CORPORATE SUSTAINABILITY REPORT

2022

ClarkDietrich®

A MESSAGE FROM OUR PRESIDENT & CEO

Hello! I am truly pleased to welcome you to the inaugural Corporate Sustainability Report (CSR) from ClarkDietrich. As president and CEO, it is very much an honor to introduce what will be an annual report, as well as a duty to be clear about where we have been in the past on sustainability, where we are at present, and where we're heading in the future.

A New Commitment to Keep Doing More.

With this, our very first CSR, we are setting an important milestone and making a great step forward. As you read and review the reported information, you will see that ClarkDietrich has practiced sustainability principles for many years; but it has been fragmented, and not clearly organized.

Today, however, change is underway. We are newly focused on creating an active and intentional sustainability program, chiefly evidenced by two key decisions.

First, as of March 2022, ClarkDietrich has leadership and individual oversight in place for these efforts. We announced the addition of a Corporate Sustainability Manager (CSM), one of whose tasks it was to make this report a reality. The fact that you're reading it now is a sign of success. Another task of this role will be to make sure this yearly report becomes more robust, and over time, structured around strong data. On this front, what we lack today, we are already working to supply tomorrow.

Second, our program will be built around Global Reporting Initiative (GRI) Standards, which you'll read more about throughout this report. We realize that our activities and business relationships have impacts on the environment, economy and people, including their human rights. Choosing to use the GRI Standards gives us an internationally recognized structured set of disclosures that will allow us to report our impacts—both positive and negative—in a consistent and credible manner. We are excited to expand our contributions to sustainable development.

Living Up to Our Values.

"Do The Right Thing—Do Things Right." That phrase tops the list of ClarkDietrich values. When it comes to sustainability, we do not choose to commit to goals we can't keep at present, make claims we cannot back up with data, or communicate empty green platitudes. Being a privately held company, we are not legally required to complete these efforts or an annual report; but we believe they are the good and right things to do for the planet, for people, and for prosperity's sake (more on that to come).

In addition to our pursuit of reporting with reference to GRI Standards and the addition of a CSM, we're proving ourselves with the implementation of a software package that will allow us to track and report on environmental impact attributes of the materials and energy flowing through all of our facilities. It will play an integral role in capturing the data we need to make informed decisions for reducing the embodied carbon in our products, and also provide you with quantifiable information. Further, we are engaged with our industry partners, such as the Steel Framing Industry Association (SFIA) and the American Iron and Steel Institute (AISI), by participating in sustainability councils and task groups.

We Now Have Three Bottom Lines.

ClarkDietrich is not the first company to adopt this definition of sustainability, and we will not be the last to come on board. Today, we embrace it for its simplicity and balance. To sum things up, sustainability for us means taking practical, commonsense actions for the concurrent benefit of Earth, its inhabitants, and long-term financial viability for all stakeholders.

Planet. People. Prosperity.

On page 16, we go deeper into each. For now, I will say we are again at a fresh starting place on sustainability. The difference is we now have defined objectives to reach, reporting systems in place, and personnel to champion the cause. As always, you have our support in bettering the built environment, and we are grateful for your support in turn.

Jim Collins
President & CEO

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GENERAL DISCLOSURES

ClarkDietrich has a growing presence as a leading manufacturer of construction products and provider of related services. Here, we summarize key details about our company, as a foundation for introducing the topic at hand: our renewed commitment to sustainability and intention for regular and robust reporting.

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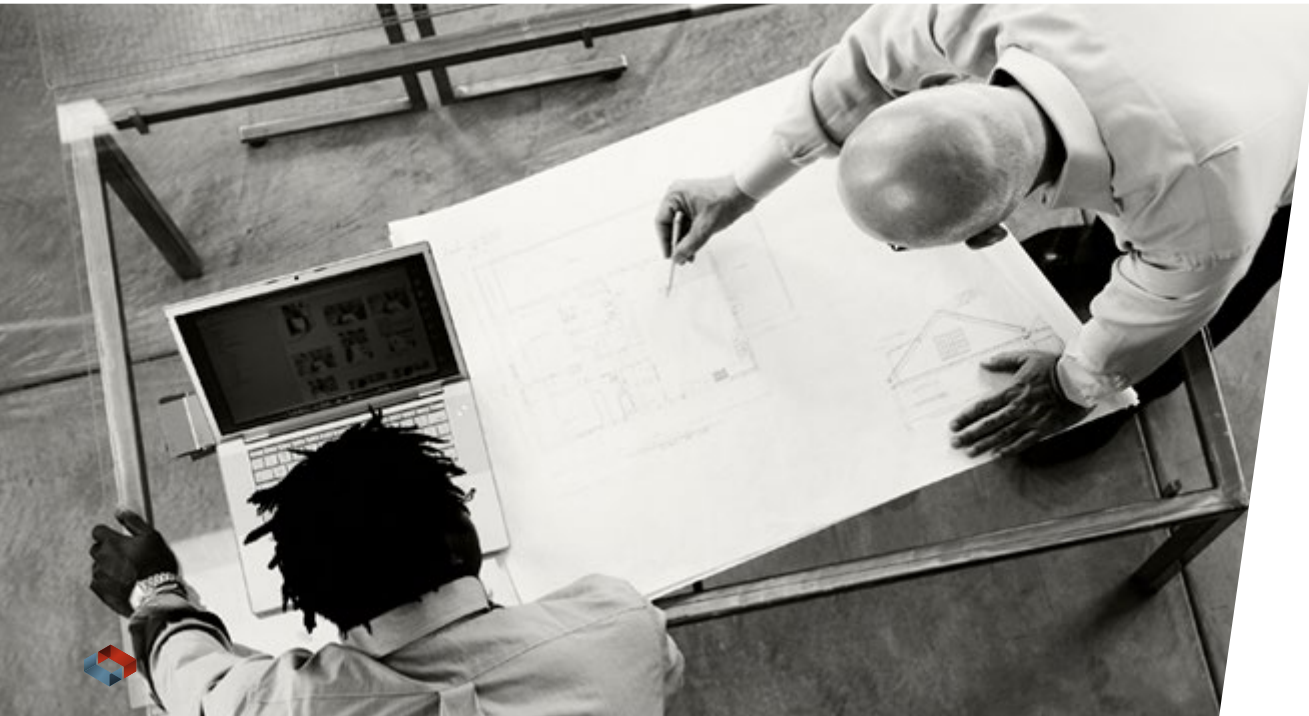
Far beyond products, our collaborations increasingly involve efforts and expertise that support smarter installation and design, including resources for BIM and ClarkDietrich Engineering Services LLC.

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

ClarkWestern Building Systems

1981
Clark Steel Framing Systems founded by James Clark

1999
Delta Metal Products acquired

2002
Purchases Ocala Building Products

2001
MISA formed;
Clark & Western form alliance

2004
Acquires Dale Industries;
ClarkWestern Design (CWD) organized

ClarkDietrich

ClarkWestern and Dietrich Metal Framing form joint venture, creating an unsurpassed offering of innovative products and services

2011
Acquires Vinyl Corp.

2017
Acquires Strait-Flex,® Intl.

2022
ClarkDietrich completes full acquisition of Structa Wire Corp.

2019
Joint Venture with Hadley Group – CDH Custom Roll Form, Inc.

2018
ClarkDietrich purchases 50% ownership of Structa Wire Corp.

1980 — 1990 — 2000 — 2010 — 2011

DIETRICH METAL FRAMING A Worthington Industries Company

1959
Dietrich Industries founded by William S. Dietrich

1984
Dietrich opens Warren processing plant

1996
Worthington acquires Dietrich Metal Framing

2002
Worthington/Dietrich acquires Unimast

2003
Dietrich launches Clip Express℠ to streamline specification and delivery

2009
Dietrich and ClarkWestern collaborate to develop new industry-changing ProSTUD® Drywall Framing System

Locations — Offices & Manufacturing Plants

CLARKDIETRICH MANUFACTURING LOCATIONS

Structa Wire Vancouver, BC	**Steel** Pasadena, TX	**Steel** Dade City, FL	**Steel** Vienna, OH
Steel Woodland, CA	**Strait-Flex** O'Fallon, MO	**Vinyl Corp** Miami, FL	**Steel** Baltimore, MD
Steel Riverside, CA	**Steel** Rochelle, IL	**Steel** Warren, OH	**Steel** Bristol, CT
Steel Dallas, TX	**Steel** McDonough, GA	**CDH Custom Roll Form** Warren, OH	

ENGINEERING OFFICE LOCATIONS

ClarkDietrich Engineering Services Carlsbad, CA	**ClarkDietrich Engineering Services** Merrillville, IN	**ClarkDietrich Engineering Services** McDonough, GA	**ClarkDietrich Engineering Services** Bristol, CT
ClarkDietrich Headquarters & Research West Chester, OH			

CLARKDIETRICH & ITS REPORTING PRACTICES

We intend to report in reference to the Consolidated Set of the 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.

Future reporting periods for the Corporate Sustainability Reports (CSRs) will be aligned with the financial reporting period, which runs from April 1st through March 31st, and will occur annually.

There are no restatements of information at this time, since this is the first annual CSR to be released.

No external assurances have been obtained for this CSR.

CLARKDIETRICH VALUE CHAIN

We manufacture and sell building products that are used in the commercial and residential construction industries. These products are manufactured mainly from steel- or vinyl-based raw materials, and they fall within the product categories of Interior Framing, Exterior Framing, Interior Finishing, Exterior Finishing, Floor Framing, Clips and Accessories. We purchase our raw materials from suppliers, such as steel mills and vinyl compounders. We sell our finished goods to customers who include commercial distributors and big box retail stores, such as The Home Depot® and Lowe's.® Our commercial and retail customers then resell our products to their customers—end users who install the products into a commercial or residential building.

Steel + Vinyl Raw Materials

ClarkDietrich Manufacturing

Commercial or Residential Building Projects

Distributors + Big Box Stores
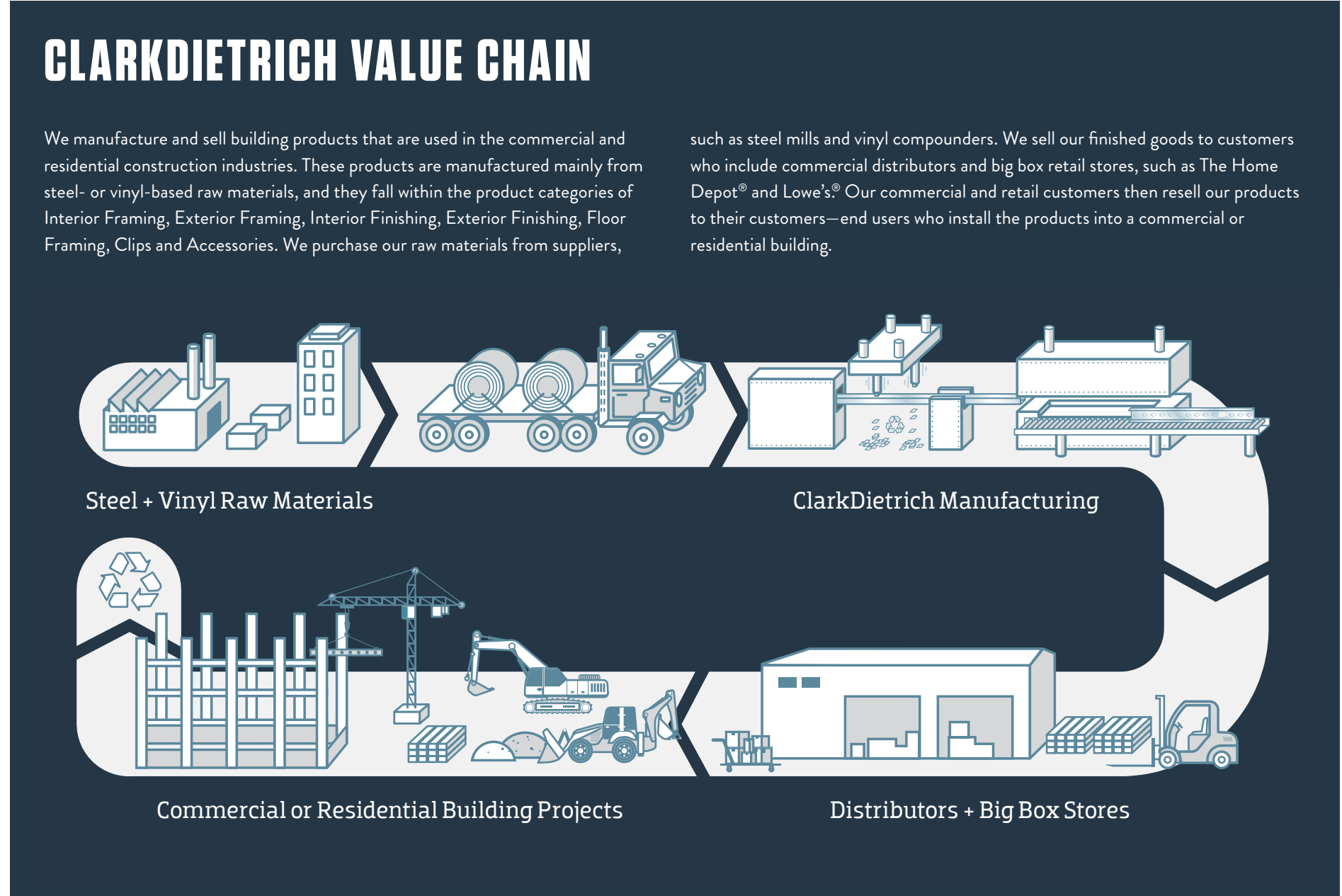
SUSTAINABILITY GOVERNANCE STRUCTURE

In 2022, the ClarkDietrich Executive Committee approved adding a new position—a Corporate Sustainability Manager—to continue the development and strengthening of the company's sustainability strategy moving into the future. The sustainability governance structure consists of the Executive Committee, the Corporate Sustainability Manager and the Sustainability Council.

The Executive Committee is comprised of: the President and CEO; Chief Financial Officer; VP of Sales; VP of Marketing; 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). The Executive Committee is responsible for reviewing and approving all sustainability strategies and programs proposed by the Corporate Sustainability Manager.

Executive Committee

While the basic governance structure of the sustainability program has been established, GRI 2: General Disclosures 2–10 through 2–21 have not been included in this first annual report. Over the course of the next year, these disclosures will be reviewed for potential inclusion in subsequent reports.

The Corporate Sustainability Manager is Adam Shoemaker. It was the responsibility of the CSM to create and draft this first annual Corporate Sustainability Report. As part of this process, responsibilities also included a review of various sustainability reporting standards. This review led to the recommendation of implementing the Global Reporting Initiative (GRI) Standards as the reporting structure, which was reviewed and approved by the Executive Committee.

Corporate Sustainability Manager

The Sustainability Council Members will consist of at least one member of the Operations team at every plant, and at least one representative from every office location. Council members will be identified and selected by the Executive Committee and the CSM, based on relevant experience and interest in the material topics. The Council will meet at least quarterly to review sustainability programs and material topics, identify stakeholders, and brainstorm ideas for new sustainability initiatives.

Sustainability Council

STRATEGY, POLICIES & PRACTICES

Statement on Sustainable Development Strategy

ClarkDietrich's first goal was to create and publish this first annual Corporate Sustainability Report (CSR), which establishes a sustainability structure that will guide us in the future. Our medium-term goals are to implement a software program that will allow us to accurately track and measure our environmental impacts. This tracking and measurement is necessary in helping us to make informed decisions on our long-term vision and strategy for reducing our impacts, while supporting all three Sustainability Imperatives (see page 16).

We are aware of many programs, goals, challenges, initiatives and organizations pushing and guiding a sustainable agenda forward on a wide scale. This list includes: the United Nations Sustainable Development Goals (UN SDGs); the Science Based Targets initiative (SBTi); the Architecture 2030 Challenge; and the Structural Engineers 2050 Commitment Program (SE 2050), just to name a few. Over the course of the next year, we will be exploring these programs in-depth to gain more insight on the knowledge, guidelines and best practices these programs have developed over the years. Since our newly expanded sustainability initiative is still in its beginning stages, we are not yet able to commit or align with these goals and programs; however, they will all be reviewed and considered for inclusion in our subsequent CSRs' strategies.

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 Handbooks released in 2021

2. Business Conduct Guide dated 3/22/2017*

3. Policy and Manual for Antitrust Law Compliance dated 12/1/2016

4. Policy and Manual for Foreign Corrupt Practices Act Compliance dated 12/1/2016

5. Internal Whistle Blowing Rules dated 10/1/2019

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.

*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.

Jim Collins
President & CEO

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

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

AISI – American Iron and Steel Institute

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 Engineers Institute

IFC – International Firestop Council

DISCA – Drywall & Interior Systems Contractors Association

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

STAKEHOLDER ENGAGEMENT

For our purposes, we adhere to the definition of stakeholders as individuals or groups with interests that are affected, or could be affected, by our organization's activities. Further, 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.[1]

Approach to Stakeholder Engagement

ClarkDietrich has been identifying and engaging with stakeholders for the entirety of its existence. However, this has usually been from the perspective of a single department, including Sales, Marketing, HR, Purchasing, or Engineering. Development of this report marks our first effort at identifying stakeholders, collectively as a company, from the viewpoint of sustainability. The Executive Committee, including the Corporate Sustainability Manager, was surveyed to identify who they believed our stakeholders are, and the graphic to the right was developed.
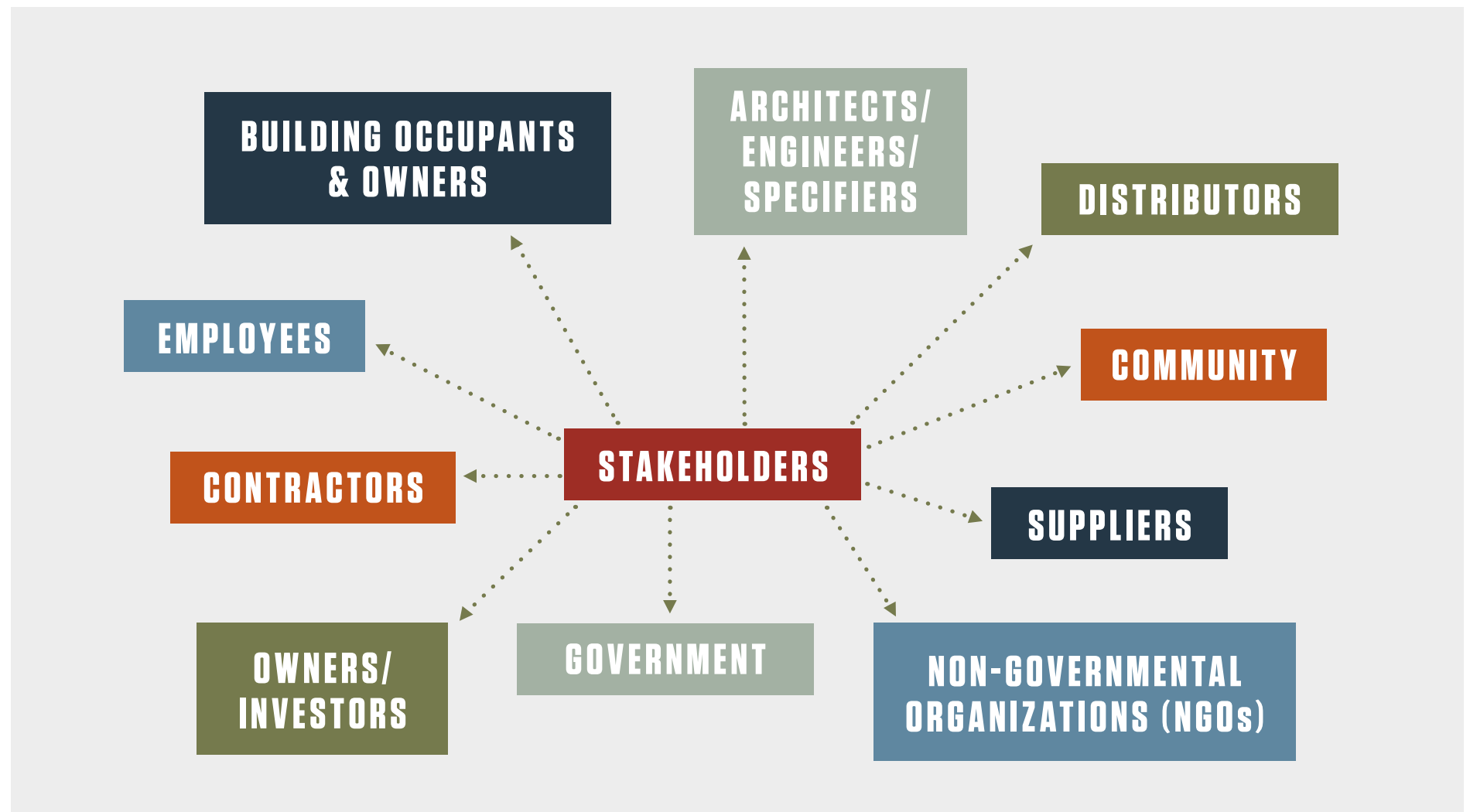
In next year's Corporate Sustainability Report, our goal is to complete a formal in-depth stakeholder identification survey and study with the participation of the Sustainability Council. At that point, we may choose to add or subtract stakeholders from the list above, as well as discuss how they were identified or why they are being removed. We also plan to include how they are engaged, provide examples of those engagements, and identify key topics for each stakeholder group.

[1] The Organization for Economic Co-operation and Development (OECD), OECD Due Diligence Guidance for Responsible Business Conduct, 2018.
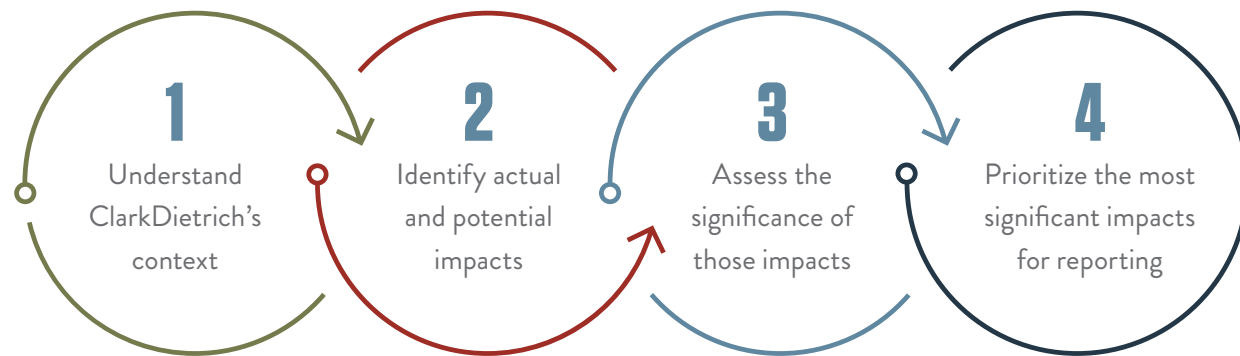
MATERIAL TOPICS

A more rigorous and defined practice of sustainability demands not only that we realize our actions have impacts outside our company, but also that we are clear about what those impacts are. Today, we are laying the groundwork for that process. In the future, this section will be a major component of our reporting.

MATERIAL TOPICS

PROCESS TO DETERMINE MATERIAL TOPICS

The GRI Standard defines Material Topics as those that represent an organization's most significant impacts on the economy, environment and people—including impacts on their human rights.

Here in our first annual Corporate Sustainability Report, we are defining the guidelines and processes that will be used to determine our list of Material Topics for the subsequent CSRs. We intend to follow the GRI guidance in determining Material Topics by employing these steps:

1 Understand ClarkDietrich's context

2 Identify actual and potential impacts

3 Assess the significance of those impacts

4 Prioritize the most significant impacts for reporting

Once developed and reported in ensuing CSRs, the management of Material Topics will also be addressed, and it will include the following: actual and potential impacts; policies or commitments regarding Material Topics; actions taken to mitigate negative impacts; and, how we plan to track the effectiveness of those actions.
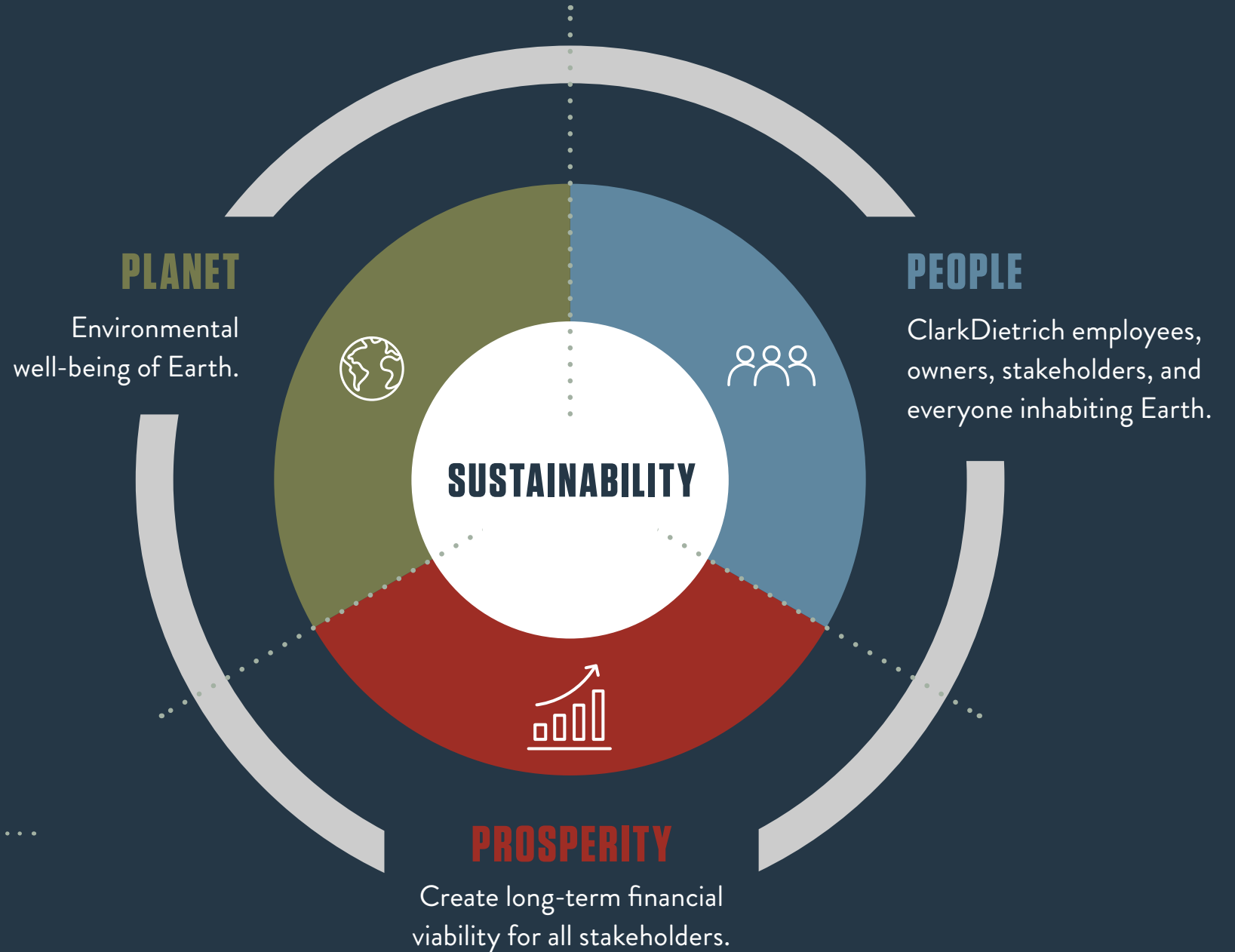
SUSTAINABILITY IMPERATIVES

Sustainability has become mainstream. It's no longer the province of "green" companies or the leading environmental vanguards. Yet, while more generally understood and accepted across society and in business, definitions and approaches differ. ClarkDietrich has adopted a definition used by many organizations, but we are making it our own.

SUSTAINABILITY IMPERATIVES

TRIPLE BOTTOM LINE

ClarkDietrich subscribes to the definition of sustainability commonly known as the 3 Ps, or "Triple Bottom Line." As such, our practice of sustainability is aimed at producing balanced benefits for the Planet, People and Prosperity.

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

PLANET
Environmental well-being of Earth.

PEOPLE
ClarkDietrich employees, owners, stakeholders, and everyone inhabiting Earth.

SUSTAINABILITY

PROSPERITY
Create long-term financial viability for all stakeholders.

PLANET IMPERATIVE

ClarkDietrich has been supporting sustainable building programs in the United States construction industry for many years, such as LEED® and the Living Building Challenge℠ (LBC). Programs like these are typically known as green building programs. We recognize that "green" means many different things to many different people, as does the concept sustainability. Therefore, we wish to be clear about our view of green building programs and how they fit in with sustainability overall.

The United States Environmental Protection Agency (EPA) defines green building as follows:

"The practice of creating structures and using processes that are environmentally responsible and resource-efficient throughout a building's life-cycle from siting to design, construction, operation, maintenance, renovation and deconstruction. This practice expands and complements the classical building design concerns of economy, utility, durability, and comfort. Green building is also known as a sustainable or high-performance building."

As for sustainability, the EPA says:

"Sustainability is based on a simple principle: Everything that we need for our survival and well-being depends, either directly or indirectly, on our natural environment. To pursue sustainability is to create and maintain the conditions under which humans and nature can exist in productive harmony to support present and future generations."

To elaborate further, The United Nations World Commission on Environment and Development says:

"Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs."

Based on these views from well-recognized and established sources, we view green building programs as one component of sustainability—albeit a most critical one. Without these programs and their effects on the environment, the larger goals of sustainability cannot be met. As a leading manufacturer of building products, and thus an influence on the environment, ClarkDietrich intends to keep supporting green building programs in order to increase the sustainable attributes of the products we supply.

Current Sustainability Initiatives

LEED – Leadership in Energy and Environmental Design

We are and will remain active with LEED, the well-known green building rating and certification system managed by the U.S. Green Building Council (USGBC). According to its documents, "LEED certification is a globally recognized symbol of sustainability achievement and leadership. To achieve LEED certification, a project earns points by adhering to prerequisites and credits that address carbon, energy, water, waste, transportation, materials, health and indoor environmental quality. Projects go through a verification and review process by GBCI and are awarded points that

correspond to a level of LEED certification: Certified (40–49 points), Silver (50–59 points), Gold (60–79 points) and Platinum (80+ points)."[2]

ClarkDietrich has been a member of the USGBC since 2008. With several LEED-accredited professionals on our staff, we are committed to supplying quality products and continually looking for new ways to develop greener building products and sustainable business practices.

Currently, our products help customers obtain LEED credits by contributing points under the Materials and Resources and Indoor Environmental Quality Credit categories. Summaries of the points available can be found on our website. The sustainable attributes of steel that contribute to these points are as follows: high recycled content (lower-embodied carbon); regional availability; cut-to-length ordering for less jobsite waste; and inherently non-emitting volatile organic compound (VOC) materials.

In 2021, we completed VOC testing on most of our vinyl finishing products, and we have maintained Clean Air Gold certification through Intertek Testing Services NA, Inc. since the initial testing was completed. Even though steel is considered an inherently non-emitting VOC source, we still receive requests for certifications regularly due to the various coatings that can be applied. So, in 2022, we completed testing on various grades of steel with various coatings applied, and achieved Clean Air Gold certification from Intertek on those variations.

The 100% recyclability of steel should not be overlooked when discussing sustainability. It can be recycled an infinite number of times into the same material, and

[2]LEED rating system, U.S. Green Building Council (usgbc.org).

with the same quality. Organic materials like paper made from wood, can only be recycled four to six times before they lose their ability to be recycled, and are sent to the landfill. Once there, they will release carbon and other greenhouse gases back into the atmosphere.

LEED places a high value on transparency, and ClarkDietrich has supported these initiatives by developing and maintaining Environmental Product Declarations (EPDs) and Health Product Declarations (HPDs)—both of which can be found on our website.

LBC – Living Building Challenge

The Living Building Challenge is a green building certification system managed by the International Living Future Institute. According to the organization, "The Living Building Challenge (LBC) is a certification program, advocacy tool, and philosophy defining the most advanced measure of sustainability in the built environment today. As a certification program, it addresses all buildings at all scales and is an inclusive tool for transformative design. Whether the project is a single building, a renovation, an infrastructure project, or a park, the LBC provides a framework for

design, construction, and improvement of the symbiotic relationships between people and all aspects of the built and natural environment."[3]

As the Institute sees it, the goal is for construction projects to move beyond being "less bad" for the environment to becoming truly regenerative.

"The Living Building Challenge consists of seven performance categories, or 'Petals': Place, Water, Energy, Health & Happiness, Materials, Equity and Beauty. Each Petal is subdivided into Imperatives, for a total of twenty Imperatives in the Challenge." Within the Materials Petal, we find Imperative #13 which is the Red List, and this is where we begin to see how steel framing is influenced by the LBC. The LBC version 4.0 states that: "All projects must avoid the following Red List chemical classes in 90% of the project's new materials by cost. *In situ* materials do not need to be removed or vetted for Red List chemical classes."[4]

This program has been challenging because many of our standard product offerings do contain chemicals that are on the Red List. But, we have been able to identify supplier sources for many products that will be Red List-compliant. While we don't commonly stock the compliant materials, we can special-order them for our customers upon request. ClarkDietrich continues to actively search for new products and material alternatives that are Red List-free in an effort to support the LBC goals.

Green Building Standards, Certification Systems & Regulations

In this report, we have taken a taken a deeper look into the LEED rating and certification system and the LBC performance-based standard and certification program. These two programs are where we see the highest volume of technical questions at present.

However, we do recognize, understand and support a larger range of sustainability standards, certifications and regulations. These rating and certification systems include: Building Research Establishment Environmental Assessment Methodology (BREEAM®); Green Globe; WELL Building Standard; and Fitwel.® Two other regulations commonly related to sustainability, and on which we are frequently questioned, are Proposition 65 from the California Office of Environmental Health Hazard Assessment, and the Restriction of Hazardous Substances (RoHS) Directive.

[3]Living Building Challenge 4.0, dated June 2019; and the *Petal Handbook*, July 2022.
[4]Living Building Challenge 4.0, dated June 2019; and the *Petal Handbook*, July 2022.

Future Sustainability Initiatives

ClarkDietrich is currently implementing a software package that will allow the tracking, measurement and reporting of environmental impacts, which include product Life Cycle Assessments (LCAs). The intention is to have a software that provides the ability to measure and report GRI Topic Standards 301 through 306, which includes: Materials, Energy, Water and Effluents, Biodiversity, Emissions, Effluents and Waste, and Waste.

Across the construction industry, and across the world, Emissions reductions has been a very high priority topic. Specifically, the reduction of greenhouse gas (GHG) emissions in metric tons of carbon dioxide (CO_2) equivalent. The GRI Emissions Standard section covers reporting on the following GHGs:

- Carbon dioxide (CO_2)
- Methane (CH_4)
- Nitrous oxide (N_2O)
- Hydrofluorocarbons (HFCs)
- Perfluorocarbons (PFCs)
- Sulphur hexafluoride (SF_6)
- Nitrogen trifluoride (NF_3)

Because there may be questions on why the standard calls for measuring Emissions in the form of a CO_2 equivalent, we will dive a little deeper into that topic.

The GRI defines the CO_2 equivalent as a measure used to compare the Emissions from various types of GHGs based on their global warming potential (GWP). The CO_2 equivalent for a gas is determined by multiplying the

metric tons of that gas by the associated GWP. GWP values convert GHG emissions data for non-CO_2 gases into units of CO_2 equivalent. Similar to the Emissions disclosures in the GRI Standard, Environmental Product Declarations (EPDs) are another tool used to report the GWP associated with building products, which are now commonly used in the construction industry.

When EPDs were first introduced to the construction industry, many people (including ourselves) used the analogy that they were like a Nutritional Facts label for food; but instead of telling you the content of your food in the form of calories, fat, cholesterol and protein, the EPD tells you the environmental impact potential of your construction materials in the form of GWP, Ozone Depletion Potential (ODP), Acidification Potential (AP), and other metrics. See page 20 for more on EPDs.

CO₂ VS. CH₄ GLOBAL WARMING POTENTIAL
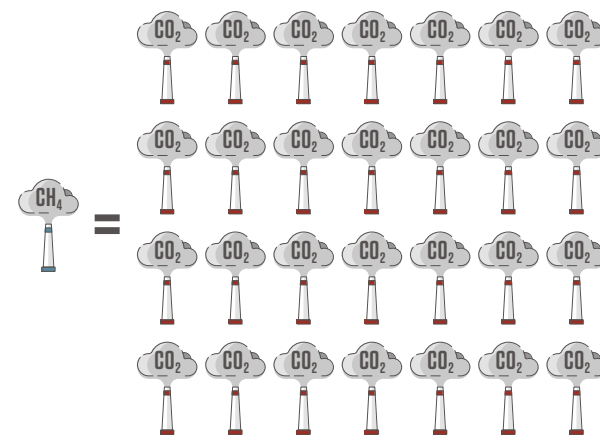
One ton of Methane (CH_4) has a GWP of 28 times that of one ton of CO_2.

See below for the list of GWPs for the GHGs covered by the GRI Emissions Standard:

GWP = 1 . . . . Carbon dioxide (CO_2)

GWP = 28 . . . . Methane (CH_4)

GWP = 265 . . . . Nitrous oxide (N_2O)

GWP = 14,800 max . . . . Hydrofluorocarbons (HFCs) – varies

GWP = 12,200 max . . . . Perfluorocarbons (PFCs) – varies

GWP = 23,500 . . . . Sulphur hexafluoride (SF_6)

GWP = 16,100 . . . . Nitrogen trifluoride (NF_3)

To gain a better understanding of the concentrations of these gases in current Emissions, you will see from the EPA graph and data (below) that CO_2 accounted for 79% of all Emissions in 2020, and the combination of CO_2, CH_4 and N_2O accounted for 97% of all Emissions during that same period.

Nitrous Oxide **7%**
Fluorinated Gases **3%**
Methane **11%**
Carbon Dioxide **79%**

OVERVIEW OF U.S. GREENHOUSE GAS EMISSIONS IN 2020

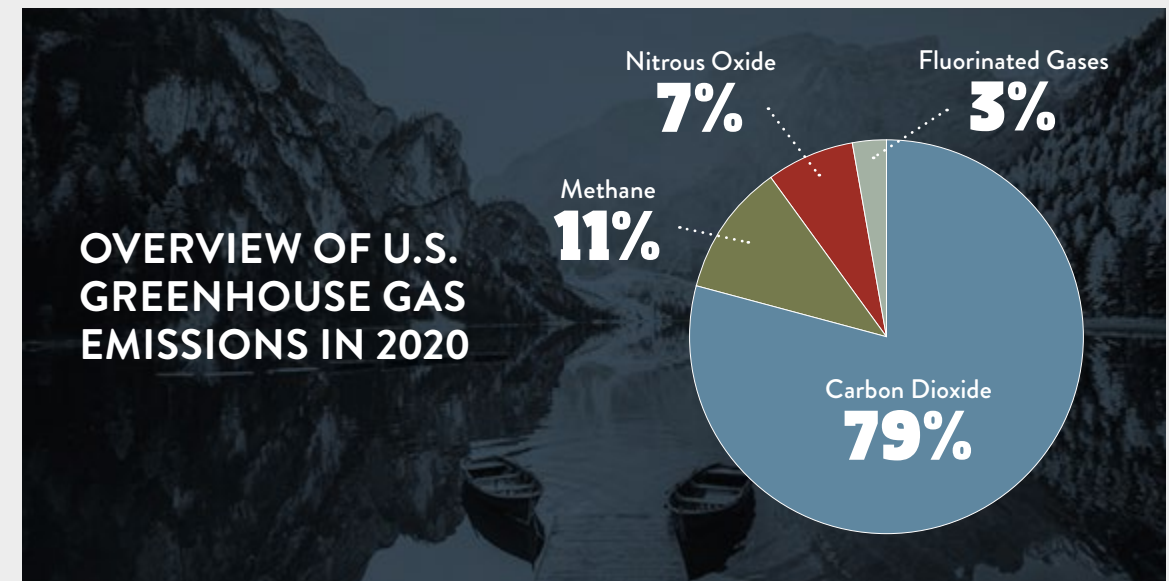**Figure 1: https://www.epa.gov/system/files/images/2022-04/gases-by-source-2022-caption.png.**

We hope that this has given you a better handle on what GHGs are measured, why they are measured, and how they are compared.

Once our software has been implemented, our objective is to be able to accurately track emissions, and employ a reduction plan and set reduction goals for the future.

While we don't currently have the ability to track, measure and report the full scope of the emissions and data referenced in the GRI Standards 301–306, we have completed four Cradle to Gate LCAs for all of our cold-formed steel framing product lines per the industry Product Category Rule (PCR), and reported the results in Environmental Product Declarations (EPDs). The impact results of those LCAs are shared here—the first being published on May 5, 2015 (top left), and the last on April 1, 2021 (bottom right). It is worth noting that two of our LCAs and corresponding EPDs are California Plant-Specific, which is a requirement of the Buy Clean California Act. Although cold-formed steel framing is not currently required by the Act as an "Eligible Material," we anticipate it will be in the near future and wanted to be prepared for our customers.

Chart Key

GWP = Global Warming Potential; ODP = Ozone Depletion Potential; AP = Acidification Potential; EP = Eutrophication Potential; POCP = Formation potential of tropospheric ozone photochemical oxidants; ADPE = Abiotic Depletion Potential for non-fossil resources; ADPF = Abiotic Depletion Potential for Fossil resources; SFP = Smog Formation Potential; ADPE$_{fossil}$ = Abiotic Resource Depletion Potential of non-renewable (fossil) Energy resources

PARAMETERS DESCRIBING ENVIRONMENTAL IMPACTS – ALL PLANTS

In accordance to the guiding PCR, the characterization method will be based on TRACI March 2012 v2.1 and CML 2012 v4.1.

Table 1. Environmental Impact: One Metric Ton of Cold-Formed Steel Product, May 5, 2015 (published).

Parameter	A1–A3
GWP	2.39
ODP	5.07E-08
AP	0.0134
EP	5.55E-04
POCP	0.185
ADPE*	4.58E-5
ADPF	2.78E04

LIFE CYCLE IMPACT ASSESSMENT RESULTS – ALL PLANTS

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

Table 2. North American Impact Assessment Results: One Metric Ton of Cold-Formed Steel Product, January 1, 2021 (published).

TRACI v2.1	A1–A3
GWP 100 [kg CO_2 eq]	2.38E+03
ODP [kg CFC-11 eq]	1.50E-07
AP [kg SO_2 eq]	5.23E+00
EP [kg N eq]	2.61E-01
SFP [kg O_3 eq]	8.42E+01
ADPE$_{fossil}$ [MJ, LHV]	1.91E+03

LIFE CYCLE IMPACT ASSESSMENT RESULTS – RIVERSIDE, CA

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

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

TRACI v2.1	A1–A3
GWP 100 [kg CO_2 eq]	2.30E+03
ODP [kg CFC-11 eq]	5.03E-09
AP [kg SO_2 eq]	4.66E+00
EP [kg N eq]	2.47E-01
SFP [kg O_3 eq]	8.10E+01
ADPE$_{fossil}$ [MJ, LHV]	1.84E+03

LIFE CYCLE IMPACT ASSESSMENT RESULTS – WOODLAND, CA

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

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

TRACI v2.1	A1–A3
GWP 100 [kg CO_2 eq]	2.34E+03
ODP [kg CFC-11 eq]	4.42E-08
AP [kg SO_2 eq]	4.73E+00
EP [kg N eq]	2.50E-01
SFP [kg O_3 eq]	8.21E+01
ADPE$_{fossil}$ [MJ, LHV]	1.89E+03

*This indicator is based on assumptions regarding current reserves estimates. Users should use caution when interpreting results because there is insufficient information on which indicator is best for assessing the depletion of abiotic resources.

PEOPLE IMPERATIVE

As inhabitants of the Earth, people are not just primary beneficiaries of a healthy environment. They are a part of the planet, interconnected in countless ways. Our holistic view of sustainability therefore takes into account the well-being of individuals in society and culture. More specifically, and closer to home, ClarkDietrich recognizes its responsibility to its team members and to the communities in which our manufacturing facilities reside.

At present, our company is active in several different ways as we put our values to work in support of our employees. We're also engaged as a company, and through volunteer employee efforts, with many organizations that serve a variety of causes for the public good.

In the following sections, we highlight various company policies and positions that affect our employees. We are also proud to touch on our community-focused activities. In future Corporate Sustainability Reports (after having completed a stakeholder identification process guided by GRI Standards), we will be able to share more measurably and meaningfully in this area.

Human Resources – Strategy

Our HR strategy is as follows:

- Attract and retain top talent
- Be an employer of choice
- Mitigate risk
- Empower employees
- Meet the needs of our workforce

Company Values

Our values set us apart throughout the employee engagement cycle.

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.

Succession Planning

ClarkDietrich recognizes the wisdom of maintaining an experienced and engaged base of employees, as well as having a steady stream of talent for the future. To that end, we continually update and revise our succession plan. The goal of our succession plan is to strengthen our leadership pipeline by identifying, communicating, developing and retaining high-performers and high potentials.

In short, we seek to invest in and hold onto our people. Specific ways in which we strengthen and keep our people include job shadowing, cross-training, and encouragement to obtain a mentor. We also encourage stretch assignments, networking, visiting other plants, taking additional training, and service to our local communities.

EMPLOYEE ENGAGEMENT CYCLE

TRANSITION — RECRUITMENT — SELECTION — PERFORMANCE — SUCCESSION — DEVELOPMENT

Employee Engagement & Communication

In order to better understand our employees, we send out engagement surveys regularly. These surveys help us quickly identify what is working and what is not working, overall as a company and by department. We follow these surveys up with small group meetings led by Human Resources. These small group meetings allow our employees to voice their opinions and be heard. The engagement surveys and small group meetings encourage open feedback, communication and collaboration.

One-on-one communication has proven to help managers and employees discuss successes, challenges, failures, and current projects/workload. One-on-one meetings also build the relationship between managers and employees. Communicating more frequently with employees on failures and successes is important in driving engagement. We encourage each manager to complete an Individual Development Plan with their employees to focus on the training and development they need to be successful.

Training

We send out an assessment annually to our employees, giving them the chance to identify what training opportunities they would like ClarkDietrich to offer. Based on their feedback, we design a customized training plan for the year. We offer web-based training covering a wide range of topics, as well as in-person training ranging from compliance, product training and leadership, to diversity, equity and inclusion.

Diversity, Equity & Inclusion Mission

ClarkDietrich's Diversity, Equity and Inclusion (DEI) mission is simple and goes back to our core values:

"We support inclusive behavior that nurtures innovation and fosters communication, enabling us to share and develop the best ideas for our business. Understanding that we think differently and, leveraging these differences effectively, make us better teammates and a stronger company."

Currently leading the charge in ClarkDietrich's DEI endeavor, as part of our executive team, is VP of Human Resources Jennifer Smith. She was designated Chief Diversity Officer in 2021. Her contribution to the company's DEI initiatives had previously been recognized by the Ohio Diversity Council—a regional member of the National Diversity Council in which ClarkDietrich holds membership.


ClarkDietrich's DEI journey started a few years ago and gathered strength in 2020 with the initiation of an Inclusion Champion Group. The Inclusion Champion Group has representation from 14 facilities nationwide with the corporate office in West Chester, Ohio. Volunteer participants work in various departments including: Manufacturing (Production and Operations); Sales; Structural Engineering; Research and Development; Finance; Sales; Purchasing; IT; Human Resources; and, Senior Leadership/Management.

In response to the sociopolitical climate in 2020, the company sought to increase awareness on interpersonal communication, and launched the Workplace Civility Policy. A training session on the topic was led by our legal advisor.

Further, we revised our DEI mission to enhance inclusiveness in our corporate strategy and community outreach. Out of this revised mission came a variety of additional actions:

- A periodic newsletter, *DEI Monthly*, was initiated to promote a sense of belonging among team members. The newsletter highlights cultural and national observations each month, and helps to educate and build awareness on diverse issues.

- We rolled out the DEI mission in small group presentations to the administrative group.

- We also conducted small group meetings on DEI and reviewed the presentation with the manufacturing hourly employees nationwide.

- We initiated Inclusion Champion Meetings with representation from across various company departments/locations.

  o An internal Microsoft Teams® communication channel is used by team members to post topics/items/video clips of interest.

  o The Inclusion Group holds bimonthly meetings with discussions led by external or internal speakers. We also hold team conversations to foster inclusion and belonging. Topics featured in recent meetings include:

    – What is Inclusion

    – What is an Ally and How to Engage with Others as an Ally

    – Understanding Bias and Taking Action

    – Leading with Emotional Intelligence and Empathy

    – The Complexity of Common Ground

    – Creating a Culture of Respect
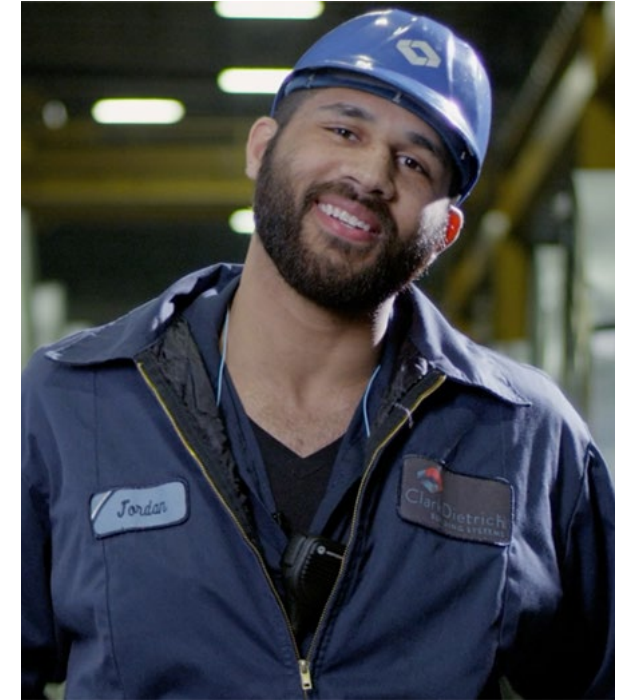
Awards

ClarkDietrich is proud of recognition that speaks to our support of people and our culture of inclusiveness. Notable awards include:

Military Friendly® Employer - 2022

Military Spouse Friendly Employer - 2022

Top Workplaces – 2020

Benefits

In addition to compensation, opportunities for growth, and a positive workplace culture, ClarkDietrich supports our people with:

Full Benefits Package (Medical, Dental, Vision, Flexible Spending Accounts and Life Insurance)

401(k) with Company Match

Incentive Pay*

Paid Time Off

Tuition Reimbursement Program

Professional Certification Reimbursement Program

Community Service Day

*Incentive pay available at most locations.

Turnover Rate

ClarkDietrich strives to engage and retain employees through training initiatives, engagement activities, and offering competitive pay and benefits programs.
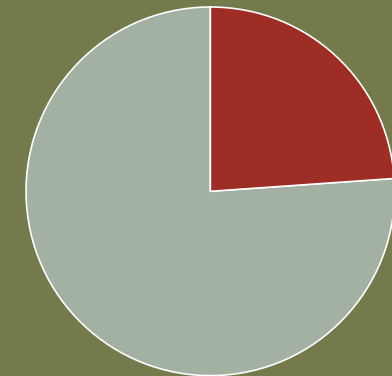
23.9%
turnover in the organization in 2022

▼ **16%**
below national industry average**

**Bureau of Labor Statistics 2021 Survey for Manufacturing, stated turnover rate = 39.9%.

Community Engagement

On ClarkDietrich Care Days, our ClarkDietrich employees take time out of the office to volunteer for local charities and organizations. Employees have built homes with Habitat for Humanity, as well as built wheelchairs for a veterans organization. We have given our time and volunteered at Indian Rock Preserve, an environmental educational facility. We also give back on Earth Day by removing litter from the roadside in our communities.

As part of our charity work within our communities, we adopt a charity called "A Friend's House." This organization is a shelter and home to youth in crisis. We have annual food drives to give back to those in need. ClarkDietrich employees also give time to an organization called "Let's Build Construction Camp for Girls," where girls explore fields of architecture, engineering, construction trades and product manufacturing. Additionally, during the holiday season, we "adopt" children to make sure they have toys, coats and shoes. Clearly, as a company we take pride in volunteering our time to help others in our local communities.

Human Resources Association Memberships

We are proud to be members of the following organizations:

SHRM – Society for Human
Resource Management

ODC – Ohio Diversity Council

NDC – National Diversity Council

GCATD – Greater Cincinnati
Chapter Association for Talent
Development

WAW – WorldatWork

PROSPERITY IMPERATIVE

Since we are not a publicly traded company with the U.S. SEC, ClarkDietrich is not required to report or disclose financial information, as such financial information is considered confidential. That said, financial considerations are very much a part of a balanced approach to sustainability.

Indeed, we've intentionally labeled the third pillar of our sustainable strategy as "Prosperity." Prosperity takes into account our need to be successful as an enterprise, and make the best decisions for the business success of our company, employees and shareholders. Yet while our view of prosperity is founded in our corporate interests, it also goes beyond them to include the collective economy of which we are a part. We must seek to act in ways that are good for the communities in which our plants and offices are located—helping them and their citizens to grow and thrive in all aspects.

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.

GRI CONTENT INDEX

Statement of Use	ClarkDietrich has reported the information cited in this GRI Content Index for the period starting January 1, 2022 through December 31, 2022 with reference to the GRI Standards.
GRI 1: Foundation 2021	GRI 1: Foundation 2021

GRI 2: General Disclosures 2021

GRI Standard	#	Disclosure	Location (Link or Page #)
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	

GRI Standard	#	Disclosure	Location (Link or Page #)
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	Strategy, Policies & Practices / People Imperative
Stakeholder Engagement	2-29	Approach to stakeholder engagement	Stakeholder Engagement
	2-30	Collective bargaining agreements	Confidential Not Disclosed
GRI 3: Material Topics 2021			
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	
GRI 11: Oil and Gas Sector 2021			
Not Applicable			
GRI 12: Coal Sector 2022			
Not Applicable			
GRI 13: Agriculture, Aquaculture and Fishing Sectors 2022			
Not Applicable			

GRI Standard	#	Disclosure	Location (Link or Page #)
GRI 201: Economic Performance 2016			
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	
GRI 202: Market Presence 2016			
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	
GRI 203: Indirect Economic Impacts 2016			
Topic Disclosures	203-1	Infrastructure investments and services supported	Confidential Not Disclosed
	203-2	Significant indirect economic impacts	
GRI 204: Procurement Practices 2016			
Topic Disclosures	204-1	Proportion of spending on local suppliers	Confidential Not Disclosed
GRI 205: Anti-corruption 2016			
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	
GRI 206: Anti-competitive Behavior 2016			
Topic Disclosures	206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	Strategy, Policies & Practices
GRI 207: Tax 2019			
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	

GRI Standard	#	Disclosure	Location (Link or Page #)
GRI 301: Materials 2016			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages materials using Disclosure 3-3 in GRI 3: Material Topics 2021.	
Topic Disclosures	301-1	Materials used by weight or volume	Future Sustainability Initiatives
	301-2	Recycled input materials used	
	301-3	Reclaimed products and their packaging materials	
GRI 302: Energy 2016			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages energy using Disclosure 3-3 in GRI 3: Material Topics 2021.	
Topic Disclosures	302-1	Energy consumption within the organization	Future Sustainability Initiatives
	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	
GRI 303: Water and Effluents 2018			
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.	
	303-1	Interactions with water as a shared resource	
	303-2	Management of water discharge-related impacts	Future Sustainability Initiatives
Topic Disclosures	303-3	Water withdrawal	
	303-4	Water discharge	
	303-5	Water consumption	
GRI 304: Biodiversity 2016			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages biodiversity using Disclosure 3-3 in GRI 3: Material Topics 2021.	
Topic Disclosures	304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	Future Sustainability Initiatives
	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	Location (Link or Page #)
GRI 305: Emissions 2016			
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	Future Sustainability Initiatives
	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	
GRI 306: Effluents and Waste 2016			
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	
GRI 306: Waste 2020			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages waste using Disclosure 3-3 in GRI 3: Material Topics 2021.	
	306-1	Waste generation and significant waste-related impacts	Future Sustainability Initiatives
	306-2	Management of significant waste-related impacts	
Topic Disclosures	306-3	Waste generated	
	306-4	Waste diverted from disposal	
	306-5	Waste directed to disposal	

GRI Standard	#	Disclosure	Location (Link or Page #)
GRI 308: Supplier Environmental Assessment 2016			
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	
GRI 401: Employment 2016			
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	
GRI 402: Labor/Management Relations 2016			
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	
GRI 403: Occupational Health and Safety 2018			
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	

GRI Standard	#	Disclosure	Location (Link or Page #)
GRI 404: Training and Education 2016			
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	
	404-2	Programs for upgrading employee skills and transition assistance programs	
	404-3	Percentage of employees receiving regular performance and career development reviews	Confidential Not Disclosed
GRI 405: Diversity and Equal Opportunity 2016			
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 Not Disclosed
	405-2	Ratio of basic salary and remuneration of women to men	
GRI 406: Non–discrimination 2016			
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
GRI 407: Freedom of Association and Collective Bargaining 2016			
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	
GRI 408: Child Labor 2016			
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	
GRI 409: Forced or Compulsory Labor 2016			
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	

GRI Standard	#	Disclosure	Location (Link or Page #)
GRI 410: Security Practices 2016			
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	
GRI 411: Rights of Indigenous Peoples 2016			
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	
GRI 413: Local Communities 2016			
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	
GRI 414: Supplier Social Assessment 2016			
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	
GRI 415: Public Policy 2016			
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	
GRI 416: Customer Health and Safety 2016			
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.	Confidential 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	

GRI Standard	#	Disclosure	Location (Link or Page #)
GRI 417: Marketing and Labeling 2016			
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	
GRI 418: Customer Privacy 2016			
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.	Confidential Not Disclosed
Topic Disclosures	418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	

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