



Mark Fallon
Chairman and CEO

January 1, 2024

EQUAL EMPLOYMENT OPPORTUNITY AND AFFIRMATIVE ACTION POLICY

APTIM fosters a work environment free from discrimination, harassment and retaliation. We expect our employees to treat each other with respect. We are all responsible for doing our part to create a positive working environment.

APTIM strives to ensure equal opportunity and affirmative action in every phase of employment, including recruitment, hiring, compensation, promotion, discipline, and termination. Our policy is not to discriminate or allow harassment of employees or applicants on the basis of age, citizenship, color, disability (physical or mental), gender, gender identity, familial or marital status, national origin, race, religious creed or religion, sexual orientation, veteran or military status, genetic information or any other legally protected status. Our goal is to implement our employment practices in an objective, unbiased manner, basing decisions only on valid job requirements.

APTIM seeks to provide reasonable accommodation to qualified employees and applicants with a known disability. If you believe you need a reasonable accommodation, contact Human Resources to begin an interactive discussion.

APTIM does not tolerate retaliation. APTIM does not harass, intimidate, threaten, coerce, intimidate, threaten or discriminate against employees or applicants because they have filed a complaint, assisted or participated in an investigation, compliance review or hearing, or engaged in other activity related to the administration of Section 503 of the Rehabilitation Act of 1973, the Vietnam Era Veterans' Readjustment Assistance Act of 1974, Executive Order 11246, all as amended, or any other federal, state, or local law or regulation regarding equal employment opportunity, opposing any unlawful act or practice, or exercising any other right protected by these laws or regulations.

APTIM is fully committed to principals of equal employment opportunity and affirmative action. I support the successful implementation of APTIM's Affirmative Action Programs ("AAP"). Dana Lake-Streams, Project Manager, Diversity Equity & Inclusion, is APTIM's Affirmative Action Manager, and she is responsible for implementing APTIM's affirmative action activities. The Affirmative Action Manager has the full support of top management and the staff necessary to implement our AAPs fully. All managers and supervisors will take an active part in APTIM's AAPs to ensure all qualified employees and prospective employees are considered and treated in a non-discriminatory manner with respect to all employment decisions.

Our AAPs include an audit and reporting system, which, among other things, uses metrics and other information to measure the effectiveness of our Programs. The Affirmative Action Manager periodically reviews progress in the compliance and implementation of the policy of affirmative action. If you wish to review appropriate portions of APTIM's affirmative action programs, contact Human Resources Compliance at HRCompliance@aptim.com. These programs are available for inspection in the Human Resources Department, Monday through Friday, from 9:00 a.m. to 5:00 p.m. upon request.

APTIM will not discharge or discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to other employees or applicants' compensation information as part of their essential job functions cannot disclose the pay of others employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with the contractor's legal duty to furnish information.

If you have any questions or concerns about our program, please contact Dana Lake-Streams or our Chief Compliance Officer, Margaret Phillips, Margaret.Phillips@aptim.com. You can also contact our Ethics Line (anonymously if you wish) to raise any issues or concerns (1.800.461.9330 or www.convercent.com/report). The Ethics Line is available 24/7.

Thank you for working with me in our shared commitment to these principles.

A handwritten signature in blue ink that reads "Mark Fallon".

Mark Fallon