



2023

| ESG REPORT



Trust. Performance. People.

Here at Weston, solving complex environmental and infrastructure challenges is not just our profession—it's our passion. And we're putting it to good use.



TABLE OF CONTENTS

Our Story	2
ESG at Weston	3
Environment	4
Responsible Consumption	5
Greenhouse Gas Emissions	7
Resiliency and Management Systems	8
Per- and Polyfluoroalkyl Substances (PFAS)	9
Temporary Power to Enable Consistent Sustainable Energy for Puerto Rico	10
Maui Wildfire Emergency Response	11
Resiliency with Geospatial Tools	12
Sustainable Remediation	13
Green Solutions and Initiatives	14
Water/Wastewater Treatment	15
EV Charging Stations	16
Social	17
Our Employees	18
Diversity Metrics	20
Employee Programs	21
Ethics and Values	27
Safety	28
Information Security	30
Small Business – Supplier Diversity Program	31
Volunteerism and Corporate Philanthropy	33
Stakeholder Engagement	33
Governance	34
Company Governance Structure	35
Business Ethics and Policies	37
Industry, Innovation, & Infrastructure	38
Approved Business Systems	39
Advancing our ESG Commitment	40
Appendices	41



OUR STORY

Weston Solutions, Inc. has long been recognized as a leader in the environmental industry. Surviving the downturn in the environmental market of the 1990s, the company redefined itself as employee-owned and polished its mission to best represent the company's core values and clients' needs.

No Weston asset is more important than our reputation for honesty and integrity. In conducting Weston's business, all employees are expected to maintain the highest ethical, legal, and business standards, and fully comply with all applicable laws, rules, and regulations. Each of us assumes responsibility for our company conducting business in this manner.

Our Core Values

- **Act with Integrity** - Live by example.
- **Live Safely** - Work safe/be safe every day.
- **Advance Client Success** - Strengthen, build trust, and deliver innovative solutions.
- **Deliver Exceptional Quality** - Every time.
- **Be Inclusive** - Diversity energizes teamwork with unlimited potential.
- **Create a Better World; Be the Change** - Environmentally, economically, socially.

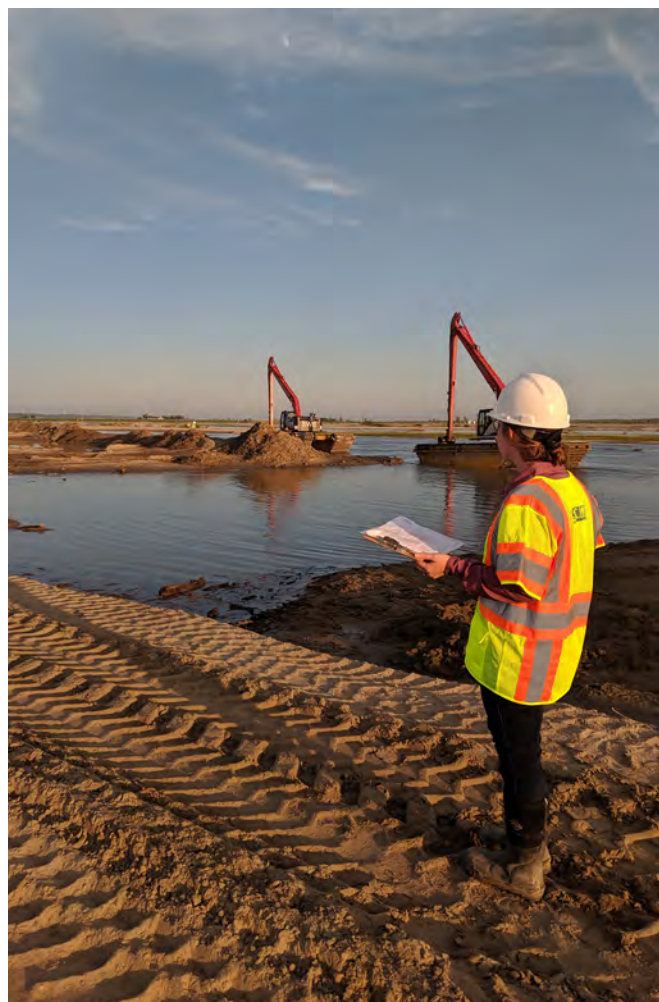


**TRUST.
PERFORMANCE.
PEOPLE.**



ESG AT WESTON

Weston Solutions, Inc. is a 100% employee-owned, national environmental and infrastructure service firm serving government, industrial, and commercial clients. Headquartered in West Chester, PA, and with offices across the United States, Weston brings a 65-year legacy of sustainable innovation and development. Unless otherwise indicated, this report covers environment, social, and governance (ESG) at Weston Solutions from January 2023 to December 2023. This report was prepared in accordance with disclosures recommended in the Professional & Commercial Services standards developed by the Sustainability Accounting Standards Board (SASB) and with reference to the Global Reporting Initiative (GRI). Working with internal and external stakeholders to capture important aspects of life at Weston, we aligned our core values to include ESG topics. Weston's business focuses on environmental services, which often affect human health as well as compliance with regulatory and oversight agencies' governance, guidelines, and requirements. This report highlights our ESG impacts and key Weston projects as we document our ESG journey.



MESSAGE FROM THE CEO



LARRY BOVE

President/Chief Executive Officer,
Weston Solutions, Inc.



The everlasting legacy of our founder, Roy F. Weston, continues on today in our vision and belief that society must focus on the balance between economic development and environmentally sustainable communities. Our employee owners strive to deliver sustainable solutions for our clients every day to help solve their infrastructure and environmental challenges. We do this because it's our passion and commitment to making a difference in the world.



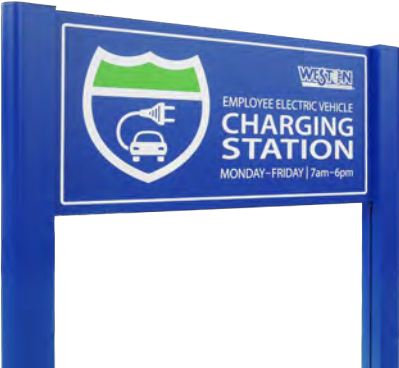
ENVIRONMENT



RESPONSIBLE CONSUMPTION

Weston uses environmentally preferred practices. These practices include choosing environmentally conscious hotels, acquiring a “Green” fleet, ensuring buildings

are energy and water efficient, purchasing office products and machines through the EPA’s Green Criteria and ODP Business Solutions’ Green Products, offering electric vehicle (EV) charging stations at Weston’s West



Chester, PA headquarters, and other office locations, and ensuring we recycle computer equipment in a responsible manner to minimize emitting pollution. As part of our recycling effort at Weston, we also encourage employees at the headquarters office to bring items from home for recycling that are not normally recycled as part of municipal recycling efforts where the employees reside. This effort includes batteries, ink jet and laser jet cartridges, cell phones, and compact fluorescent lights (CFLs). Weston also encourages the use of energy efficient appliances and motion sensor lights in our offices to reduce our corporate carbon footprint.

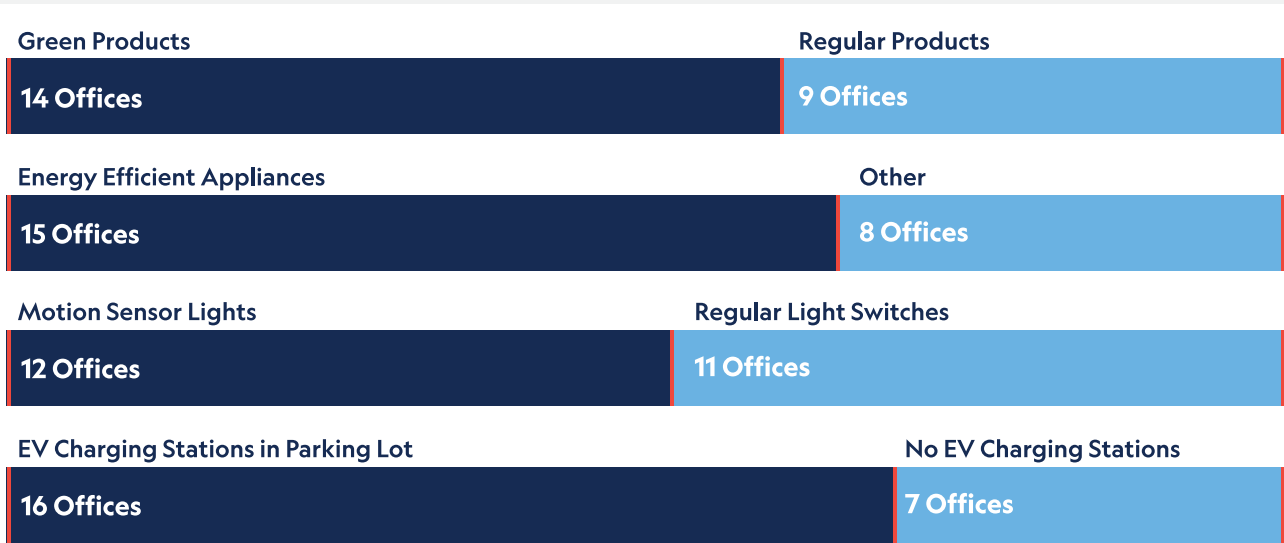


Figure 1:
Environment-Friendly Practices at Weston Offices



In 2023, Weston moved to an electronic procurement system. By integrating sustainable solutions into our procurement policies and procedures, we have reduced our environmental footprint significantly. The use of Energy Star ratings to guide the energy consumption of products and the development of an Environmental Management System focusing on green procurement are testaments to our dedication to environmental stewardship. Furthermore, the electronic ACH payments for vendors and subcontractors not only streamline the process but also reduce the environmental impact associated with paper-based systems. Weston's approach aligns with our sustainability policy, which emphasizes the integration of sustainability into all operations to meet or exceed stakeholder expectations.

Quantities recycled by the Headquarters Office between October 31, 2022 and October 31, 2023

Aluminum, Glass, Plastic	305 Pounds
Office Paper & Cardboard	30 Tons
Fluorescent Lamps*	735 Lamps
Consumer Batteries	176 Pounds
Commercial Batteries	1359 Pounds
Printer Cartridges	272 Pounds
K-Cup® pods	176 Pounds

Table 1:

Weston Headquarters Recycling between October 2022 and October 2023

**Fluorescent lamps consist of tubes, compact fluorescent lights (CFL), and u-tubes (each lamp is estimated to contain 2-20 mg of mercury).*

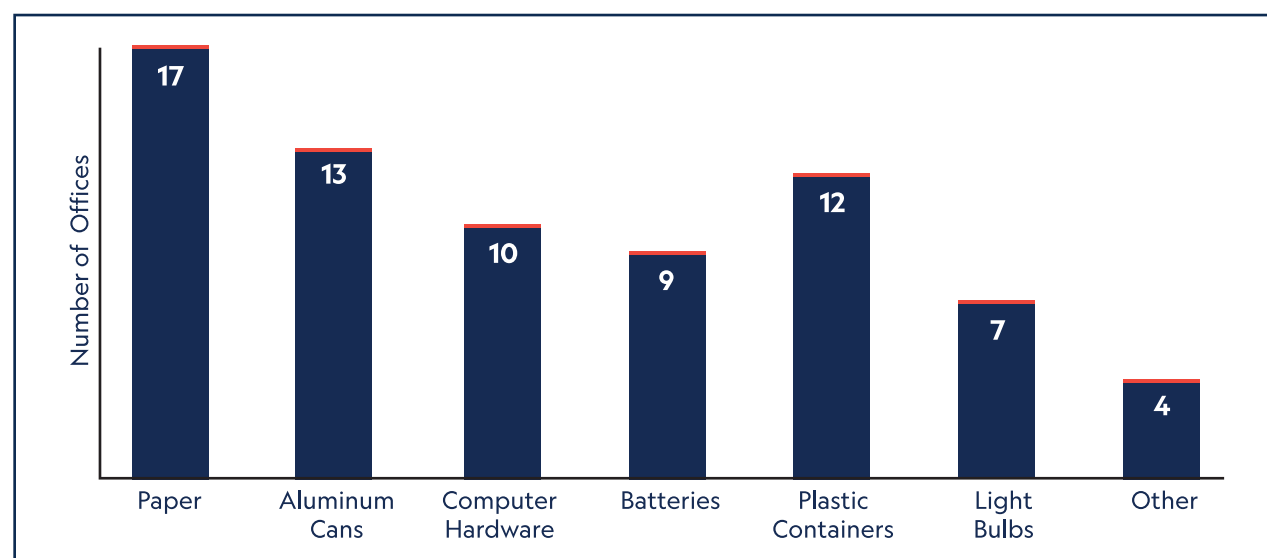


Figure 2:

Weston Offices Participating in Recycling Programs





GREENHOUSE GAS EMISSIONS

In 2023, Weston initiated its tracking of Greenhouse Gas Emissions (GHG) to establish reasonable and meaningful metrics to set goals and reduce our environmental footprint. Weston increased awareness within the organization and improved the accuracy of our tracking for all scopes. Scope 1 emissions consist of our 101 fleet vehicles and emissions are calculated using mileage driven and each vehicle's engine-type. Scope 2 emission calculations use energy use and utility information provided by landlords. Scope 3 emissions capture Weston employee business travel, but we do not currently have the metrics to capture emissions from personal vehicles used for projects or for commuting throughout 2023.



2023 CO₂ EMISSIONS

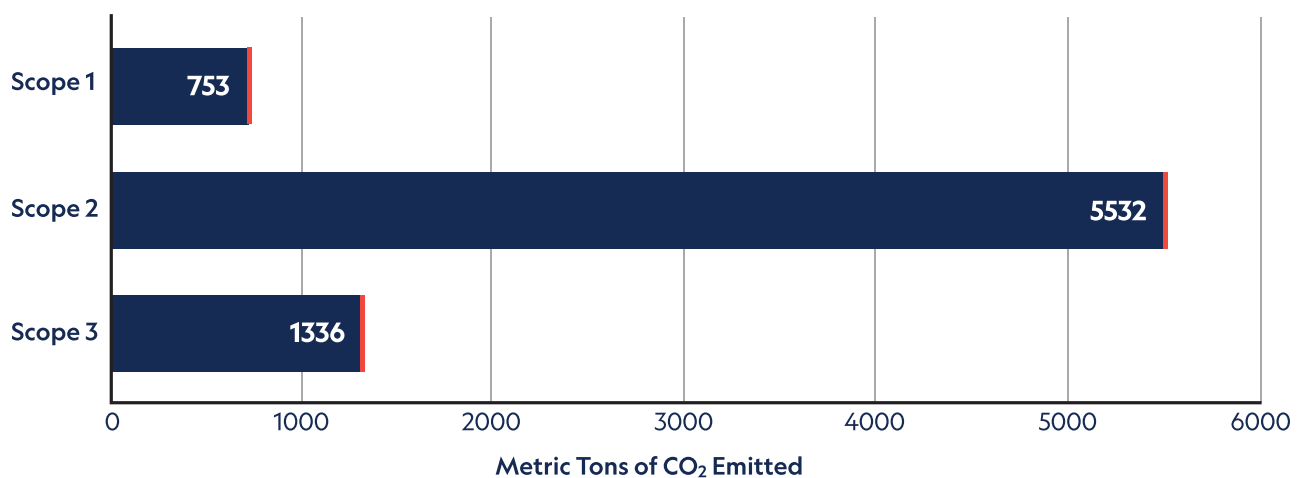


Figure 4:

Calculations are based on the GHG Protocol and data calculator for 19 office locations, including 3 warehouse spaces, from December 2022 through December 2023. All office locations were considered in the evaluation although landlords of our leased office spaces denied Weston's request for utility information for those spaces. Scope 3 does not include personal vehicle use for projects or commuting throughout 2023.



RESILIENCY AND MANAGEMENT SYSTEMS



Weston has an established business continuity plan. The plan is designed to protect life, information, and

equipment and aims to minimize operational and financial impacts in the event of a disaster. It includes preventative controls, contingency resources, and procedures, which are managed by a formal recovery management organization. With the COVID-19 outbreak, it was updated to address health and human safety. Weston also has a comprehensive approach in developing resilience strategies, the encompasses risk assessment and mitigation, climate-resilient infrastructure, and emergency preparedness and response.



**Protect Life,
Information, and
Equipment**



**Preventative
Controls**



**Assessment
and Mitigation**



Procedures



**Minimize
Operational and
Financial Impacts**



**Contingency
Resources**



PER- AND POLYFLUOROALKYL SUBSTANCES (PFAS)

Weston's 20 years of PFAS experience and a nationwide network of subject matter experts (SMEs) and PFAS technical professionals enable us to provide tailored solutions and comprehensive support for our clients and the communities in which we reside.

When PFAS or any other hazardous substance endangers our drinking water, soil, and air quality, our clients rely on us as their go-to consultant for regulatory, technical, and risk communication



guidance. Weston has built a name as a trusted solutions-focused provider solving the toughest PFAS challenges that meet and exceed objectives and are fiscally and environmentally sustainable. Our SMEs engage with industry groups, academia, communities of practice, and vendors to advance the science of PFAS by developing innovative solutions, shaping standard approaches and regulatory frameworks, and ensuring current best practices are implemented across our services.



150+ UNIQUE PFAS PROJECTS



Successful completion of drinking water investigations and restoration for municipalities and more than **1,000 private water supply wells**



Collected >20,000 PFAS samples from multiple media with **100% usable data** and **>99.9% compliance** with the data quality objectives



30 states and within all 10 EPA regions



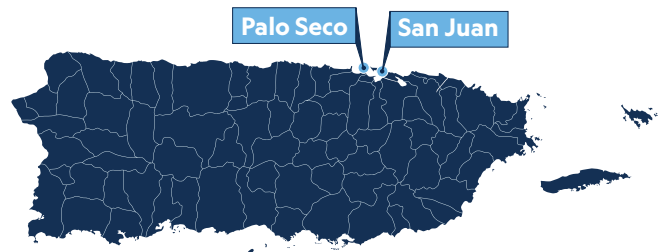
Supporting **federal, state, local, and commercial** clients



TEMPORARY POWER TO ENABLE CONSISTENT SUSTAINABLE ENERGY FOR PUERTO RICO

Puerto Rico frequently experiences severe power shortages due to the devastating impacts of hurricanes and tropical storms on its electrical infrastructure. This precarious condition has led to inconsistent electricity distribution and frequent and often long-lasting power outages.

To help the island implement modernized, reliable, and more environmentally friendly power, Weston completed the construction, installation, and commissioning of dual-fuel, natural gas generators to supply 150MW of power to the Palo Seco Power Plant and another 200MW of temporary power at the San Juan Power Plant. We are now part of the system's operations and maintenance team until Spring 2024. This alternate power supply is pivotal in stabilizing the energy grid while Puerto Rico's power grid is reimagined. The commonwealth of Puerto Rico's economy, communities and people realize the benefits of consistent and reliable power to grow and prosper.





MAUI WILDFIRE EMERGENCY RESPONSE

In 2023, when wildfires abruptly swept through the City of Lahaina and Kula on Maui, they had a devastating impact: 100 people lost their lives, more than 2,000 homes were destroyed, 7,000 residents were displaced, and 800 businesses with 7,000 employees estimated to generate \$2.7 million in daily revenue were shut down. Through Weston's EPA Region 9 Superfund Technical Assessment and Response Team (START) contract, we were quickly onsite and supporting the recovery, with the goal of getting residents relief as soon as possible. Our



task fell under EPA's household hazardous material removal mission assignment, which is considered Phase 1 of the federal response. The hazardous materials include everyday products like paints, cleaners, solvents, oils, batteries, pressurized fuel cylinders, and pesticides/herbicides.



Setting this stricken community on the path to recovery with speed and compassion required us to mobilize 25 to 30 people immediately and more than 65 personnel at peak performance. Weston's professionals dealt with a unique environment: awareness and respect for Maui's strong native culture across this sacred land, electric vehicles and charging station hazardous waste components, and the need for certain unconventional remedies as soil sealant to stabilize an area subject to tropical storms and hurricanes that could spread hazardous materials.

BY THE NUMBERS:



5.2 square miles
investigated



Investigation of **1,621 parcels**
with homes and businesses



167 acres
of soil stabilized

\$2,500 donated
by Weston, Inc.



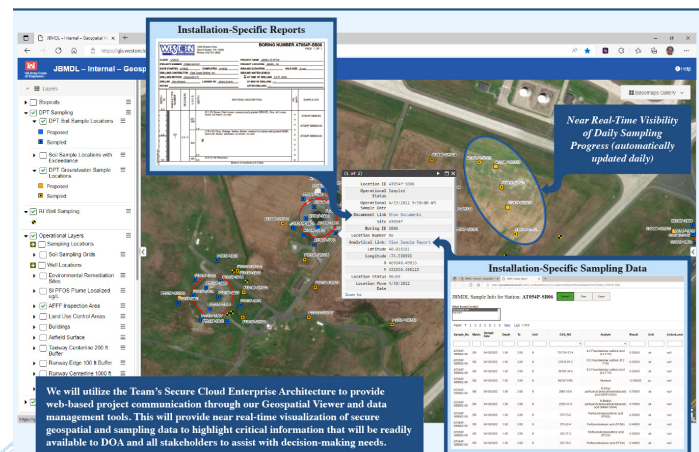
to the American Red Cross of
Hawaii to help those affected
as quickly as possible



RESILIENCY WITH GEOSPATIAL TOOLS

In collaboration with Weston, the New Jersey Coastal Coalition, Inc. (NJCC) developed a user-friendly mobile application designed for disseminating public alerts and gathering real-time data. This app, in partnership with the Federal Emergency Management Agency (FEMA), pinpoints essential locations and compiles vital information that is crucial during the initial phase of planning relief efforts. It offers subscribers timely updates on flood events and navigational guidance to circumvent hazardous areas and prevent property damage. Featuring live flood extent maps, weather radar, and alerts, the application serves as a valuable tool for immediate safety measures. Additionally, it archives data to enhance long-term preparedness and assists municipalities in devising strategies for flood mitigation.

Additionally, Weston continues to work with the Navajo Nation to advance resiliency solutions using geospatial data. This work includes addressing the environmental justice issue tribal residents have long faced regarding legacy uranium mining impacts. Unregulated sources of water have been in use for generations and are known to contain contaminants tied to past mining activities. In addition, leveraging Weston's geospatial tools, Navajo families now have critical information about accessing new safe water supply points and services.



24P-0004-2



SUSTAINABLE REMEDIATION

Weston specializes in sustainable remediation and highlights our expertise in cleaning up and restoring contaminated sites while minimizing our environmental impact. In our remediation efforts, we deploy innovative technologies to address contamination issues directly while reducing energy consumption, waste generation, and our clients' environmental footprint. Weston also uses energy-efficient solutions including anaerobic bioreactors to break down organic contaminants in groundwater



naturally. Weston also prioritizes reducing chemical usage and integrating more renewable energy strategies into our remediation projects. One method of integrating more renewable energy strategies includes installing solar photovoltaic (PV) systems to provide clean energy to our power remediation treatment systems.



Weston has a robust portfolio of contracts and projects addressing the challenges of orphaned wells, including oil, gas, and mining wells. These projects demonstrate Weston's commitment to environmental stewardship and our expertise in managing the complexities associated with orphaned wells.

The following are typical of this experience:

- Weston holds a contract with the Colorado Oil and Gas Commission (COGCC) for the state's Orphan Well Program and COGCC's Environmental Unit. Under this contract, Weston provides a suite of services such as stormwater management, emergency response, permitting, remediation, biological studies, site characterization, and environmental sampling.
- Weston has undertaken projects to establish a prioritization strategy for the plugging, abandonment, and reclamation of orphaned wells, for the Arizona Department of Environmental Quality (ADEQ).



GREEN SOLUTIONS AND INITIATIVES

Weston has several internal green initiatives that reflect our commitment to sustainability and environmental stewardship. The Weston Final 2020 EPA Green Report outlines the company's efforts to improve sustainability performance across all operations, offices, and projects. This includes integrating sustainability into business practices and delivering innovative sustainability services to customers. The report also highlights Weston's corporate goals to ensure environmental and sustainability concerns are factored into all planning and decision-making processes. In addition, we have service lines and growth targets in areas that aim to provide more green and sustainable solutions for our clients, including energy transition and resilience, and electric vehicle charging infrastructure.





27 WWTP upgrades,
including **200 million**
gallons per day (MGD)
WWTP capacity

142 lift stations
assessments and design
(0.1 to 28 MGD capacity)

13 metering stations
from 2 to 200 MGD
capacity

Over **24 miles** of pipelines
and **10 miles** using a
trenchless method including
rehabilitation of one of the
largest sewer diameters
(132") in the country.

WATER/ WASTEWATER TREATMENT

For the San Antonio Water System (SAWS), Weston is performing preliminary engineering, design, bidding, and construction phase services for rehabilitation and/or replacement of approximately 50,000 linear feet of sewer line throughout the Olmos Basin. There have been various environmental constraints during construction with protected trees, archeological sites and cultural resources, a 100-year floodplain, and springs that are protected in a nature preserve. Weston's efforts are improving water quality; bringing water and wastewater systems into permit compliance; and increasing resiliency of infrastructure assets while eliminating sanitary sewer overflows.





EV CHARGING STATIONS

Weston and Silver Mountain Construction, LLC (SMC) have partnered to perform studies, planning, design, construction, commissioning, and support services for electric vehicle charging stations at federal agency locations throughout New England and Mid-Atlantic regions of the USA. Weston looks forward to supporting clients in their transition from traditional fueling to electric vehicle supply equipment (EVSE) systems. The Weston and SMC partnership is under a former Small Business Mentor-Protégé relationship.





SOCIAL





OUR EMPLOYEES

Weston provides interesting and challenging work assignments that foster career development and advancement, while encouraging flexibility and diversity in the workplace. We are a fully employee-owned company under a KSOP, which combines an employee stock ownership plan and a 401(k). We give our staff the ability to earn shares in the company through a 401(k) match and become owners. This structure gives employee owners more power, promotes employee ownership and loyalty, and helps employees prepare for a better retirement. Weston's employees' ideas, solutions, and passions drive the value we provide to our clients. Weston's employee owners represent the diversity that fuels creativity and innovation. Our alignment around core values pushes our strong sense of integrity in all that we are and all that we do.

Weston's October 2022 Employee Satisfaction Survey responses indicated that 84% of respondents said that professional development discussions have occurred with them in the last 12 months. Of the respondents, 40% agree that Weston is better than other firms at employee development while only 8% disagree, and the majority neither agreed nor disagreed. 81% of respondents believe that Weston provides greater flexibility than other companies. Additionally, 83% strongly agree that their manager creates an environment that fosters connectivity. With Weston managers and leaders maintaining an environment that keeps Weston teams connected and offers flexibility, our employees are supported with a strong work/life balance.



	Total Hours Worked	Total Billable Hours Worked	Utilization Rate
Admin	199,333	13,702	0.07
CSL	282,635	172,142	0.61
Eng Science and Tech	1,336,406	973,605	0.73
Federal East	189,449	135,091	0.71
Federal West	122,154	70,399	0.58
Strategy and Development	100,328	452	0.00
Grand Total	2,230,305	1,365,391	0.61

Table 2:

Hours worked in 2023 by Weston employees by department including total hours, billable hours, and utilization rates (calculated by dividing the billable hours worked by total hours worked).



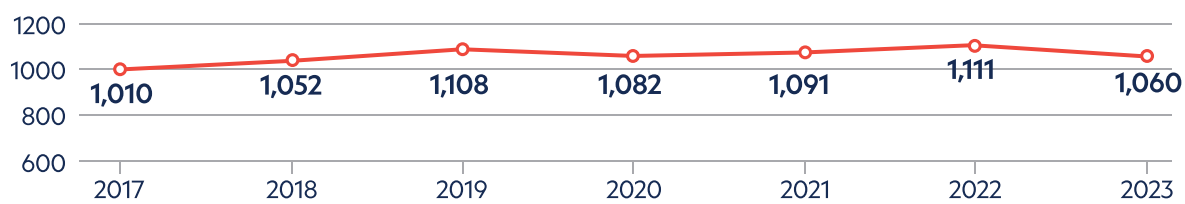


Figure 4:
Weston Employee Headcount from 2017 through 2023

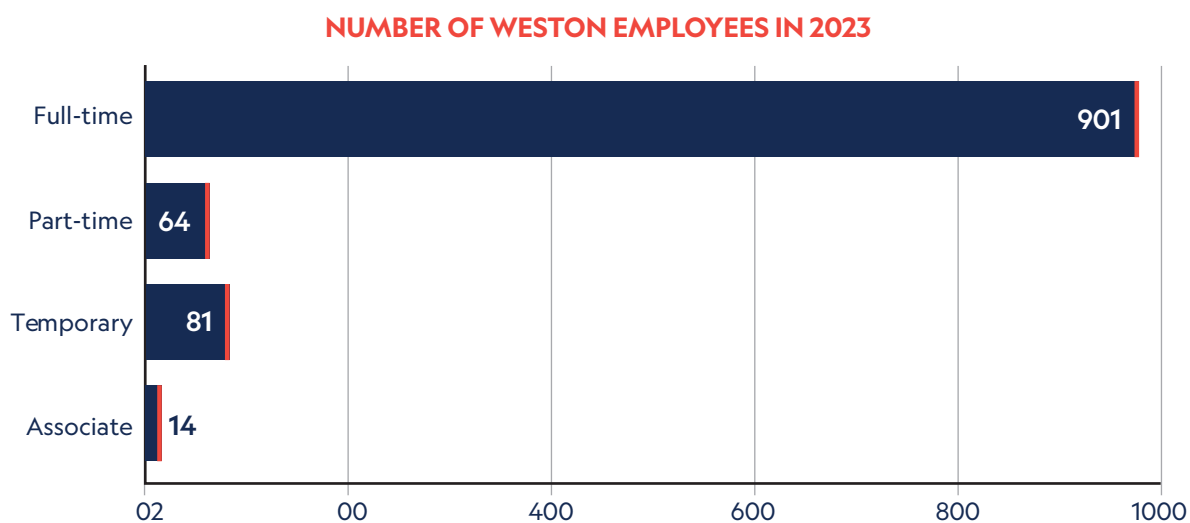


Figure 5:
2023 Weston Employment broken down by employment category.

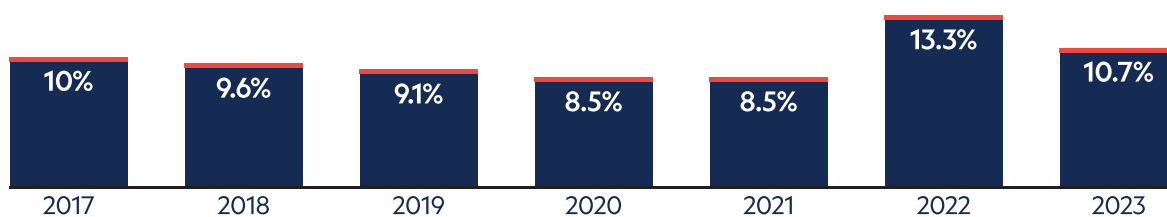


Figure 6:
Rolling 12-Month Employee Voluntary Turnover Rate



DIVERSITY METRICS

Being inclusive is a core value at Weston. We work every day to enhance our workplace culture and celebrate diverse perspectives. Through transparency, we can work to advance equity together.



NUMBER OF WESTON EMPLOYEES IN 2023

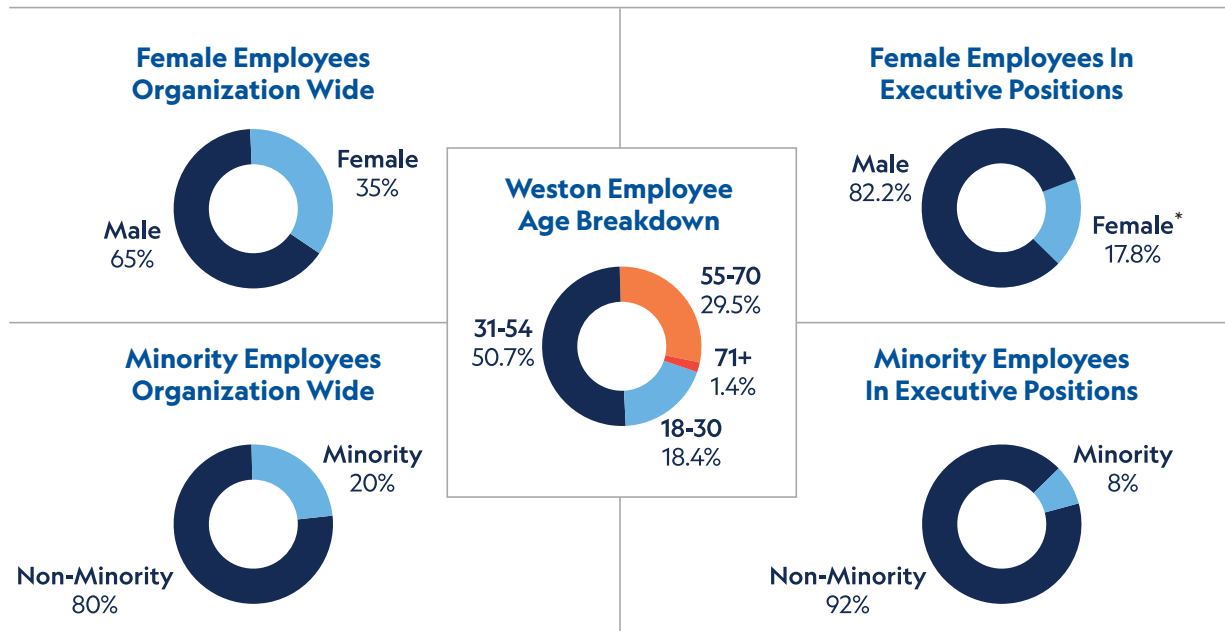


Figure 7:

Weston Employee Demographics company-wide and in executive positions

*Women in positions of vice president or higher



EMPLOYEE PROGRAMS



PROJECT MANAGER IN TRAINING (PMIT)

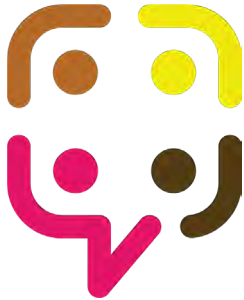
In 2023, 15 developing Weston Project Managers, supported by 9 coaches and senior leadership, gathered at our headquarters in West Chester, PA to kick off their learning journey to become experts in effective and successful project management at Weston.

For more than 8 months, the PMIT program prepares individuals to step confidently into the Project Manager role by providing relevant, strengths-based, on-the-job training for immediate impact. The PMIT cohort benefits from classroom learning instructed by experienced Project Managers, on-the-job opportunities, and engaged interaction with other PMIT members and alumni. Each cohort partners with a coach for one-on-one mentoring to help navigate the program.





DIVERSITY AND INCLUSION LEADERSHIP COUNCIL (DILC)



The Diversity and Inclusion Leadership Council (DILC) was established to promote education, direction, conversation and celebration of the diversity that exists at Weston. The focus of this initiative goes beyond race and is inclusive of age, gender, religion, sexual orientation, and all characteristics that make us unique. The Council's mission to increase awareness and cultivate meaningful change within our company and the communities we serve has spurred conversation and expansion of

inclusive diversity at Weston. Through messaging, educational videos on our internal social network, Yammer, DEI Workshops, monthly Yammer and social media recognition of diverse employees, the Council continues to nurture communications and learning opportunities that reinforce a commitment to fundamental growth change.





PATRICK AUSTIN
Founding Member/Leader of Weston's
Diversity and Inclusion Council

Since the Council launched in June 2020, the Team's accomplishments include:

- A series of educational resources to recognize implicit and unconscious biases, the negative impacts of stereotypes, inequity of privilege, and the actions we can take to mitigate these behaviors. Discussion around these topics was well received and sparked emotional and provocative conversation around shared learning experiences.
- A celebration and acknowledgement of our diverse workforce accomplishments through monthly Yammer and social media recognition.
- Implementation of blind hiring to reduce unconscious recruiting bias and improve workplace diversity across Weston.
- Authentically represent our diverse workforce by featuring our employee owners across genders, ethnicities, backgrounds, and abilities on our website.
- A collaborative effort with the Weston Women's Network (WWN), engaged senior leadership to update Weston's Core Values to include representation of a diverse, inclusive, and equitable workplace. The core value "Be Inclusive" declares diversity, equity, and inclusion as a foundational principle of our organization.
- With support from senior management and Human Resources, DILC has adopted diversity and inclusion training for employees with special focus on key management roles so that leaders are equipped to help drive meaningful change at Weston. This training was rolled out to all employees in 2023.

#WEAREWESTON





WESTON WOMEN'S NETWORK (WWN)



Weston Women's Network (WWN), established by women, for women, provides a vibrant and empowering community within Weston Solutions. As women continue to make great strides

in historically male-dominated STEM fields (science, technology, engineering, and mathematics), the value of a women's network in the workplace becomes more apparent than ever. Since its inception in 2020, WWN has emerged as the largest group within Weston, providing tailored support and resources to address the unique challenges women may face in the workforce and in a STEM-focused industry. By connecting women across the company, the WWN creates a platform for collaboration, knowledge-sharing, and personal development—empowering

our members to break barriers and achieve their full potential. Notably, WWN championed the development and beta-testing between 2020 and

2023 of a companywide mentorship program; this program is designed to boost professional growth through 1-on-1 mentoring, helping employee owners expand their internal and external networks. That program was scheduled for full implementation in 2024 based on the feedback from the beta test. Each year, we nominate new Council members to ensure diverse perspectives are included in the decision-making process and to nurture future leaders.



The Weston Women's Network (WWN) provides a variety of support to the firm's women, including:

Collaboration and Knowledge-Sharing: Connecting women across the company to create a platform for collaboration and personal development, empowering members to achieve their full potential. This includes social media engagement, a resource library, newsletters, small group networking with applicable focus topics, and other avenues of connection.

Mentorship Program: WWN sponsors a companywide mentorship program to boost professional growth through one-on-one mentoring, helping expand internal and external networks.

Leadership and Inclusion: The network nominates new Council members annually to include diverse perspectives in decision-making and nurture future leaders. It also partners with Weston's Diversity, Equity, and Inclusion Council to promote cultural awareness and team building.

Professional Development: WWN hosts webinars and panels with experts to address top needs and challenges, such as negotiation skills and paths to leadership.

Advocacy: WWN takes the feedback received through its many activities and advocates for women with Weston's leadership, helping to raise women's concerns and facilitate solutions or clarification. These initiatives embody WWN's commitment to empowering women and driving meaningful change.





COMMUNITIES OF PRACTICE (CoPs)

Weston's Communities of Practice (CoPs) are pivotal in fostering a culture of continuous improvement and knowledge-sharing, directly impacting the quality of work and employee development. They uphold Weston's core values ensuring a behavior-based quality culture.

CoPs facilitate nationwide knowledge-sharing, spurring innovation and empowering high-performing teams, which is crucial for employee development and retention, leading to a low voluntary turnover rate and a high percentage of internal promotions for management positions.





ETHICS AND VALUES

Weston's ethics and values are deeply intertwined, with a strong emphasis on integrity as the cornerstone of all operations, both internal and external. The company's six core values form the foundation of our business success.



Act with Integrity,



Live Safely



Advance Client
Success,



Deliver Exceptional
Quality,



Be Inclusive,



Create a Better World;
Be the Change

These values guide decisions and actions, ensuring a reputation for honest and ethical behavior, which is vital for sustainable success. Our commitment to social responsibility extends to providing a safe and profitable workplace, flexible work policies for work-life balance, and comprehensive wellness programs, all of which reflect Weston's dedication to its employee owners and the broader community.





| SAFETY

Every day at Weston, we focus on achieving a ZERO incident outcome so that our employees go home safely every night. Our employee owners face occupational hazards daily in our line of work. Hazards include those that we face every day outside of work such as sun exposure, heat, and cold stress and include working from heights, hot work, and exposure to chemicals. Weston upholds a safety-first-and-all-the-time culture in which employees accept personal responsibility for creating a safe environment. We care about our co-workers, clients, and subcontractors and are focused on being safety leaders everywhere, every day. We have built safety into every phase of our project lifecycle: from opportunity pursuit through project completion. We strive to work safely 100% of the time in an environmentally responsible manner. Weston consistently implements regulatory and legislative requirements and continuously refines our best practices to ensure that we are adapting and preparing for potential risks. We do this by completing Activity Hazard Analyses (AHA) for every task our employee owners face. We identify risks and how to eliminate or mitigate them through implementing the hierarchy of controls. After identifying risks, Weston also requires that all personnel working on site conduct safety tailgate meetings to ensure that everyone is aware of the risks, their responsibilities in eliminating or mitigating work-related hazards, and what to do if there is an incident.



Safety is tightly integrated into daily life at Weston, from corporate leaders to field safety officers nationwide. The team collaborates with the safety department at each project phase, from planning and field construction to sharing lessons learned and every step in between. Safety, done right, takes a team.



HEROLD HANNAH, CISP
Director of Health & Safety



In 2022, Weston restated and cascaded accountability and ownership of safety starting with the COO, CFO, through the regional centers of operations, to the employees in the field and in the office. This was done through ongoing multiple versions of messaging by individuals in leadership roles reiterating the vital importance of safety.



2023 Year-End Safety Metrics

Metric	Weston Solutions, Inc.	Industry Average
Total Recordable Incident Rate (TRIR)	0.71	2.7*
Experience Modification Rate (EMR)	0.81	1.0

*2.7 is the industry average TRIR for all private industries

Table 3:

Weston's 2023 Year-End Safety Metrics as compared to the industry averages. Both referenced metrics are well below the industry averages.



Weston's Experience Modification Rate for the Prior 3 Years

2023	2022	2021
0.81	0.72	0.66

Table 4:

Weston's Experience Modification Rates (EMR) for 2021-2023 are well below the industry average which demonstrates our strong safety standards.



INFORMATION SECURITY

The security and privacy of our employees and clients remains a top priority at Weston. With clients over a variety of sectors and various levels of government, sensitive information must be protected. Weston's information technology (IT) team works continuously to harden the security of Weston's IT network and systems. Weston has developed its IT security around the National Institute of Standards and Technology (NIST) Cybersecurity Framework. The IT Department also facilitates the secure and seamless exchange of business information and stakeholder collaboration as part of our Security Policy with numerous supporting procedures, tools, and protocols.

Effective information security also requires the awareness and proactive support of all staff supplementing and making full use of the technical security controls. In support of our goal of zero security incidents, all employees complete cyber security training with additional training for those involved in federal Department of Defense (DoD) projects. IT performs phishing tests quarterly and those personnel who do not pass must complete additional training. In addition, we also conduct Insider Threat Security awareness training annually.

Weston is committed to ensuring the protection of the data that our clients and employees entrust to us. We maintain an information security program of robust policies, procedures and standards governing data privacy and information security. Weston is governed by our Information Management and Business Confidentiality policies which state that Weston will capture, store, create, preserve, and deliver information in a manner that is effective, efficient, and in compliance with all applicable laws and regulations and that the confidentiality of Weston and our client information is required to be protected. Weston's security framework aligns with government and industry-leading standards and safeguards; we comply with the Cybersecurity Maturity Model Certification CMMC/NIST 800-171 and are completing certification.

Weston retains many client documents throughout its business operations. We retain all documents if required by law, regulation, contract, or sound business practice. All documents not required by law, regulation, contract, or sound business practice to be retained and no longer useful for the performance of Weston work are destroyed.





SMALL BUSINESS – SUPPLIER DIVERSITY PROGRAM

Weston maintains a Small Business - Supplier Diversity Program governed by federal, state and corporate policies and procedures.

Weston's Small Business/Supplier Diversity Program has earned an EXCEPTIONAL rating from the Defense Contract Management Agency (DCMA) and the U.S. Small Business Administration (SBA). This rating is significant in representing the effectiveness of a large business federal prime contractor's SB subcontracting and Supplier Diversity Program.

The DCMA conducts an audit on behalf of the SBA every 3 years. In bestowing the EXCEPTIONAL rating, the DCMA and SBA noted their appreciation of Weston's commitment to work with SBS, providing them with technical, financial, and management assistance. Weston was also commended for upper management's support of providing opportunities to small, disadvantaged, woman-owned, HUBZone, veteran-owned, and service-disabled veteran-owned SB concerns via teaming and subcontracting.

Weston prioritizes subcontracting and teaming opportunities on all public and private sector assignments with: Small Businesses, Historically Underutilized Business Zone (HUBZone) SBs, Small Disadvantaged Businesses (SDBs/DBEs/MSEs), Woman-Owned Small Businesses (WOSBs/WBEs), Veteran-Owned Small Businesses (VOSBs), Service-Disabled Veteran-Owned Small Businesses (SDVOSBs), Alaska Native Corporations (ANCs), Native Hawaiian Organizations (NHOs), Indian tribes, Ability One, and Community Rehabilitation Programs (CRP) organizations.

In addition to maximizing subcontracting to diverse SBs, Weston conducts ongoing outreach, training, developmental assistance, and mentoring for emerging firms.



Weston has advocated and participated in the DoD and SBA Mentor-Protégé Programs for over 25 years, and is currently engaged in 4 formal agreements:

TEKSOL Integration Group, Inc. (TEKSOL) (8(a) SDB)
Bering Straits Global Innovations (BSGI) (ANC 8(a) SDB)
Aerostar Environmental & Construction, LLC (AEC) (ANC 8(a) SDB)
Cape Environmental Management, Inc. (CAPE) (SB)



Beyond our formal mentoring programs, Weston provides ad-hoc developmental assistance to diverse SBs by conducting training and seminars tailored to such areas as subcontractor management, certified payroll reporting, health & safety programs, QA/QC programs, Cybersecurity Maturity Model Certification (CMMC)/IT security compliance and best practices, and marketing/business development. Training is provided at regional and national outreach events, as well as one-on-one.

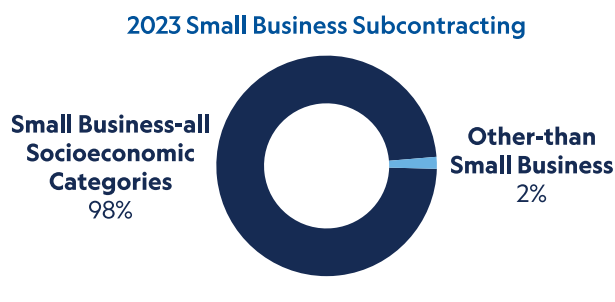


Figure 8:

Weston's total federal subcontracting spend for FY2023 and the percentage that was awarded to small business enterprises. In 2023, Weston subcontracted almost \$1.05 Billion under its federal programs, with \$1.025 Billion (98%) awarded to diverse small businesses, and \$25 Million (2%) to other-than small business, demonstrating our strong commitment to supplier diversity.

Weston's SB-Supplier Diversity Program effectiveness is exemplified by the company having been recognized by the US Small Business Administration, the Department of Defense, the Society of American Military Engineers, other agencies, and SB Groups.

In 2023, Weston received the following awards and recognition:



Weston's SB-Supplier Diversity Program Manager/Small Business Liaison Officer (SBLO) was presented with Certificates of Commendation from the Director, DoD Office of Small Business Programs for her service on the Board of Direction and significant contributions to the DoD Mid-Atlantic Regional Council for SB Advocacy and Education. The Mid-Atlantic Regional Council (MARC) is one of seven Department of Defense (DoD) Regional Councils for Small Business Education and Advocacy among a nationwide network of small business and acquisition professionals. They are organized to promote federal small business

programs and provide a unique forum for training, legislative and policy information dissemination, and idea sharing to address issues impacting these programs.



Champion of Veteran Enterprise Award

Presented by the National Veteran SB Coalition (NVSBC) for Weston's exceptional Support of Veteran and Service-Disabled Veteran owned Small Business, Weston has received this recognition annually for the past 5 years. NVSBC is a nationally recognized non-profit organization that provides training, networking, and advocacy for veteran small business entrepreneurs in the federal market to ensure they are "procurement ready" and have

enhanced access to opportunities to start, operate, sustain, and grow competitive and strong businesses serving federal agencies and other government contractors.



2023 Large Business Contractor Award

Presented by the Society of American Military Engineers for Weston's outstanding achievements in outreach, subcontracting, and mentoring/developmental assistance to small businesses. The Society of American Military Engineers (SAME) is an organization that

builds leaders and fosters collaboration between government and industry. It brings together individuals and organizations from various fields related to architecture, engineering, construction, environmental, facility management, contracting, and acquisition to support national security in the United States.



VOLUNTEERISM AND CORPORATE PHILANTHROPY

Weston's commitment to volunteerism and corporate philanthropy is deeply embedded in our culture, reflecting a dedication to social responsibility and community engagement. The company's employee owners are not just professionals in their fields, they also actively contribute to the communities where they live and work. They take pride in using their expertise to make a positive impact, supporting sustainable causes that matter to their communities, families, and colleagues. This commitment extends beyond project delivery to include a wide range of volunteer activities, demonstrating Weston's belief in the importance of balancing people, profit, and planet in its business practices.



STAKEHOLDER ENGAGEMENT

Weston's stakeholder engagement remains a cornerstone of our project management and corporate culture, emphasizing the importance of building trust and aligning stakeholder expectations with project goals. The approach involves engaging stakeholders in the development of project quality pledges, leveraging the mechanics of stakeholder organizations, and ensuring collaborative work environments. This engagement plays a crucial role in managing complex projects with multiple subcontractors and internal team members, as well as in resolving conflicts, enhancing communication, and validating performance objectives with stakeholders. Through effective stakeholder engagement plans, Weston's project managers lead by example, demonstrating the company's commitment to transparency, accountability, and collaborative success.





GOVERNANCE



COMPANY GOVERNANCE STRUCTURE

Weston's governance structure is designed to ensure effective oversight and strategic alignment across the organization. By minimizing multiple tiers of authority throughout the company, Weston's employee owners have the reach and direct feedback from their superiors to facilitate our agility and responsiveness to our clients' needs and expectations. The Weston Board of Directors (BOD) provides strategic oversight of the company's operations, ensuring that senior management adheres to the highest standards of compliance and governance. The BOD operates with a commitment to

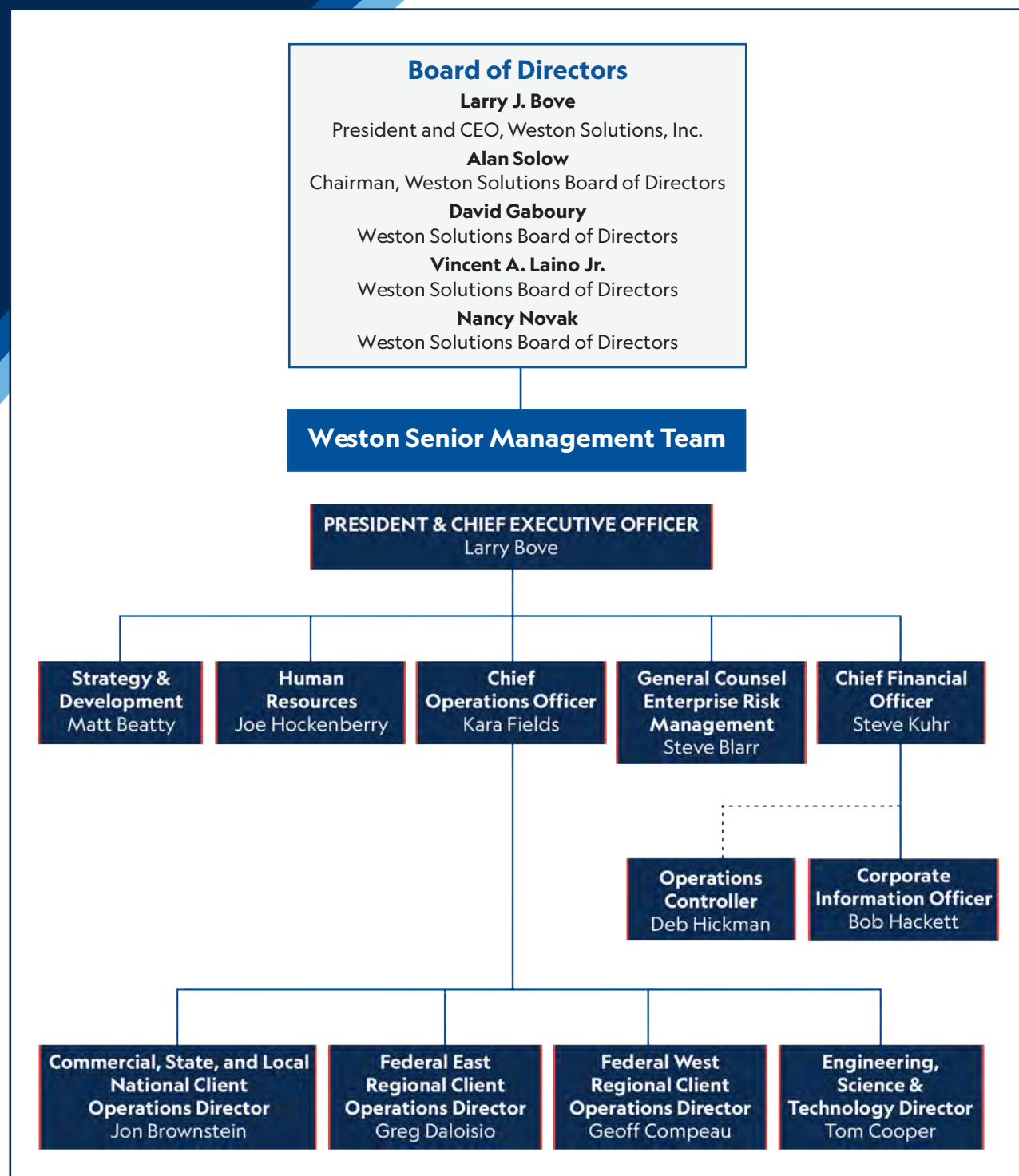
Weston's core values, including integrity and safety, which are crucial for maintaining the company's reputation and success. This structure facilitates decision-making and supports the company's strategic objectives, such as strategic growth initiatives, change management, streamlining reporting structures, eliminating excess overhead, and the realignment of business lines for greater efficiency and effectiveness.

Senior management engages regularly with the BOD to review operations, discuss strategic initiatives, and ensure compliance with various regulatory bodies such as the DCMA, DCAA, EPA, and state and local regulatory agencies. These interactions occur through scheduled meetings, as needed to ensure client and corporate milestones are met.





Weston's organizational structure is designed to facilitate clear communication and efficient decision-making across all levels of management. The organizational chart presented below visually represents the internal governance structure, delineating the lines of authority and reporting relationships within the company. This chart is an essential tool for understanding how the company is governed and how different tiers of management interact with each other.





BUSINESS ETHICS AND POLICIES

Weston Solutions is committed to the highest standards of ethical conduct and corporate citizenship. Our Code of Conduct reflects this commitment, guiding employees, officers, and directors in maintaining integrity in all business dealings. We conduct business ethically and professionally, adhering to both the letter and spirit of our code. Our comprehensive policies & procedures ensure consistency in processes, enhance efficiency, improve performance, and mitigate risk, while clearly defining roles and responsibilities to align operations with our core values and strategic objectives.

Annually, we conduct Business Ethics Training for all employees to reinforce ethical behavior and legal compliance. This training concludes with an Ethics Compliance Acknowledgment, emphasizing each individual's role in upholding Weston's integrity.

Our Business Ethics Code specifies conduct expectations, particularly in government interactions, and details disciplinary measures for policy violations, promoting transparency and accountability at all organizational levels. It also provides resources such as Weston's Ethics Hotline, the Corporate Ombudsperson, and the

Audit Committee for reporting concerns.

Our unwavering dedication to ethics and adherence to company policies ensures that Weston operates with transparency, responsibility, integrity, and excellence, upholding our reputation as a leader in the industry. Nothing is more important to our future than our reputation for honest and ethical behavior. We know that sustainable success in business is impossible to achieve without integrity. Each person's actions affect all of us, and this is particularly true when it comes to integrity. Some may argue that it is too hard to maintain high ethical standards in a global marketplace with substantial variations in ethical practices. At Weston, we know this argument is shortsighted and flatly wrong. Truly sustainable prosperity for our company and for ourselves is not possible unless we compete fairly, lawfully, and ethically. Our Weston Business Ethics Code provides guidance on ethical and legal issues. Sometimes complex laws and legal procedures require legal training to understand. At Weston, all employees must annually certify their completion of Ethics Training by attending a prescribed training module and completing an exam with a passing score. Weston's commitment to anti-bribery and anti-corruption in the workplace is also outlined in our Business Ethics Code.





INDUSTRY, INNOVATION, & INFRASTRUCTURE

As Weston plays a crucial role in industry, innovation, and infrastructure, it is vital that we maintain regulatory compliance with our auditing and oversight agencies while still providing our clients with the best results. As a government contractor, numerous public laws and government agency policies and procedures drive our day-to-day operations and require our compliance. We maintain compliance by executing a robust enterprise risk management process. This risk management process helps to identify and mitigate risks associated with industry-specific challenges and allows Weston to enhance resilience. We also engage with government agencies, local communities, and other stakeholders to develop resilient infrastructure solutions and foster positive relationships with them as we navigate an ever-changing regulatory environment.





APPROVED BUSINESS SYSTEMS

Weston Solutions maintains several business and operating systems that have been approved by the Defense Contract Audit Agency (DCAA) and the Defense Contract Management Agency (DCMA), which ensures our integrity and compliance with federal requirements. Weston's Purchasing System, which undergoes DCMA Contractor Purchasing System Reviews (CPSR), evaluates the efficiency and effectiveness with which Weston spends Government funds and complies with applicable contract terms, regulations, and Government policy when subcontracting. In addition, Weston's federally approved Cost Accounting System has been certified by DCMA as approved and acceptable for determining costs applicable to cost-type contracts or task orders in accordance with the terms and conditions of DFARS 252.242-7006. Furthermore, Weston's SB/Supplier Diversity Program has been audited and rated "exceptional" by the DCMA and SBA, and is recognized as fully compliant with FAR 19.706, FAR 52.219-8, and FAR 52.219-9.



ADVANCING OUR ESG COMMITMENT

Weston is in the preliminary stages of documenting our ESG journey. We have identified ESG as vitally important to us and our industry and plan to continue to prioritize this journey, establish meaningful goals and milestones, and enhance our metrics for documenting and reporting. As we continue to refine ESG at Weston, we have identified several steps to advance our commitment to ESG. We will publish ESG reports annually and strive to improve them each year. We will assess our current position with ESG and will focus on identifying measurable improvements, goals and data gaps.. Lastly, we will continue to promote ESG awareness internally. Our employee owners play a vital role in this journey, so we want to foster awareness, education, and engagement across the organization.





Appendices:

Appendix A: Sustainability Accounting Standards Board (SASB) Disclosures

TOPIC	ACCOUNTING METRIC	LOCATION	CODE
Data security	Description of approach to identifying and addressing data security risks	Information Security	SV-PS-230a.1
	Description of policies and practices relating to collection, usage, and retention of customer information	Information Security	SV-PS-230a.2
	(1) Number of data breaches, (2) percentage that (a) involve customers' confidential business information and (b) are personal data breaches, (3) number of (a) customers and (b) individuals affected	<i>No known data breaches to date</i>	SV-PS-230a.3
Workforce Diversity & Engagement	Percentage of (1) gender and (2) diversity group representation for (a) executive management, (b) non-executive management, and (c) all other employees	Our Employees	SV-PS-330a.1
	1) Voluntary and (2) involuntary turnover rate for employees	Our Employees	SV-PS-330a.2
	Employee engagement as a percentage	Our Employees	SV-PS-330a.3
Professional Integrity	Description of approach to ensuring professional integrity	Our Story, Company Governance Structure, Business Ethics and Policies	SV-PS-510a.1
	Total amount of monetary losses as a result of legal proceedings associated with professional integrity	<i>Weston does not currently disclose this information.</i>	SV-PS-510a.2
Activity Metrics	Number of employees by: (1) full-time and part-time, (2) temporary, and (3) contract	Our Employees	SV-PS-000.A
	Employee hours worked, percentage billable	Our Employees	SV-PS-000.B

Appendix B: Global Reporting Initiative (GRI) Standard Disclosures

GRI STANDARD	DISCLOSURE	LOCATION
GRI 2: General Disclosures 2021	2-1 Organizational details	ESG at Weston
	2-2 Entities included in the organization's sustainability reporting	ESG at Weston
	2-3 Reporting period, frequency and contact point	Advancing our ESG Commitment
	2-6 Activities, value chain and other business relationships	Our Story, Responsible Consumption, Small Business -- Supplier Diversity Program
	2-7 Employees	Our Employees
	2-8 Workers who are not employees	Our Employees
	2-9 Governance structure and composition	Company Governance Structure



	2-12 Role of the highest governance body in overseeing the management of impacts	Company Governance Structure
	2-15 Conflicts of interest	Company Governance Structure, Business Ethics and Policies
	2-22 Statement on sustainable development strategy	ESG at Weston
	2-23 Policy commitments	Business Ethics and Policies
	2-24 Embedding policy commitments	Business Ethics and Policies
	2-26 Mechanisms for seeking advice and raising concerns	Business Ethics and Policies
	2-29 Approach to stakeholder engagement	Stakeholder Engagement
GRI 201: Economic Performance 2016	201-3 Defined benefit plan obligations and other retirement plans	Our Employees
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	Resiliency and Management Systems, Green Solutions and Initiatives
GRI 205: Anti-corruption 2016	205-2 Communication and training about anti-corruption policies and procedures	Business Ethics and Policies
GRI 301: Materials 2016	301-1 Materials used by weight or volume	Responsible Consumption
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Greenhouse Gas Emissions
	305-2 Energy indirect (Scope 2) GHG emissions	Greenhouse Gas Emissions
	305-3 Other indirect (Scope 3) GHG emissions	Greenhouse Gas Emissions
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	Our Employees
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	Safety
	403-2 Hazard identification, risk assessment, and incident investigation	Safety
	403-3 Occupational health services	Safety
	403-4 Worker participation, consultation, and communication on occupational health and safety	Safety
	403-6 Promotion of worker health	Our Employees
GRI 404: Training and Education 2016	404-2 Programs for upgrading employee skills and transition assistance programs	Our Employees, Project Manager in Training
	404-3 Percentage of employees receiving regular performance and career development reviews	Our Employees
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Our Employees

