

# **ENVIRONMENTAL POLICY**

Effective Date: January 1, 2025

Revised Date: January 1, 2025

Bohn and Dawson, Inc.("Company") is committed to sustainable business practices and high standards of environmental, social, and governance practices. This policy reinforces the Company's commitment to responding to environmental challenges, promoting environmental responsibility, and supporting development and diffusion of environmentally friendly technologies. It applies to the Company's employees, contractors, subcontractors, agents, and other authorized representatives and third parties acting on the Company's behalf ("Company Representatives").

This policy applies to all Company Representatives and the Company's global operations and relates to the Company's commitment to adopt, track, and disclose environmentally sustainable business practices. We believe that it is our responsibility to operate sustainably and to invest in a better future for the benefit of our global communities. A copy of this policy will be maintained on the Company Website: bdiweldedtubing.com.

The Company environmental standards are as follows:

## **Environmental Permits and Reporting**

All required environmental permits (e.g., discharge monitoring), approvals, and registrations shall be obtained, maintained, and kept current, and their operational and reporting requirements shall be followed.

#### **Pollution Prevention and Resource Conservation**

Emissions and discharges of pollutants and generation of waste shall be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance, and facility processes; or by other means. The use of natural resources, including water, fossil fuels, minerals, and virgin forest products, shall be conserved by practices such as

modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means.

### **Hazardous Substances**

Chemicals, waste, and other materials posing a hazard to humans or the environment shall be identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal. Hazardous waste data shall be tracked and documented.

## Solid Waste

Company shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous). Waste data shall be tracked and documented.

### Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion byproducts generated from operations shall be characterized, routinely monitored, controlled, and treated as required prior to discharge. Ozone- depleting substances shall be effectively managed in accordance with the Montreal Protocol and applicable regulations. Company shall conduct routine monitoring of the performance of its air emission control systems.

## **Materials Restrictions**

Company shall adhere to all applicable laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

## Water Management

Company shall implement a water management program that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. All wastewater shall be characterized, monitored, controlled, and treated as required prior to discharge or disposal. Company shall conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.

## **Energy Consumption and Greenhouse Gas Emissions**

Company shall establish and report against an absolute corporate-wide greenhouse gas reduction goal. Energy consumption and all Scopes 1, 2, and significant categories of Scope 3 greenhouse gas emissions shall be tracked, documented, and publicly reported. Company shall look for

methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.

### **Questions and Concerns**

Any questions or concerns regarding this policy should be directed to Human Resources. Suspected violations of this policy should be directed to the Human Resources Department in accordance with the procedures set forth in the Company's Code of Business Conduct and Ethics.