



# AEGEUS

## ENVIRONMENT, SOCIAL, AND GOVERNANCE PROGRAM

July 2024

Through our ESG Program, the Aegeus Group is committed to fostering a safe, diverse workplace for all our employees that resembles the communities we serve while also aiming to lessen our environmental impact.

We are also committed to promoting and adopting equitable, sustainable and ethical workplace practices to demonstrate to our employees, clients, and vendors the importance of integrity in our actions and through our services.



# AEGEUS

As we navigate the ever-evolving landscape of our business, it becomes increasingly evident that our success is not solely measured by financial performance. In today's world, we must also focus on our Environmental, Social, and Governance (ESG) responsibilities. By anticipating and adapting to societal and environmental shifts, we position ourselves as leaders in a rapidly changing world. ESG is not a burden; it's an opportunity to innovate, differentiate, and thrive.

By adopting sustainable practices, reducing our carbon footprint, and investing in environmentally friendly initiatives, we not only contribute to a healthier planet but also ensure the resilience of our operations for today and tomorrow.

The well-being of our employees, customers, and communities is fundamental to who we are as a group. Prioritizing social responsibility is not just a moral imperative; it's a strategic advantage. A positive corporate culture, diversity and inclusion, fair labor practices, and community engagement not only enhance our reputation but also foster innovation and employee loyalty. By investing in the social fabric around us, we build a foundation for sustained success, together with our employees.

Our commitment to ESG is not a mere obligation; it is a strategic imperative and beneficial to our employees and clients. As we align our business practices with sustainable principles, we not only contribute to a better world but also secure the long-term success of our group. Let us work together to integrate ESG considerations into every facet of our operations, creating a legacy of responsible and resilient business practices together as a united team.

Ryan Niparts  
Chief Executive Officer



## FOREWORD: THE IMPORTANCE OF ESG

The AEGEUS logo is displayed in a large, white, stylized font against a dark background. The letters are bold and modern, with a slight shadow effect. The background of the entire page features a golden-yellow sunburst at the top, with rays extending downwards, and a series of dark, curved lines that resemble a stylized tree or a series of arches, creating a sense of depth and structure.

## *Our Valued Stakeholders,*

*As President of Kiefner and Associates, Inc., I am proud to present our company's Environmental, Social, and Governance (ESG) policy. This document is not just a reflection of our current practices but a commitment to the sustainable future we are striving to build.*

*In an industry that is both vital and challenging, we understand that the way forward requires a balance between meeting the world's energy needs and protecting our planet for future generations. Our ESG policy is a commitment to that balance, ensuring that we operate not just in compliance with regulations but go beyond, to consistently improve our environmental footprint, nurture our workforce, and uphold the highest standards of governance.*

***Environment:*** *We are dedicated to implementing practices that reduce our ecological impact. From optimizing resource use and embracing renewable energy solutions to minimizing emissions and waste, every decision is made with the foresight of environmental custodianship.*

***Social:*** *Our commitment extends to fostering a workplace where diversity is celebrated, and inclusivity is the norm. We believe in supporting our employees, customers, and the communities where we operate, with initiatives that promote well-being, education, and empowerment.*

***Governance:*** *Transparency, integrity, and ethics are the cornerstones of our corporate governance. We hold ourselves accountable to the highest standards, ensuring that we conduct our business with unwavering honesty and fairness.*

*This ESG policy is a living document, evolving as we progress in our journey of continuous improvement. It outlines not just our aspirations but our plans, practices, and performance indicators that will drive Kiefner to be a leader in corporate responsibility within the energy sector. I invite our stakeholders to join us on this path, to hold us accountable, and to collaborate in creating a more sustainable and equitable world. Together, we can ensure that the energy that powers our lives today also powers a brighter future for all.*

*- Trae J. Miller III,  
President and Chief Engineer*





At JANX, we recognize the importance of an ESG Program to drive sustainability, employee equality and safety, and operational excellence as core principles of our company. As we navigate the dynamic landscape of the oil and gas industry, we are acutely aware of the responsibility we bear—to our clients, our employees, the communities we serve, and the environment we share. Our pledge:

- We will actively work towards reducing greenhouse gas emissions through the adoption of technologies and measures to promote efficiency and reduction in carbon emissions.
- We will responsibly manage natural resources, striving to minimize waste generation, and promoting efficient use of water, energy, and other resources.
- Uphold the health, safety, and wellbeing of our employees which is paramount. We are committed to providing a safe and healthy workplace, investing in training, and implementing measures to prevent accidents and occupational hazards. We are committed to maintaining safe, inclusive, and diverse workplaces.
- We will conduct our business with the highest standards of ethics, integrity, and transparency, complying with all applicable laws and regulations, client specifications and codes to ensure quality is prioritized.

This policy is not merely a set of guidelines; it is a reflection of our commitment to continuous improvement to our employees and clients. Together, we can build a future where responsible business practices are the standard, and our collective efforts contribute to a more sustainable and equitable world.

Travis Rogers  
Central Regional Director

Jim Barrett  
Eastern Regional Director



# AEGEUS

*In harnessing the power of Sustainability and HSE, Aegeus ensures that every endeavor protects both our workforce and the planet. Our commitment goes beyond mere compliance; it's an expression of our values. We believe that a prosperous future doesn't come at the expense of the environment or our people, but rather through their mutual care and growth. Through dedication and innovation, we're sculpting a future where success, sustainability, and well-being are intertwined, setting an example for the Non-destructive Testing, Engineering, and Technical Staffing Services industry.*

*- Schae Dominique  
HSE Manager*



## HEALTH, SAFETY, AND ENVIRONMENTAL

# OUR HSE PILLARS

HSE

## Stop Work Authority

- At Aegeus, the safety and well-being of our employees, contractors, and stakeholders is paramount. We empower every individual with the Stop Work Authority (SWA) - a responsibility and right to halt any operation or activity that poses a risk to health, safety, or the environment.
- Our commitment to SWA reinforces a proactive safety culture, ensuring that potential hazards are addressed immediately and decisively. Together, we prioritize safety above all, fostering a workplace where everyone returns home safely.

Stop Work Authority

## HSE Training

- We believe in building a foundation of safety and environmental stewardship. To this end, we are deeply committed to providing top-tier Health, Safety, and Environmental (HSE) training to our team.
- Our training programs are meticulously crafted, regularly updated, and designed to ensure that every member understands and upholds the highest standards of safety and environmental responsibility. Through continuous learning and development, we aim to create a workspace that is not only efficient but also inherently safe and environmentally conscious.

Employee Training

## Progressive Leading Indicators

- We're not just content with meeting industry standards – we aim to define them. Recognizing the value of foresight in Health, Safety, and Environmental (HSE) management, we are ardently committed to integrating progressive HSE Leading Indicators into our HSE Program.
- These proactive measures help us anticipate potential issues, drive continuous improvement, and uphold our promise of operational excellence. By focusing on the future and embracing forward-thinking metrics, we're charting a course for a safer, more responsible, and sustainable operational journey.

Leading Indicators





# SUSTAINABILITY

---

Reduction  
of Carbon  
Footprint

We are committed to the strategic adoption of cutting-edge digital technology. This transformative shift significantly reduces waste, including the elimination of film and chemical usage. Our consistent approach to digital technology is intrinsically linked to our dedication towards environmental stewardship, emission reduction, and a mindful approach to minimizing our ecological footprint. Simultaneously, this digital shift enhances operational efficiency, elevates safety, and secures the consistency and reliability of our services. In conjunction with waste reduction, we prioritize management of radiation exposure in efforts to extend the operational life of our equipment and safety of our employees.

Through this holistic approach to sustainability including waste reduction, emission mitigation, and resource conservation, we uphold our commitment to a more environmentally responsible future for all.





# SUSTAINABILITY

Reduction  
of Carbon  
Footprint

Aegeus respects, understands, and is committed to a sustainable approach in our operations working to minimize the impact to our environment. We measure our CO2 emissions annually to track towards targeted goals of lowering that threshold. We do this via:

- Equipping all our company vehicles with CO2 emissions and fuel usage tracking to be able to monitor and track in real time.
- Targeting smaller fleet vehicles to lessen the CO2 emissions and fuel consumption.
- Setting annual goals in CO2 emissions and fuel consumption in relation to company performance goals.
- Promoting hybrid work schedules were possible to promote the reduction of employee personal vehicle emissions and fuel consumption.





# SOCIAL: INCLUSION & DIVERSITY

**AEGEUS**

At Aegeus, we encourage leadership, entrepreneurship, flexibility, and continuous personal development. We recruit and promote from within, providing equal opportunities across our operations nationally. We also recognize that diversity enhances our team through unique perspectives and backgrounds to reflect the communities we serve and live in. As part of our commitment to the principles of diversity and inclusion, our goal is to promote a safe work environment where each member of our team has the opportunity to achieve professional success and growth within our organization.

“

- Stacy Gross

Vice President, Human Resources

# SOCIAL: DIVERSITY & INCLUSION

Aegeus principles of Diversity & Inclusion are based on a foundation of policy, employee feedback, training, and annual tracking to recognize value at the individual level and promote an environment of respect, equality, and engagement.

Inclusion  
& Diversity



Valuing each individual.

Providing an environment where all employees feel respected.

Encouraging active participation and engagement.

Appreciating the variety of different backgrounds, styles, values, and attitudes as assets.

Recognizing and considering the other person's perspective and sensitivity.

## Aegeus Principles of Diversity & Inclusion

Transparent job postings

Employee feedback

Training & awareness

Equal Employment Opportunity Policies

Tracking of gender statistics for hires, promotions, & terminations



# Social: Employee Engagement

Employee  
Engagement

We recognize that our employees are our most valuable resource, and engaged workforce provides an unparalleled employee and client experience. Our employee engagement is measured by five factors annually to promote retention and drive employee growth.





# Social: Human Rights - Four Pillars

Code of  
Ethics

Human  
Rights

**Aegeus's Human Rights Policy is based on four pillars to guide our actions and decisions to promote responsibility, integrity, and the fundamental respect for human rights that are inherent to everyone.**

- Aegeus prohibits all modern slavery and human trafficking including forced or mandatory labor. The Company supports the fundamental rights of each individual in their freedom of choice and liberty.
- Any actions to deny an employee's freedom, choice, or liberty, to exploit them for personal and or commercial gain, including all forced or mandatory labor, are strictly prohibited by the Aegeus Group.

Elimination of  
Modern Slavery  
and Human  
Trafficking

- Aegeus believes that all people are entitled to basic human rights including access to education. Child labor is counterintuitive to those rights, is illegal in many areas, and is strictly prohibited within the Company.

Prohibition of  
Child Labor

- All prospective applicants and employees must be at a minimum 18 years of age or older to be employed with Aegeus. All new hires will be subject to a background check to validate identity and age requirements before starting work at the Company.

Commitment to a  
Work  
Environment Free  
of Harassment,  
Discrimination,  
and Retaliation

- Aegeus is an equal opportunity employer, and the Company as a whole strives to have the best qualified persons in every job
- The Company's anti-discrimination policy applies to all persons involved in the operation of the Company and prohibits discrimination by any employee of the Company, including supervisors, co-workers, interns, and third parties doing business with the Company such as vendors, independent contractors, and others doing business with the Company.

Compliance with  
Federal, State, and  
Local Regulations  
Regarding Wages  
and Working  
Hours

- Aegeus is committed to ensuring all individuals are paid a wage that is compliant with the federal, state, or local minimum wage laws for their area.
- Working hours are set upon hire and will comply with regulatory requirements and are designed to keep the employee's safety a priority at all times.
- Discrimination, including gender wage discrimination, is strictly prohibited.

# Social: Supplier Diversity & Sustainability

Supply Chain

Inclusion & Diversity

Our supplier policy is built on four principles to ensure responsible sourcing, cost effective spend, and respect all human rights and the environment:

The Company is committed to encouraging the use of diverse suppliers to create a positive economic impact to historically challenged businesses by promoting diversity spend in the communities in which we serve. It is the policy of Aegeus to ensure diverse suppliers have an equal opportunity to be included in our strategic sourcing and procurement. We therefore encourage and promote the use of Minority, Women, Veteran, Small, and Small Disadvantaged Business Enterprises through our Supplier Diversity Program.

Increasing supply chain resiliency and strength by building relationships with primary suppliers to Aegeus who are established, responsive, and reliable

Find the best suppliers through increased competition and quality requirements.

Promoting supplier diversity to benefit local communities, creating a positive economic impact, and promoting historically challenged companies.

Creating a responsible sourcing program to ensure protection of Aegeus information and interests, minimizing the environment impact, and protecting human rights.

# Governance: Code of Ethics

Code of  
Ethics

Aegeus's Code of Ethics Policy is based on our principles to guide our actions, judgment, and decision making to promote responsibility, integrity, impartiality and transparency in our services and commitments to our clients, co-workers, and the communities we serve.



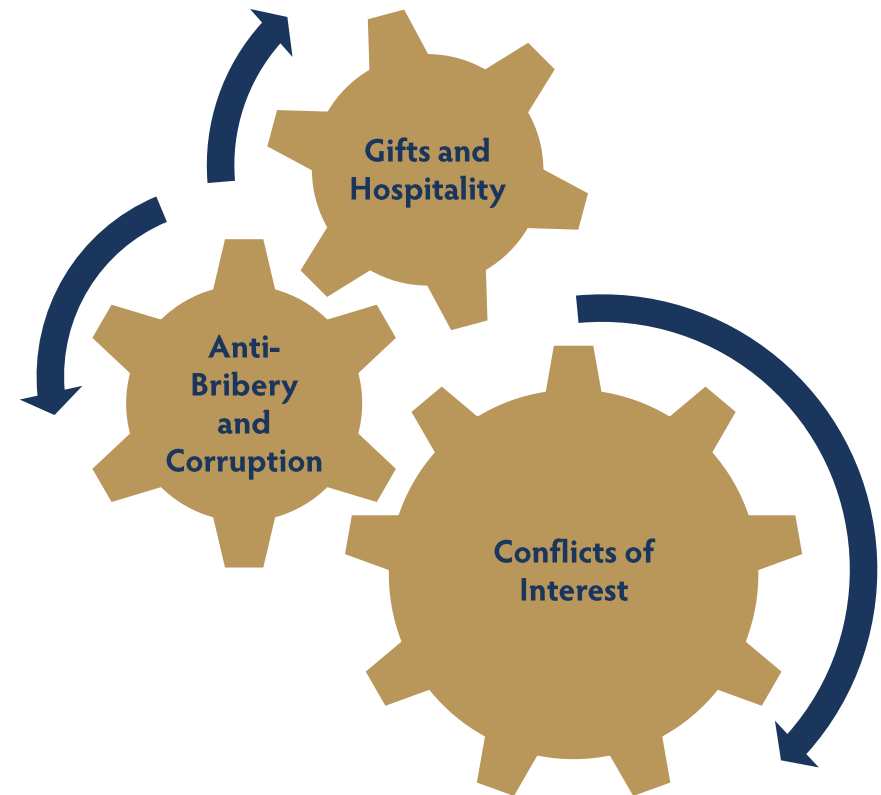
# Governance: Integrity & Impartiality in our Services

Code of  
Ethics

## Integrity and Impartiality in our Services

The Company strives to perform our services with the upmost integrity and impartiality. All individuals are responsible for ensuring honesty and impartiality in all decisions, always acting in the best interest of our organization and our clients in compliance with codes and standards.

This includes compliance with Company and client procedures and policies, ethical decision making in our work responsibilities, and integrity in our actions and judgements. Individuals should report any concerns immediately if they are put in a position that violates this policy and their ability to be impartial.





# Governance: Integrity & Impartiality in our Services

Code of Ethics

## Conflicts of Interest

Ageus defines the following as conflicts of interests: personal relationships in the workplace, personal or financial links to suppliers or clients, competing activities, gaining of personal opportunities, and gifts or other benefits.

We should also be mindful of conflicts of interest and how they can impact our impartiality and judgment.

## Anti-Bribery and Corruption

Ageus is committed to conducting our business activities with the highest standards of integrity and ethics in all aspects of our business. The Company is fully committed to preventing bribery and corruption and maintains compliance with the US Foreign Corrupt Practices Act (FCPA).

Ageus strictly prohibits offering, giving, receiving, or soliciting any form of bribe, kickback, or corrupt payment, wither it is cash or gifts, to and from any individual and/or entity.

## Gifts and Hospitality

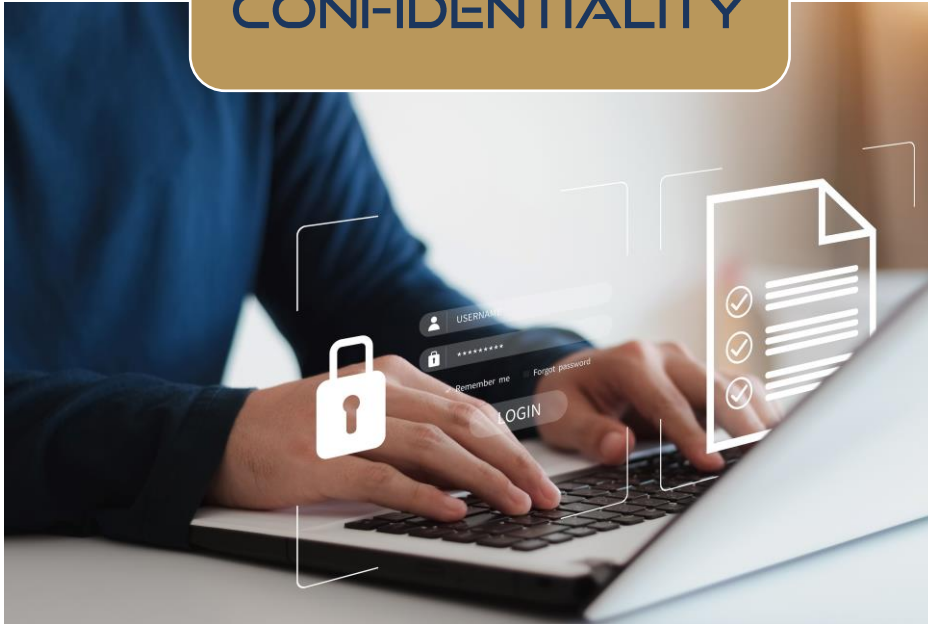
Ageus understands that gifts and hospitality are a part of working business relationships; however, giving or receiving gifts and/or hospitality must be reasonable, transparent, and in compliance with applicable federal, state, and local laws.

Gifts or hospitality should never be given or received with the intent to influence or gain an unfair advantage or impact impartiality and integrity in our decisions.

# Governance: Protecting Confidentiality

Code of  
Ethics

## PROTECTING CONFIDENTIALITY



**Aegeus is committed to protecting confidentiality related to our clients, vendors, partners, and employees. We understand that in the normal course of our job duties we have access to data that can be sensitive to our clients, employees, and vendors and our job is to ensure that sensitive data is only available to those that have a validated need to access it.**

**All individuals need to be mindful of handling and protecting sensitive data in their daily responsibilities.**

**Aegeus prohibits the use of sensitive data that is improper, in violation of confidentiality, and/or using it for personal gain.**

# Governance: Promoting Fair Competition

Code of  
Ethics

PROMOTING FAIR  
COMPETITION

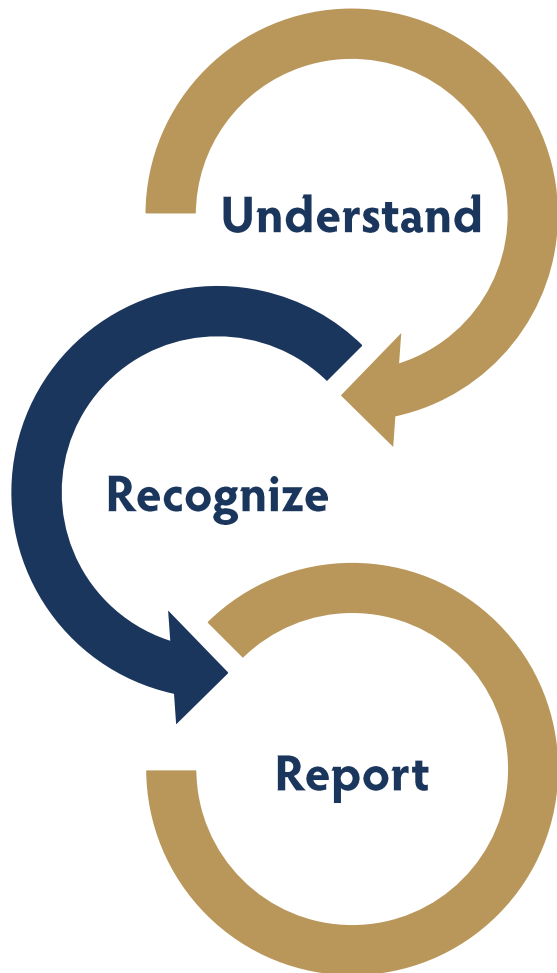


Promoting fair competition is important to ensure a level playing field for all businesses and supporting our communities' economic growth and compliance with all laws.

Aegeus prohibits anti-competitive prices which include but are not limited to price-fixing, collusion, bid rigging, and other forms of agreements between our competitors that restricts competition and provides a negative impact to our communities that we serve. Aegeus also prohibits the improper use of and/or disclosure of sensitive data belonging to 3<sup>rd</sup> parties.

# Governance: Whistleblowing & Reporting

Code of  
Ethics



**UNDERSTAND.** The effectiveness of our efforts depends largely on employees, interns, independent contractors, and other persons telling us about violations to our Code of Ethics Policy. All employees are required to know and understand our Code of Ethics Policy.

**RECOGNIZE.** If have you witnessed or have knowledge about violations to this policy, you should report it immediately via our whistleblowing channel. If you do not report the violations, the Company may not become aware of a possible ethics violation and may not be able to take appropriate corrective action.

**REPORT.** All individuals are encouraged to report any violations to this policy via our whistleblowing channel for prompt and thorough investigation. All violations should be reported to:

**[whistleblowing@aegeusinspections.com](mailto:whistleblowing@aegeusinspections.com)** The Company will protect whistleblowers from retaliation, which includes threatening or taking an adverse action against an individual and will maintain their confidentiality to the extent permitted by law.

Reporting  
Violations





# AEGEUS

## ENVIRONMENT, SOCIAL, AND GOVERNANCE PROGRAM



July 2024