



Mark Fallon
Chairman and CEO

February 20, 2025

EQUAL EMPLOYMENT OPPORTUNITY POLICY

APTIM does not tolerate discrimination, harassment, or retaliation. We expect our employees to treat each other with respect, and we recognize that we are all responsible for doing our part to create a positive working environment.

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

APTIM provides reasonable accommodations to any employee or applicant with a known disability who is otherwise qualified to perform the essential functions of his or her job. If you require a reasonable accommodation because of a protected disability, notify your Human Resources business partner to begin an interactive dialogue about your need for an accommodation.

APTIM respects the religious beliefs and practices of all its employees. APTIM makes every attempt to provide reasonable accommodation for such beliefs, practices, and observances. If your sincerely held religious belief, practice, or observance conflicts with your job schedule, with APTIM's policy or practice on dress and appearance, or with other aspects of employment, and you seek a religious accommodation, notify your Human Resources business partner to begin an interactive discussion of the conflict and your proposed accommodation. APTIM evaluates each request for a reasonable accommodation on a case-by-case basis.

APTIM does not tolerate retaliation. APTIM does not harass, intimidate, threaten, coerce or discriminate against employees or applicants because they have requested an accommodation, 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, , 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 obligations for federal contractors. I fully support the successful implementation of APTIM's Disabled and Protected Veterans Affirmative Action Programs ("AAP"). APTIM's VP of Human Resources and Administration, Emily Reed, is responsible for implementing APTIM's affirmative action obligations in accordance with federal law and regulations. Emily has the full support of top management and the staff necessary to implement our AAPs fully. As an equal employment opportunity employer, all APTIM managers and supervisors are responsible for ensuring that all qualified employees and prospective employees are considered and treated in a non-discriminatory manner with respect to all employment decisions.

If you wish to review appropriate portions of APTIM's required affirmative action programs, contact Human Resources Compliance at HRQuestions@aptim.com. The narrative provisions of 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.

If you have any questions or concerns about our program, please contact 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.

Mark Fallon