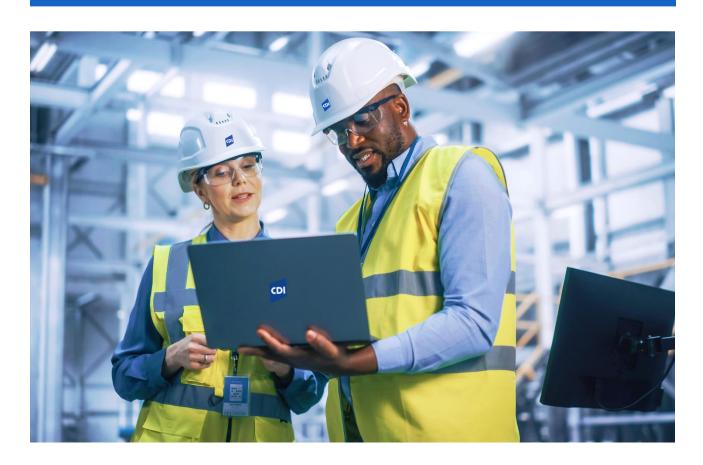




2023 Sustainability and ESG Report





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About CDI Engineering Solutions, LLC

CDI Engineering Solutions, LLC is a multi-disciplinary engineering organization offering a full range of integrated engineering, design, project support, procurement and construction management services to the energy and chemicals industries.

We offer proven project management capabilities, mature systems and processes, a network of eight engineering centers and an incredible team of experts to deliver the most complex and challenging projects – safely, on time and on budget.

We believe the future of human prosperity hinges on lower carbon solutions. Our goal is to deliver affordable, reliable, quality solutions which help our clients reduce their carbon footprint and help them with the challenges that face them with cost effective commercial solutions. Changes to the world's energy systems are necessary to reduce greenhouse gases and improve sustainability. Changes to infrastructure are required to face the impacts of climate change. Work is needed to safeguard our natural resources, to meet the needs and impact of explosive population growth. CDI is fully committed to helping our customers with their energy transition and sustainability goals. CDI has committed resources to assist our customers in applying existing and innovative technologies to meet energy goals of reduced greenhouse gases and renewable energy capability.

Our Vision is to be the leading EPCM provider focused on industrial clients who are executing projects to make life better.

Our Mission is to safely deliver high quality EPCM services to the energy and chemicals industries with a focus on the energy transition, renewables, and sustainability. We specialize in mid-cap project delivery and long-term alliances with our clients.





A Message from our CEO

CDI began to truly focus on sustainability in 2021. At the time, we created a task force to identify our current baseline of efforts and they developed a roadmap for all future efforts on sustainability. Today we are proud to recognize our forward progress. We have not only committed to the United Nations Global Compact, but we have also tied our goals to the United Nations Sustainable Development goals. In 2023, we achieved several of the goals such as:



Environmental

• Reduce Carbon Emissions

- We have calculated on Scope 1 and Scope 2 Carbon Emissions and developed goals to reduce our carbon emissions to zero by 2030.
- We have developed a Waste Management policy.
- Identified vendors to partner with who align with our ESG (Environmental, Social & Governance) efforts.

Education

- We have provided various educational opportunities through townhalls and web-based training on our environmental efforts.
- Expansion of our business model to support our client's efforts on sustainability and the Energy Transition
 - Battery and semiconductor materials projects
 - Outside Battery Limits (OSBL) engineering and design services for first US based Lithium Refinery
 - Front-End engineering for High Purity Manganese Sulfate Processing Plant
 - Designed the facility for a \$400M expansion of a US-based Silicon Carbide Producer
 - Green and Blue Ammonia and Carbon Capture Utilization and Sequestration (CCUS)
 - Supporting implementation of the first commercial scale Green and Blue Ammonia projects in the US.

Social

Drive Employee Wellbeing, Diversity and Engagement

- Updated and launched our Human Rights Policy
- Created DEI (Diversity, Equity & Inclusion) policy and framework
- Launch first annual Employee Engagement Survey
- o Identify and track KPIs (Key Performance Indicators) for diversity
- Annual review employee compensation against market data
- Focus on community impact and involvement activities across the organization

Safety = YOU

Celebrated 2.2 million safe work hours























- Launched Safety = YOU program to revitalize and strengthen our employee and workplace safety culture and program. Safety = YOU embody the phrase "safety begins with the Why – and ends with You", focusing on the "why" employees should focus on safety first, and emphasizing the need for personal responsibility and engagement.
- o Redesign and updated the CDI Life Saving Rules
- Established Regional Safety Teams (RST) within each region to drive our safety culture from a local perspective.
- o Hired a full-time dedicated Safety Manager
- Published a Monthly Safety Newsletter

SAFETY = YOU



2 MILLION SAFE WORK HOURS - In January, we celebrated a significant milestone, our employees' safety worked over 2 million work hours without an OSHA recordable incident.

• Supplier Diversity and Code of Conduct

- Developed Supplier Diversity Policy
- Created Supplier Diversity Goals and Plan of Action
- Identified key metrics to measure progress and success

Governance

Code of Conduct

- Updated Code of Conduct Policies
- o Trained all Staff and In-House Billable employees on Code of Conduct

Risk Assessment

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Conducted Rapid Risk Assessment for Anti-Corruption

I am genuinely excited about our sustainability journey and know our efforts not only support our internal goals but also help our clients progress their goals as well.

Steve Karlovic
President/CEO

CDI Engineering Solutions, LLC









Our Services

Changes to the world's energy systems are needed to reduce greenhouse gases and improve sustainability. Changes to infrastructure are needed to face the impacts of climate change. Work is needed to safeguard our natural resources, to meet the needs and impact of explosive population growth. CDI is fully committed to helping our customers meet the goals of energy transition and achieve their sustainability goals.

As a broadly diverse firm, CDI has a strong base in the energy and chemicals industries. Our customers are tackling some of the world's greatest challenges: cleaner energy, resilient infrastructure, making the most of natural resources. CDI will be at the forefront, providing innovative and sustainable solutions, exploring all options in pursuit of answers to these challenges. We offer the following services to our clients:

Energy Decarbonization

- Carbon Footprint Assessment and Reduction
- Plant Efficiency and Power Factor Correction
- LED Lighting/ Building Envelope Analysis
- On-Site Solar and/or Energy Storage
- Updating Aging/Inefficient Infrastructure
- High-Efficiency Heating/Ventilation/Air Conditioning (HVAC)
- Carbon Capture, Utilization, and Storage or Sequestration (CCUS)

Renewable Fuels Production

- Bio and Renewable Diesel
- Blue Fuels/ Low Carbon Fuel Standard Production (LCFS)
- Blue/ Green Ammonia Production
- Waste to Green Methanol
- Renewable Natural Gas

Distributed Generation

- Cogeneration/ CHP
- Fuel Cells
- Demand Response
- Microgrids

Energy Resilience

- Battery Storage/ BESS (plant and utility-scale)
- Diesel or Natural Gas Gensets
- Horizontal Generators
- Power Quality/ UPS



Energy Transition

- Electric Vehicles (EV) Charging and Infrastructure
- Boiler/ Furnace Electrification
- Energy Analytics (dynamic optimization)
- Hydrogen Production and Storage
- Battery Materials Production
- Advanced Semiconductor Materials

Environment

- Water and Wastewater Treatment
- Impact Studies and Risk Assessment

Sustainability Affiliations, Partnerships and Recognitions

United Nations Global Compact

We recognize the importance of sustainability and as such earlier in 2023 our CEO joined thousands of other CEOs in the United Nations Global Compact Commitment. Through this effort, CDI is committed to supporting the Ten Principles of the United Nations Global Compact on human rights, labor, environment and anti-corruption. We are committed to making the UN Global Compact and its principles part of the strategy, culture, and day-to-day operations of our company and to engaging in collaborative projects with advance the broader development goals of the United Nations, particularly the Sustainable Development Goals. As such, we have linked all of our goals, achievements, and metrics to the United Nations 17 Sustainable Development Goals.

Ecovadis Silver Medalist



For the second consecutive year, our comprehensive ESG program has been recognized with a Silver Medal in 2022 by EcoVadis, a leading independent rating agency of sustainability practices. The Silver Medal places our ESG program in the top 25% of more than 90,000 firms worldwide.

University Partnerships

In early 2023, CDI launched our Early Career Program, which provides internships to college and university students and full-time positions with structured professional development to recent graduates. Part of our goal with our Early Career Program aims to build strong relationships with universities and colleges who have a diverse student body, including Historically Black Colleges & Universities (HBCUs) and other



leading universities to attract top talent. In 2023, we were proud to partner with several universities such as Prairie View A&M, Southern University, and A&M College, Louisiana State University, University of Houston, Saginaw Valley State University, Marshall College, and others.













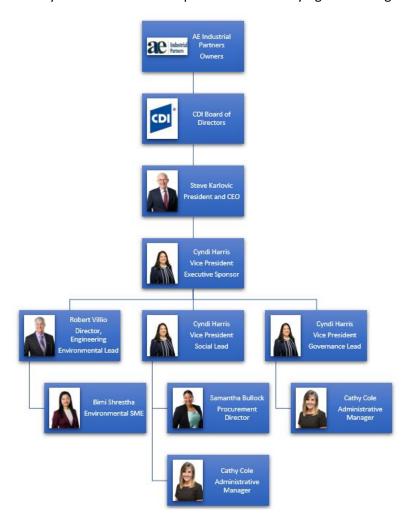
Environmental, Social and Governance

Our Environmental, Social and Governance (ESG) journey is one that we as a company are undertaking to better our vision of the future so that with our clients, "Together We Make Life Better". Our goals for this initiative are designed to be our roadmap to creating a more sustainable company and future. By achieving these goals, we will focus on actionable initiatives aimed at furthering out ESG efforts.



Steering Committee

At CDI, we have a steering committee who drive our ESG efforts within our organization. This steering committee reports directly to our CEO and is responsible for identifying and driving our initiatives.



Environment

Our overarching environmental goal is to not only reduce our own carbon footprint but also help our clients reduce their carbon footprint.



Greenhouse Gas (GHG) Emissions Intensity

What is GHG Emissions Intensity?

GHG Emissions Intensity is the number of units of Scope 1 and Scope 2 emissions from the operations per unit of economic output. Scope 1 emissions are direct GHG emissions that occur from sources that are owned or controlled by the company such as emissions from combustion in owned or controlled boilers furnaces, vehicles, etc. Scope 2 emissions are indirect GHG emissions from the generation of purchased electricity consumed by the company. It is measured in units of carbon dioxide equivalents, which consist of all the greenhouse gases including carbon dioxide, methane, and nitrous oxide.

How is GHG Emissions Intensity calculated?

Scope 1 + Scope CO2e emissions in metric tons

Revenue in million USD

emissions

Metric	GHG intensity (Scope & 2)	
2021	0.44	
2022	0.34	
Target	N/A	
Peer	1.13	
Benchmark	2.99	
YoY Change(%)	-22.73%	

	Topic	Increasing energy efficiency
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Energy Consumption Intensity

Metric	Energy consumption intensity		
2021	1.84		
2022	1.42		
Target	N/A		
Peer	2.92		
Benchmark	14.21		
YoY Change(%)	-22.83%		

What is Energy Consumption Intensity?

Energy Consumption Intensity of an organization is the number of units of energy consumed during the organization's operations per unity of economic output. The metric allows comparison of the underlying energy efficiencies across organizations and sectors and provides an indication of the energy efficiency standards of the technologies in use by the organization. For equivalent operations, a lower energy consumption efficiency indicates a higher energy efficiency standard.

How is Energy Consumption Intensity calculated?

Total energy consumed in MWh

Revenue in million USD



Target Progression Chart

This chart displays actual data for the years 2021 and 2022. If the company has reduction targets for the metrics, the charts will have red vertical lines denoting the reduction target. It visually presents whether CDI's performance improved or declined compared to the established targets for the period of 2022 – 2023. Stakeholders can quickly grasp the progress made towards the targets to facilitate decision-making, identify areas for improvement, and communicate the company's achievements.



Waste Management Policy

CDI has created a CDI Waste Management Policy. Our objectives for this policy are to identify areas of waste production, employ effective waste management practices to identify the most efficient methods to reduce the production of waste, maximize the re-use or recycling of waste material, and manage the process to ensure compliance with best practices.

As part of this policy, CDI has completed several objectives in 2023 including:

- Audit of CDI locations and partnered with building management to identify opportunities to reduce waste.
- Partner with vendors such as UBEO to determine the best solutions for waste management utilizing innovative technologies, new processes and ensuring we partner with vendors conscious of reducing waste.
- Ensure our vendors such as Iron Mountain utilize recycling practices for CDI shredded paper collection.
- Continued recycling additional waste such as aluminum in our Charleston, WV location and computer and phone equipment in our Houston, TX location.

Environmental Educational Opportunities

CDI hosted different sessions throughout 2023 to provide employees with further education on sustainability and updates on our progress throughout the year. For example, in May, a session titled Driving Sustainability – Progress, Roadmap and Strategies for Winning Sustainable Projects was presented to our employee population by Bimi Shrestha, our Sustainability Process Engineering Lead. In addition, during the quarterly employee update, we present our progress on our sustainability efforts. Lastly, our management team reviews our sustainability goals, and our progress throughout the year.



Social

CDI strongly believes fair and equitable practices are instrumental to our success. We have a strong commitment to human rights, diversity, employee engagement and social responsibility. CDI considers our human capital our most valuable asset. The combined sum of the individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities, and talent that our employees invest in our workplace environment and their work represents a significant part of our culture, reputation, and company achievements.

Human Rights Policy

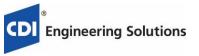
In 2023 we updated our Anti-Human Trafficking Policy and renamed it the CDI Human Rights Policy. The purpose of this policy is to state our intolerance to any use of "modern-day slavery" in our operations or from our suppliers and vendors. Our updated policy establishes the structures and processes by which CDI seeks to prevent human trafficking or modern-day slavery.

CDI is committed to a work environment that is free from human trafficking and modern-day slavery, which includes forced labor and unlawful child labor. CDI will not tolerate or condone human trafficking or slavery in any part of our organization. CDI employees, subsidiaries, contractors, subcontractors, vendors, suppliers, partners, and others through whom CDI conducts business must avoid complicity in any practice that constitutes trafficking in persons or modern-day slavery. Employees are encouraged to report any suspected violations by CDI or any related third parties who conduct business with an entity engaging in any activity prohibited by this policy.

Diversity

CDI has a diverse employee population, and we are committed to fostering, cultivating and preserving a culture of diversity, equity, and inclusion. CDI is dedicated to creating a safe work environment where all employees are included, treated with dignity and respect, and placed in a position to contribute to our future success. Our goal is to provide a working environment where all employees are included and valued for their contributions and to reflect the diversity of our clients and the communities in which we work.

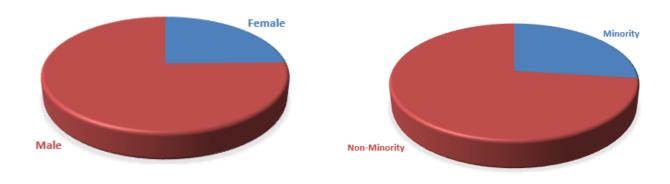
We are guided by the principles of honesty, integrity, trust, and respect as we work together to meet the objectives of our company and clients. We embrace a diverse workforce and recognize and respect individual qualities such as gender identities, age, race, ethnicity, national origin, culture, religious or political beliefs, language, education, socioeconomic background, family or relationship status, sexual orientation, genetics, and/or disability. We also value diversity of perspective including differences in personality, life and work experience, skills, and ways of thinking and working. Our commitment to diversity extends to all areas of our business including recruitment, job assignment, compensation and benefits, talent development, skills enhancement, promotions, employee retention, flexible work arrangements, forms of leave available to employees, policies and procedures, and succession planning.



CDI's diversity initiatives are applicable in all our practices and policies on recruitment and selection; compensation and benefits; professional development and training; promotions; transfers; social and recreational programs; layoffs; terminations; and continued development of a work environment built on the premise of diversity equity that encourages and enforces:

- Respectful communication and cooperation between all employees.
- Teamwork and employee participation, focusing on the representation of all groups and employee perspectives.
- Work/life balance through flexible work schedules to accommodate employees' varying needs in accordance with our flexible work policy.
- Employer and employee contributions to the communities we serve to promote a greater understanding and respect for diversity.

In 2023, our leadership team and hiring manager focused on increasing the diversity of our workforce. Through these focused efforts, CDI increased both our female and minority populations across our organization.



In March 2023, we celebrated International Women's Day across our organization and launched our Houston Area Women's Networking Group. This group met monthly throughout 2023 with the overall objective to support, network, and provide career guidance and support to each other within the group. Each month, between 10-15 women attend these meetings in our Houston office.





Employee Engagement

CDI encourages its employees to be engaged within the organization, with our clients, and within their communities. To this end, we attempt to provide excellent compensation and fringe benefits at a level at or above the mid-point of our peer firms in the markets in which we compete. We aspire to provide comfortable and professional office space for the employees assigned to our offices. We set expectations for a collegial environment of respect by our managers and all employees that engage employees in the success of our projects, our clients, the company, and one another.



In 2023, our Human Resources organization partnered with an outside specialist firm, CultureAmp, to conduct our first annual Employee Engagement Survey. This survey is utilized to assess our organization's overall employee satisfaction and engagement and develop actions to drive further engagement for our employees. We were pleased with our employee initial participation rate of the first annual survey, which reached 64%.

Our results confirmed our employees are highly engaged with an overall engagement score of 76%. Our employees valued most our management style and work life flexibility.

The company obtained extensive anonymous feedback from the survey, which included opportunities for improvement, which are being addressed by all levels of management to further improve employee engagement, both in general, and as specifically measured by this survey instrument.



Beyond setting a broad environment for engagement, CDI encourages a culture employee engagement through our Employee Engagement Committees, or as we like to call them – our FUN committees, located at each of our offices. These committees are composed of motivated volunteers formed with the support and oversight of our Human Resources department. The committees are charged with the following responsibilities.

- Improving our workplace environment and culture
- Making work more enjoyable
- Identifying employee concerns and opportunities for improvement
- Identifying community needs and opportunities for employees to volunteer and support worthy causes, with company support

The company provides financial support at the level of approximately \$5 per employee per year for these committee operations.



Early Career Program – Interns

The mission of our Early Career Program – Interns is to empower and develop the next generation by providing meaningful and diverse learning experiences which foster growth, creativity, collaboration, and innovation.

Our goals for our interns and this program include:

- Attract talented and motivated students and/or recent graduates who can contribute to CDI projects and bring fresh perspectives to the team.
- Identify potential full-time hires by evaluating the performance, fit, and potential of the interns during their tenure.
- Increase diversity and inclusivity to the team by reaching out to candidates from underrepresented groups and providing them with equal opportunity.
- Foster relationships with academic institutions and student organizations to create a pipeline of talent for future internships and full-time positions.
- Enhance the reputation and brand of CDI as an employer of choice.
- Influence and educate the next generation so they are prepared to enter the workforce.
- Providing clients with enhanced cost-effective solutions for talent and allowing students to apply newly learned technical skills to their work.

In 2023 we had our first class of interns join CDI's team. We had 15 interns working alongside our employees in multiple offices and remotely. These interns completed our eight-week program where they learned several competencies such as collaboration, teamwork, business acumen, verbal and written communication, presentation skills, leadership skills, decision making, problem solving and networking.

Our interns had an opportunity to work on real world projects that supported both CDI and client success.







Community Impact

CDI takes pride in our community involvement efforts and charitable donations. We are supported by many charity events in 2023. Some of these events include:

- United Way Dancing with the Stars in Charleston, WV
- St. Jude Baseball Tournament in Baton Rouge, LA
- CF Industries Yazoo Golf Tournament supporting the Boys and Girls Club of the Mississippi Delta
- Children's Assessment Center Toy Drive in Houston, TX
- Indorama Fish-O-Rama in Beaumont, TX supporting STEAM Education and recycling within the community
- Olin & Song of Survivors Charity Golf Tournament
- CF Donaldsonville's Fundraiser Golf Tournament
- TotalEnergies March of Dimes Golf Tournament
- Westlake Golf Tournament for Capital Area United Way
- INEOS ICAN Foundation Golf Tournament
- CDI Annual Back to School Supplies Drive supporting local schools
- Breast Cancer Awareness Fundraiser supporting local area charities who focus on breast cancer awareness, education, and support
- Participation in local blood drives in celebration of National Blood Donor Day







INEOS ICAN Foundation Golf Tournament

CDI participated in the INEOS Golf Tournament, which gives children in the Houston Gulf Coast area a chance to grow up healthier and better educated!





Safety

The safety of our employees, our clients, and our community is the top priority at CDI. We have a formal program administered by our Chief Health, Safety, Security and Environment officer, who is supported by our Safety Manager and a team of committed personnel at each of our offices. Our program is a Behavior-Based program that employs measures of safety behaviors, both leading metrics as well as lagging safety results metrics. This evergreen program consistently focuses on process improvement opportunities within our organization, at our client's sites, and within the communities we support. Specifically, we focus on our culture, our processes, and compliance with current safety regulations to ensure our program is forward looking and continually keeps our employees, clients, communities, and others safe.

To reinforce and revitalize our commitment to safety, we launched a new program SAFETY = YOU in 2023. Our newly launched program focuses on how our employees' behavior affects safety for themselves, their co-workers, their family, our clients, and our communities. Our program is committed to the following:

HSSE Commitment



CDI places the utmost importance on Health, Safety, Security and Environment (HSSE). Our evergreen program consistently focuses on process improvement opportunities which ensure visibility throughout our organization, at our client's sites, and within the communities we support. Specifically, we focus on our culture, our processes, and compliance with current safety regulations to ensure our program is forward looking and continually keeping those we care about safe. Our commitment is to continue to drive safe behavior by focusing on HSSE through our SAFETY = YOU program.

- Differentiate ourselves through our leadership's commitment to safety
- Achieve Goal Zero and going beyond to reduce the possibility of incidents
- Engrain safety into CDI's culture and processes
 Maintain an evergreen HSSE program with constant review and improvement
- Verify and measure compliance and performance Capture and implement Lessons Learned
- · Comply with all current regulations

SAFETY = YOU

Executive Commitment

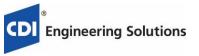
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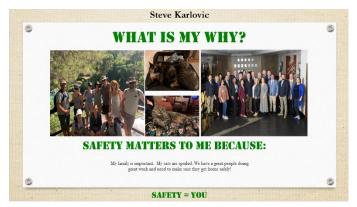
Candi Hamb

Director of Operations Mid America

- Differentiate ourselves through our leadership's commitment to safety.
- Achieve Goal Zero (no incidents)—and going beyond to reduce the possibility of incidents.
- Engrain safety into CDI's culture and processes.
- Maintain an evergreen HSSE program with constant review and improvement.
- Verify and measure compliance and performance.
- Capture and implement Lessons Learned
- Comply with all current regulations.

To launch our new program, we celebrated 2.2 million safe work hours in February 2022. This amazing accomplishment was celebrated throughout all CDI locations with safety-focused events including employee recognition, training, and refreshments.





Driving a culture of safety is critical to CDI's success. Through the launch of SAFETY = YOU, we also introduce the "What is my Why" campaign to our organization. Employees were provided the "What is my Why" template to complete and post outside of their workspace. Employees can add pictures of why safety is important to them as well as add a personal safety statement. "What is my Why" is a key component of our program as it is a visual reminder of the importance of safety in all aspects of what our employees do. As employees walk

through our offices to leave, the "What is my Why" triggers a powerful visual reminder of why safety is important to not only themselves, but also to their co-workers.

Additionally, we updated our CDI Life Saving Rules by adopting the Industry Standard International Association of Oil & Gas Producers (IOPG) Life-Saving Rules. These Life-Saving Rules were created to help in the prevention of fatal injuries during higher-risk activities and focus on a few clear simple rules that are proactive, observable, task-based, and actionable for our employees.



It is important for our program to have local drive and support within our regions. As such, we have established (and in one case, re-established) Regional Safety Teams (RST) whose main objective is to drive our safety culture within their region. Our teams are comprised of a mixture of employees who visit the field frequently and those who visit about once per quarter, office-based employees, and management. The team presents monthly safety topics, recognizes employees who embrace our SAFETY = YOU culture, and identifies and solutions local safety issues.

Supplier Diversity

As part of our commitment to fostering, cultivating, and preserving a culture of diversity, equity, and inclusion, we focus on ensuring qualified suppliers follow our Supplier Diversity Policy by meeting the Small Business Administration's business size criteria for the following categories:



- Women-owned businesses
- Veteran-owned businesses
- Service-disabled veteran-owned businesses
- LGBT-owned businesses
- Disadvantaged businesses
- Historically Underutilized Business Zone (HUBZone) businesses
- Minority-owned and other small businesses

Final criteria used to evaluate and select a supplier includes commitment and adherence to our Supplier Code of Conduct and Diversity policies and practices, price, quality, customer service, delivery, and other business requirements are among the criteria used to evaluate suppliers.

We strive to continue to reach our goals by:

- Identifying, actively seeking and continuously expanding our network of small diverse business vendors.
- Training and encouraging our clients to include small diverse business vendors in the purchasing process where there is alignment with business needs.
- Monitoring and measuring the effectiveness of our supplier diversity efforts.

Governance

Everyone connected with the CDI organization is expected to foster a culture in which legal and ethical conduct is recognized, practiced, and valued by all – all the time. As part of this commitment, everyone connected with CDI is required to:

- Obey all laws, rules and regulations that apply to our business.
- Avoid all conflicts of interest between work and personal interests.
- Treat all employees in accordance with fair employment practices.
- Be honest and fair in all business activities with customers, vendors and competitors.
- Endeavor to have all employees work in a safe environment.

Integrity is part of our CDI SPIRIT Core Values and embedded in everything we do. The foundation of our Governance program is to be corporately responsible, drive accountability, be aware of risks through our risk management approach, and ensure our decisions are made impartially, without personal interest, and with transparency.

Code of Conduct

This Code of Conduct sets out general principles of conduct. A series of Conduct Policies provides more specific guidance on what constitutes acceptable behavior.

Adherence to this Code of Conduct and all related Conduct Policies is required of all directors, officers, employees, consultants, vendors, and representatives of companies in the organization. Failure to read



the Code or the Conduct Policies or to sign an acknowledgment form agreeing to abide by their terms does not exempt anyone from the obligation to comply with the Code and the Conduct Policies.



In 2023, we refreshed and updated our Code of Conduct policies based on our current business needs and market environment. We also implemented a training program for all our staff and inhouse billable employee populations. Through this training program, over 98% of our eligible population completed training on *Living by Our Code*. This course provided our employees with guidance on ethical decision-making and fair dealing, as well as best practices for navigating conflicts of interest and avoiding insider trading. It also emphasized diversity and inclusion and

harassment prevention as integral to a safe and respectful workplace. Additionally, our employees received direction on communicating professionally and protecting organizational resources, including confidential information, intellectual property, and company assets. Lastly, the course offered guidance on reporting violations of organizational policy and the law.

Code of Conduct Violations

Anyone who violates this Code of Conduct or any of the Conduct Policies, requests another person to do so, fails to report a possible violation of the Code of Conduct Policies or retaliates against anyone who does report such a possible violation will be subject to disciplinary action by CDI. This disciplinary action may include termination of employment or, if the violator is a director, consultant, vendor or representative, termination of that relationship.

Everyone subject to this Code of Conduct is responsible for reporting suspected violations of this Code or any of the Conduct Policies. Suspected violations are to be reported to an employee's supervisor, CDI's Human Resources Department, CDI's Chief Compliance Officer, CDI's Legal Department, the Board of Directors of CDI Ultimate Holdings, LLC, or by calling the Code of Conduct Hotline (346-395-5133) or sending an e-mail to CodeofConduct@cdicorp.com.

Any waiver of any provision of the Code or a Conduct Policy for directors or executive officers may only be made by the Board of Directors of the applicable CDI company.

In 2023, CDI reports we had zero code of conduct violations.

Supplier Code of Conduct

We expect our Suppliers to aspire to these same standards in their business operations as we do. As such, CDI has created a Supplier Code of Conduct, which sets out the standards expected of any Supplier doing business with CDI and other third-party resources performing services to or on behalf of CDI. Our Supplier Code of Conduct includes requirements for:

- Use of CDI Company Assets
- Data Privacy and Confidentiality



- Ethical Standards
- Health & Safety
- Prohibitions Against Discrimination and Harassment
- Compliance with Labor Laws and Labor Standards
- Environment
- Community Involvement
- Gifts and Conflicts of Interest
- Business Integrity and Corruption
- Insider Trader
- Compliance, Communication and Enforcement
- Reporting Concerns

Rapid Risk Assessment for Anti-Corruption

In 2023, CDI conducted a rapid anti-corruption risk assessment aligned to Transparency International's ("Transparency") guidance. This assessment focused on the potential for corruption within the CDI organization, where corruption is defined by Transparency as "the abuse of entrusted power for private gain".

Through this assessment, we identified the potential for corruption is minimal based on the unlikely event that corruption could occur and/or the minimal impact that it would have on CDI if it were to occur. In the long history of CDI, its parent companies, and subsidiaries (CDI Corp. was incorporated in 1950), there have been no incidents of corruption.

Several elements were considered in this risk assessment. They include the diagnosis of corruption based on perception and actual experience; assessment of institutional weaknesses in the enforcement of rules and regulations; assessment of the risk based on the likelihood of corruption times the potential impact of the corruption; communication of the risks to the organization; and development of anti-corruption strategies to manage any critical risks.

Key Performance Indicators (KPIs)

N / - + ... -

CDI tracks a number of metrics to assess our progress towards our Social Goals. The include the following:

Metric	Result		
HEALTH, SAFETY, AND ENVIRONMENT			
Total Recordable Incident Rate (2022) 0.00			
Total Number of days away from work	0		
Total number of cases with job transfer or restriction 0			
GOVERNANCE			

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Number of Whistleblower Cases	0
Code of Conduct Violations	0
PEOPLE	
Average number of training hours per employee per year	15 hours
% employees utilizing tuition reimbursement and/or	10%
professional development	
% employees with personal career development plans	39%
% of employees participating in benefit plans	82%
Number of Townhalls Presented	13 (8 technical, 5 company
	updates)

Sustainability Accounting Standards Board (SASB) Standards

The SASB Standards are a set of industry-specific sustainability accounting standards, and they are intended to aid entities in disclosing information about sustainability-related risks and opportunities that could reasonably be expected to affect our cash flow, access to finance, or cost of capital over the short, medium, or long term. We are aligning to the standards for both the Engineering and Construction Services industry and the Professional and Commercial Services Industry.

SASB Topic	SASB Metric	Code	Result
	Number of incidents of non-compliance with environmental permits, standards, and regulations	IF-EN-160a.1	CDI does not have any incidents of non-compliance with environmental permits, standards and regulations
Environmental Impact of Project Development	Discussion of processes to assess and manage environmental risks associated with project design, siting, and construction	IF-EN-160a.2	All Project Kick-Off discussions include an assessment and mitigation requirements of environmental risks associated with the project design, siting and construction.
	Amount of defect- and safety-related rework costs	IF-EN-250a.1	CDI does not have any costs related to defect- and safety-related rework
Structural Integrity and Safety	Total amount of monetary losses as a result of legal proceedings associated with defect- and safety-related incidents	IF-EN-250a.2	CDI does not have any monetary losses as a result of legal proceedings associated with defect- and safety-related incidents
Workforce Health and Safety	(1) Total recordable incident rate (TRIR) and (2) fatality rate for (a) direct	IF-EN-320a.1	2022 (1)(a) TRIR = 0.0 (1)(b) TRIR = 0.0 (2)(a) Fatality Rate = 0.0



	employees and (b) contract		(2)(b) Fatality Rate = 0.0
Lifecycle Impacts of	employees Number of (1) commissioned projects certified to a third-party multi-attribute sustainability standard and (2) active projects seeking such certification	IF-EN-410a.1	CDI strives to continually support our clients' sustainability efforts. This includes supporting project sustainability certification such as the LEED certification. As these certifications are based on client specific projects, CDI does not have an accurate estimate of the number of projects with LEED certification or those seeking such certification.
Buildings and Infrastructure	Discussion of process to incorporate operational-phase energy and water efficiency considerations into project planning and design	IF-EN-410a.2	Operational water and energy efficiency considerations are addressed during the Front-End Loading or Front-End Engineering Design phases of projects when CDI is contracted to perform these services. Detailed methodologies to address carbon footprint quantification and reduction during FEL and FEED are under development.
	(1) Number of active projects and (2) backlog in countries that have the 20 lowest ranking in Transparency International's Corruption Perception Index	IF-EN-510a.1	CDI currently has about 1,000 active and open projects we support. CDI is a United States organization that does not have any work outside of the United States.
Business Ethics	Total amount of monetary losses as a result of legal proceedings associated with charges of (1) bribery or corruption and (2) anticompetitive practices	IF-EN-510a.2	CDI does not have any monetary losses because of legal proceedings associated with charges of bribery, corruption, or anticompetitive practices.
	Description of policies and practices for prevention of (1) bribery and corruption, and (2) anti-competitive	IF-EN-510a.3	CDI is committed to observing the highest ethical standards in all our business transactions. All personnel



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	behavior in the project bidding process		doing business on behalf of CDI are responsible for complying with all applicable laws, rules, and regulations, as well as with the CDI Code of Conduct, wherever CDI conducts business. This obligation includes mandatory compliance with the anti-bribery laws including the U.S. Foreign Corrupt Practices Act ("FCPA"). While the FCPA focuses on improper payments to non-U.S. government officials, it is the policy of CDI to prohibit all improper payments, including payments to customers, prospective customers and other third parties, that may be prohibited by U.S. or local law, including those laws prohibiting commercial bribery. Additionally, CDI is committed to competing vigorously and fairly and in compliance with all applicable antitrust laws. Every employee of CDI and its affiliated companies is expected to comply with the antitrust and competition laws and our Policy. No supervisor, manager or executive has the authority to direct or approve any action by a CDI employee in violation of those laws or our
		CV DC 222	Policy.
Data Security	Description of approach to identifying and addressing data security risks	SV-PS-230a.1	approach to identifying and addressing data security risks. CDI has policies and processes in place, requires annual training for our



		employees on data security risks, and partners with our managed service provider, Synoptek, to identify and mitigate any data security risks.
Description of policies and practices relating to collection, usage, and retention of customer information	SV-PS-230a.2	CDI and our client's confidential information is a valuable company asset that must be used, stored, and disclosed only in the best interest of the Company and only in accordance with all applicable laws and the terms of the CDI Company Confidential Information Policy. Confidential Information may only be used by people with proper authorization and in connection with Company business. It may never be
		used for personal reasons or gain. Confidential Information must always be used, transported, and stored in a manner designed to prevent unauthorized access. Accordingly, Confidential Information must be used in a location and in a manner that prevents unauthorized access to it. And it must be stored in an area, room, closet or filing cabinet that can be locked to prevent unauthorized access during non-business hours. Confidential Information may
		only be disclosed, either internally or externally, to persons who have a legitimate need to know. When Confidential



			Information is disclosed, it must be transmitted in a secure fashion, including encryption or password protection when transmitted electronically.
	(1) Number of data breaches, (2) percentage involving customers' confidential business information (CBI), or personally identifiable information (PII) (3) number of customers affected	SV-PA-230a.3	CDI did not have any data breaches involving either CDI or our client's confidential business information.
	Percentage of gender and racial/ethnic group representation for (1) executive management and (2) all other employees	SV-PS-330a.1	CDI executive management is 12.5% female and 25% minority. Our employee population is 25% female and 27% minority.
Workforce Diversity and Engagement	(1) Voluntary and (2) involuntary turnover rate for employees	SV-PS-330a.2	Our voluntary turnover rate is 15.1% and our involuntary turnover is 11.2%.
	Employee engagement as a percentage	SV-PA-330a.3	CDI's current employee engagement survey identified our employee engagement at 76%.
Professional Integrity	Description of approach to ensuring professional integrity	SV-PS-510a.1	At CDI, Integrity is part of our CDI SPIRIT Core Values. We take several steps to ensure integrity is embedded in all of our business practices. Our employees participate in annual training, sign off on our Code of Conduct during onboarding and we conduct quality audits to ensure integrity in our work product.
	Total amount of monetary losses as a result of legal proceedings associated with professional integrity	SV-PS-510a.2	CDI did not have any monetary losses as a result of legal proceedings associated with professional integrity.