


	Policy – Environmental, Social, and Governance (“ESG”)	Environmental, Social, and Governance (“ESG”)	
Authorized By:	Chief Executive Officer	Revision:	1
Document Owner:	Chief Compliance Officer	Page:	Page 1 of 4

1.0 Revision History

Revision Number:	Description of Revision(s):	Created / Revised by:	Date Created / Revised:
0	Original Issue	SKillian	January 20, 2023

2.0 Purpose

- Apache Industrial believes that Environmental, Social, and Governance (“ESG”) principles are crucial to developing a resilient organization that delivers long-term value. We are fully committed to integrating ESG into all aspects of our business.
- Apache Industrial’s ESG initiatives are focused on matters that are meaningful to our employees, customers and stakeholders. We seek to lead by example and apply our insights to drive change across the industries we work by:
 - Reducing waste from our operations and increasing the focus of reuse and recycling;
 - Recruiting and fostering diverse talent through active networks such as the MIT (“Manager In Training”), Veterans Network, and Access II Industry programs that are dedicated to hiring, retaining and raising awareness of diverse groups through networking events, training programs, and mentoring relationships;
 - Driving and supporting improvements in the communities in which we operate by providing employment opportunities and supporting community educational and development initiatives;
 - Training our employees through Annual Compliance Training, which includes topics such as data protection and privacy, Apache Industrial’s Code of Conduct and Ethics, and fiduciary duties / conflicts of interest among others;
 - Engaging the entire organization in our cybersecurity awareness efforts to educate our employee population to recognize suspicious activities and report them for investigation; and,
 - Advancing opportunities to partner with women and minority owned businesses.

	Policy – Environmental, Social, and Governance (“ESG”)	Environmental, Social, and Governance (“ESG”)	
Authorized By:	Chief Executive Officer	Revision:	1
Document Owner:	Chief Compliance Officer	Page:	Page 2 of 4


3.0 Scope

- This Policy - ESG applies to all of Apache Industrial Holdings, Inc. and its subsidiaries (“Apache Industrial”). It is reviewed annually to reflect changes to our business. This Policy - ESG is subject to change as the company considers necessary or advisable.

4.0 Philosophy

- We believe that our ESG focus will strengthen our company, drive value, enhance returns, and help to create better outcomes for our customers and the communities in which we operate.
- We strive for a highly coordinated approach driven by our corporate Executive Team that applies best practices, champions our ESG initiatives, and regularly reports our progress on our ESG initiatives to our employees, customers, and stakeholders.
- ESG factors that may be incorporated into our ESG philosophy include, but are not limited to, the following.

Environmental Considerations	Social Considerations	Governance Considerations
Waste management (reduce, recycling and reuse)	Diversity, equity, and inclusion	Fraud, anti-bribery, and anti-corruption controls
Energy management and efficiency	Employee health and safety	Risk management
Stormwater Pollution Prevention	Labor relations and practices	Conflicts of interest
Carbon Footprint/Greenhouse Gases	Customer privacy and cyber security (management of confidentiality)	Transparency (including financial and operational reporting)
	Apprenticeship Programs	Corporate governance and oversight
	Workforce Development	Business Continuity
	Modern slavery, child labor, human trafficking	

	Policy – Environmental, Social, and Governance (“ESG”)	Environmental, Social, and Governance (“ESG”)	
Authorized By:	Chief Executive Officer	Revision:	1
Document Owner:	Chief Compliance Officer	Page:	Page 3 of 4

5.0 Focus Areas

- Across our organization, we have identified the following priority ESG topics.
 - Climate Change Mitigation
 - We recognize that climate change is a systemic issue, affecting all sectors and geographies. Our goal is to reduce carbon emissions through our approaches to daily operations and project execution. We are also focused on supporting our customers involved in the energy transition.
- Diversity, Equity, and Inclusion (DEI)
 - We are highly focused on driving diversity within Apache Industrial by working to foster employment opportunities and career mobility for diverse and historically underrepresented talent.
 - We focus a number of resources on the development of the trades and apprenticeship programs.
 - We are committed to identifying and advancing opportunities to partner with women and minority owned businesses.
- Oversight and Governance
 - We believe that corporate oversight and governance is essential for financially sound companies. We have an active and engaged board of directors with the skill to properly oversee and direct management and encourage protocols to enhance transparency and good governance.

6.0 Reporting

- We are committed to transparency with our employees, customers, and stakeholders regarding Apache Industrial’s ESG initiatives, successes, and goals and provide periodic and annual updates regarding our ESG program.
- We value regular, frequent engagement related to ESG matters and seek input from our employees, customers, and stakeholders on an ongoing basis.

	Policy – Environmental, Social, and Governance (“ESG”)	Environmental, Social, and Governance (“ESG”)	
Authorized By:	Chief Executive Officer	Revision:	1
Document Owner:	Chief Compliance Officer	Page:	Page 4 of 4

7.0 Roles and Responsibilities

- Apache Industrial’s Chief Executive Officer (CEO) and Chief Compliance Officer (CCO) have ultimate responsibility for overseeing this Policy - ESG.
- The corporate Executive Team coordinates initiatives across the organization to maintain consistency in approach. Our Regional and Local Business Unit Leaders are responsible for supporting and ensuring compliance with this Policy - ESG and any other requirements and overseeing their annual review.
- Our Executive Leadership Team monitors changes and updates to industry trends, policy, and regulations and provides insight to the business units as needed.