
ESG POLICY + 2022 PERFORMANCE REPORT

CUMMING
GROUP

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INTRODUCTION



A Message from our Chairman of the Board

Throughout Cumming Group's successful journey, sustainability and responsible business practices have been at the company's core and integrated into how it operates. As we navigate the increasingly complex global business landscape to grow our company, we recognize the imperative of prioritizing and incorporating Environmental, Social, and Governance (ESG) principles into everything that we do, to ensure our long-term success and to continue to make a positive contribution for the benefit of our stakeholders which include our people, clients, and communities. As one of the most trusted brands in the built environment, Cumming Group is uniquely positioned to influence, contribute, and lead in the advancement of ESG principles.

We are proud to share Cumming Group's ESG Policy and Performance Report which outlines our commitments reflected in tangible goals, actions, and outcomes. Our approach has long been to partner and earn the trust of our stakeholders, and to keep that trust by delivering on our commitments. Our ESG efforts are a natural extension of that approach, and we will continue to hold ourselves accountable for achieving our goals.

Cumming Group's board and leadership team are fully aligned on our commitment to ESG principles, which are embedded into Cumming Group's long-term strategy. We look forward to reporting our progress.

- Dr. Hisham Mahmoud



A Message from our President + CEO

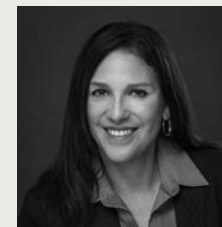
I am pleased to share Cumming Group's ESG Report, highlighting the strides we have taken to develop our ESG program. We recognize our role in safeguarding our people, communities, and environment, and we are excited to take this important step.

Our ESG strategy is intended to guide our actions and influence our decisions as we aim to minimize negative impacts and deliver restorative solutions. Our commitment to ESG is a core component of our values, day-to-day business operations, and vision going forward.

Our vision is stated simply; To be the most trusted team in the Built Environment. Trust is at the very heart of our vision, and it is central to the values we live by daily here at Cumming Group. As we expand our influence across the globe, we remain committed to earning and retaining the trust of our team members, our clients, and the communities within which we operate. As trusted advisors and proactive leaders, we should all be proud of the contributions made by our team as we help our industry tackle some of the most complex, and challenging problems facing society today.

I would like to thank you for your interest in our progress on this important front, and hope you share my enthusiasm for the steps we have taken, and my optimism for the future.

- Derek Hutchison



A Statement from our VP, Sustainability

We are living in a time of extraordinary global change. Amidst the ongoing digital revolution, rapid urbanization, and the impacts of climate change, our world is a different place than it was even a year ago.

We are positioned to provide our clients with the highest caliber of sustainability services, and this year we have focused internally to more consistently and comprehensively integrate sustainability into our operations and values. All businesses must serve as environmental stewards, and the adoption of our ESG strategy is a critical step toward advancing this goal at Cumming Group. For us, sustainability is not only a necessity, it is a passion. Our team of sustainability experts will bring the same dedication that drives our client sustainability work to improving Cumming Group's own practices.

Protecting the environment is our shared goal. Working together, we hope to accelerate progress in creating economic opportunity, enhancing sustainability, and strengthening communities around the world.

- Christine Marez



ABOUT THIS REPORT

This report introduces Cumming Group's ESG Policy and Strategy for our international operations. It also serves as the first annual Performance Report, covering the 2021 calendar year. Performance reports will be issued annually and will each cover a fiscal year. We are reporting in accordance with the Sustainability Accounting Standards Board (SASB) framework. We have also provided information on alignment with Task Force on Climate-related Financial Disclosures standards. This first report benchmarks Cumming Group's performance for the future.

The content and scope of this report were defined based on the significance of topics to our stakeholders as determined by our materiality assessment exercise.

Recognizing the intersectional impacts of Cumming Group's international reach and multi-sector service offerings, we have also aligned our ESG policy and goals with the applicable United Nations Sustainable Development Goals. This report and subsequent updates will serve to communicate our progress and contributions towards these goals.

Please contact cmarez@cumming-group.com if you have any questions or feedback on sustainability at Cumming Group.

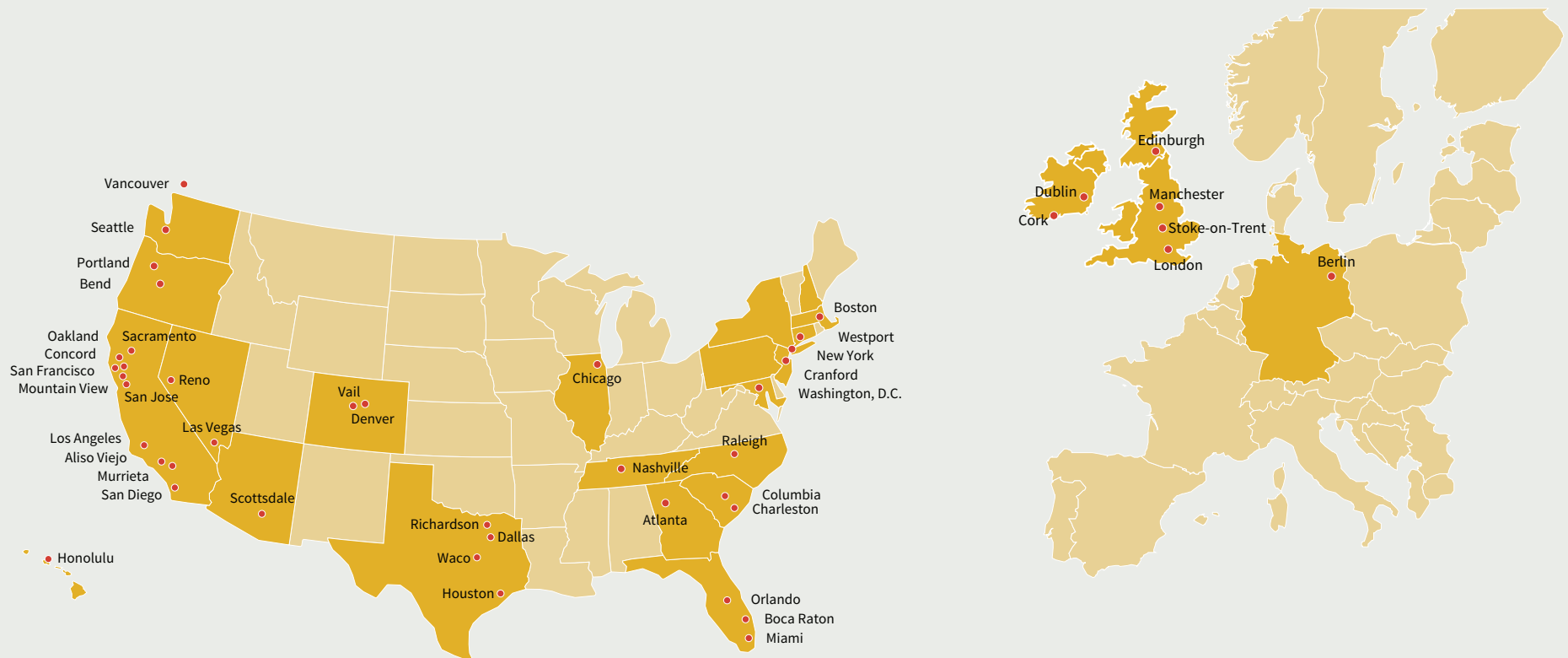
SUSTAINABLE DEVELOPMENT GOALS



ABOUT OUR COMPANY

Established in 1996 as a project and cost management company, Cumming Management Group, Inc. (“Cumming”) has evolved into a multi-faceted consulting firm with a determined focus on providing services that add value at every step of a project’s development. At the date of publication of this ESG policy, our team is now over 1850+ strong, with 52 offices located throughout the United States, North America, and Europe.

At Cumming Group, we are passionate about helping our clients execute large-scale, complex projects on-time and within budget. Our project and cost-management services are specifically tailored to each client’s needs and add meaningful value at every step of a project’s development. Drawing on deep expertise in the communities and sectors we serve, we anticipate and solve problems, deliver solutions, and drive results.



CULTURE + CORE VALUES

At Cumming Group, our culture—who we are as a company—is defined by the values we rely on to guide our decisions on a daily basis. Cumming Group fosters a culture of exceptional service and recognizes that the strength of our team members is what drives our long-term success. We are proud of our culture and operate with a strong sense of core values structured around client focus, team members, integrity, and quality. These core values are embraced by every Cumming Group team member as the foundation of both our cultural identity and our sustained success:

Client Focus - Client focus is central to who we are and is a fundamental component of our success. We are in business because of our clients, and our future opportunities and successes depend on servicing our clients at the highest levels. We listen to our clients and provide services and solutions that meet their needs.

Team Members - Team members are the lifeblood of our organization. It has always been the combined experience and effort of our team members that has made Cumming Group successful. Knowing this, we hire only the very best people. At the same time, we do everything in our power to foster a strong, rewarding environment that promotes both professional and personal growth, and that fosters long-term company loyalty.

Integrity - Integrity is more than just operating within the parameters of the law: it is also about being ethical and moral. As one team member put it, “It not only has to be right, it also has to look and feel right.” At Cumming Group, integrity is about treating people and companies the way we want to be treated. It is about doing what we say we are going to do and following through. Simply stated, we do the right thing, always.

Quality - Quality has been and will always be our core differentiator. We have a culture of continuous improvement, whereby our collective progress as a company is achieved through the ongoing personal growth of our team members. It is not acceptable to cut corners or accept poor performance. It is expected that each Cumming Group team member holds one another accountable for the quality our clients expect from us. Through teamwork, hard work, and openness to new ideas, we continue to be recognized as the leader in quality services and solutions.

Vision

To be the most trusted team in the built environment.

Mission

To create value for our clients through proven expertise and to build lasting relationships based on trust, reliability, and results.

Core Values

Client Focus: We exist to serve our clients.

Team Members: Our success is based on our great people.

Integrity: We always do the right thing

Quality: We define ourselves by high quality services and solutions.

An aerial photograph of a rugged coastline. The top half of the image shows dark, jagged rock formations with white, frothy waves crashing against them. The bottom half of the image is a deep, dark teal color, representing the calm water of the ocean. The text "CUMMING GROUP'S ESG POLICY" is centered in the teal area, with a short horizontal line above it.

CUMMING GROUP'S ESG POLICY



ESG APPROACH + METHODOLOGY

In 2021-22, Cumming Group conducted a materiality assessment to determine which topics had the most significant internal and external impacts, as informed by the Sustainability Accounting Standards Board (SASB) standards and the U.N. Sustainable Development Goals. To build our materiality matrix, we distributed a survey with the SASB list of material topics and asked our internal stakeholders (team members, executives) to rank them. We also interviewed our senior management (executive teams and business unit leaders) to understand their goals, priority risks, and areas of opportunity. In total, we conducted 18 interviews with over 40 participants across our business units, and received survey responses from over 120 team members from around the globe.

Additionally, we conducted a peer review to better understand the environment in which our business operates, priorities for our peers, and opportunities for Cumming Group to make a positive impact. The peer review included a review of over 10 ESG plans, materiality assessments, and performance reports put out by firms similar to Cumming Group. The result of this assessment is a list of topics across governance, social and environmental metrics, with varying impacts on our core business, stakeholders, and the communities in which we operate.

Allowing our stakeholders to influence our material topics has enabled us to focus resources in the areas that are most pressing to our business. We also considered any international and voluntary agreements that we align with, such as UN declarations and conventions. From this process, key areas were highlighted and shortlisted as material topics that we will need to manage, monitor and report on.

The material topics form the basis of our ESG policy and inform our overall ESG strategy, goals, targets, and initiatives. The ESG materiality analysis is separate and distinct from the company's analysis of materiality for other legal and financial reporting purposes.

SASB topics rated highly material include **Business Ethics, Human Rights & Community Relations, Talent Acquisition & Retention**. These topics will be our highest priorities in the near-term.



MATERIALITY ASSESSMENT RESULTS

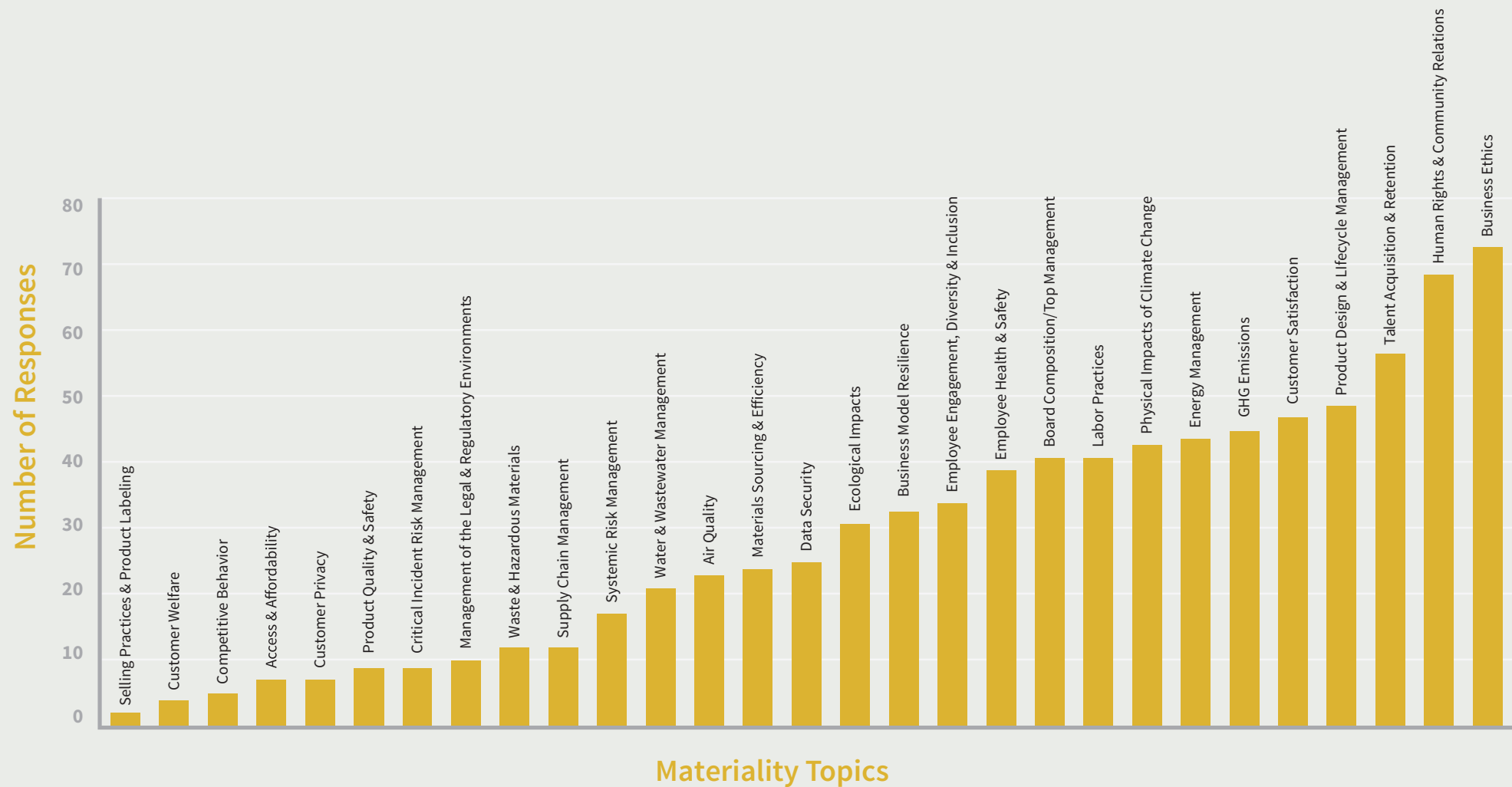


Figure 1: 2022 Materiality Matrix

CUMMING GROUP ESG POLICY

Cumming Group is committed to building environmental sustainability, social responsibility, and robust corporate governance into all aspects of our business and services. We believe a strong ESG approach contributes to better management of risks and opportunities, and improved long-term value creation. We expect this policy statement to be upheld by all team members, including executives, officers, and directors of the company. As we look ahead to the future, we will continue to be transparent and remain focused on expanding our sustainability efforts.

Cumming Group ESG Policy describes our specific commitment to each area and includes our company's strategies and goals:

- **Environmental Stewardship**
- **Social Responsibility**
- **Corporate Governance**

Cumming Group is committed to acting with social and environmental responsibility, directing efforts to drive economic and social development, considering the specific needs of each business unit, the complexity of services offered, and the applicable legal and regulatory aspects. Cumming Group needs to be innovative and solution-oriented to advance sustainable, long-term growth. By engaging with stakeholders – including team members, clients, and vendors – we can do our part to improve sustainability, better serve our community, and simultaneously build a competitive advantage for our company.

Internally, we will champion exemplary environmental, social and governance (ESG) performance. This commitment informs every aspect of our business, including how we execute new projects, operate our portfolio, collaborate with stakeholders, and report progress. Simultaneously, we strive to have a positive



impact on the world around us by building sustainable, equitable, healthy, and diverse communities through a combination of innovative project management, cost management, and sustainability solutions for our clients.

We recognize the importance of identifying, assessing, and managing ESG factors that are material to Cumming Group in order to mitigate risk. (ESG information is regarded as material if there is a likelihood that it would be considered important to key stakeholders when making a decision regarding their engagement with Cumming Group). Failure to address material ESG factors properly could expose Cumming Group to economic, operational, legal, regulatory, or reputational risks. Conversely, addressing ESG factors proactively could help us identify strategic opportunities, meet competitive challenges, and adapt to evolving market conditions.

Our ESG efforts are guided by the following principles:

- **Relevance** through the identification of the ESG issues that are most relevant and applicable to our activities and business model
- **Proportionality**, through measures and guidelines that are appropriate to our organizational structure and market positioning. In addition to our core values, we focus our ESG efforts based on the United Nations Sustainable Development Goals (SDGs).

Cumming Group's policies, which apply to all our offerings, operations, entities, and team members internationally, support our commitment to ESG principles. These include:

- **ESG Policy**
- **Corporate Social Responsibility**
- **Diversity, Equity & Inclusion**
- **HR Team Member Handbook**
- **Information & Cybersecurity Policy**

Validity, Revocation, and Cycle of Revision

This Policy is valid as of the date of its publication and must be reviewed and approved by the Board of Directors at least every 3 years. The document must include any change in the regulatory environment, risk management, or ESG structure for the period. This Policy must be widely disclosed within Cumming Group and made available to all team members and stakeholders through our website.

Environmental Stewardship

POLICY: We are committed to operating in an environmentally responsible manner to mitigate our impact on climate change, conserve natural resources, and operate in compliance with local environmental regulations. We will seek opportunities to reduce our impact on the environment, including reducing our energy, carbon, water, and waste footprint in our operations and across our global value chain, and procuring environmentally sustainable products for our operations.

We recognize that the world faces environmental challenges and is committed to promoting a healthy environment. We aim to embed environmental stewardship in everything we do. Within the context of our international operations, we define environmental sustainability as our efforts to reduce energy consumption, water usage, waste (including e-waste) disposal, and carbon emissions, and the promotion of strategies that progress towards encouraging these reductions in a practical and cost-effective manner.

STRATEGY: Climate change is one of the greatest risks to our planet and the building sector contributes 40% of the global greenhouse gas emissions. As we do not own most of our office spaces, we have limited control of our total environmental footprint, making it even more critical that we engage both internal and external stakeholders to drive sustainable innovation and systematic change across our value chain.

We will promote environmental sustainability initiatives with team members and personnel at our office properties to achieve ongoing environmental and sustainable operational improvements. We proactively manage the waste produced by our operations, including participation in both mandatory and voluntary subscription-based recycling and organics programs where available, minimize printing, and seek out waste reduction opportunities on an ongoing basis.














Furthermore, we are prioritizing new office properties which hold green certifications such as LEED, and will prioritize suppliers that provide responsibly sourced materials without adversely impacting biodiversity. When restructuring existing office space, we are committed to implementing sustainable solutions in a practical and cost-effective manner towards future-proofing and enhancing the resilience of our office spaces. Where practical, we promote flexible working hours and encourage team members to hold virtual meetings to reduce travel related emissions.

Beyond our internal operations, Cumming Group's Sustainability Service line amplifies our impact by delivering sustainability and climate action solutions to our clients internationally. We are committed to supporting our clients to achieve a reduction of 1 gigatons (GT) of CO₂e by 2026 through the development and implementation of climate mitigation and strategic sustainability planning.

Alignment with United Nations Sustainable Development Goals (SDGs)



GOALS: ENVIRONMENTAL STEWARDSHIP

ESG Category	Material ESG Issues Identified	5-Year Goal	Initiatives	Alignment with the UNSDGs
Environment	Energy Management / GHG Emissions / Air Quality	Reduce our GHG emission intensity for scope 1 & 2 (lbs. CO2e per office space sq ft) 25% by 2028 from 2022 baseline	Review corporate tenant improvement design standards to identify additional energy efficiency/conservation measures for adoption for all future office fit-outs and modernization	 
		Reduce our GHG emission intensity for scope specific applicable scope 3 categories of emissions (lbs. CO2e per team member) 25% by 2028 from the 2022 baseline	Prioritize leasing offices in buildings with relevant sustainability certifications (e.g. LEED, BREEAM, WELL, etc.)	  
			Collaborate with landlords & explore options to purchase Renewable Energy Credits (RECs)	 
			Evaluate and select strategies to reduce emissions from employee commute and business travel	
			Phase out single-use plastic water bottles from offices by 2024	
	Product Design & Lifecycle Management	Provide strategic guidance and solutions to support our clients achieve their Net Zero Carbon goals	Create 15 Climate Action Plans for cities/organizations by 2030	 
	Materials Sourcing & Efficiency	Reduce the carbon intensity of our supply chain 25% by 2028 from 2022 baseline	Create an internal Sustainable procurement policy and reporting mechanism	 



Social Responsibility

POLICY: Our team members are our most important asset. We are committed to being a preferred employer by fostering an environment of diversity, inclusion, and non-discrimination across our business, with a focus on empowering women and minorities, operating ethically, and promoting the health, safety, and wellbeing of all team members. We will continually update policies and practices that attract, retain, and develop high-quality team members with the right skills to deliver on current and future business needs, as well as equipping team members with the skills necessary to succeed in a fast-changing market.

We believe that diversity and inclusion strategies are the catalyst for success and innovation in the workplace and serve to support our business overall. We embrace and value diversity in all its forms, whether race, gender, class, national origin, religion, age, disability, marital status, sexual orientation, gender identification, political opinion, or any other status.

STRATEGY: We strive to hire and retain the best talent by creating safe and inspiring workplaces where people feel valued. We offer competitive compensation and benefits to all regular full-time team members and aim to foster both personal and professional growth at all levels of the organization through annual performance reviews, training, and professional development opportunities. Every new team member is provided a copy of the Team Member Handbook, which includes the set of values that we all strive to embody every day. We believe that differing opinions and lived experiences are valuable and provide workplaces that reward innovation and collaboration at all levels. We promote wellness and work-life balance for our team members and adhere to the relevant health and safety standards at our workplaces and project sites. Our workplaces reflect pay equity and mutual respect, and are kept free from discrimination and harassment, promoting an environment of fairness and equality.









As a global organization, Cumming Group is committed to being a responsible member of the community and supports a range of programs and activities that enhance local, regional, and global communities. We support community engagement initiatives that benefit the environment, human welfare and education and engage our suppliers, customers, and team members around safety, health, human rights, and wellness.

Cumming Group supports and upholds the principles contained in the Universal Declaration on Human Rights, the United Nations Guiding Principles on Business and Human Rights, the UK Modern Slavery and Human Trafficking Policy, and our Code of Conduct. Our social responsibility commitments are supported by our [Corporate Social Responsibility Policy](#), our Team Member Handbook, and other corporate policy documents.

Alignment with United Nations Sustainable Development Goals (SDGs)



GOALS: SOCIAL RESPONSIBILITY

ESG Category	Material ESG Issues Identified	5-Year Goal	Initiatives	Alignment with the UNSDGs
Human Capital	Talent Acquisition & Retention	Reduce voluntary employee attrition 25% by 2028 from 2022 baseline	Focus on new talent acquisition channels	
			Increase training hours per team member by 10%	 
	Employee Engagement, Diversity & Inclusion	Achieve the performance goals established in Cumming Group's DEI strategy	Finalize a DEI strategy and establish specific goals	 
			Continue to provide resources for ERG programs	
	Employee Health and Safety	Reduce the number of accidents and Lost Time Injury (LTI) by 90% by 2028 from 2022 baseline	Adopt a Corporate Health and Safety policy	 
			Develop and circulate Workplace Safety Guidelines	
			Promote and increase participation in the Wellness Initiative	
Social Capital	Human Rights & Community Relations	Increase our Community Engagement activities and impact globally by strengthening relationships and building local community partnerships	Promote Employee Volunteer Hours	
		Increase philanthropic investments by 25% by 2028 from 2022 baseline	Sponsor charitable organization events annually in each region or local office	

CORPORATE GOVERNANCE

POLICY: We are committed to building a culture dedicated to ethical business behavior and responsible corporate activity. In addition to our core values, we will comply with all applicable laws, rules, regulations, policies, best practices, and guidelines. We will promote strong oversight, transparency, and risk management at all levels of our company, ensuring the resilience and long-term preservation of value for our business.

STRATEGY: Cumming Group has identified business ethics and human rights and community relations as the company's top ESG-related risks. The Board and Executive Leadership have direct oversight of Cumming Group's ESG policy and program and play an active role to ensure effective risk management and oversee the achievement of company ESG Governance Goals and Strategies (outlined on the following page) and alignment with the UN Sustainable Development Goals.

CORPORATE STRUCTURE: We define "governance" as the set of processes, customs, policies, laws, and institutions affecting the way an organization (i) is directed, administered, or controlled and (ii) relates to third parties. Strong governance, ethical business practices, and prudent risk management are critical ingredients for long-term value creation for stakeholders and driving sustainability. The Board provides a sound approach to corporate governance that complies with all applicable laws, rules, regulations, policies, best practices, and guidelines as well as unwavering adherence to our core values. Cumming Group's corporate governance promotes strong oversight, transparency, and risk management at all levels of our company, ensuring the resilience and long-term preservation of value for our business.

The Board oversees our policies and operational controls for environmental, health, safety, and social risks, and is led by the Chairman of the Board of Directors and our Chief Executive Officer. The Executive Leadership team, charged with identifying near and long-term strategic ESG initiatives aimed at encouraging continuous and incremental improvements, are supported by a risk management framework which includes committees, departments, and systems which monitor, manage, and report on market, liquidity, and operational risk.

Cumming Group's in-house Sustainability and ESG services department are responsible for developing the annual ESG Performance Report collecting data and collaborating with Human Resources, Finance & Accounting, Business Services, and Operations departments and cross-functional leads for Diversity, Equity, & Inclusivity and Employee Resource Groups (ERGs).

Our directors and all team members, including senior management, conduct themselves in accordance with the highest moral and ethical standards, informed by a robust Code of Conduct and our core values. We are committed to ensuring a fair workplace for our team members and have strict policies to protect against unlawful discrimination and harassment. We strongly encourage honest and direct communication to resolve issues and concerns in an expeditious manner. We also have an alternative and anonymous method of reporting suspected compliance violations, unlawful or unethical behavior, or fraud.

Alignment with United Nations Sustainable Development Goals (SDGs)



GOALS: CORPORATE GOVERNANCE

ESG Category	Material ESG Issues Identified	5-Year Goal	Initiatives	Alignment with the UNSDGs
Governance	Business Ethics	Reduce the number of incidents of non-conformance by 95%	Review and revise the ethics training and provide regular refresher training	
	Board Composition/Top Management	Continue to foster diversity on the Board and Executive team	Continuously review Board Member selection processes	 
		Achieve our 5-year ESG goals	Integrate ESG considerations into leadership performance evaluations	
Business Operations	Customer Satisfaction	Achieve Net Promoter System (NPS) scores >50 for our top 100 clients by 2026	Measure and manage client satisfaction using Net Promoter System (NPS) - see Org SMART Goals which has target of NPS>50 for top 100 clients by 2026	
	Climate Risk & Opportunity	Oversee management of climate risk related to physical, and compliance risks, as well as transitional risks related to our services	Explore funding options for internal sustainability efforts	
			Establish an ESG management structure and resources below Executive level	
			Report annually under the ESG reporting framework	
	Service Lines	Achieve our 5-year company growth goals	Continue to expand service offerings in existing and emerging markets	

ALIGNMENT WITH OUR INVESTORS

Through the development of our ESG program, we have sought to align with our key investor, New Mountain Capital (NMC). NMC prioritizes growth and business building in its investing approach, and emphasizes investing in a sustainable and responsible way, with a focus on improving environmental, social, and governance issues within its portfolio companies.

New Mountain is a signatory of the United Nations Principles of Responsible Investing (UNPRI) and a member of the American Investment Council (AIC). New Mountain has identified 24 key ESG Metrics that have been integrated into the due diligence and monitoring process for private equity and credit investments. The applicable metrics have been considered in the development of our ESG program.



“New Mountain Capital emphasizes investing in a sustainable and responsible way, with a focus on improving environmental, social, and governance issues within our portfolio companies and at the Firm”

<https://www.newmountaincapital.com/social-responsibility/>

2022

ESG PERFORMANCE REPORT

CUMMING
GROUP

INTRODUCTION

Cumming Group's 2022 ESG Performance Report covers environment, economic, and social performance between January 1- December 31, 2022. As outlined in our ESG policy, we report in accordance with the SASB framework and apply applicable sector and indicator-specific data management protocols/techniques to calculate or estimate performance against our metrics. Any use of estimates in place of actual data is disclosed and all assumptions are specified.

Our ESG Indicators provide a baseline and basis for performance reporting across a variety of ESG topics. These indicators include our GHG emissions, resource use (energy use, water use, waste generated), employee demographics, health and safety performance, and others. We understand that what gets measured, gets managed. The consolidated data provides value by helping us:

- **Better manage risk and identify opportunities.**
- **Demonstrate our ESG performance to our clients and stakeholders**
- **Benchmark performance against industry standards.**

The data and trend analysis completed to produce our annual ESG performance report allows Cumming Group to assess our ESG risks and impacts, while re-evaluating our incremental and long-term goals across our disciplines and business lines.



PERFORMANCE: ENVIRONMENTAL STEWARDSHIP

We are committed to calculating our carbon footprint on an annual basis in accordance with EPA protocols in order to track our progress toward our goal of **reducing our Scope 1, 2 and 3, emissions intensity by 25% by 2028 from our 2022 baseline.**

For scopes 1 and 2, emissions intensity is normalized by square footage of our office spaces. For scope 3, emissions intensity is normalized by number of team members. Additional 2022 metrics related to our Environmental Goals are included below:

- 5 Offices were in LEED certified buildings
- Kicked off development of 3 Climate & Sustainability Plans
- 1850 Trees planted through charitable donations

Interested in learning what your organization's carbon footprint is?

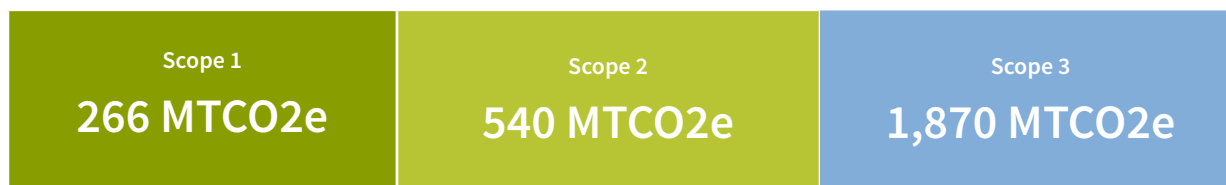
Learn about our services [here!](#)

4,996 MMBtu
of natural gas
used at our offices

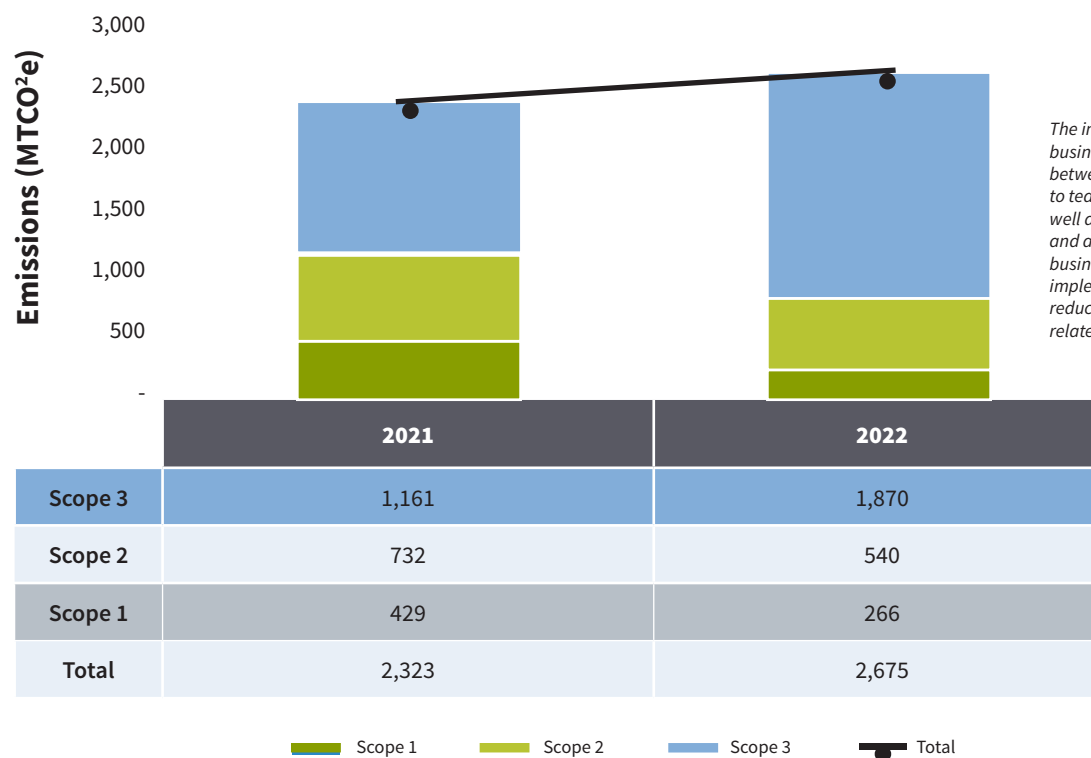
1,772 MWh
of electricity
purchased to
power our offices

4.97M Miles
traveled by train,
road, marine or air

2022 Carbon Footprint



Annual Emissions by Scope



PERFORMANCE: SOCIAL RESPONSIBILITY

Social Responsibility

Cumming Group's long history of corporate responsibility is built on a commitment to touch the lives of people in meaningful ways. We are building a better world, making our communities better places to live and work. We do this with our dollars, time, and most importantly - with heart. In the communities in which we work, it means striving to be good neighbors by reflecting our Cumming Group values in all that we do.

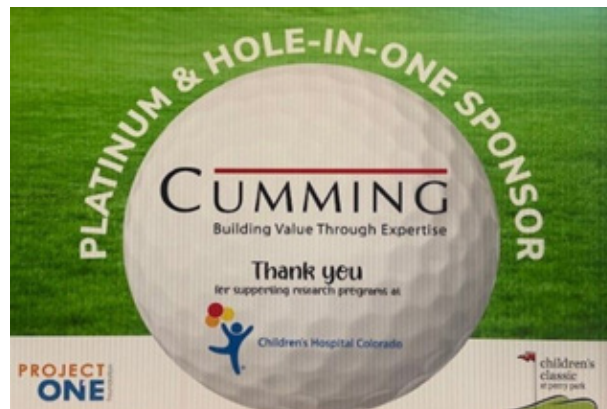
We have a long-standing history of contributing to causes that improve the communities where we live and work. We regularly contribute to the large nonprofit organizations near our locations. Locally, we support hospitals/healthcare foundations, school districts, youth nonprofits, homeless shelters, food banks, and several other local charities.

During the past year, we contributed to the social and economic prosperity of many of the local communities where we are active through charitable donations, the sponsorship of educational programs, and the provision of individual scholarships or awards. Furthermore,

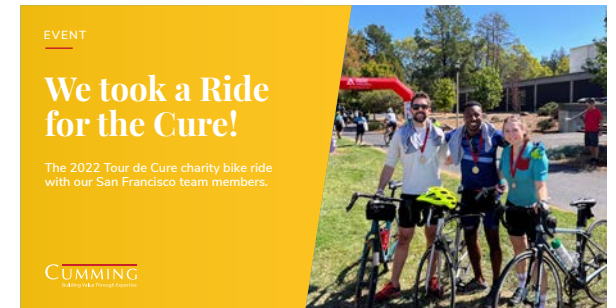
our employees continued to regularly participate in a wide variety of activities to support causes where the outcome had a direct impact on members of their local community.

We believe in coming together for the greater good of our communities. We create shared value by supporting local businesses and employing local people in our surrounding communities. We volunteer time and contribute funds to support meaningful charitable causes that protect, preserve, and enhance our society.

We also support our local communities and the broader society by seeking to engage with business partners, service providers, and suppliers whose business practices are aligned with ours and who seek to minimize adverse health, safety, and other human rights impacts as a consequence of them conducting their business.



2021 Event Highlights



PROGRAM HIGHLIGHT: SOCIAL RESPONSIBILITY



WWIRE

Founded in 2017, WWIRE: Wellness for Women In Real Estate is a Cumming Group owned networking organization for women in the CRE/AEC industry. WWIRE brings women in the industry together through fitness and wellness focused networking events integrating the five aspects of wellness; social, spiritual, chemical, structural and emotional. Our social events are focused on expanding connections within our industry, while building a stronger mind and body. WWIRE's holistic approach to wellness reinforces Cumming Group's core value of inclusivity, where regardless of age, job title, or experience in the industry, people are welcomed and accepted. WWIRE has partnered with established industry organizations including CREW, CoreNet, NAWIC and ISPE to complement their program offering to members. WWIRE has grown steadily from 2020 to 2021 adding chapters in new cities and expanding our network of women across the country. There are now six chapters nationally; Boston, Southern Connecticut, New York City, Philadelphia, DMV (DC, Maryland, Virginia), and Southern California. WWIRE will introduce new chapters yearly through the Cumming Group office network and organic relationships in the industry.

In addition, WWIRE integrates community outreach into our wellness and fitness focused events. In 2021, WWIRE raised over \$6,000 for charities including, Rosie's Place, North East Animal Shelter, ASPCA, The Boys and Girls Club, Leukemia and Lymphoma Society and The Pink Agenda.

Recent WWIRE achievements summarized below:

- 25% increase in participation from 2020 to 2021
- \$6,000 raised in 2021 through community outreach events
- Connecting more than 5,000 people in the CRE/AEC industry across 500 companies
- In 2021 there were 40 events across six chapters with an estimated 1,500 attendees

PERFORMANCE: HUMAN CAPITAL

Our Team Members

At Cumming Group, bright minds meet exciting opportunities, enterprise meets empowerment, talent meets teamwork, and responsibility meets ownership. We provide our employees the environment to nurture their potential and the canvas to perform. We propagate a culture where ideas flourish and boundaries disappear. Most important of all, we have built a culture where employees want to stay and strive beyond the normal call of duty.

The nature of our business makes it imperative for us to have an employee force that carries our growth momentum forward with its skill, intellect, and dedication. At the end of 2021, we employed 1,098 team members internationally. Our success stems from our collaborative and inclusive environment, where differences are appreciated, and our team members are considered our most valued asset. Our team members bring with them different backgrounds, life experiences, cultural histories and personal attributes. We welcome this diversity and believe it makes for a richer, more creative and more effective workplace. Our team members make it possible for us to fulfill our Mission, Vision, and Values.

Our commitment to our team members is highlighted through one of our core values: Team-members. We recognize that the well-being of our team members, whether physical, emotional, or financial, drives engagement, satisfaction and productivity.

Diversity, Equity & Inclusion (DEI)

At Cumming Group, we recognize and celebrate diversity, equity, and inclusion, which is why we consciously foster a work environment where every team member feels they belong and can thrive. This effort begins with our recruiting and hiring practices, where we actively seek out diverse candidates from all backgrounds and walks of life. It continues through to our internal policies, training and

advancement opportunities, and overall company values, all of which are under continual scrutiny as we strive to make Cumming Group the most equitable and forward-thinking employer in our industry.

We have been working hard to ensure that we attract, develop, promote, and engage female team members and we are proud to say women represent 33% of our team members worldwide. We celebrate our environment, which promotes gender diversity and the continued growth and development of our female talent.

Our Equal Employment Opportunity Policy is the foundation to our commitment for providing equal opportunities to all team members. We proactively review our policies, processes, and programs, as outlined in our team member handbooks for each country, for enhancement, relevance, and equality purposes.

Our team member demographics are described on the following page.



Discovering Allyship



In March of 2022, Cumming Group was honored to host Dr. Giovanna Brasfield (Dr. “G.”), an accomplished diversity, equity and inclusion advocate with over 18 years of experience in the construction industry, to lead Allyship 101

bootcamp open to all team members. The workshop covered what allyship is, why it is important, how individuals can use allyship to create change and how it plays into the bigger picture of business, including project pursuits and supplier diversity programs.

After completion of the workshop, Cumming Group launched a survey to all attendees and found that **100%** of responders enjoyed learning about Allyship and **90%** of responders found the information was either extremely or very useful.

“It was meaningful to have participation at the highest levels as well as the participation throughout the company.”

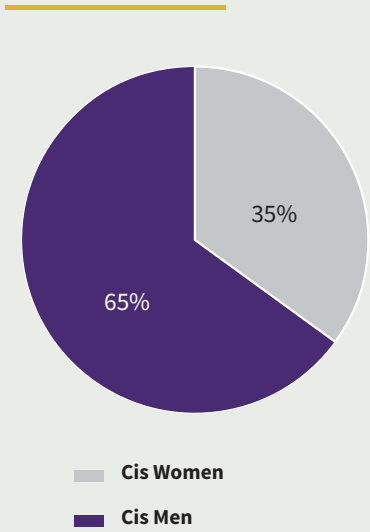
- Anonymous survey response

U.S. Team Member Demographics

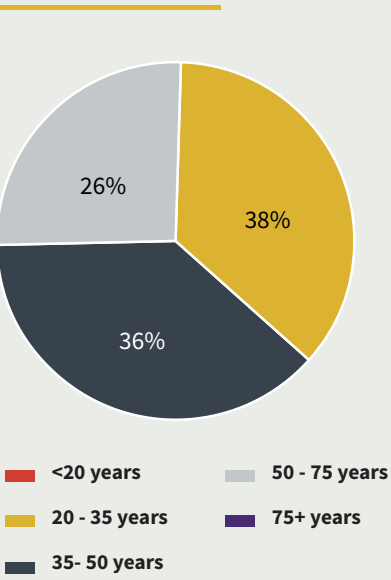
Year	Asian	Black or African American	Hispanic or Latino	White	Other	Not Declared
2022	178	56	83	808	73	8

2022 Team Member Demographic Spotlight for the U.S. *Population*

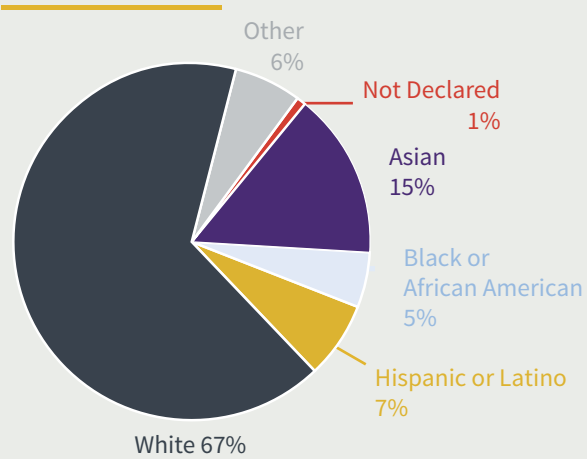
Distribution by Gender



Distribution by Age



Racial Diversity





91

YTD US ORGANIC
HIRES

500

ADDITIONAL TEAM
MEMBERS

29%

2021 VS 2022

New Talent + Recruitment

Cumming Group is committed to providing Equal Employment Opportunity in its personnel policies and practices. It is our policy to recruit, hire, train and promote Team Members and applicants for employment without regard to race, color, religion, age, sex, marital status, registered domestic partner status, genetic information, sexual preference, sexual orientation, and gender including gender expression and gender identity (see Corporate Social Responsibility Policy for full list). All decisions are based on (1) individual merit, qualifications, and competence as they relate to the particular position, and (2) promotion of the principle of equal employment opportunity.

Team Member Engagement

We recognize team member engagement as a crucial driver and contributor to our continued success. Our senior leaders and Human Resources team are committed to our Open Door Policy, operating in an environment that focuses on continuous learning and development, transparency, two-way feedback, and collaboration. In fact, we have implemented numerous company-wide programs based on team member feedback.

As part of our efforts in keeping our team members updated and informed, we hold quarterly global team member meetings, sharing current aspects of our business and facilitating an open and interactive Q&A session. Additionally, our quarterly global newsletter, global team member calls, and focus groups in our

team members' native languages demonstrate our commitment to communicating with our team members internationally.

Another way we support our team members is by facilitating a variety of Employee Resource Groups (ERGs), through which we aim to facilitate an environment for open discourse. These groups are managed by our own team members, and we aim to actively support them. These programs underscore our commitment to transparency, professional development, and engagement.

Veteran Advocacy

Our company has developed a Veterans Advocacy program to recruit veterans and their families. The talent, leadership skills, and commitment to teamwork exemplified by veteran members of the U.S. Armed Forces are well aligned with the values of our business. We are committed to helping veterans transition into a corporate environment and offer a strong support system. In addition, we create a pool of highly qualified team members that live by both their military values as well as our company values.

Career Framework

Our framework is a structure that organizes jobs consistently based on their impact to the organization and scope of responsibility. It helps our team members understand how their roles align to our strategic plan to understand their career opportunities and see different options to grow and develop their skills, broaden their experience, and enrich their careers. The framework encourages team members to own their careers, and it rewards them for their performance, initiative, and perseverance.

Internship Program

Our company has an annual Internship Program that serves as a catalyst for identifying and fostering a talent pipeline with the potential to lead our organization in the future. We recruit students from diverse universities and academic programs from across the U.S. and internationally. Our objectives for the program include identifying, hiring, and retaining top talent with the potential to lead our organization in the future. We also offer corporate law externship programs to law students.

We offer interns challenging and diverse projects in a supportive environment that promotes career readiness and provides them with the knowledge and skills necessary for a career in their chosen fields. The program provides an opportunity to network with other interns as well as gain experience from and exposure to cross-functional leaders. The program concludes with a formal end-of-assignment presentation of their innovations, ideas, and experiences to an audience of team leaders and executives.

Leadership Development

We recognize the criticality of strong, effective leaders, and the imperative to build our internal pipeline for senior leadership positions. Since 2018, more than half of our people managers have completed an in-person leadership development program. Our custom-designed programs include instructor-led modules that emphasize skills such as managing teams, delegation, and feedback essentials. Adopting the best practices of learning organizations, we utilize executive program-sponsorship and action learning projects to solidify key learnings. Immediate and sustained feedback from these programs has been positive.

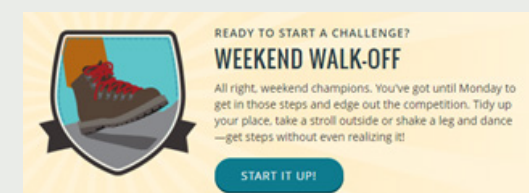
Training and Development

We believe that our team members are the most valuable asset of the company, as evidenced by one of our company values, People Focused. We invest in our team members and believe that learning and development is a catalyst for both professional and personal growth. Learning not only propels team members to thrive, it also fosters organizational innovation and ensures the long-term success of our business.

We offer a wide variety of learning programs to suit team members' development needs. Also, all our team members complete annual training that promotes a respectful and inclusive work environment that is free from all forms of harassment, intimidation, and discrimination. Additionally, the company offers tuition reimbursement for team members to complete their degrees and to achieve and/or maintain certifications.

Team Member Health & Wellness

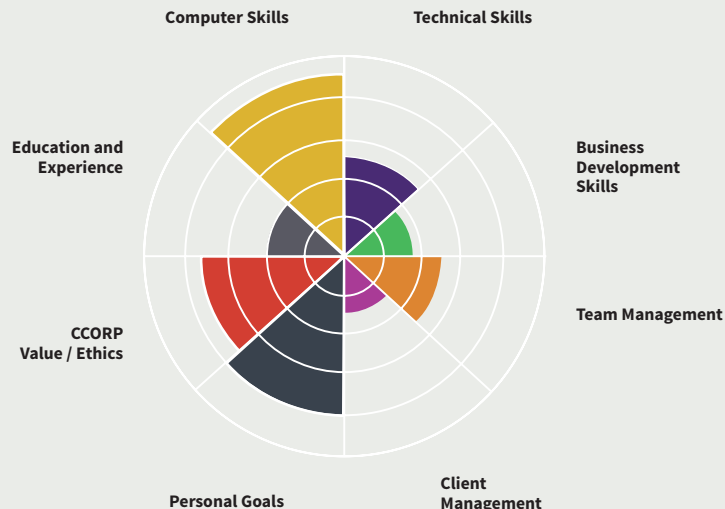
We are invested in the health and well-being of our team members. We encourage our team members to take care of their health through rewards earned by participating in the Virgin Pulse programs. Team members who participate in dynamic steps challenges, healthy eating challenges, take mindfulness breaks, and complete preventative care are eligible to earn cash incentives.



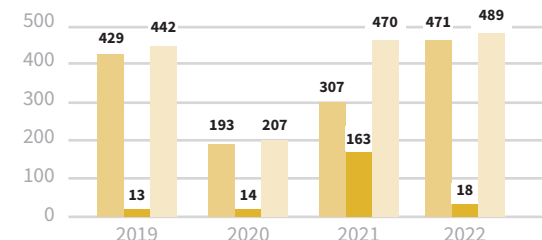
Online Training



Cumming Group is proud to offer all team members access to free online training through Cumming Group Academy. The Academy offers technical courses, computer skills trainings, and other trainings to promote the personal and professional development opportunities to our team.



Leadership & Managerial Training Participation



- Number of employees completed the managerial training
- Number of employees completed the leadership training
- Total

Compensation and Benefits

Our compensation packages consist of base remuneration, prerequisites, and performance incentives. The components of remuneration vary for different grades, and are governed by industry patterns, qualifications, experience, responsibilities, and individual performance. Transforming jobs into high-growth career avenues requires an atmosphere that recognizes and rewards talent. We have some of the most competitive remuneration policies in the industries in which we operate. This fosters a culture of empowerment, professionalism, and creative freedom to unlock the hidden potential in our people.

Our global compensation and benefits strategy is to provide programs and resources focused on four pillars of overall well-being. These pillars drive programs that help team members and their families strengthen and nurture their physical, mental, and financial health, and assist them with managing personal challenges and major life events. Our four pillars of well-being include Physical, Emotional, Financial, and Social.

As part of our investment in helping team members take care of themselves and their families, our company health and welfare benefits include, but are not limited to the following:

- Medical, Dental, and Vision Plans
- Health Savings Account (HSA) Contributions
- Disability Coverage – Short-term (STD) and Long-term (LTD)
- Leaves of Absences (LOAs) – FMLA, Non-qualified FMLA, Personal/Discretionary, and Military
- Life Insurance – Basic and Voluntary available for team members, spouses and their dependents
- Accidental Death and Dismemberment Insurance (AD&D)
- Business Travel and Accident Insurance (BTA)
- Critical Illness, Accident, and Hospital Indemnity Coverage
- Paid Time Off (PTO)
- Commuter and Parking Benefits
- Sponsorship of Professional Certifications

PROGRAM HIGHLIGHT: EMPLOYEE RESOURCE GROUPS (ERGS)



Women of CCORP

Women of CCorp (WOCC) is a network of female employees at Cumming Group. We champion and empower women to thrive at our company, within the industry, and in the community. Acting as a key resource for women, we are committed to cultivating an environment where all professional women have an opportunity to achieve their full career potential by encouraging self-development, leadership skills, and outreach through an open forum. We firmly believe that when women succeed, everyone benefits. This group is dedicated to attracting and retaining women to Cumming Group, and providing opportunities for professional development, networking, and exposure.

Established in 2020, WOCC is the firm's first Employee Resource Group (ERG). Since then, WOCC's member engagement has grown to 200+ women and a leadership team of regional 'Champions' has been established. Recent wins for WOCC include:

- **Championing an increase in paid parental leave impacting 1400+ employees**
- **Bolstering engagement and belonging with mergers and acquisitions**
- **Catalyzing cross-departmental collaboration to win new work and improve efficiencies for current clients**

In the past 12 months, WOCC has facilitated dialogue on several key issues such as:

- **Navigating microaggressions**
- **Confident communication tactics**
- **Advancement and representation of women at the senior level**
- **The power of setting boundaries**
- **Success and likeability**
- **Self-advocacy in internal negotiations**
- **Building your personal brand**
- **Creating an effective elevator pitch**

Obsidian

Founded in 2021, the Cumming Group Obsidian DEI Group is dedicated to connecting the company's Black team members and creating a dedicated space for them to share and discuss their insights and experiences.

Obsidian's current goals include:

- **Creating a safe place for open and honest dialogue, to improve the workplace experience and team member engagement**
- **Taking an active role in recruitment, to increase the number of diverse interns and professionals**
- **Increasing transparency of and access to growth opportunities, to accelerate career progression for team members**
- **Expanding diverse representation within the Executive group and demonstrating industry leadership around DEI**

Obsidian members held a panel discussion chaired by some of Cumming Group's Black leaders, who shared details on their career journey, described some of the challenges they've faced while navigating the industry, highlighted opportunities where they believe the firm can do better, and offered advice for up-and-coming team members. The Obsidian group will continue to play an active role on key DEI initiatives such as volunteering with high school students in their communities, developing relationships with HBCU, and partnering with industry Black professional groups. Obsidian has also been working together with other ERGs at Cumming Group – such as Women of CCorp – to align their goals, strategies, and best practices, and to ensure they are working in concert to achieve companywide DEI initiatives.

Obsidian is open to all team members, although its focus and purpose will remain as described above: to provide a forum for Black team members to discuss their experiences and perspectives, and to work together on solutions to the issues that face them in our workplace and industry.



Sexuality and Gender Alliance (SAGA)

SAGA is Cumming Group's newest ERG. SAGA's mission is to cultivate an inclusive, equitable, and respectful working environment at Cumming Group by offering resources and a network of support so that all of our team members feel empowered to bring their true, authentic selves to work every single day.

PERFORMANCE SUSTAINABILITY ACCOUNTING STANDARDS BOARD (SASB)

We have selected Sustainability Accounting Standards Board (SASB) as our primary reporting tool. The sections below present our quantitative ESG disclosure in accordance with the SASB index for Professional Services & Commercial Services Industry, as outlined in Appendix A. Qualitative metrics are addressed throughout the report, and details on where to find each response are also outlined in Appendix A. The sections below cover the year 2022.

Data Security

SASB Code: SV-PS-230a.3

(1) Number of data breaches, (2) percentage involving customers' confidential business information (CBI) or personally identifiable information (PII), (3) number of customers affected.

Year	Number of data breaches	Percentage of breaches involving customers confidential information OR personally identifiable information	Number of customers affected
2022	0	0	0

Workforce Diversity + Engagement (U.S. Only)

SASB Code: SV-PS-330a.1

Percentage of gender and racial/ethnic group representation for (1) executive management and (2) all other employees.

	Asian	Black or African American	Hispanic or Latino	White	Other	Not Declared	Women	Men	Not Declared
Executive Management	1	0	1	17	1	0	0	20	0
All Other Non-Contingent Employees	177	56	82	791	72	8	433	752	1

Other^ includes the classifications: Native American or Alaska Native, Native Hawaiian or Pacific Islander, and "Two or More Races"

*N/A=not available or not disclosed

Workforce Diversity + Engagement

SASB Code SV-PS-330a.2

(1) Voluntary and (2) involuntary turnover rate for employees.

	Voluntary turnover for employees (number)	Involuntary turnover for employees (number)
Turnover Rate	16%	5%

Activity Metrics

SASB Code: SV-PS-000.A

Number of employees by: (1) full-time and part-time, (2) temporary, and (3) contract.

	Number of full-time employees	Number of part-time employees
International	379	26
US	1,174	32
Global	1,553	58

SASB Code SV-PS-330a.2

Employee engagement as a percentage.

100% of employees received 2-hour onboarding training.

Personal Integrity

SASB Code: SV-PS-510a.1

Total amount of monetary losses as a result of legal proceedings associated with professional integrity.

No significant monetary losses were reported in 2022 as a result of legal proceedings associated with professional integrity.

SASB Code: SV-PS-000.B

Employee hours worked, percentage billable. US data only.

Employee Hours Worked	% Billable
2,396,743	72%

PERFORMANCE: TASK FORCE ON CLIMATE RELATED DISCLOSURES (TCFD)

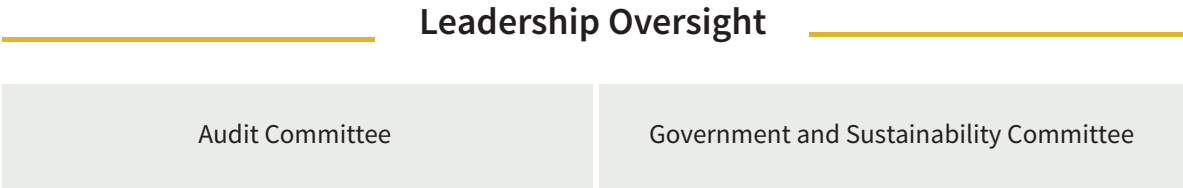
Cumming Group is committed to integrating ESG into our daily practices and long-term strategies. In line with that commitment and in support of furthering our environmental transparency, we have aligned our climate-related disclosures with the recommendations of the Financial Stability Board’s Task Force on Climate-related Financial Disclosures (“TCFD”).

Climate impacts, while often viewed through a lens of risk, also present Cumming Group with opportunities for growth. We are optimistic that the Company’s structure and our business fundamentals position us to thrive in an uncertain future.

Below we provide details of the four core recommendations of the TCFD: Governance; Strategy; Risk Management; Metrics and Targets.

TCFD Governance: Board

Beginning in 2023, leadership will be responsible for climate-related risk. Management reviews and discusses risks and opportunities with the Board as part of the business conducted at each of the regular meetings of the Board. While the Board has primary responsibility for overseeing the Company’s risk management, each committee of the Board also considers risk within its area of responsibility –Corporate Governance, Compensation, and Audit Committee. Each committee regularly reports back to the Board on its risk oversight activities.



TCFD Governance: Management

Cumming Group facilitates a proactive, structured process for identifying and mitigating market, operational, climate-related, financial, infrastructural, and reputational risk.

The development and execution of Cumming Group’s ESG program company-wide includes initiatives and activities aimed at sustainability improvements in many categories, including but not limited to reductions in GHG emissions related to climate change. Cumming Group management is responsible for ensuring visibility to the executive team, and subsequently to the Governance and Sustainability Committee. Additionally, Cumming Group management proactively communicates

and advocates corporate sustainability initiatives to the stakeholder base, including those related to energy management.

Cumming Group’s employees are crucial to the success of the ESG program. Team Members are encouraged to identify continuous improvement opportunities through process, knowledge, and innovative thinking. Cumming Group’s team members have championed many initiatives directly related to our priority ESG issues, including reducing energy consumption and GHG emissions.

TCFD Governance: Risks and Opportunities

Cumming Group's Board and executive management team have established a layered structure for identifying company-wide risks and opportunities. Using a formal Enterprise Risk Management process along with business leader expertise, we identify risks across the organization. Frequent strategic planning aids in identification of opportunities to make the company more resilient.

TCFD Governance: Scenario Analysis

To understand the impact climate change could have on Cumming Group, we performed a high-level review

of the impact of a 2°C global warming scenario. This scenario was developed based on global temperature increases expected by 2100. Over the next 80 years, gradual environmental changes may occur that impact our businesses. With this concept in mind, we reviewed a shorter 10-year horizon, to see impacts possible by 2030. We excluded not-yet-executed outside opportunities in this scenario.

Our assumptions for this scenario include: Rapid and aggressive action to address climate change including regulations of GHG emissions, restrictions on

deforestation, water conservation initiatives, and physical impact of climate change minimized.

Our assumptions regarding the business impact for this scenario include: Carbon pricing enacted as an emissions management alternative, subsequently raising operating costs and costs along the supply chain, and that Cumming Group benefits from market transition to lower emission service offerings in current portfolio and market transition to more efficient modes of transportation.

Climate-Related Risks	Time Horizon			Climate-Related Opportunities
	Short (< 5 years)	Medium (5 - 10 years)	Long (>10 years)	
<i>Policy and Regulatory</i>				
Carbon tax-emissions limits	Y	Y		A transition to emission limits in the US may present business opportunities.
Stricter regulation of ESG reporting	Y			Cumming Group has the opportunity to leverage current governance strengths to align with changes to many types of emerging regulatory reporting.
<i>Technology</i>				
Cost of transition to lower emission technology	Y	Y		Cumming Group evaluates the cost/benefit of lower emission technology as part of our operations and asset purchase reviews. Opportunity exists as possible regulatory incentives alleviate the cost differential between purchase options.
Price increases due to variability of renewable sources	Y	Y		In line with electricity availability, opportunity exists to mitigate price increases through cost cutting measures in other operational processes, as well as the implementation of new technologies to reduce energy consumption overall.

	Time Horizon			
Climate-Related Risks	Short (< 5 years)	Medium (5 -10 years)	Long (>10 years)	Climate-Related Opportunities
<i>Market</i>				
Increased cost of raw materials	Y	Y	Y	We see opportunities to leverage our purchasing power to mitigate some of the potential impact of material cost increases. Innovative and strategic focus to eliminate possible waste in our production processes also presents opportunities for cost mitigation.
Unreliable supply chain	Y	Y		Opportunity exists to diversify supplier base to rely on sustainability-focused suppliers which are often more resilient. As climate change increasingly impacts companies in our markets, Cumming Group provides reliability where other less diversified companies may be challenged.
Change in customer behaviors	Y	Y		As customers shift to find energy efficiency and lower emission options, opportunities arise for our energy and sustainability services.
<i>Reputation</i>				
Stigmatization of less "green" services	Y	Y		Diversification of services across Cumming Group allows us to maintain a balanced emissions portfolio. Additionally, participation in energy reduction programs and carbon credit initiatives should allow us to reduce our carbon footprint overall.
<i>Acute</i>				
Extreme temperatures limit operating hours or days	Y			At Cumming Group, we have the opportunity to leverage E&S-driven business continuity plans to ensure resilience across our operating facilities.
Extreme temperatures affect employee health and safety	Y	Y		At Cumming Group, we have the opportunity to leverage E&S-driven business continuity plans to ensure resilience across our operating facilities.
<i>Chronic</i>				
Rising average temperatures	Y	Y	Y	
Changes in precipitation patterns and extreme variability in overall weather	Y	Y	Y	Long-term weather and climate impacts bring opportunities to evaluate acquisition and organic growth in lower risk regions; to affect change by investing in new technologies; and to rely on the resilience we are building through sustainable operational practices.



TCFD Risk Management

Identification and assessment of risk is a routine part of any business. Cumming Group operates in multiple, complex industries where opportunities and risks cannot always be separated. We believe it is important to regularly review both the risks and opportunities of our businesses and to strategize for future success.

Cumming Group's Risk Management Team provides direct input at both the Cumming Group corporate level and the individual business level to manage climate-related risks through evaluation, selection, and review of appropriate insurance coverage; organic risk mitigation strategy collaboration, including capital spend planning; and risk prevention strategies.

Cumming Group's Legal Team provides mitigation and prevention strategies and overall guidance across the business in response to ESG risks, opportunities, and strategic direction.

Cumming Group's Senior Management Team monitors for micro and macro trends in the industries where we operate to actively identify and prepare for climate-

related impacts. From monthly business reviews to annual strategic planning, business unit leadership and senior management build business processes to address changes to supply chain resilience, customer preferences, industry norms, workforce reliability, weather patterns, and new technology.

TCFD Metrics and Targets

2022 is Cumming Group's first full year of ESG disclosure. We have adopted Sustainability Accounting Standard Board's ("SASB") reporting standards.

We continue to research, develop, measure, and set baseline data levels, with broadening disclosure expected as our sustainability program matures. Once baseline data is comprehensive, we expect to develop specific targets to compare against performance.

Cumming Group's businesses continue to take an active role in pursuing initiatives that promote environmental responsibility.



IN CONCLUSION

Thank you for your interest in Cumming Group's ongoing ESG efforts. We are focused on continual improvement, and welcome your feedback. Our performance report is published annually. Please visit [our website](#) for posted ESG Performance Reports.

APPENDIX A

SASB Index - Professional & Commercial Services Industry.

Table 1. Sustainability Disclosure Topics & Accounting Metrics

Topic	Accounting Metric	Category	SASB Code	Disclosure or Location
Data Security	Description of management approach to identifying and addressing data security risks	Discussion and Analysis	SV-PS-230a.1	p.11
	Description of policies and practices relating to collection, usage, and retention of customer information	Discussion and Analysis	SV-PS-230a.2	p.11
	(1) Number of data breaches, (2) percentage involving customers' confidential business information (CBI) or personally identifiable information (PII), (3) number of customers affected	Quantitative	SV-PS-230a.3	p.30
Workforce Diversity & Engagement	Percentage of gender and racial/ethnic group representation for (1) executive management and (2) all other employees	Quantitative	SV-PS-330a.1	p.30
	(1) Voluntary and (2) involuntary turnover rate for employees	Quantitative	SV-PS-330a.2	p.31
	Employee engagement as a percentage	Quantitative	SV-PS-330a.3	p.31
Professional Integrity	Description of approach to ensuring professional integrity	Discussion and Analysis	SV-PS-510a.1	p.31
	Total amount of monetary losses as a result of legal proceedings associated with professional integrity	Quantitative	SV-PS-510a.2	p.31

Table 2. Activity Metrics

Accounting Metric	Category	SASB Code	Disclosure or Location
Number of employees by: (1) full-time and part-time, (2) temporary, and (3) contract	Quantitative	SV-PS-000.A	p.31
Employee hours worked, percentage billable	Quantitative	SV-PS-000.B	p.31

A large, jagged iceberg floats in the ocean under a cloudy sky. The iceberg's surface is textured with various ridges and crevasses, and its base is partially submerged in the dark water. The sky is filled with soft, white clouds.

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