizing that the demand for sustainable building solutions remains on the rise, we are responding to our customers’ individual needs, as well as to the market overall. We want to create a world that contributes to the collective growth of all stakeholders.

We have outlined an environmentally conscious strategic plan focused on these key areas:

### Green Building

We will continue to innovate and expand our product portfolio to offer the most comprehensive and sustainable solutions in the industry.

### Industry Leadership

We will leverage our expertise and resources to become the recognized leader in sustainability and automation within the cold-formed steel framing sector.

### Operational Excellence

We will invest in technologies and processes that reduce our carbon emissions and improve our overall environmental performance.

### Brand of Choice

We will strengthen our reputation as the brand of choice by providing high-quality, sustainable products, exceptional service and innovative solutions.

## Our Environmental Impact Reduced

At ClarkDietrich, the commitment to reduce our environmental impact goes beyond words. We hold ourselves to specific actions and measurable progress.

Recently, we completed our second annual greenhouse gas (GHG) emissions study, which confirmed the hotspots we identified in 2023. We are moving forward with an operational efficiency review to identify upgrades which will reduce our

Scope 1 and Scope 2 emissions. We also recognize the importance of Scope 3 emissions and are actively working with our suppliers to source low embodied carbon (LEC) materials.

## An Eye on The Future

Today, and in those to follow, I look forward to working alongside the talented individuals at ClarkDietrich to further our goals for our Planet, People and Prosperity. In that spirit, I am fully committed to our Sustainability Team, and I trust their recommendations on projects that will continue to make us a leader in the space.

Speaking for everyone, we are confident that our strategic plan will enable us to achieve our sustainability goals and create a competitive advantage. By working with our employees, customers, suppliers and communities, we will create a more sustainable future for all.

**Brian Panuccio**  
President & CEO

# A MESSAGE FROM OUR DIRECTOR OF CORPORATE SUSTAINABILITY



A handwritten signature in black ink that reads "Adam Shoemaker".

**Adam Shoemaker**  
Director of Corporate Sustainability

With all that we've accomplished, it's hard to believe it was only three years ago that ClarkDietrich first established a dedicated corporate sustainability role. In that short amount of time, it's been motivating to watch our company grow in the "green building" space to become a leading voice in sustainable manufacturing. This past year has been no different. We continued to make significant strides in our sustainability journey, and I'm proud to share a few recent highlights.

## **Growing Our Sustainability Team**

One notable development was the strategic addition of a dedicated Sustainability Architectural Representative to our team. This role allows us to further bring sustainability to the forefront of conversations with our network of architects, designers, and contractors, and it deepens our ability to advise clients on how ClarkDietrich products can help achieve their desired sustainability goals. With an expanded sustainability team, we're positioned to accelerate our initiatives and pursue new opportunities in our commitment to environmental stewardship.

## **Reducing Scope 1, 2 and 3 Emissions**

Following the completion of our annual GHG emissions study, we will be embarking on operational efficiency projects at each of our manufacturing facilities. All 16 plants will receive a comprehensive operational assessment to identify energy-saving and waste-reduction opportunities.

As a result of optimizing operations at the plant-level, we expect to reduce our Scope 1, 2 and 3 emissions, ultimately lowering the embodied carbon of our products as reported in our Environmental Product Declarations (EPDs). While the results of these efforts will not start being reflected in our GHG reports until FY2025, we are beginning this important process now—because you have to start somewhere.

## **Increasing Transparency Documentation**

In addition to operational efficiency, we are committed to increasing transparency. We are expanding documentation on all product lines to provide our customers with the information they need to achieve green building certifications across various programs, in addition to the well-established LEED® program. Transparency is essential to empowering customers to make informed decisions about the products they use and the materials they bring into their buildings. That's why I am particularly excited about growing our portfolio of

Health Product Declarations (HPDs) moving into the future, which provide detailed information about the ingredients in our products. We are also working to refine our product formulations and supplier selection to minimize the use of harmful substances.

I am incredibly proud of the progress we have made and the momentum we have built. There are many exciting things on the horizon for this team, and with the continued support of our leadership, the dedication of our employees, and the collaboration of our partners, I am confident that ClarkDietrich will continue to lead the way in creating a more sustainable future for the built environment.

# CONTENTS

## **General Disclosures** **5**

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About ClarkDietrich—Organizational Details	6
Historical Timeline of ClarkDietrich	7
Locations—Offices & Manufacturing Plants	8
ClarkDietrich & Its Reporting Practices	9
ClarkDietrich Value Chain	9
Sustainability Governance Structure	10
Strategy, Policies & Practices	11
Statement on Sustainable Development Strategy	11
Policies & Practices	11
Association Memberships	12
Stakeholder Engagement	13
Approach to Stakeholder Engagement	13
Stakeholder Identification Process	13
Future Stakeholder Engagement	14

## **Material Topics** **15**

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Process to Determine Material Topics	16
Top 20 Material Topics	17
Future Considerations	17

## **Sustainability Imperatives** **18**

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Triple Bottom Line in Action	19
Planet Imperative	20
Current Sustainability Initiatives	21
People Imperative	29
ClarkDietrich Core Values	29
Our Human Resource Strategy	30
Stronger Together	31
Employee Inclusion	31
Training & Development	33
Succession Planning	33
Community Engagement & Social Responsibility	34
ClarkDietrich Cares to Give Back in 2024	34
Beyond the Job	35
Conclusion / Looking Ahead	36
Prosperity Imperative	37
Corporate Citizenship	38
Statement on Business Conduct Guide & Responsibilities	38
Supply Chain Transparency Efforts Around Conflict	38
Minerals & Human Trafficking	38

## **GRI Content Index** **39**

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# GENERAL DISCLOSURES



## GENERAL DISCLOSURES

# ABOUT CLARKDIETRICH— ORGANIZATIONAL DETAILS

Clarkwestern Dietrich Building Systems LLC d/b/a ClarkDietrich offers a comprehensive lineup of construction products and services for both cold-formed steel framing and drywall/plastering finishing systems. We manufacture innovative products for interior and exterior framing, interior and exterior finishing, floor and roof framing, as well as clips, connectors, metal lath, welded wire, barrier mesh and accessories.

As the demands for higher performance in all aspects of today’s buildings rise, we partner with teams of architects, engineers, building developers and owners, contractors, and more on projects of all sizes, scope and complexity.

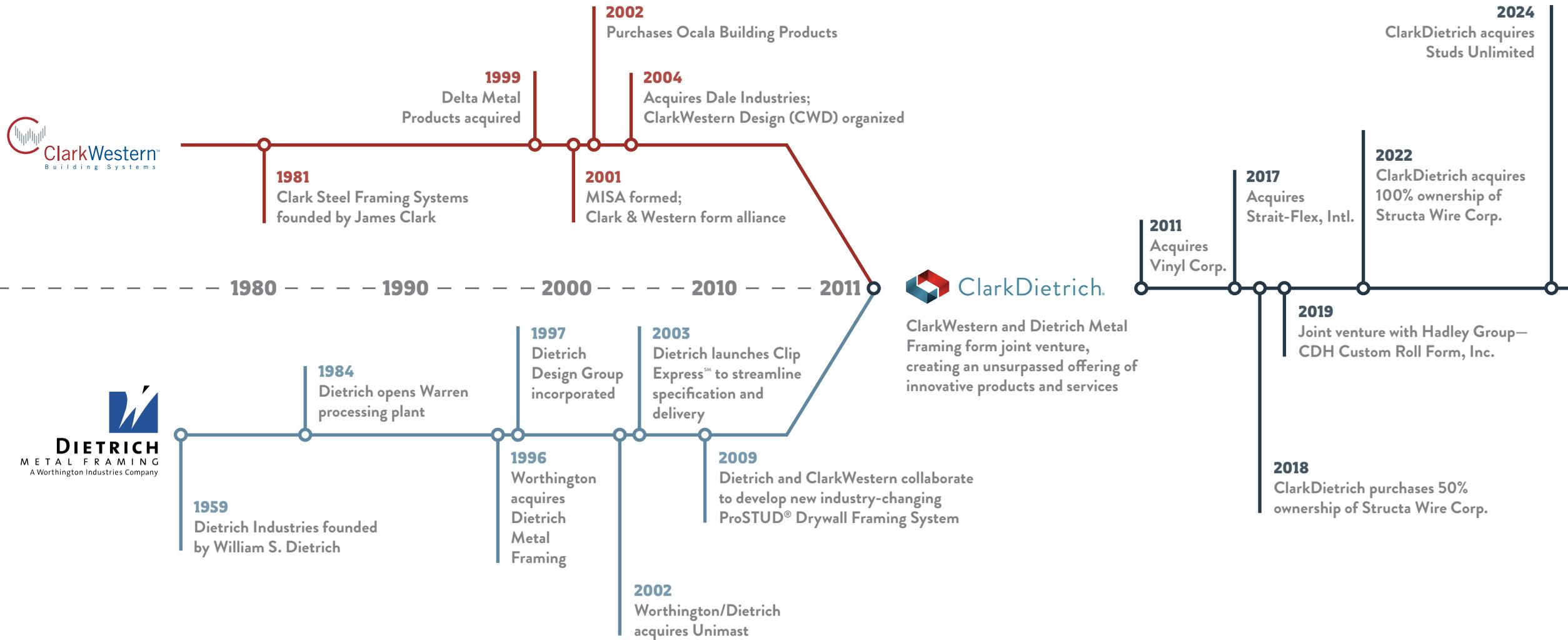
Far beyond products, our collaborations increasingly involve efforts and expertise that support smarter installation and design, including resources for BIM and ClarkDietrich Engineering Services LLC.

Formed in 2011 through the combination of two established market leaders—ClarkWestern Building Systems and Dietrich Metal Framing—ClarkDietrich is in an unprecedented position to help you bring change to the built environment.

ClarkDietrich is a privately owned limited liability corporation.



## Historical Timeline of ClarkDietrich



## Locations—Offices & Manufacturing Plants

CLARKDIETRICH MANUFACTURING LOCATIONS
CDH CUSTOM ROLL FORM Warren, OH
CLIP EXPRESS <sup>SM</sup> Warren, OH
STEEL Baltimore, MD
STEEL Bristol, CT
STEEL Dade City, FL
STEEL Dallas, TX
STEEL McDonough, GA
STEEL Oklahoma City, OK
STEEL Pasadena, TX
STEEL Riverside, CA
STEEL Rochelle, IL
STEEL Vienna, OH
STEEL Warren, OH
STEEL Woodland, CA
STRAIT-FLEX O'Fallon, MO
STRUCTA WIRE Vancouver, BC
VINYL CORP Miami, FL



OFFICE LOCATIONS	
CLARKDIETRICH ENGINEERING SERVICES Bristol, CT	CLARKDIETRICH ENGINEERING SERVICES Carlsbad, CA
CLARKDIETRICH ENGINEERING SERVICES McDonough, GA	CLARKDIETRICH ENGINEERING SERVICES Merrillville, IN
CLARKDIETRICH HEADQUARTERS & RESEARCH West Chester, OH	

# CLARKDIETRICH & ITS REPORTING PRACTICES

We intend to report in reference to the Consolidated Set of the Global Reporting Initiative (GRI) Standards 2021 when the information is available and the strategies have been fully developed, otherwise the information will be omitted from this report. We are not a publicly traded company; thus some information is considered confidential or private and will not be disclosed. Omissions will be noted within the body of the report or in the GRI Content Index.

ClarkDietrich and all fully owned entities including Vinyl Corp., Strait-Flex and Structa Wire will be reviewed and considered for environmental impact sustainability reporting. Joint ventures were included and considered as a Scope 3 downstream leased asset during this reporting period.

Reporting periods for the Corporate Sustainability Report (CSR) will be aligned with the financial reporting period, which runs from April 1 through March 31, and will occur annually.

To help improve clarity and comparability, we are reporting both location-based and market-based for GHG emissions in this year’s report. Meanwhile, with better data availability, we updated our report on GHG intensity for composite vinyl products from “MT CO<sub>2</sub>e per LF Vinyl” last year, to “MT CO<sub>2</sub>e per MT Composite Vinyl” this year, to be in alignment with our steel and non-composite vinyl reporting.

No external assurances have been obtained for this CSR.

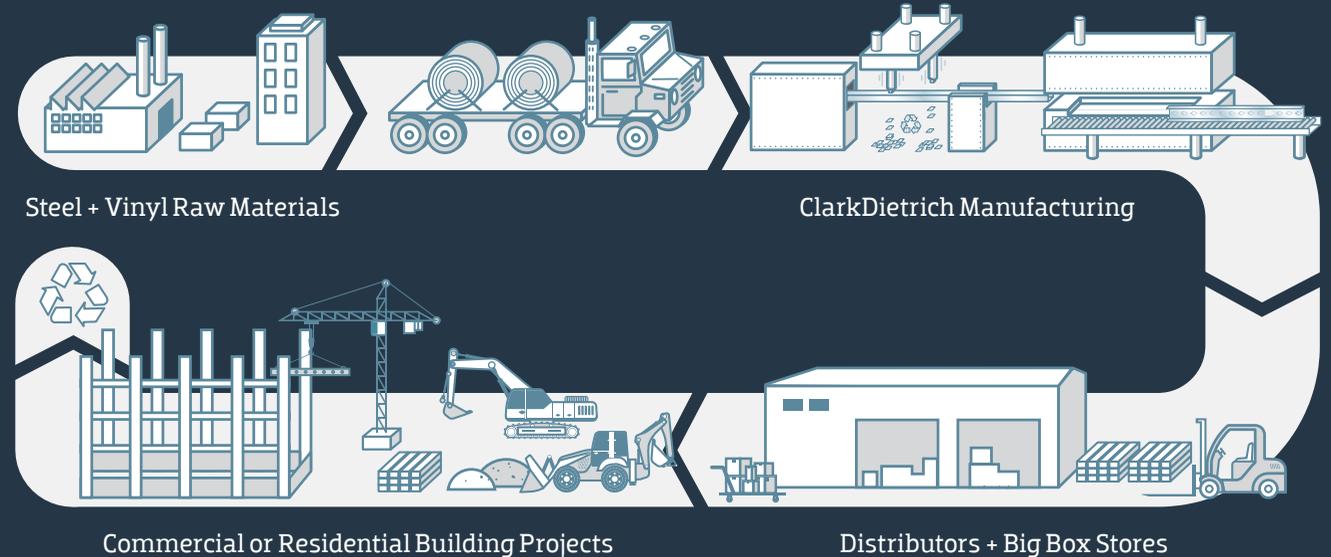
## Future Endeavors

As ClarkDietrich’s sustainability program evolves, we remain committed to transparency and continuous improvement. While core governance structures are in place, we will continue assessing opportunities to enhance disclosure in alignment with sustainability reporting frameworks such as GRI 2: General Disclosures 2-10 through 2-21. As a private company, certain confidential elements remain under review, but we will strive to expand disclosures where possible in future reports.

# CLARKDIETRICH VALUE CHAIN

We manufacture and sell building products that are used in the commercial and residential construction industry. These products are manufactured from steel, vinyl or composite products that include combinations of paper along with the steel or vinyl bases. They fall within the product categories of Interior Framing, Exterior Framing, Interior Finishing, Exterior Finishing, Floor Framing, Steel Framing Connectors and

Wood Framing Connectors. We purchase our raw materials from suppliers such as steel mills and vinyl compounders, then sell our finished goods to customers who include commercial distributors and big box stores such as The Home Depot® and Lowe’s®. Our customers then resell those products to the end users who install the products into a commercial or residential building.



# SUSTAINABILITY GOVERNANCE STRUCTURE

ClarkDietrich continues to strengthen its commitment to sustainability through a structured governance framework designed to drive meaningful progress. The governance structure remains fundamentally the same as in previous years, consisting of the Executive Committee, the Director of Corporate Sustainability, and the Sustainability Council. However, with the addition of a new team member, our sustainability program has gained greater capacity to execute key initiatives.



## Executive Committee:

The Executive Committee—comprised of the CEO, President, Chief Financial Officer, VP of Sales, VP of Marketing, VP of IT, VP of Business Development, VP of Operations, VP of Human Resources, VP of Purchasing, and the VP of the Building Product Group for Marubeni-Itochu Steel America Inc. (MISA)—continues to play a pivotal role in evaluating and endorsing sustainability strategies and initiatives.



## Director of Corporate Sustainability:

Adam Shoemaker, now serving as the Director of Corporate Sustainability, remains responsible for overseeing the company’s sustainability strategy and ensuring alignment with corporate objectives. Over the past year, his focus has included integrating sustainability principles across the organization and further refining our sustainability reporting processes.



## Sustainability Architectural Representative:

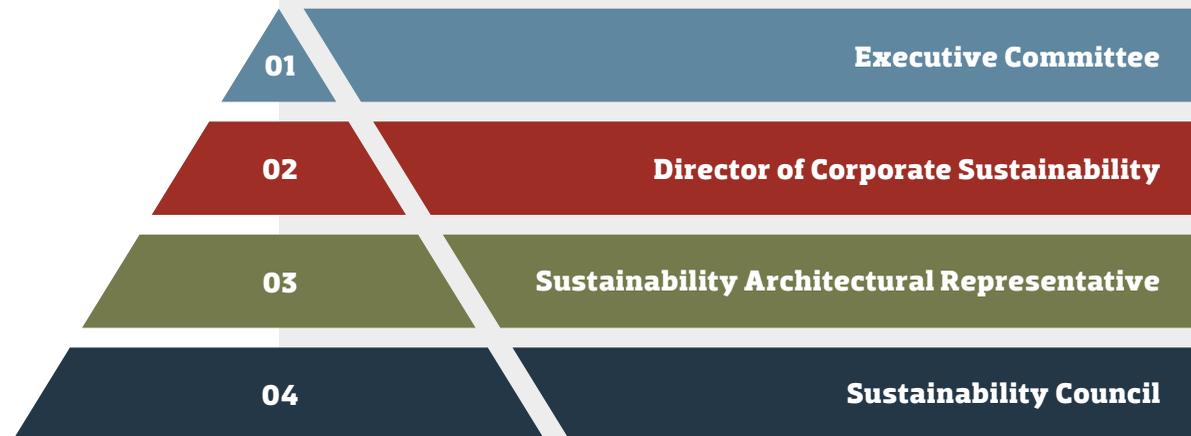
In July 2024, James Sforza joined the team as a Sustainability Architectural Representative, expanding our ability to drive sustainability initiatives. Reporting to the Director of Corporate Sustainability, James is responsible for managing Sustainability Council activities, maintaining engagement among council members, and facilitating feedback on critical sustainability matters. Since joining, he has demonstrated his commitment to the field by earning both his LEED® Green Associate (GA) and LEED Accredited Professional with a Building Design + Construction specialty (LEED AP BD+C) certifications.



## Sustainability Council:

The Sustainability Council remains a cornerstone of ClarkDietrich’s commitment to sustainable practices, ensuring that sustainability principles are embedded in company operations and decision-making. The Council’s composition and mission remain unchanged, with over 40 members from diverse departments and locations providing insight and guidance on key sustainability topics.

This year, the Council’s activities were limited as the team adapted to structural changes. With the addition of James Sforza, renewed emphasis will be placed on enhancing council engagement, facilitating discussions, and ensuring continuous feedback on sustainability initiatives. Moving forward, James will take a leading role in council operations, allowing for a more structured and collaborative approach to sustainability governance.



# STRATEGY, POLICIES & PRACTICES

## Statement on Sustainable Development Strategy

Building upon the foundation laid in our first two annual CSR reports, ClarkDietrich continues to strengthen its sustainability framework with the publication of this third annual report—an achievement that remains a key short-term goal each year. Another major milestone in our journey has been expanding our sustainability team, allowing us to enhance our program’s reach and impact.

Our medium-term goal of implementing a software solution for tracking and measuring environmental impacts, with implementation originally targeted for FY2023, has proven to be more complex than initially anticipated. Given the challenges of integrating data from multiple sources, this goal has now shifted to a longer-term priority. In the meantime, we remain committed to conducting comprehensive manual GHG emissions calculations. Even with software implementation in the future, we recognize that manual data input may still be required in the short- to midterm, reinforcing the importance of selecting an automated system that can streamline data collection.

While we continue evaluating alignment with key sustainability programs—such as the UN Sustainable Development Goals (SDGs), Science-Based Targets initiative (SBTi), Architecture 2030, and SE 2050—we have not yet committed to

formal participation in any single initiative. Instead, we actively draw insights and expert guidance from these frameworks to inform our evolving strategy.

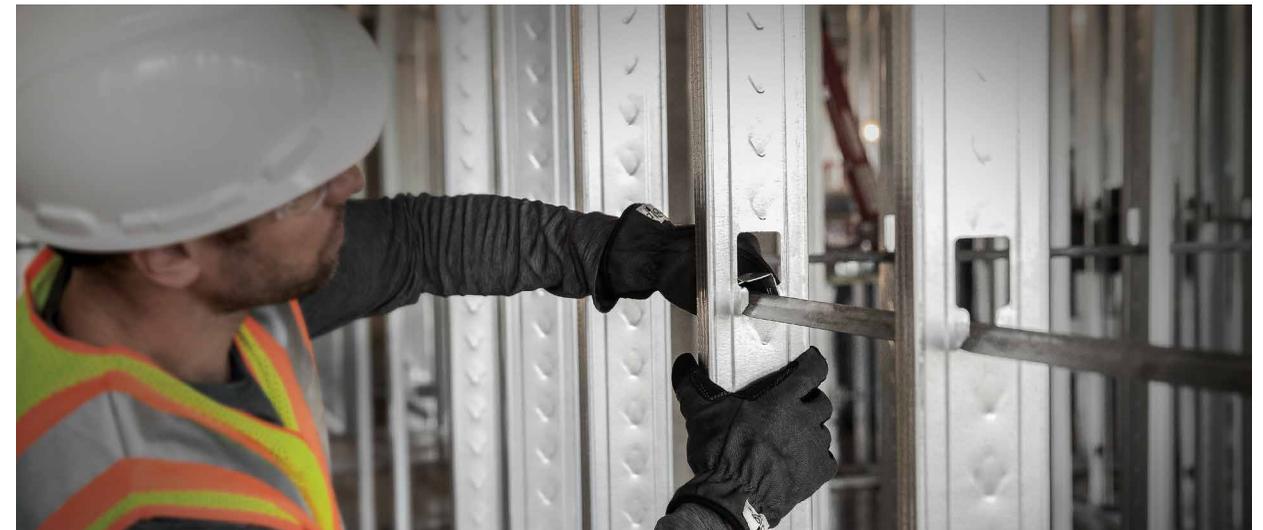
A major accomplishment this year was the completion of our second company-wide GHG emissions study for FY2023, further solidifying our commitment to transparency and data-driven decision-making. While our FY2024 GHG study is already underway, its results will not be available in time for this report. However, we have accelerated our calculation timeline and anticipate having future emissions data ready for the corresponding annual sustainability reports in the coming years. Achieving this level of synchronization will likely align with the implementation of an automated software solution.

Despite the evolving nature of our goals and timelines, our end objective remains unchanged—enhancing transparency and making meaningful strides toward a more sustainable future. We remain dedicated to refining our processes, leveraging best practices, and sharing our progress with stakeholders as we continue this journey.

## Policies & Practices

Our policy commitments, embedded policy commitments, processes to remediate negative impacts, mechanisms for seeking advice and raising concerns, and statements on compliance with laws and regulations are comprehensively addressed by these internal ClarkDietrich policies:

1. Employee Handbook, dated 1/1/2024
2. Business Conduct Guide, dated 1/1/2024
3. Policy and Manual for Antitrust Law Compliance, dated 1/1/2024
4. Policy and Manual for Foreign Corrupt Practices Act Compliance, dated 1/1/2024



## Association Memberships

We are proud to be members of the following organizations:



USGBC – U.S. Green Building Council



ILFI – International Living Future Institute



HPDC – Health Product Declaration Collaborative



SFIA – Steel Framing Industry Association



EIMA - EIFS Industry Members Association



ASTM INTERNATIONAL

ASTM – American Society for Testing and Materials International



AIA – The American Institute of Architects



CSI – Construction Specifications Institute



AWCI – The Association of the Wall and Ceiling Industry



CFSEI – Cold-Formed Steel Engineering Institute



INTERNATIONAL FIRESTOP COUNCIL  
THE Source of Firestop Expertise™

IFC – International Firestop Council



DISCA – Drywall & Interior Systems Contractors Association



MASFA  
Steel Leads the Way

MASFA – Mid-Atlantic Steel Framing Alliance



FWCCA – Florida Wall & Ceiling Contractors Association



TLPCA – Texas Lathing & Plastering Contractors Association



DACA – Drywall and Acoustical Contractors Association



AWMI – Association of Women in the Metal Industries



MWCC – Midwest Wall and Ceiling Contractors



RAINA - Rainscreen Association in North America



CMHA - Concrete Masonry & Hardscapes Association

# STAKEHOLDER ENGAGEMENT

Stakeholders are individuals or groups that have interests that are affected or could be affected by the organization’s activities. Meaningful stakeholder engagement is characterized by two-way communication and depends on the good faith of participants on both sides. It is also responsive and ongoing and includes, in many cases, engaging with relevant stakeholders before decisions are made!

## Approach to Stakeholder Engagement

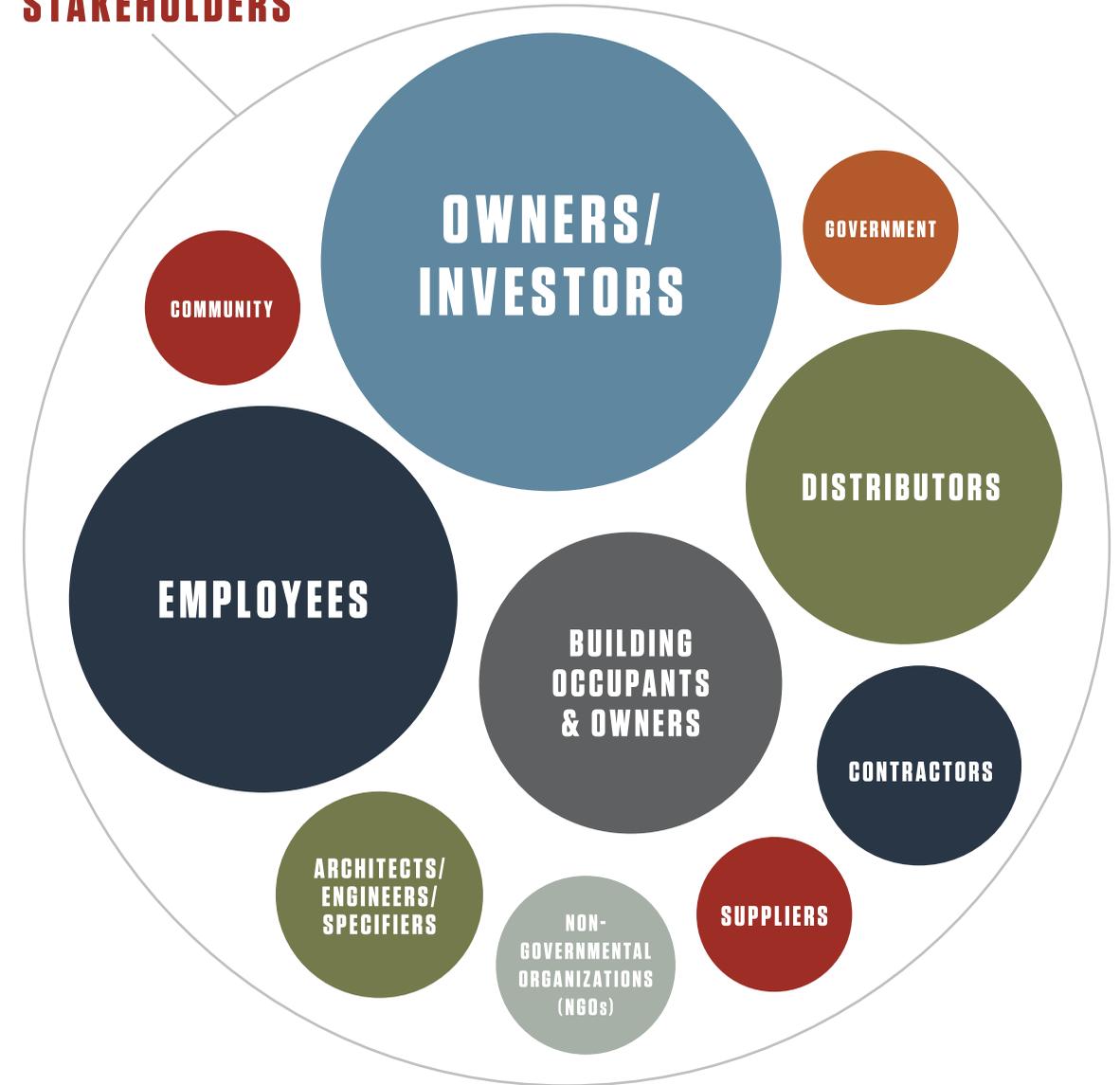
Stakeholder engagement remains a fundamental pillar of our sustainability efforts. While no new initiatives were introduced this past year, the work we previously completed continues to serve as a strong foundation. The establishment of the Sustainability Council provided a structured approach to identifying and understanding our key stakeholders, and our initial findings remain just as relevant today. With no major shifts in our industry or company ownership, we are confident that the stakeholder groups we identified last year still accurately reflect those who influence and are influenced by our business. However, we recognize that market conditions, regulatory changes, and emerging societal concerns can alter stakeholder priorities. To ensure ongoing relevance, we are committed to continuously monitoring these factors and adapting our stakeholder engagement approach as needed.

Moving forward, we recognize the need to re-energize stakeholder engagement efforts, and with the addition of a Sustainability Architectural Representative to our team, we are well-positioned to do so. This role will include managing council activities and ensuring that stakeholder engagement remains an active and evolving process.

## Stakeholder Identification Process

Our stakeholder identification process—built on the foundation of the GRI Approach to Stakeholder Engagement—was designed to capture a broad view of those connected to our sustainability journey through a multi-step survey last year, engaging diverse council members to rank the top 10 stakeholder groups based on influence and interest, aligning with GRI principles of inclusiveness and materiality. This resulted in the circular diagram where the size of each circle reflects their significance, with Owners/Investors and Employees as the largest, followed by Building Occupants & Owners, Contractors, Distributors, Suppliers, Community, Government, Architects/Engineers/Specifiers, and NGOs—a mapping we confidently retain given the lack of major industry or ownership shifts. This visualization guides our sustainability reporting and engagement efforts.

## STAKEHOLDERS



<sup>1</sup> Organisation for Economic Co-operation and Development (OECD), OECD Due Diligence Guidance for Responsible Business Conduct, 2018.

## Future Stakeholder Engagement

While engagement efforts took a back seat this past year due to competing priorities, they remain a crucial part of our long-term sustainability vision. Now, with additional support in place, we are ready to renew our focus. The Sustainability Council will play a larger role in maintaining open communication channels, and we will work toward creating more structured opportunities for both internal and external stakeholders to provide input.

Internally, the Council itself is an example of successful stakeholder engagement, representing employees (#4 on our list) and serving as a voice for sustainability within the organization. Externally, we aim to build on our existing framework by identifying key issues that resonate across our stakeholder groups and finding ways to foster more meaningful conversations around them.

As we move forward, our stakeholder engagement strategy will be dynamic, adapting to new insights, challenges, and opportunities. The goal is not just to check a box, but to build enduring relationships that propel our sustainability efforts forward. We gauge our success by listening to our stakeholders through regular input methods—like employee engagement initiatives and community partnerships—and by tracking concrete results, such as reductions in emissions and advancements in operational efficiency, as outlined in our ongoing sustainability initiatives.



# MATERIAL TOPICS



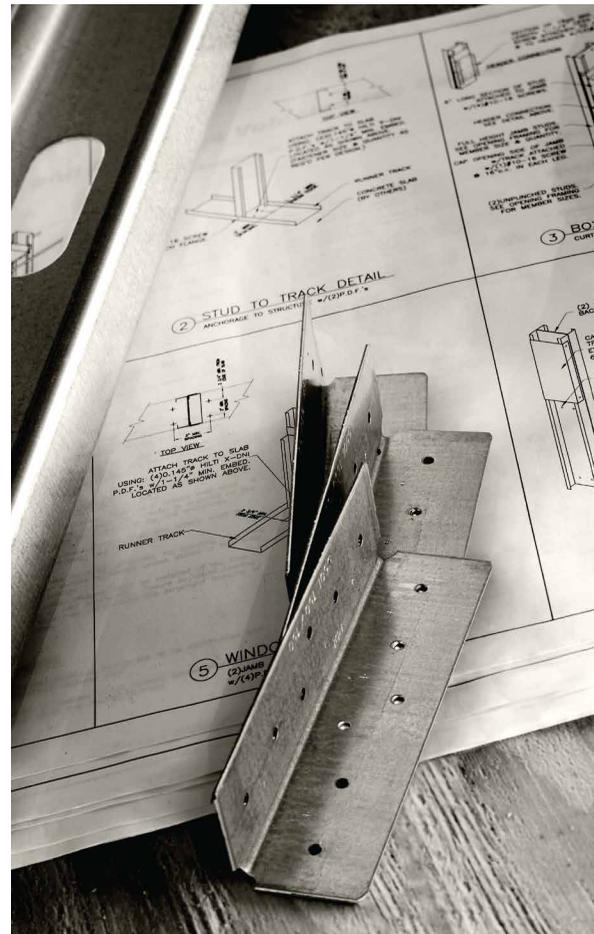
## MATERIAL TOPICS

At ClarkDietrich, we recognize that sustainability requires a focused and measurable approach. Last year, we took a major step forward by identifying our material topics—key areas where our operations have the greatest impact on the environment, society, and economic well-being. While our engagement with the Sustainability Council was limited this past year due to competing priorities, we remain confident that the material topics identified in our initial process continue to be relevant. Given the stability of our industry and company structure, along with our ongoing monitoring of external trends, we believe these priorities continue to reflect our most significant areas of impact.

### Process to Determine Material Topics

ClarkDietrich’s material topics were originally identified through a structured, multi-step process (see box to right), led by the internal Sustainability Council. Following guidance from the GRI, we conducted surveys to assess actual and potential impacts, categorize them as positive or negative, and evaluate their significance based on criteria such as scale, intensity, and duration. These assessments were aggregated into a ranked list of the top 20 material topics for the company.

While we did not revisit this process in FY2024, we continue to monitor industry and regulatory developments to ensure our material topics remain relevant.



## STEPS TAKEN:

### 1. UNDERSTANDING CLARKDIETRICH’S CONTEXT

The Sustainability Council, comprised of key internal stakeholders, undertook a comprehensive review of our internal and external context to gain deep insights into the factors shaping our industry, market and organizational priorities.

### 2. SURVEY ON ACTUAL AND POTENTIAL IMPACTS

Following the context review, the Council members completed a survey to identify both actual and potential impacts our operations may have on the economy, environment and society.

### 3. SURVEY ON POSITIVE AND NEGATIVE IMPACTS

The Council members were then asked to determine if the impacts were positive, negative, or had no impact at all.

### 4. SURVEY ON SIGNIFICANCE OF THOSE IMPACTS

Finally, the Council members participated in a survey to assess the significance of the identified impacts, applying rigorous criteria that considered factors such as scale, intensity, and duration.

### 5. DETERMINATION OF MATERIAL TOPICS

The Top 20 Material Topics list (see next page) was determined using an average ranking of the four different survey categories: Actual and Potential Impacts, Positive Impacts, Negative Impacts, and Significance of Impacts.

## Top 20 Material Topics



### CHART KEY

- Highest Priority
- High Priority
- Priority

### Future Considerations

As we continue to refine our sustainability program, we aim to re-engage with both internal and external stakeholders to further validate and enhance our material topics. In the coming years, we will explore ways to incorporate broader perspectives, whether through formal stakeholder consultations, industry benchmarking, or direct engagement with customers and supply chain partners.

In the short-term, we plan to integrate these material topics more deeply into our decision-making processes, ensuring they guide both corporate strategy and operational improvements. Potential initiatives include enhanced internal sustainability training, increased focus on circular economy principles, and the exploration of new technologies to improve environmental performance.

The Top 20 Material Topics chart reflects the collective views of our Sustainability Council, derived from multi-stage surveys where members ranked their most critical sustainability issues using a weighted average approach. Participants assigned a priority score, with 1 indicating the highest priority, meaning the smallest numbers on the chart—such as Paying Local, State, and Federal Taxes, and Occupational Health and Safety of Employees—represent the topics deemed most important by the council. However, the Executive Committee and Director of Corporate Sustainability retain the authority to elevate topics they consider crucial to our goals, with Investments in Renewable Energy as a specific example, ensuring alignment with strategic priorities.

Our commitment to transparency and continuous improvement remains strong. While FY2024 was a year of maintaining the groundwork we’ve built, we look ahead to reinvigorating our efforts and driving meaningful progress in alignment with our material topics.

# SUSTAINABILITY IMPERATIVES



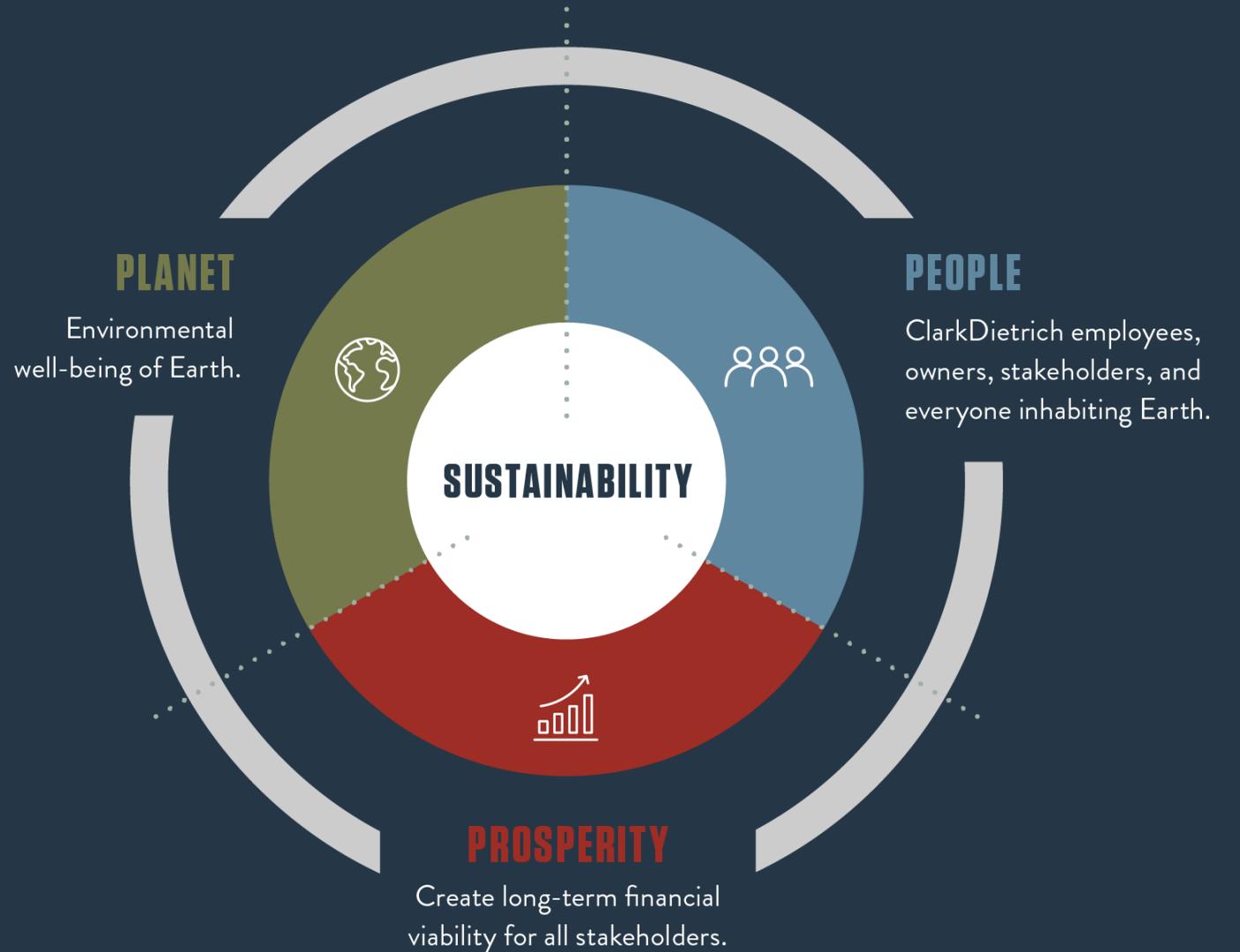
## SUSTAINABILITY IMPERATIVES

# TRIPLE BOTTOM LINE IN ACTION

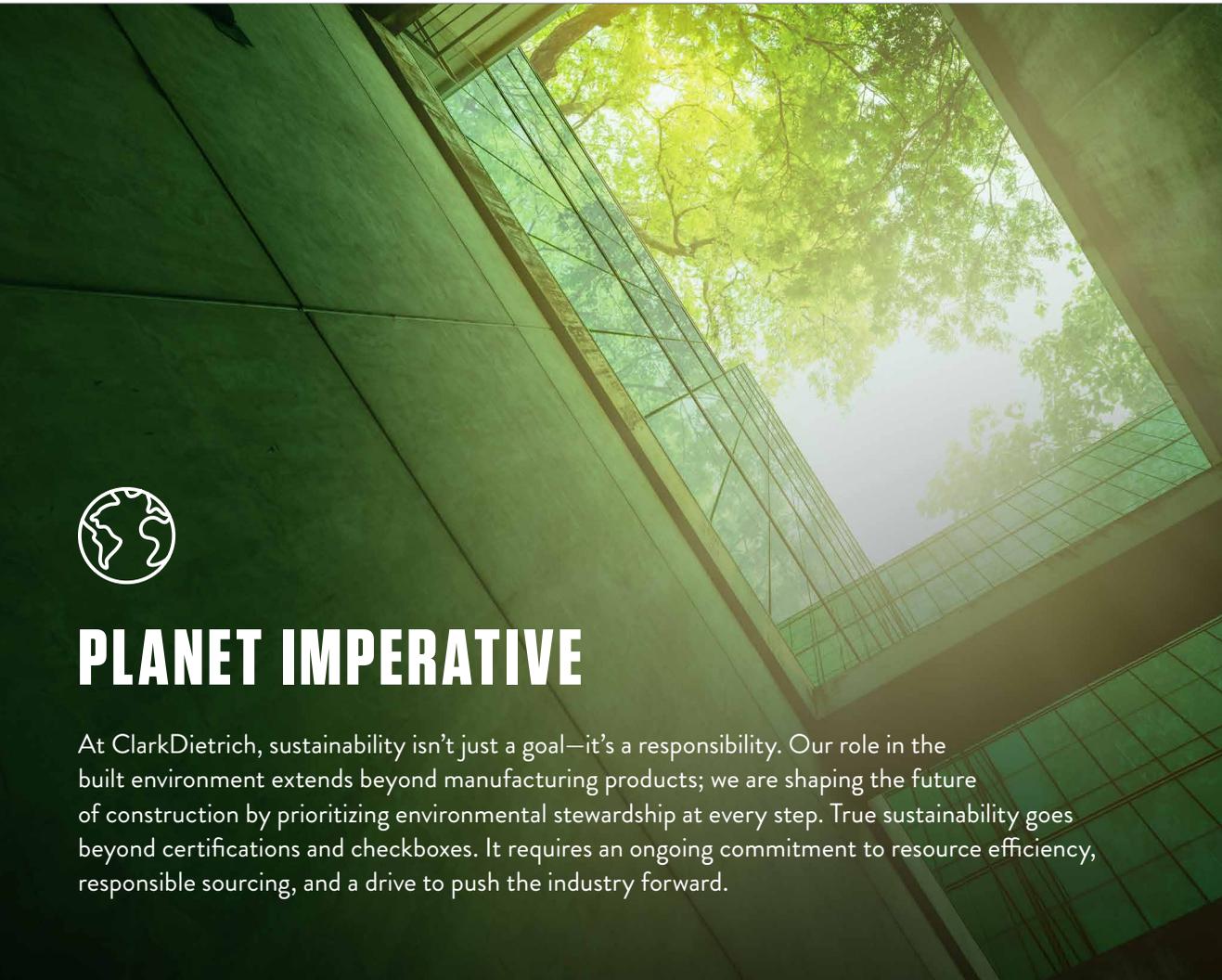
At ClarkDietrich, sustainability isn't just a commitment—it's the foundation of how we operate. Our Sustainability Imperatives—Planet, People, and Prosperity—are central to our decision-making framework and influence our strategic priorities. These three principles are not abstract ideals or checkboxes in a report; they are the real-world framework that ensures our actions today build a stronger, more sustainable future for all.

Sustainability is only meaningful if it's fully integrated into decision-making. We recognize that a choice benefiting one pillar at the expense of another may sometimes be necessary, yet we strive to balance our Planet, People, and Prosperity imperatives for long-term impact. Every initiative we pursue—whether reducing embodied carbon in our products, investing in employee development, or strengthening supply chain resilience—is evaluated with consideration for all three imperatives. While trade-offs may arise—such as short-term cost increases to lower emissions—we manage them thoughtfully, using our governance structure as a guide to ensure a holistic approach that aligns with our strategic vision.

This year's report highlights the tangible progress we're making across Planet, People, and Prosperity—proving that sustainability is not just an aspiration at ClarkDietrich, but a reality we are shaping every day.



All three imperatives must be accounted for in a business decision, otherwise it is not sustainable.



# PLANET IMPERATIVE

At ClarkDietrich, sustainability isn't just a goal—it's a responsibility. Our role in the built environment extends beyond manufacturing products; we are shaping the future of construction by prioritizing environmental stewardship at every step. True sustainability goes beyond certifications and checkboxes. It requires an ongoing commitment to resource efficiency, responsible sourcing, and a drive to push the industry forward.

We recognize that our planet's resources are finite, and every decision we make has lasting consequences. As the U.S. EPA emphasizes, "everything we need for our survival and well-being depends, either directly or indirectly,

on our natural environment." This principle underscores our commitment to ensuring that our materials and processes support long-term sustainability without compromising the needs of future generations.

## Driving Sustainability in Action

Over the past year, we have continued to expand our impact by supporting LEED® and other leading green building programs through our [SustainabilityPRO tool](#), ensuring that designers, builders and owners have access to the data they need to make informed sustainability decisions. A major focus has been on advancing LEC products, an area that is increasingly gaining traction due to government incentives like the Inflation Reduction Act (IRA). With substantial funding backing the push for LEC materials in General Services Administration (GSA) projects, our work in this area is helping to shape the future of sustainable construction.

Reducing embodied carbon is not just a compliance exercise—it's a necessary shift in the way materials are sourced, produced, and utilized. By continuously improving our manufacturing processes and product offerings, we are ensuring that our materials contribute to lower carbon emissions and more resilient buildings.

## Collaborating for a Greener Future

Sustainability is not achieved in isolation. That's why ClarkDietrich remains actively engaged with industry leaders and sustainability organizations to advance environmental standards. Our ongoing support for LEED and other sustainability frameworks ensures that we are not only meeting industry expectations but also influencing the way

sustainability is defined in the steel supply chain. ClarkDietrich was a member of the committee revising the Product Category Rule (PCR) for Designated Steel Construction Products, which shows our commitment to advocating for clearer, more effective sustainability criteria in our industry EPDs.

## The Journey Forward

Our **Planet Imperative** is a continuous effort—one that evolves as new challenges emerge and better solutions become available. Every year, we push the boundaries of what's possible, integrating innovation with responsible practices to reduce our environmental footprint. Moving forward, we will continue to explore new technologies, enhance product transparency, and expand our efforts in decarbonization. Sustainability is not just about where we are today; it's about where we're headed, and at ClarkDietrich, we are committed to leading that charge.

**"EVERYTHING WE NEED FOR OUR SURVIVAL AND WELL-BEING DEPENDS, EITHER DIRECTLY OR INDIRECTLY, ON OUR NATURAL ENVIRONMENT!"**

- U.S. Environmental Protection Agency

# CURRENT SUSTAINABILITY INITIATIVES

## Environmental Product Declarations

In today's construction industry, transparency and data-driven decision-making are essential for advancing sustainability. EPDs have become a crucial tool for evaluating and communicating the environmental impact of building materials, allowing manufacturers, architects, and builders to make informed choices that align with sustainability goals.

At ClarkDietrich, we recognize that EPDs play a vital role in transforming the built environment by:

### Providing Standardized Environmental Data

EPDs offer a clear, third-party verified assessment of a product's environmental footprint, enabling stakeholders to compare materials based on consistent life cycle data.

### Enhancing Supply Chain Transparency

By publishing EPDs, we ensure that our customers and partners have access to reliable information on the sustainability of our products—reinforcing our commitment to responsible sourcing and manufacturing.

### Supporting Regulatory and Market Expectations

As green building codes and procurement policies increasingly prioritize low-carbon materials, EPDs help demonstrate compliance with evolving environmental standards.

### Contributing to Green Building Certifications

Programs like LEED® reward project teams for specifying products with EPDs, making them an important factor in sustainable building design.

### Enabling Life Cycle Assessments (LCAs)

EPDs provide the critical data needed to conduct whole-building LCAs—a growing requirement in green construction.

At ClarkDietrich, we have taken a leadership role in advancing EPD transparency within the steel framing industry. Our commitment to third-party verified EPDs spans both our LEC product line and our standard product offerings, ensuring that customers can assess environmental impacts across our full range of materials.

In the following sections, we will outline our latest efforts in EPD development, including the release of our LEC steel framing EPD and updates to our standard product line EPDs, further demonstrating our dedication to sustainability and transparency in construction.



## Low Embodied Carbon Environmental Product Declaration: A Commitment to Transparency and Sustainable Innovation

### Low Embodied Carbon EPD

In March 2024, ClarkDietrich took a significant step forward in the steel framing industry by publishing our LEC EPD. This milestone was not only a demonstration of our commitment to sustainability, but also a direct response to the increasing demand for carbon-conscious building materials. By following up with our EPD Optimization Assessment in June 2024 (see chart below, right), we further strengthened our ability to support environmentally responsible construction while enhancing the value we provide to our customers.

### Driving Sustainability in Construction

The environmental impact of the built environment is undeniable—the manufacturing of construction materials accounts for at least 7% of global carbon emissions, with embodied carbon becoming a central focus in the fight against climate change.<sup>2</sup> Our LEC EPD provides third-party verified data showcasing reduced Global Warming Potential (GWP) in our cold-formed steel framing, giving architects, builders and developers the transparency they need to make informed, sustainable choices.

Beyond transparency, this EPD allows us to identify opportunities for future impact reduction. With its validity through 2029, we are committed to

continuously improving our processes, working with suppliers, and exploring innovations that will further lower GWP levels over time.

### A Competitive Edge in the Market

Sustainability is no longer just an ideal—it is a requirement. With the federal government recently investing billions into low-carbon materials through the IRA, products that meet GSA LEC requirements have had a distinct advantage in securing contracts for these federally funded projects. By developing and certifying our LEC EPD, ClarkDietrich ensures that our products qualify for these projects—giving our customers a clear market advantage, and also allowing us to contribute to greener buildings nationwide while meeting the needs of a rapidly shifting market.

Additionally, we recognize that sustainability standards continue to evolve. Many state and municipal building codes are beginning to or have already mandated embodied carbon reductions, following the lead of federal initiatives. With our LEC EPD, ClarkDietrich is positioned to put our customers at the forefront of this movement, providing solutions that align with both current and future industry expectations.

### Supporting Our Customers' Sustainability Goals

For our customers, navigating green building certifications can be a challenge—but our LEC EPD makes it easier. The documentation supports projects pursuing LEED® v4.1

Materials & Resources (MR) category EPD credits, qualifying under:

**Option 1:** Environmental Product Declarations—Counting as a third-party verified Type III EPD, which contributes toward the 20-product requirement.

**Option 2:** Embodied Carbon Optimization—Since we have also completed an EPD Optimization Assessment, our products help qualify projects for an additional point, supporting customers aiming for higher levels of LEED certification.

By proactively developing and optimizing our EPDs, we give our customers an edge in creating buildings that meet stringent environmental criteria,

ultimately helping them reduce carbon footprints while achieving sustainability goals.

### A Shared Responsibility for a Sustainable Future

The success of sustainable construction depends on the shared commitment of manufacturers, builders and policymakers. Our LEC EPD represents more than just a document—it is a tool for environmental progress, a competitive asset in an evolving market, and a resource for customers dedicated to building a better future. ClarkDietrich remains committed to advancing low-carbon solutions, supporting our partners with transparent data, and continuously working to reduce the impact of our products—because a more sustainable industry benefits us all.

## LIFE CYCLE ASSESSMENT RESULTS: ONE METRIC TON OF COLD-FORMED STEEL PRODUCT

LCA results are relative expressions and do not predict impacts on category endpoints, the exceeding of thresholds, safety margins or risks.

(See Chart Key on page 24.)

TRACI, IPCC AR5 GWP <sub>100f</sub> AND CML 2011-2016	Raw Material Supply (A1)	Transport (A2)	Manufacturing (A3)	A1-A3
GWP [kg CO <sub>2</sub> eq]	1.54E+03	5.41E+01	6.62E+01	<b>1.66E+03</b>
AP [kg SO <sub>2</sub> eq]	5.29E+00	2.73E-01	1.73E-01	<b>5.74E+00</b>
EP [kg N eq]	2.10E+00	2.35E-02	1.82E-02	<b>2.14E+00</b>
ODP [kg CFC-11 eq]	5.71E-05	1.39E-13	5.73E-12	<b>5.71E-05</b>
SFP [kg O <sub>3</sub> eq]	1.22E+02	7.19E+00	3.97E+00	<b>1.33E+02</b>
ADP <sub>fossil</sub> [MJ, LHV]	4.97E+03	7.50E+02	1.97E+03	<b>7.69E+03</b>

<sup>2</sup> Carbon Leadership Forum. Embodied Carbon 101. <https://carbonleadershipforum.org/embodied-carbon-101/>

## Environmental Product Declarations: Standard Product Lines

At ClarkDietrich, we remain committed to a balanced approach to sustainability, ensuring that our efforts to lower embodied carbon also support a stable and adaptable supply chain. Last year, we emphasized the importance of maintaining a diverse supplier base that includes both Electric Arc Furnace (EAF) and Basic Oxygen Furnace (BOF) mills—and that message remains unchanged. While we continue to promote our LEC product line, we recognize that a resilient, market-responsive supply chain must incorporate both EAF and BOF steel production to meet industry needs effectively.



### The Value of a Diversified Supply Chain

Our reasoning from last year still holds true—sourcing exclusively from EAF mills is not yet a viable option for the industry. While EAF steel production significantly reduces embodied carbon, BOF mills remain an important part of the supply network for several key reasons:

#### Supply Chain Resilience

By sourcing from both EAF and BOF mills, we minimize risks associated with supply disruptions and ensure a consistent and reliable flow of materials for projects across the U.S.

### Price Stability

Relying solely on EAF mills could lead to supply constraints and cost fluctuations. Maintaining a balanced sourcing strategy helps keep pricing stable and predictable.

### Collaborative Sustainability

BOF mills are actively investing in carbon reduction strategies, including carbon capture technologies and increased scrap utilization. Engaging with both types of producers allows us to support broader sustainability advancements across the steel industry.

### Market Agility

A diverse supplier base enables us to adapt to shifts in demand, regulatory changes, and technological advancements, ensuring we continue to provide sustainable, high-quality solutions for our customers.

### A Commitment to Transparency and Choice

Just as we stated last year, both our **LEC EPD** and our **standard product EPDs** remain valuable resources for our customers. While we are increasing our efforts to promote LEC solutions, our company-wide standard product EPDs—which account for a mix of EAF and BOF steel production—are still widely used across projects throughout the country.

Sustainability is a long-term commitment, and part of that commitment is delivering a consistent, transparent message. Our strategy remains the same: we are dedicated to reducing carbon footprints while ensuring supply chain resilience. By standing behind this approach, we continue to serve the needs of our customers, our industry, and the environment—all while positioning ourselves as a leader in sustainable steel framing solutions.

Tables 1, 2 and 3 (right) include the GWP results for both our company-wide EPD and California plant-specific EPDs, further illustrating our commitment to transparency and continuous improvement in steel framing sustainability.

**TABLE 1**  
**LIFE CYCLE IMPACT ASSESSMENT RESULTS – ALL PLANTS<sup>3</sup>**

LCIA results are relative expressions and do not predict impacts on category endpoints, the exceeding of thresholds, safety margins or risks.

TRACI v2.1	A1–A3
GWP 100 [kg CO <sub>2</sub> eq]	2.38E+03
ODP [kg CFC-11 eq]	1.50E-07
AP [kg SO <sub>2</sub> eq]	5.23E+00
EP [kg N eq]	2.61E-01
SFP [kg O <sub>3</sub> eq]	8.42E+01
ADPE <sub>fossil</sub> [MJ, LHV]	1.91E+03

**TABLE 3**  
**LIFE CYCLE IMPACT ASSESSMENT RESULTS – WOODLAND, CA<sup>4</sup>**

LCIA results are relative expressions and do not predict impacts on category endpoints, the exceeding of thresholds, safety margins or risks.

TRACI v2.1	A1–A3
GWP 100 [kg CO <sub>2</sub> eq]	2.34E+03
ODP [kg CFC-11 eq]	4.42E-08
AP [kg SO <sub>2</sub> eq]	4.73E+00
EP [kg N eq]	2.50E-01
SFP [kg O <sub>3</sub> eq]	8.21E+01
ADPE <sub>fossil</sub> [MJ, LHV]	1.89E+03

**TABLE 2**  
**LIFE CYCLE IMPACT ASSESSMENT RESULTS – RIVERSIDE, CA<sup>3</sup>**

LCIA results are relative expressions and do not predict impacts on category endpoints, the exceeding of thresholds, safety margins or risks.

TRACI v2.1	A1–A3
GWP 100 [kg CO <sub>2</sub> eq]	2.30E+03
ODP [kg CFC-11 eq]	5.03E-09
AP [kg SO <sub>2</sub> eq]	4.66E+00
EP [kg N eq]	2.47E-01
SFP [kg O <sub>3</sub> eq]	8.10E+01
ADPE <sub>fossil</sub> [MJ, LHV]	1.84E+03

#### CHART KEY

**GWP** = Global Warming Potential; **ODP** = Ozone Depletion Potential; **AP** = Acidification Potential; **EP** = Eutrophication Potential; **ADPE** = Abiotic Depletion Potential for non-fossil resources; **ADPF** = Abiotic Depletion Potential for Fossil resources; **SFP** = Smog Formation Potential; **ADPE<sub>fossil</sub>** = Abiotic Resource Depletion Potential of non-renewable (fossil) Energy resources

<sup>3</sup> North American Impact Assessment Results: One Metric Ton of Cold-Formed Steel Product, January 1, 2021 (published).

<sup>4</sup> North American Impact Assessment Results: One Metric Ton of Cold-Formed Steel Product, April 1, 2021 (published).

## Health Product Declarations: Expanding Transparency in Material Health

At ClarkDietrich, we are committed to product transparency and responsible material disclosure, ensuring that our customers have the information they need to make informed, sustainability-driven decisions. As part of this commitment, we provide HPDs for our steel products manufactured from coils meeting ASTM A1003 and ASTM A653 specifications, which cover the two product families of [Interior Framing, Exterior Framing and Clips/Accessories](#), and [Interior Finishing and Exterior Finishing](#) respectively. We will continue to maintain and renew these HPDs indefinitely. While our current HPD coverage does not yet extend to all product lines, we are actively exploring opportunities to expand our HPD library to include additional steel- and vinyl-based products in the near future.

### What is an HPD?

An HPD is a standardized document that transparently discloses a product’s chemical composition and any associated health hazards. Developed according to the Health Product Declaration Collaborative (HPDC) Open Standard, HPDs provide for self-declared or a third-party verified framework for assessing material health, helping project teams align with leading green building certifications such as LEED® v4.1—where HPDs can contribute toward earning the Material Ingredients credit under the MR category, when aligned with the required thresholds and verification levels.

### Why HPDs Matter?

HPDs serve as a critical tool for environmental responsibility, human health, and industry leadership, benefiting a wide range of stakeholders:

**For the Environment**—By promoting material transparency and safer chemical formulations, HPDs encourage the reduction of harmful substances in construction materials, supporting more sustainable manufacturing practices.

**For Our Customers and Project Teams**—Architects, specifiers and building owners increasingly prioritize health-conscious material selection. HPDs provide clear, standardized data, making it easier to specify materials that align with corporate sustainability goals, wellness programs, and green building certifications.

**For Contractors and Installers**—Those working with construction materials benefit from greater awareness of product composition, ensuring safer handling practices and improved on-site health considerations.

**For Industry Leadership**—As disclosure and transparency expectations continue to evolve, manufacturers that maintain HPDs demonstrate a proactive approach to sustainability and compliance. ClarkDietrich’s ongoing commitment to publishing and expanding our HPD offerings reflects our leadership in responsible product stewardship.

### Looking Ahead

While our current HPDs cover steel products manufactured from ASTM A1003- and ASTM A653-compliant coils, we recognize the value of expanding this documentation. As we continue to assess opportunities for greater material

transparency, we are always seeking ways to extend HPD coverage to more steel- and vinyl-based product lines, providing greater visibility into the health and sustainability attributes of our full product portfolio.



## Greenhouse Gas Emissions Inventory

In our third annual sustainability report, we are pleased to present our second consecutive year of GHG emissions reporting, further advancing our commitment to transparency and data-driven sustainability efforts. As we continue refining our approach, we have maintained our methodology, referencing the World Resource Institute’s GHG Protocol Corporate Standard, the GHG Corporate Value Chain Standard, and ISO 14064-1:2018 – Corporate Level Accounting. We have also continued using the operational control approach to define organizational boundaries for emissions calculations.

### Advancing Our GHG Reporting Process

Because of the time-intensive process required to collect, validate, and analyze emissions data, our annual CSR includes FY2023 emissions data. While our current reporting cycle operates on a one-year lag, we are actively working toward aligning our GHG data collection and CSR timeline. Achieving this alignment will be a key focus as we continue evaluating and implementing automated data collection software to streamline reporting and improve accuracy.

### Scope of Reporting and Methodology

As a private company reporting with reference to the GRI standards, we continue to publicly report Scopes 1, 2, and 3 emission intensities rather than gross direct and indirect emissions. Emission

intensities are reported using MT CO<sub>2</sub>e per MT of Steel sold, with FY2022 serving as the baseline year (100%). This approach allows us to effectively track year-over-year trends, providing a clearer picture of emissions efficiencies, progress or challenges in our sustainability journey.

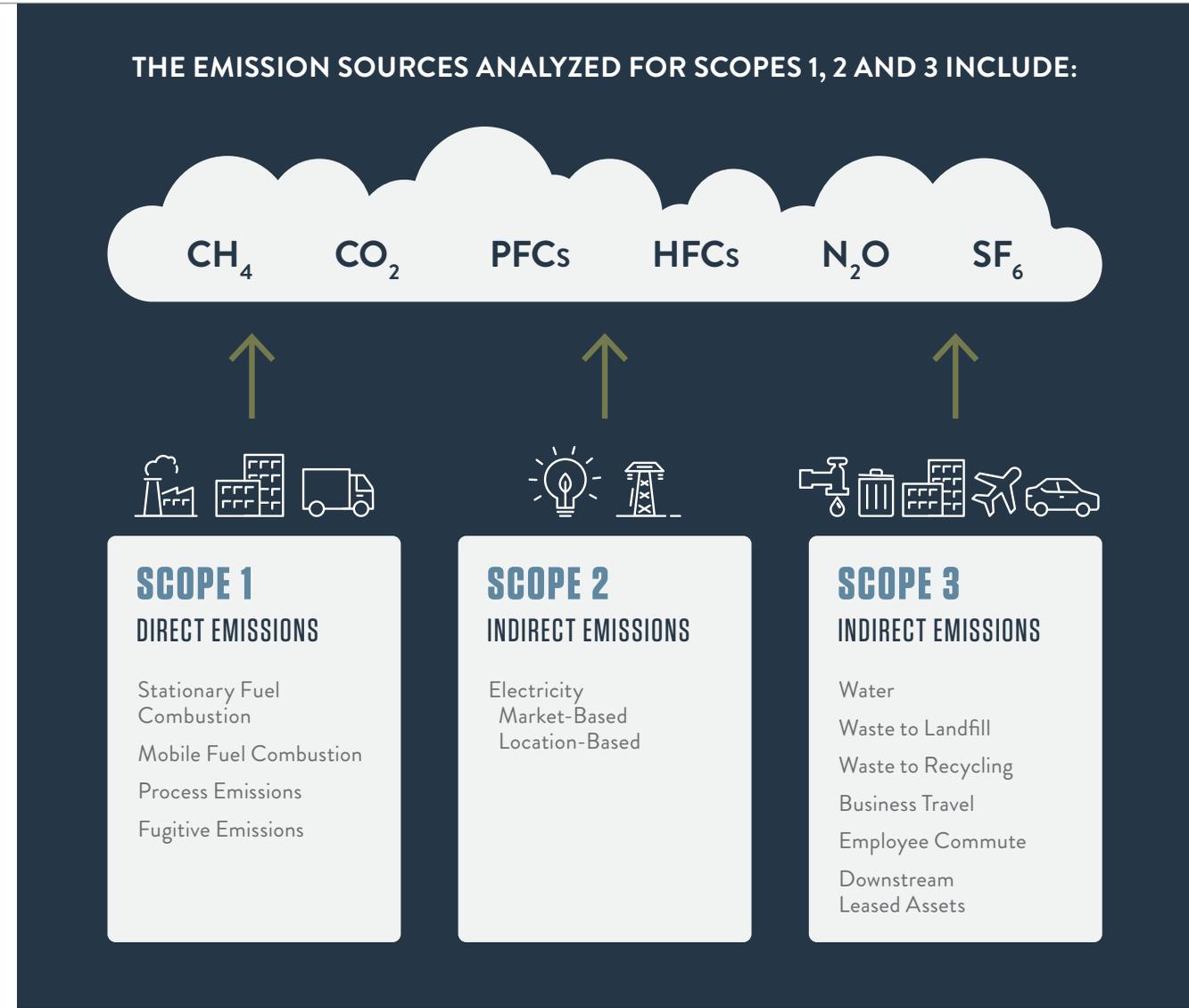
To ensure consistency with our EPDs, our calculations include emissions data specifically for cold-formed steel framing products covered by our EPDs. Manufacturing facilities that produce specialty steel products not included in our EPDs are excluded from intensity calculations; however, these facilities are still accounted for in our overall GHG emissions totals. Additionally, our corporate headquarters and engineering offices remain included in our emissions analysis to provide a comprehensive view of our organizational footprint.

### Expanding GHG Emissions Data Collection

Beyond steel products, we have continued to collect and analyze GHG emissions data for our Extruded Vinyl and Composite Vinyl manufacturing facilities, despite not yet having EPDs for those product lines. As we work toward potential EPD development for additional product categories, we will continue to refine our emissions tracking process for non-steel-based materials, ensuring greater visibility across our full range of manufacturing operations.

### Looking Ahead

While we have made significant progress in data collection and analysis, the real work begins now. Over the coming years, we will refine our understanding of emissions drivers, explore



reduction strategies, and set the foundation for continuous improvement. With each reporting cycle, our insights will become more refined, and our ability to drive impactful, lasting reductions will grow stronger.

ClarkDietrich remains committed to turning data into action, ensuring that our emissions reporting is not just a measurement tool, but a road map toward a more sustainable and efficient future.

## Greenhouse Gas Emissions Results & Year-Over-Year Comparison

With two years of GHG emissions data now collected, ClarkDietrich has reached an important milestone in our sustainability journey—we can now begin to analyze trends, identify key drivers of emissions changes, and lay the groundwork for future reduction initiatives. While we have yet to implement formal GHG reduction projects, this year-over-year comparison provides valuable insights into how our operations are evolving and where opportunities for improvement may exist.

### Key Findings from FY2023 vs. FY2022

**Steel Product Lines:** CO<sub>2</sub>e emissions intensities decreased by 8.0% compared to FY2022. Since steel product lines account for the majority of our overall emissions, this is an encouraging trend that suggests greater efficiency in production relative to output. A decrease in CO<sub>2</sub>e emissions intensities means that we produced less CO<sub>2</sub>e per metric ton of steel processed—a key step toward our long-term goal of driving emissions as close to zero as possible.

**Extruded Vinyl Product Lines:** CO<sub>2</sub>e emissions intensities increased by 19.3%, indicating a rise in emissions per unit of material produced.

**Composite Vinyl Product Lines:** CO<sub>2</sub>e emissions intensities increased by 3.9%, showing a smaller but still measurable rise year over year.

Although total production volume increased across all three product lines in FY2023, the relationship between higher production and emissions efficiency is complex. On one hand, increased production often leads to greater machine run times, which can drive up total emissions. However, higher output can also improve efficiency, reducing downtime and optimizing resource use. At this stage, it is difficult to determine the precise factors contributing to emission intensity reductions in steel and increases in vinyl products, but this is exactly the type of data-driven analysis that will help us pinpoint areas for improvement.

### GHG EMISSIONS INTENSITIES FOR COLD-FORMED STEEL FRAMING

FY2022 to FY2023

Scope Emissions	MT CO <sub>2</sub> e per MT Steel	
	FY2022	FY2023
Scope 1	0.010	0.008
Market-Based, Scope 2	0.020	0.020
Location-Based, Scope 2	0.021	0.019
Scope 3	0.024	0.022
Market-Based, Total	0.054	0.050
Location-Based, Total	0.055	0.049

Note: MT CO<sub>2</sub>e = Metric Tons of Carbon Dioxide Equivalent | MT Steel = Metric Ton (1,000 kg) of Steel. Includes 11 manufacturing facilities and three office facilities.

### GHG EMISSIONS INTENSITIES FOR EXTRUDED VINYL PRODUCTS

FY2022 to FY2023

Scope Emissions	MT CO <sub>2</sub> e per MT Vinyl	
	FY2022	FY2023
Scope 1	0.011	0.015
Market-Based, Scope 2	0.252	0.319
Location-Based, Scope 2	0.250	0.308
Scope 3	0.044	0.045
Market-Based, Total	0.306	0.379
Location-Based, Total	0.305	0.368

Note: MT CO<sub>2</sub>e = Metric Tons of Carbon Dioxide Equivalent | MT Vinyl = Metric Ton (1,000 kg) of Vinyl. Includes one manufacturing facility.

### GHG EMISSIONS INTENSITIES FOR COMPOSITE VINYL PRODUCTS

FY2022 to FY2023

Scope Emissions	MT CO <sub>2</sub> e per MT Composite Vinyl	
	FY2022	FY2023
Scope 1	0.102	0.096
Market-Based, Scope 2	0.386	0.374
Location-Based, Scope 2	0.398	0.327
Scope 3	0.061	0.101
Market-Based, Total	0.549	0.571
Location-Based, Total	0.561	0.524

Note: MT CO<sub>2</sub>e = Metric Tons of Carbon Dioxide Equivalent | MT Vinyl = Metric Ton (1,000 kg) of Composite Vinyl. Includes one manufacturing facility.

## Building a Strategy for Future Reductions

Now that we have two years of GHG data, we can begin to dig deeper into the numbers, searching for hotspots and low-hanging fruit that present the best opportunities for meaningful reductions. The ultimate goal is clear: reduce CO<sub>2</sub>e emissions intensities as much as possible, ultimately aiming for zero metric tons of CO<sub>2</sub>e per metric ton of steel processed.

Moving forward, we will take a phased approach to GHG reduction:

- 1. Data Analysis and Trend Identification**—Further examining facility-level and product-level emissions to understand efficiency trends and inconsistencies.
- 2. Opportunity Mapping**—Identifying areas where operational changes or process optimizations could yield immediate emissions intensity reductions without major capital investments.
- 3. Project Implementation**—Developing and executing targeted GHG reduction initiatives to drive long-term improvements in emissions efficiency.





## PEOPLE IMPERATIVE: BUILDING A SUSTAINABLE WORKFORCE

At ClarkDietrich, sustainability is not just about environmental impacts, it's about people. Our **People Imperative** is rooted in fostering a workplace culture where employees thrive, feel valued, and contribute to a shared objective. Our approach integrates inclusion, employee development, and community engagement, ensuring that sustainability remains at the heart of our workforce strategy.

## CLARKDIETRICH CORE VALUES:



**Do The Right Thing - Do Things Right** — Our pursuit of excellence is demonstrated by a commitment to go the extra mile in our efforts. We treat our customers, employees, investors and suppliers, as they would like to be treated.



**Creative Solutions from Everyone** — We expect everyone to be a problem solver and an opportunity creator. We value innovation, encourage diverse perspectives, foster two-way communication and recognize the work it takes to create and sustain a culture that embodies those values.



**Positive Energy and Teamwork** — Our team focus and the positive energy with which we do business make ClarkDietrich a great place to work. We stand by each other. We support each other. We listen to each other. We make every effort to ensure that our work life is fulfilling and enjoyable.



**A Balanced Life** — We appreciate that people work to live, not live to work; the most significant aspects of our lives occur outside the workplace. The importance of balancing our lives around work, family, and community is integral to our culture.

## Our Human Resource Strategy: Inspiring People, Driving Excellence

Our HR strategy is built on five key pillars that support our commitment to an engaged, high-performing workforce:

### 1. Attracting and Retaining Top Talent—

In 2024, we strengthened our talent acquisition efforts by broadening our outreach through strategic partnerships with technical schools, veteran organizations, and inclusion-focused hiring platforms. Additionally, we improved our employee benefits by introducing Parental Leave at all locations. ClarkDietrich has traditionally offered maternity leave, but we’ve now enhanced this benefit to include both parents—providing one week of paid parental leave. This allows time to bond with their growing family while reinforcing our commitment to supporting all our employees.

### 2. Empowering Employees—

At ClarkDietrich, empowerment starts with listening. Our employee engagement surveys provide a platform for every team member to share their experiences, insights, and ideas, ensuring that their voices help shape company decisions. These surveys are a critical part of how we enhance workplace culture, address concerns, and implement meaningful changes that support employee well-being and success. By actively listening and acting on feedback, we reinforce a workplace where employees feel valued, heard, and motivated to grow. Looking ahead,

we aim to integrate AI-driven learning tools and mentorship networks to foster continuous growth and engagement.

### 3. Mitigating Risk—

At ClarkDietrich, we prioritize a fair, compliant and ethical workplace. This year, we enhanced HR compliance by offering anti-harassment and discrimination training and strengthening data privacy policies to protect employee records and meet evolving labor laws. Looking ahead, we will leverage predictive analytics to track workforce trends, enhance compliance, and integrate HR technology to improve the employee experience.

### 4. Fostering Belonging—

In 2024, we expanded our Culture and Belonging strategy by planning Culture Squads (employee groups) at each location, to be implemented in 2025. Led by local HR Business Partners, they will foster connection and cultural initiatives. We updated our mission and introduced a quarterly one-question survey to gather ongoing feedback, ensuring our efforts remain effective in making ClarkDietrich the employer of choice. Next year, we will integrate inclusivity and belonging into leadership development programs and use employee tracking systems and processes to measure our impact.

### 5. Adapting to Workforce Needs—

As the industry evolves, so do our workforce strategies. This

year, we introduced parental leave benefits, expanded mental health support through our Employee Assistance Program (EAP), and launched One Pass, a multi-location gym membership to promote health and wellness. Looking ahead, we will leverage AI-driven workforce analytics, along with our employees’ feedback, to enhance productivity and well-being—ensuring employee needs remain at the center of our decision-making.



## “STRONGER TOGETHER—UNITED FOR SUCCESS” MISSION STATEMENT

At ClarkDietrich, we are committed to building a culture where everyone belongs. People can achieve great things when they feel seen, valued and connected. Our priorities are doing the right thing, positively working together as a team, embracing creativity, and striving for balance. We celebrate our unique perspectives by encouraging each other to bring our authentic selves to the table; this way, we unlock innovation, strengthen communication, and spark the best ideas. Together, we grow and thrive, and we not only build a stronger team but also build a stronger ClarkDietrich.

## Stronger Together: A People-First Approach to Belonging

Our commitment to valuing, empowering and supporting employees is reflected in initiatives that drive professional growth, community engagement, and inclusivity. Through leadership development, volunteer programs, and cultural initiatives, we create a workplace where employees can thrive, work as a team, and contribute to a shared vision for success.

### 1. Leadership Development and Training—

ClarkDietrich provides employees with the skills and knowledge needed to excel and grow in their careers. Our leadership programs focus on strategic thinking, decision-making, and technical expertise to prepare teams for future challenges. Through mentorship, coaching and hands-on learning, we foster both professional and personal development. Ongoing training and research have long been a priority at ClarkDietrich. In 2024, we took this commitment a step further by researching programs that enhance learning, support career progression, and enrich the employee experience—focusing on more refined and customized solutions tailored to the needs of both our customers and our diverse workforce.

**2. Community Engagement—**We believe in giving back to the communities in which we operate. Through our ClarkDietrich Cares Program, we have strengthened partnerships with local organizations, enabling employees to volunteer for community service initiatives. Our paid



volunteer days allow employees to participate in activities such as Habitat for Humanity home-building projects, environmental cleanups, and mentorship programs for underserved youth. These initiatives not only benefit our communities but also enhance team collaboration and personal fulfillment among our employees.

**3. Stronger Together Program—**We foster an inclusive culture through employee-led initiatives, voluntary inclusion and belonging training, and company-wide engagement programs. ClarkDietrich’s inclusion efforts spread through different departments and



locations, shaping policies, driving initiatives, and promoting a culture of belonging. Our ongoing training programs and inclusive leadership empower employees at all levels to create a workplace where every voice is heard and respected.

### Employee Inclusion: A Culture of Recognition and Belonging

We continue to lead the way in sustainability, safety and community engagement across all locations. Here are the key takeaways from 2024 employee engagement events, reflecting our commitment to innovation, safety and people:

### Record-Breaking Safety Achievements:

**Eight plants** have reached **one year or more recordable injury-free** (first time in the history of CDBS), reinforcing ClarkDietrich’s dedication to a safe and proactive workplace culture.

<b>CDH</b>	4+ years	(1,556 days)
<b>McDonough</b>	3+ years	(1,214 days)
<b>Miami</b>	2+ years	(1,041 days)
<b>Pasadena</b>	1+ years	(640 days)
<b>O’Fallon</b>	1+ years	(605 days)
<b>Baltimore</b>	1+ years	(587 days)
<b>Bristol</b>	1+ years	(531 days)
<b>Vancouver</b>	1+ years	(395 days)



**Innovative Solutions for Workplace Efficiency:**

- The **Dade City** plant introduced a custom grease fitting adapter to improve maintenance efficiency, reducing downtime.
- The **Sacramento** team implemented a repair solution for broken mill equipment, minimizing downtime and ensuring seamless production.

**Veteran Recognition:**

- **Multiple plants**, including **Baltimore, Bristol, McDonough and Sacramento**, held special Veterans Day appreciation events, offering meals and gifts to honor those who served.
- We are proud to be recognized with the **Military Friendly® Award and Military Friendly® Spouse Award** in 2024, underscoring our dedication to veterans, military families, and inclusive hiring practices.

**Enhancing Sustainability and Production Efficiency:**

- **CDH's** new light-duty production line was installed at the Warren, OH facility, increasing capacity and sustainability efforts.
- **Dade City and McDonough** continued record-breaking production days, improving efficiency and throughput.

**Customer and Product Excellence:**

- **ClarkDietrich Engineering Services, Bristol**, successfully re-established a relationship with a major architectural client by providing outstanding service and technical expertise.
- **ClarkDietrich's marketing team** participated in industry leadership events, strengthening partnerships and market positioning.

**Employee Milestones and Engagement:**

- Long-tenured employees celebrated **30–40+ years of service**, showing incredible dedication to the company.
- **Annual holiday events and appreciation celebrations** took place at all locations, featuring lunches, giveaways, and team-building activities.
- **Vienna and Riverside** plants hosted creative workplace initiatives, including safety training, charity races, and holiday sweater contests to foster engagement.

ClarkDietrich's 2024 accomplishments reflect a company deeply committed to its employees, community, and industry leadership. Through enhanced safety measures, sustainability efforts, community outreach, and employee development, we continue to set new benchmarks for success.

**“Stronger Together” Employee Newsletter:**

- ClarkDietrich's **“Stronger Together” Newsletter**, launched in December 2024, enhances communication, celebrates employees, and keeps everyone informed. This quarterly publication highlights career development, work-life balance, community engagement, and workplace achievements while encouraging participation in mentorship programs, training, and employee feedback surveys. Featuring engaging content like Manufacturing MythBusters, employee spotlights, and healthy recipes, the newsletter fosters inclusivity, teamwork and recognition. As we enter 2025, we remain committed to innovation, team support, and industry leadership with integrity and excellence.
- We are in the process of launching the **‘Stronger Together–United for Success’** campaign, set to roll out in 2025 as a company-wide initiative focused on employee engagement, well-being, and workplace culture. As part of this effort, employee-led Culture Squads will be established at every location, empowering teams to shape their work environment. These groups will drive engagement, community initiatives, events, training, and wellness programs, ensuring that every voice is heard and valued. Through this program, we reaffirm our commitment to creating a workplace where employees feel supported, connected and inspired to succeed.

## Training & Development: Investing in Our Workforce

Training is a vital part of personal and professional growth, equipping employees with the skills and knowledge needed to succeed. Our approach emphasizes customized learning, practical skill-building, and leadership development to help employees excel and grow within the company. Through direct employee input, feedback, and skill gap analysis, we tailor training programs to align with both individual and organizational goals. Employees have access to diverse learning formats, including interactive online courses and hands-on sessions, covering topics such as—

**Leadership development** for aspiring and current managers through institutions such as MRA, Center for Creative Leadership, Cornerstone, and Dale Carnegie, among others.

**Compliance and safety training** to ensure regulatory adherence and workplace safety. At ClarkDietrich, we pride ourselves on offering on-site, in-person and online training to all employees.

**Technical skills enhancement** for plant operations, maintenance, and equipment management. ClarkDietrich provides a structured tiered wage system designed to promote cross-training at the plant level. This program ensures that all employees can develop new skills, advance in their roles, and increase their earning potential while contributing to a more versatile and skilled workforce.

**Culture and belonging workshops** to foster an inclusive and engaged workforce. ClarkDietrich offers online training and voluntary leadership programs for managers and supervisors, ensuring continuous development opportunities at all levels.

**Plant Training Program:** Focused on hands-on, operational training, this program equips employees with critical technical knowledge for plant operations. It includes machinery operation, safety protocols, and troubleshooting techniques, helping employees develop expertise in their roles while maintaining a strong safety culture.

**Job Shadowing and Cross-Training:** Employees are encouraged to expand their skill sets by shadowing experienced co-workers and participating in cross-training opportunities. This initiative allows employees to explore different roles, giving them flexibility and career progression.

In 2024, employees across all levels, locations and departments collectively completed over **10,000 hours of online, in-person, and on-site training**, reinforcing our commitment to continuous learning and development.

By prioritizing continuous learning, we ensure that employees are equipped with the skills, confidence, and knowledge to excel in their careers while contributing to the company’s long-term success.

## Succession Planning: Building Future Leaders

At ClarkDietrich, we are dedicated to developing and retaining high-potential employees. Looking ahead, we will enhance internal mobility programs and leadership pipelines to retain top talent and strengthen succession planning by—

**Lateral Moves:** Employees transition to a different role at the same level to gain new skills and broaden their expertise.

**Promotions:** Employees move into higher-level positions based on performance and leadership potential.

**Cross-Departmental Transfers:** Employees shift to different departments, expanding their organizational knowledge.

**Project-Based Assignments:** Employees temporarily work on special projects outside their usual responsibilities.

**Performance Management:** Support employee development by continuing to encourage the use of Individual Development Plans (IDPs) and providing a structured approach for career progression. We encourage consistent one-on-one meetings between employees and managers to foster open communication, enhance employee



experience, and ensure alignment of goals. Additionally, we assist employees with the tools and resources needed for success, joining them on their journey toward continuous growth and future career advancement.

## Community Engagement & Social Responsibility: Making an Impact

We believe that our success is not just measured by the products we create, but by the positive impact we have on the communities where we live and work. Our commitment to giving back, supporting those in need, and fostering meaningful connections is at the heart of our culture. Through **ClarkDietrich Cares Days** and community partnerships, we strive to make a difference—whether through charitable donations, volunteer efforts, or initiatives that promote well-being and support underserved communities.



### ClarkDietrich Cares to Give Back in 2024

**Baltimore and Corporate offices** participated in the ClarkDietrich Cares initiative, donating food, toys, and winter gear to schools, shelters, and crisis centers, ensuring families had the resources they needed during the colder months.

**Bristol and Riverside teams** organized food drives benefiting St. Vincent de Paul and Feeding America, helping provide holiday meals for families facing food insecurity.

**Dallas and Miami teams** extended their generosity by volunteering at animal shelters and hosting charity events, reinforcing our commitment to serving and uplifting local communities.

The **Vienna plant** led a successful Salvation Army Angel Tree initiative, ensuring that children in foster care received holiday gifts and felt the warmth of community support.

**Sacramento teams** organized a Socktober event, collecting 459 pairs of socks that were donated to those in need, demonstrating the power of small gestures in creating a big community impact.

Through these efforts, ClarkDietrich continues to strengthen our commitment to making a difference beyond the workplace. We are proud of our employees who step up, give back, and embody the true spirit of community.

## Beyond the Job: Benefits That Support You

We recognize that our employees are our greatest asset, and we are committed to providing a comprehensive benefits package that supports health, financial security, career growth, and one of our core values—a work-life balance. Our benefits are designed to ensure employees, and their families, have the resources they need to thrive both personally and professionally.

We are committed to fostering a work environment where employees feel supported, valued, and empowered to succeed. Through our robust benefits package, we ensure that employees can focus on what matters most—both at work and in life.

### HEALTH & WELLNESS

**Full Benefits Package**—We offer **medical, dental and vision coverage**, along with **flexible spending accounts (FSAs)** to help employees manage healthcare expenses. Employees have access to preventive care, mental health resources, and wellness programs to maintain overall well-being.

**Employee Assistance Program (EAP)**—Confidential support services for employees and their families, offering mental health counseling, financial guidance and legal support.

**Wellness Initiatives**—ClarkDietrich promotes a healthy lifestyle through wellness challenges, fitness reimbursements, and preventive health screenings, helping employees take proactive steps toward their well-being.

### FINANCIAL SECURITY & FUTURE PLANNING

**401(k) Retirement Plan**—ClarkDietrich provides a competitive company match, helping employees build financial security and plan for their future.

**Multiple Incentive Plans**—Employees are rewarded for their contributions to the company’s success through performance-based bonuses, recognizing their hard work and dedication on a quarterly and monthly basis.

**Life and Disability Insurance**—Employees receive company-paid life and disability insurance (**1x their salary**), with the option to enroll in supplemental life insurance at their own cost, ensuring financial protection and peace of mind for themselves and their families.

### CAREER GROWTH & DEVELOPMENT

**Tuition and Certification Reimbursement**—To encourage continuous learning and career advancement, we offer financial assistance for job-related courses, certifications, and degree programs. This investment in education supports both individual growth and company success.

### WORK-LIFE BALANCE & FAMILY SUPPORT

**Paid Time Off (PTO) and Holidays**—Employees receive generous PTO, vacation time, paid holidays, paid sick time, and personal leave options to maintain a healthy work-life balance.

**Parental Leave (New for 2024)**—To support both parents in bonding with their growing family, ClarkDietrich has introduced paid parental leave, reinforcing our commitment to family-friendly policies.

## Conclusion: Sustainability Through People

Sustainability starts with our people. By fostering an inclusive, engaging, and high-performing workplace, we create an environment where employees feel valued, supported and empowered to grow. Our commitment to training, career development, safety, well-being, and community engagement strengthens not only our workforce but also the communities we serve. When employees succeed, our business succeeds, and together, we build a stronger, more sustainable future.



### Looking Ahead: Driving a Future of Growth & Innovation

As we continue to evolve, we remain focused on:

**Expanding leadership development initiatives** by providing mentorship, effective training, and IDPs to support career growth at all levels.

**Strengthening community impact programs** through ClarkDietrich Cares, volunteer efforts, and local partnerships that make a difference where we live and work.

**Enhancing culture and belonging** by launching initiatives such as the “Stronger Together—United for Success” campaign, and the employee-led Culture Squads, at all locations to foster engagement and inclusion.

**Leveraging AI and advanced technology** to enhance operational efficiency, drive innovation, and position ClarkDietrich as an industry leader and employer of choice.

Through these efforts, we are shaping a future where employees, communities and businesses succeed together. ClarkDietrich is not just a place to work—it’s a place to build careers, make an impact, and be part of something greater.

**Together, we are stronger, more innovative, and ready for a sustainable future!**



# PROSPERITY IMPERATIVE

While ClarkDietrich is not subject to reporting financial information to the U.S. Securities and Exchange Commission (SEC) as a privately held company, we recognize the critical role financial considerations play in our sustainability approach. Although financial data remains confidential, it is integral to our decision-making processes.

The third pillar of our sustainable strategy, aptly named “Prosperity,” underscores our commitment to enterprise success while considering the well-being of our employees, shareholders, and the communities in which we operate. Our notion of prosperity extends beyond corporate interests to encompass the

broader economy in which we operate. We recognize our responsibility to contribute positively to the communities surrounding our plants and offices, supporting their growth and prosperity in various facets of life. Through our actions, we endeavor to foster economic vitality and resilience within the communities we serve.



# CORPORATE CITIZENSHIP

At ClarkDietrich, we are committed to conducting business in an ethical and responsible manner. Our commitment to the company's core values and code of conduct ensures we are fostering an ethical business culture for our customers, employees, suppliers, and communities. We value integrity and hold all of our employees and executive leadership to the standards detailed in ClarkDietrich's Business Conduct Guide.

## Supply Chain Transparency Efforts Around Conflict Minerals & Human Trafficking

ClarkDietrich is committed to ensuring our supply chain is ethically sourced and compliant with all applicable laws. Learn more about our supply chain transparency efforts around conflict minerals and human trafficking by following these links to our website.

[Conflict Minerals Policy](#)

[California Transparency in Supply Chains Act Disclosure](#)

## Statement on Business Conduct Guide & Responsibilities

As ClarkDietrich employees, we can be proud of our reputation as an ethical and responsible Company. Our sense of integrity and fair dealing helps to make us an industry leader, as shown by our consistent high rankings from customer associations. As ClarkDietrich employees, it is important that we strive to maintain a high standard of conduct in our business dealings with customers, suppliers, the public and one another. It is important that we each work to maintain that reputation now and in the future.

This Guide has been developed to assist us in this effort. It is intended to serve as a general guide for each of us on ethical business conduct and our responsibilities to the Company. The Guide and the compliance program are integral parts of the Company's overall program for legal compliance and ethical conduct.

This Guide also serves to outline individual responsibilities under the compliance program.

If we each adhere to these few general principles and utilize the Company's compliance program, I am confident that our reputation will continue to grow and enhance our standing as a leader in our industry.

**BRIAN PANUCCIO**  
President & CEO

# GRI CONTENT INDEX



# GRI CONTENT INDEX

As noted previously, our use of GRI Standards provides a well-recognized and structured method of reporting on our impacts. Per GRI protocol, the following index provides an overview of our reported information and helps stakeholders navigate at a glance.

<b>Statement of Use</b>	ClarkDietrich has reported the information cited in this GRI content index for the period starting April 1, 2024 through March 30, 2025 with reference to the GRI Standards.
<b>GRI 1: Foundation 2021</b>	GRI 1: Foundation 2021

## GRI 2: General Disclosures 2021

GRI Standard	#	Disclosure	
The Organization and Its Reporting Practices	2-1	Organizational details	About ClarkDietrich—Organizational Details
	2-2	Entities included in the organization’s sustainability reporting	ClarkDietrich & Its Reporting Practices
	2-3	Reporting period, frequency and contact point	
	2-4	Restatements of information	
	2-5	External assurance	
Activities and Workers	2-6	Activities, value chain and other business relationships	ClarkDietrich Value Chain
	2-7	Employees	Confidential Not Disclosed
	2-8	Workers who are not employees	
Governance	2-9	Governance structure and composition	Sustainability Governance Structure
	2-10	Nomination and selection of the highest governance body	
	2-11	Chair of the highest governance body	
	2-12	Role of the highest governance body in overseeing the management of impacts	
	2-13	Delegation of responsibility for managing impacts	
	2-14	Role of the highest governance body in sustainability reporting	
	2-15	Conflicts of interest	
	2-16	Communication of critical concerns	
	2-17	Collective knowledge of the highest governance body	
	2-18	Evaluation of the performance of the highest governance body	
	2-19	Remuneration policies	
	2-20	Process to determine remuneration	
	2-21	Annual total compensation ratio	

<b>GRI Standard</b>	<b>#</b>	<b>Disclosure</b>	
Strategy, Policies and Practices	2-22	Statement on sustainable development strategy	Strategy, Policies & Practices
	2-23	Policy commitments	
	2-24	Embedding policy commitments	
	2-25	Processes to remediate negative impacts	
	2-26	Mechanisms for seeking advice and raising concerns	
	2-27	Compliance with laws and regulations	
	2-28	Membership associations	
Stakeholder Engagement	2-29	Approach to stakeholder engagement	Stakeholder Engagement
	2-30	Collective bargaining agreements	Confidential Not Disclosed
<b>GRI 3: Material Topics 2021</b>			
Disclosures on Material Topics	3-1	Process to determine material topics	Material Topics
	3-2	List of material topics	
	3-3	Management of material topics	
<b>GRI 11: Oil and Gas Sector 2021</b>			
Not Applicable			
<b>GRI 12: Coal Sector 2022</b>			
Not Applicable			
<b>GRI 13: Agriculture, Aquaculture and Fishing Sectors 2022</b>			
Not Applicable			

<b>GRI Standard</b>	<b>#</b>	<b>Disclosure</b>	
<b>GRI 201: Economic Performance 2016</b>			
Topic Disclosures	201-1	Direct economic value generated and distributed	Confidential Not Disclosed
	201-2	Financial implications and other risks and opportunities due to climate change	
	201-3	Defined benefit plan obligations and other retirement plans	
	201-4	Financial assistance received from government	
<b>GRI 202: Market Presence 2016</b>			
Topic Disclosures	202-1	Ratios of standard entry level wage by gender compared to local minimum wage	Confidential Not Disclosed
	202-2	Proportion of senior management hired from the local community	
<b>GRI 203: Indirect Economic Impacts 2016</b>			
Topic Disclosures	203-1	Infrastructure investments and services supported	Confidential Not Disclosed
	203-2	Significant indirect economic impacts	
<b>GRI 204: Procurement Practices 2016</b>			
Topic Disclosures	204-1	Proportion of spending on local suppliers	Confidential Not Disclosed
<b>GRI 205: Anti-corruption 2016</b>			
Topic Disclosures	205-1	Operations assessed for risks related to corruption	Strategy, Policies & Practices
	205-2	Communication and training about anti-corruption policies and procedures	
	205-3	Confirmed incidents of corruption and actions taken	
<b>GRI 206: Anti-competitive Behavior 2016</b>			
Topic Disclosures	206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	Strategy, Policies & Practices
<b>GRI 207: Tax 2019</b>			
Topic Management Disclosures	207-1	Approach to tax	Confidential Not Disclosed
	207-2	Tax governance, control, and risk management	
	207-3	Stakeholder engagement and management of concerns related to tax	
Topic Disclosures	207-4	Country-by-country reporting	

<b>GRI Standard</b>	<b>#</b>	<b>Disclosure</b>	
<b>GRI 301: Materials 2016</b>			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages materials using Disclosure 3-3 in GRI 3: Material Topics 2021.	Future Sustainability Initiatives
Topic Disclosures	301-1	Materials used by weight or volume	
	301-2	Recycled input materials used	
	301-3	Reclaimed products and their packaging materials	
<b>GRI 302: Energy 2016</b>			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages energy using Disclosure 3-3 in GRI 3: Material Topics 2021.	Future Sustainability Initiatives
Topic Disclosures	302-1	Energy consumption within the organization	
	302-2	Energy consumption outside of the organization	
	302-3	Energy intensity	
	302-4	Reduction of energy consumption	
	302-5	Reductions in energy requirements of products and services	
<b>GRI 303: Water and Effluents 2018</b>			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages water and effluents using Disclosure 3-3 in GRI 3: Material Topics 2021.	Future Sustainability Initiatives
	303-1	Interactions with water as a shared resource	
	303-2	Management of water discharge-related impacts	
Topic Disclosures	303-3	Water withdrawal	
	303-4	Water discharge	
	303-5	Water consumption	
<b>GRI 304: Biodiversity 2016</b>			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages biodiversity using Disclosure 3-3 in GRI 3: Material Topics 2021.	Future Sustainability Initiatives
Topic Disclosures	304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	
	304-2	Significant impacts of activities, products and services on biodiversity	
	304-3	Habitats protected or restored	
	304-4	IUCN Red List species and national conservation list species with habitats in areas affected by operations	

GRI Standard	#	Disclosure	
<b>GRI 305: Emissions 2016</b>			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages emissions using Disclosure 3-3 in GRI 3: Material Topics 2021.	
Topic Disclosures	305-1	Direct (Scope 1) GHG emissions	Greenhouse Gas (GHG) Emissions Inventory
	305-2	Energy indirect (Scope 2) GHG emissions	
	305-3	Other indirect (Scope 3) GHG emissions	
	305-4	GHG emissions intensity	
	305-5	Reduction of GHG emissions	
	305-6	Emissions of ozone-depleting substances (ODS)	
	305-7	Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	
<b>GRI 306: Effluents and Waste 2016</b>			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages effluents and waste using Disclosure 3-3 in GRI 3: Material Topics 2021.	
Topic Disclosures	306-1	Water discharge by quality and destination	Future Sustainability Initiatives
	306-2	Waste by type and disposal method	
	306-3	Significant spills	
	306-4	Transport of hazardous waste	
	306-5	Water bodies affected by water discharges and/or runoff	
<b>GRI 306: Waste 2020</b>			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages waste using Disclosure 3-3 in GRI 3: Material Topics 2021.	Future Sustainability Initiatives
	306-1	Waste generation and significant waste-related impacts	
Topic Disclosures	306-2	Management of significant waste-related impacts	
	306-3	Waste generated	
	306-4	Waste diverted from disposal	
	306-5	Waste directed to disposal	

<b>GRI Standard</b>	<b>#</b>	<b>Disclosure</b>	
<b>GRI 308: Supplier Environmental Assessment 2016</b>			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages supplier environmental assessments using Disclosure 3-3 in GRI 3: Material Topics 2021.	Not Disclosed
Topic Disclosures	308-1	New suppliers that were screened using environmental criteria	
	308-2	Negative environmental impacts in the supply chain and actions taken	
<b>GRI 401: Employment 2016</b>			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages employment using Disclosure 3-3 in GRI 3: Material Topics 2021.	Strategy, Policies & Practices
Topic Disclosures	401-1	New employee hires and employee turnover	Confidential Not Disclosed
	401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Strategy, Policies & Practices; Benefits
	401-3	Parental leave	
<b>GRI 402: Labor/Management Relations 2016</b>			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages labor/management relations using Disclosure 3-3 in GRI 3: Material Topics 2021.	Strategy, Policies & Practices
Topic Disclosures	402-1	Minimum notice periods regarding operational changes	
<b>GRI 403: Occupational Health and Safety 2018</b>			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages occupational health and safety using Disclosure 3-3 in GRI 3: Material Topics 2021.	Confidential Not Disclosed
	403-1	Occupational health and safety management system	
	403-2	Hazard identification, risk assessment, and incident investigation	
	403-3	Occupational health services	
	403-4	Worker participation, consultation, and communication on occupational health and safety	
	403-5	Worker training on occupational health and safety	
	403-6	Promotion of worker health	
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships		
Topic Disclosures	403-8	Workers covered by an occupational health and safety management system	
	403-9	Work-related injuries	
	403-10	Work-related ill health	

<b>GRI Standard</b>	<b>#</b>	<b>Disclosure</b>	
<b>GRI 404: Training and Education 2016</b>			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages training and education using Disclosure 3-3 in GRI 3: Material Topics 2021.	Training
Topic Disclosures	404-1	Average hours of training per year per employee	Not Disclosed
	404-2	Programs for upgrading employee skills and transition assistance programs	
	404-3	Percentage of employees receiving regular performance and career development reviews	
<b>GRI 405: Diversity and Equal Opportunity 2016</b>			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages diversity and equal opportunity using Disclosure 3-3 in GRI 3: Material Topics 2021.	Diversity, Equity & Inclusion Mission
Topic Disclosures	405-1	Diversity of governance bodies and employees	Confidential
	405-2	Ratio of basic salary and remuneration of women to men	Not Disclosed
<b>GRI 406: Non-discrimination 2016</b>			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages non-discrimination using Disclosure 3-3 in GRI 3: Material Topics 2021.	Strategy, Policies & Practices
Topic Disclosures	406-1	Incidents of discrimination and corrective actions taken	Confidential Not Disclosed
<b>GRI 407: Freedom of Association and Collective Bargaining 2016</b>			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages freedom of association and collective bargaining using Disclosure 3-3 in GRI 3: Material Topics 2021.	Confidential Not Disclosed
Topic Disclosures	407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	
<b>GRI 408: Child Labor 2016</b>			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages child labor using Disclosure 3-3 in GRI 3: Material Topics 2021.	Corporate Citizenship
Topic Disclosures	408-1	Operations and suppliers at significant risk for incidents of child labor	
<b>GRI 409: Forced or Compulsory Labor 2016</b>			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages forced or compulsory labor using Disclosure 3-3 in GRI 3: Material Topics 2021.	Corporate Citizenship
Topic Disclosures	409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	

<b>GRI Standard</b>	<b>#</b>	<b>Disclosure</b>	
<b>GRI 410: Security Practices 2016</b>			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages security practices using Disclosure 3-3 in GRI 3: Material Topics 2021.	Confidential Not Disclosed
Topic Disclosures	410-1	Security personnel trained in human rights policies or procedures	
<b>GRI 411: Rights of Indigenous Peoples 2016</b>			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages rights of indigenous peoples using Disclosure 3-3 in GRI 3: Material Topics 2021.	Confidential Not Disclosed
Topic Disclosures	411-1	Incidents of violations involving rights of indigenous peoples	
<b>GRI 413: Local Communities 2016</b>			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages local communities using Disclosure 3-3 in GRI 3: Material Topics 2021.	Community Engagement
Topic Disclosures	413-1	Operations with local community engagement, impact assessments, and development programs	Not Disclosed
	413-2	Operations with significant actual and potential negative impacts on local communities	
<b>GRI 414: Supplier Social Assessment 2016</b>			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages supplier social assessment using Disclosure 3-3 in GRI 3: Material Topics 2021.	Not Disclosed
Topic Disclosures	414-1	New suppliers that were screened using social criteria	
	414-2	Negative social impacts in the supply chain and actions taken	
<b>GRI 415: Public Policy 2016</b>			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages public policy using Disclosure 3-3 in GRI 3: Material Topics 2021.	Strategy, Policies & Practices
Topic Disclosures	415-1	Political contributions	
<b>GRI 416: Customer Health and Safety 2016</b>			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages customer health and safety using Disclosure 3-3 in GRI 3: Material Topics 2021.	Not Disclosed
Topic Disclosures	416-1	Assessment of the health and safety impacts of product and service categories	
	416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	

<b>GRI Standard</b>	<b>#</b>	<b>Disclosure</b>	
<b>GRI 417: Marketing and Labeling 2016</b>			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages marketing and labeling using Disclosure 3-3 in GRI 3: Material Topics 2021.	Not Reported; Policies are managed per Federal and State guidelines and SFIA Compliance
Topic Disclosures	417-1	Requirements for product and service information and labeling	
	417-2	Incidents of non-compliance concerning product and service information and labeling	
	417-3	Incidents of non-compliance concerning marketing communications	
<b>GRI 418: Customer Privacy 2016</b>			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages customer privacy using Disclosure 3-3 in GRI 3: Material Topics 2021.	Not Disclosed
Topic Disclosures	418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	

# STAY UP-TO-DATE ON OUR PROGRESS.

Visit our [sustainability page](#) for news and updates.

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