



ClarkDietrich®

CORPORATE SUSTAINABILITY REPORT FY2023



A MESSAGE FROM OUR CEO

Hello! Last year, we pledged to move beyond promises and into tangible action, guided by our triple bottom line of sustainability imperatives – **Planet, People, and Prosperity**. Today, I stand before you, proud of the significant progress we've made, transforming aspiration into achievement across all three pillars.

Mapping Our Footprint, Planet First

Recognizing that awareness precedes action, we meticulously calculated the greenhouse gas (GHG) emissions for every single ClarkDietrich plant and office. This wasn't just a box-ticking exercise; it's a laser-sharp picture of our environmental impact. Now, armed with this granular data, we can identify and tackle the "hot spots" driving our emissions, paving the way for substantial reductions in the months and years ahead. This is Planet, prioritized and addressed, stud by sustainable stud.

Driving Collective Impact, Engaging Our People

Recognizing that true sustainability starts from within, we established the ClarkDietrich Sustainability Council. This dedicated group of over 40 employees nationwide represents diverse roles and voices, actively engaged in identifying

our stakeholders and material topics. They analyzed both internal and external stakeholders, and pinpointed areas where our operations can have the most positive – or negative – impacts on the world around us. This collaborative effort empowers our people, fosters deeper engagement, and ensures our sustainability journey reflects the needs and aspirations of all who are part of the ClarkDietrich family. This is People, at the heart of our progress, collaborating for a greener future.

Empowering Your Green Choices, Prosperity Enabled

We understand the growing focus on embodied carbon in construction, and we're actively helping architects and builders realize their green vision. Our low embodied carbon Environmental Product Declaration (EPD) for steel framing products empowers your choices. By choosing ClarkDietrich steel, you can seamlessly reduce the embodied carbon footprint of your projects, meeting stringent specifications like the GSA requirements of the Inflation Reduction Act. This is Prosperity manifested in sustainable builds and shared success.

These achievements – measuring and influencing for Planet, empowering choices for Prosperity, and engaging voices for People – represent a fundamental shift. We're not just measuring, we're actively influencing. We've equipped ourselves with the knowledge to improve, empowered our partners to do the same, and are harnessing the collective ingenuity of our people to drive collective impact.

Of course, the journey doesn't end here. Our data informs our next steps, from optimizing production processes to exploring innovative low-carbon materials. Our EPD paves the way for deeper collaboration with architects and engineers, designing and building structures that minimize their environmental impact. This is Planet, People, and Prosperity, woven into the fabric of every action, every innovation.

As we continue this vital journey, we remain inspired by your commitment to sustainable building practices. Together, we can transform the built environment one steel stud at a time.



JIM COLLINS
Chief Executive Officer



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GENERAL DISCLOSURES



GENERAL DISCLOSURES

ABOUT CLARKDIETRICH – ORGANIZATIONAL DETAILS

Clarkwestern Dietrich Building Systems, LLC d/b/a ClarkDietrich offers a comprehensive lineup of construction products and services for both cold-formed steel framing and drywall/plastering finishing systems. We manufacture innovative products for interior and exterior framing, interior and exterior finishing, floor and roof framing, as well as clips, connectors, metal lath, welded wire, barrier mesh, and accessories.

As the demands for higher performance in all aspects of today's buildings rise, we partner with teams of architects, engineers, building developers and owners, contractors, and more on projects of all sizes, scopes, and complexity.

Far beyond products, our collaborations increasingly involve efforts and expertise that support smarter installation and design, including resources for Building Information Modeling (BIM) and ClarkDietrich Engineering Services LLC.

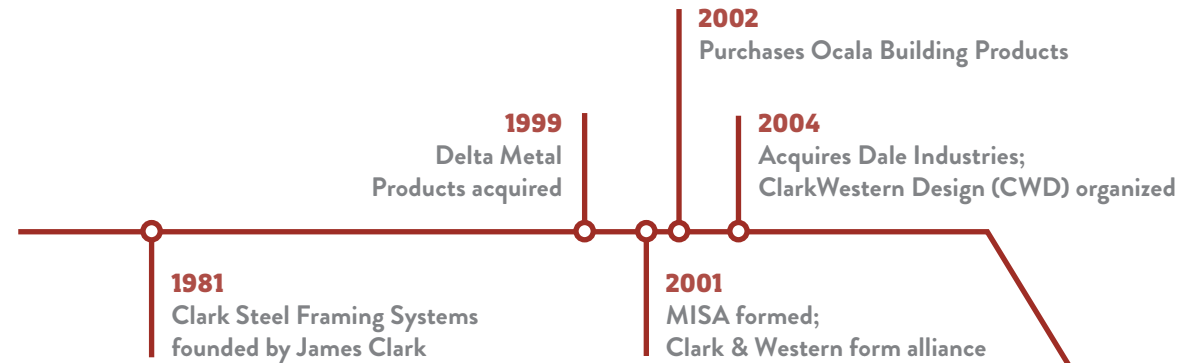
Formed in 2011 through the combination of two established market leaders, ClarkWestern Building Systems and Dietrich Metal Framing, ClarkDietrich is in an unprecedented position to help you bring change to the built environment.

ClarkDietrich is a privately owned limited liability corporation.





Historical Timeline of ClarkDietrich



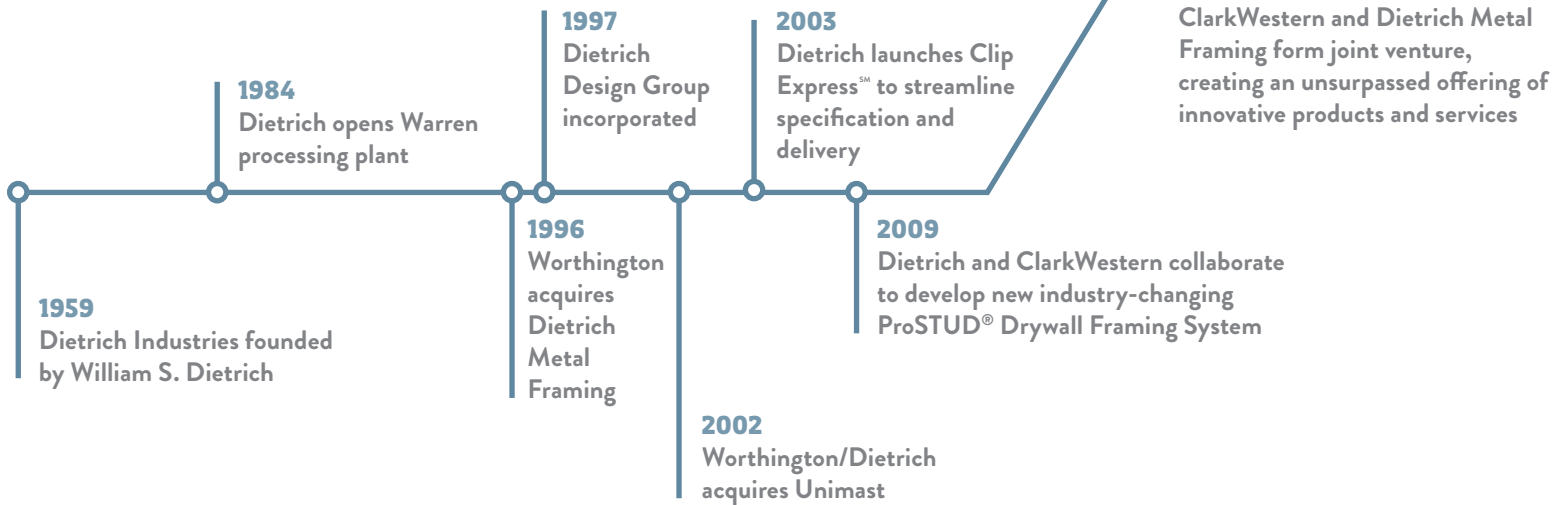
1980

1990

2000

2010

2011



2011
Acquires
Vinyl Corp.

2017
Acquires
Strait-Flex[®] Intl.

2019
Joint Venture with Hadley Group –
CDH Custom Roll Form, Inc.

2018
ClarkDietrich purchases 50%
ownership of Structa Wire Corp.

2022
ClarkDietrich acquires
100% ownership of
Structa Wire Corp.



Locations – Offices & Manufacturing Plants



CLARKDIETRICH MANUFACTURING LOCATIONS			
Structa Wire Vancouver, BC	Steel Pasadena, TX	Steel Dade City, FL	Steel Vienna, OH
Steel Woodland, CA	Strait-Flex O’Fallon, MO	Vinyl Corp Miami, FL	Steel Baltimore, MD
Steel Riverside, CA	Steel Rochelle, IL	Steel Warren, OH	Steel Bristol, CT
Steel Dallas, TX	Steel McDonough, GA	CDH Custom Roll Form Warren, OH	Clip Express™ Warren, OH

ENGINEERING OFFICE LOCATIONS			
ClarkDietrich Engineering Services Carlsbad, CA	ClarkDietrich Engineering Services Merrillville, IN	ClarkDietrich Engineering Services McDonough, GA	ClarkDietrich Engineering Services Bristol, CT
ClarkDietrich Headquarters & Research West Chester, OH			



CLARKDIETRICH & ITS REPORTING PRACTICES

This report is prepared with reference to GRI 1: Foundation 2021 Standards, including information that is available and has fully developed strategies. We are not a publicly traded company; thus, some information is considered confidential or private and will not be disclosed.

ClarkDietrich and all fully owned entities, including Vinyl Corp., Strait-Flex, and Structa Wire, are included within the metrics disclosed throughout this report. Joint Ventures were included and considered only as a Scope 3 downstream leased asset during this reporting period.

The reporting periods for this report aligns with our financial reporting period, which runs from April 1st through March 31st, and will occur annually.

There are no restatements of information from previous reporting periods and no external assurances have been obtained.

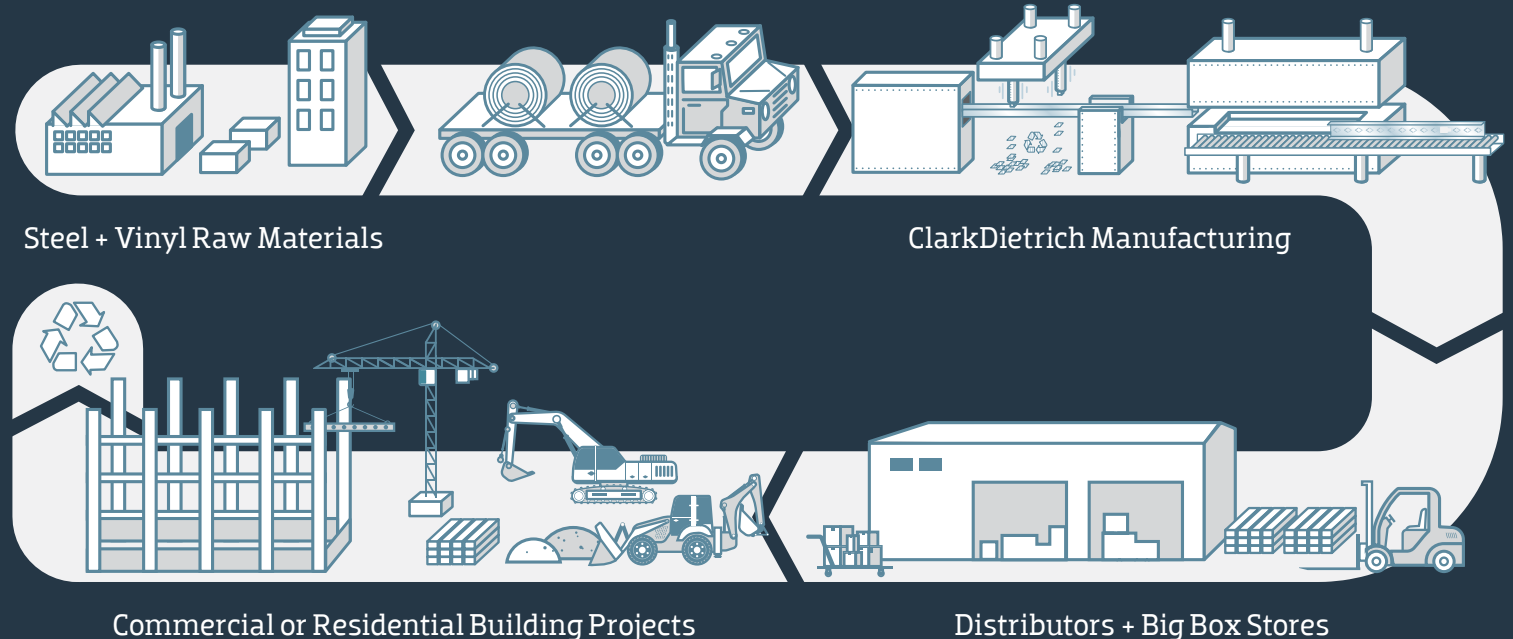
Future Endeavors

While the foundational governance structure of our sustainability program is now firmly established, we acknowledge that certain aspects, particularly those outlined in GRI 2: General Disclosures 2-10 through 2-21, have been partially disclosed in this second annual report. Some sections remain pending due to the confidential nature of the information and our capacity as a private company. Over the next year, we will diligently assess these disclosures, incorporating additional details when available, and continue strengthening our commitment to transparency and accountability in subsequent reports.

CLARKDIETRICH VALUE CHAIN

We manufacture and sell building products that are used in the commercial and residential construction industry. These products are manufactured from steel or vinyl and fall within the product categories of Interior Framing, Exterior Framing, Interior Finishing, Exterior Finishing, Floor Framing, Connectors, and Accessories. We purchase our raw materials from suppliers such as steel mills

and vinyl compounders, then sell our finished goods to customers who include commercial distributors and big box stores such as Home Depot and Lowes. Our customers then resell those products to the end users who install the products into a commercial or residential building.





SUSTAINABILITY GOVERNANCE STRUCTURE

In 2022, ClarkDietrich took significant strides in fortifying its commitment to sustainability by incorporating a dedicated Director of Corporate Sustainability into the organizational structure. This strategic addition, approved by the ClarkDietrich Executive Committee, reaffirmed our dedication to shaping a sustainable future. Our sustainability governance structure remains unchanged, consisting of the Executive Committee, the Director of Corporate Sustainability, and the Sustainability Council.





STRATEGY, POLICIES & PRACTICES

At ClarkDietrich, we are committed to conducting business in an ethical and responsible manner. Our commitment to the company's core values and code of conduct ensures we are fostering an ethical business culture for our customers, employees, suppliers and communities. We value integrity and hold all of our employees and executive leadership to the standards detailed in ClarkDietrich's Business Conduct Guide.

Statement on Sustainable Development Strategy

Building on the foundation laid in our first annual CSR, ClarkDietrich has continued to strengthen its sustainability structure, marking the publication of our second annual report, which will remain a short-term goal annually. Our medium-term goal of implementing a software program that will allow us to track and measure our environmental impacts accurately has not yet been achieved and will remain on this list until it is. Notably, in the past year, we completed a comprehensive manual Greenhouse Gas (GHG) emissions study covering all facilities and offices. This study serves as a pivotal tool, guiding us in making informed decisions on strategically reducing our impacts while aligning with our Sustainability Imperatives.

Last year, we embarked on our sustainability journey with the understanding that collaboration and learning are critical for success. We identified numerous influential programs and initiatives – UN SDGs, SBTi, Architecture 2030, and SE 2050, to name a few – as valuable sources of knowledge and best practices. While fully aligning with a specific

program at this stage is premature, we've completed in-depth reviews to gain nuanced insights and assess potential contributions to our evolving strategy.

This year's significant milestone, our first comprehensive GHG emissions study, has provided us with a roadmap for action. We're prioritizing immediate efforts on addressing identified "hot spots" – the key areas where we can make the most substantial environmental impact reductions. This data-driven approach allows us to focus resources strategically and maximize our positive contribution to the global sustainability landscape.

As we continue to learn and grow, we remain open to aligning with the program or initiative that best resonates with our unique values and goals. Our commitment to transparency and responsible action remains unwavering, and we look forward to sharing future progress in our ongoing collaboration with the broader sustainability community.

Policies & Practices

Our policy commitments, embedded policy commitments, processes to remediate negative impacts, mechanisms for seeking advice and raising concerns, and statements on compliance with laws and regulations are comprehensively addressed by these internal ClarkDietrich policies:

- 1 Employee Handbooks released in 2021
- 2 Business Conduct Guide dated 3/22/2017
- 3 Policy and Manual for Antitrust Law Compliance dated 12/1/2016
- 4 Policy and Manual for Foreign Corrupt Practices Act Compliance dated 12/1/2016
- 5 Internal Whistle Blowing Rules dated 10/1/2019





Association Memberships

We are proud to be members of the following organizations:



USGBC – U.S. Green Building Council



ILFI – International Living Future Institute



HPDC – Health Product Declaration Collaborative



SFIA – Steel Framing Industry Association



AISI – American Iron and Steel Institute



ASTM INTERNATIONAL

ASTM – American Society for Testing and Materials International



AIA – The American Institute of Architects



CSI – Construction Specifications Institute



AWCI – The Association of the Wall and Ceiling Industry



CFSEI – Cold-Formed Steel Engineers Institute



IFC – International Firestop Council



DISCA – Drywall & Interior Systems Contractors Association



MASFA – Mid-Atlantic Steel Framing Alliance



FWCCA – Florida Wall & Ceiling Contractors Association



TLPCA – Texas Lathing & Plastering Contractors Association



DACA – Drywall and Acoustical Contractors Association



AWMI – Association of Women in the Metal Industries



MWCC – Midwest Wall and Ceiling Contractors



STAKEHOLDER ENGAGEMENT

Stakeholders are individuals or groups that have interests that are affected or could be affected by the organization's activities. Meaningful stakeholder engagement is characterized by two-way communication and depends on the good faith of participants on both sides. It is also responsive and ongoing and includes, in many cases, engaging with relevant stakeholders before decisions are made.¹

Approach to Stakeholder Engagement

In the last year, we achieved a significant milestone by establishing the Sustainability Council, a diverse body representing various segments of our workforce. Among the council's key responsibilities was completing a formal stakeholder identification process, which they executed with remarkable success.

Stakeholder Identification Process

To ensure a comprehensive and inclusive perspective, we initiated an extensive process.

Future Stakeholder Engagement

In the coming year, we are poised to build upon this foundational work and evolve our stakeholder engagement process in sync with our sustainability commitments. We will leverage the insights gleaned from this robust stakeholder identification process to further refine our engagement strategies, focusing on key topics of shared concern to address mutual challenges and opportunities throughout our value chain. Focusing inward, we will continue our internal stakeholder engagement (i.e., #4 on our Stakeholder Ranking) with our employees via the Sustainability Council to ensure we're building strong relationships and collaborating across our diverse stakeholder community.

1

A kickoff meeting was held to review the GRI definition of Stakeholders and the identification process that would be used.

2

Sustainability Council members completed a survey to identify their top 10 stakeholders based on their unique vantage points throughout the company.

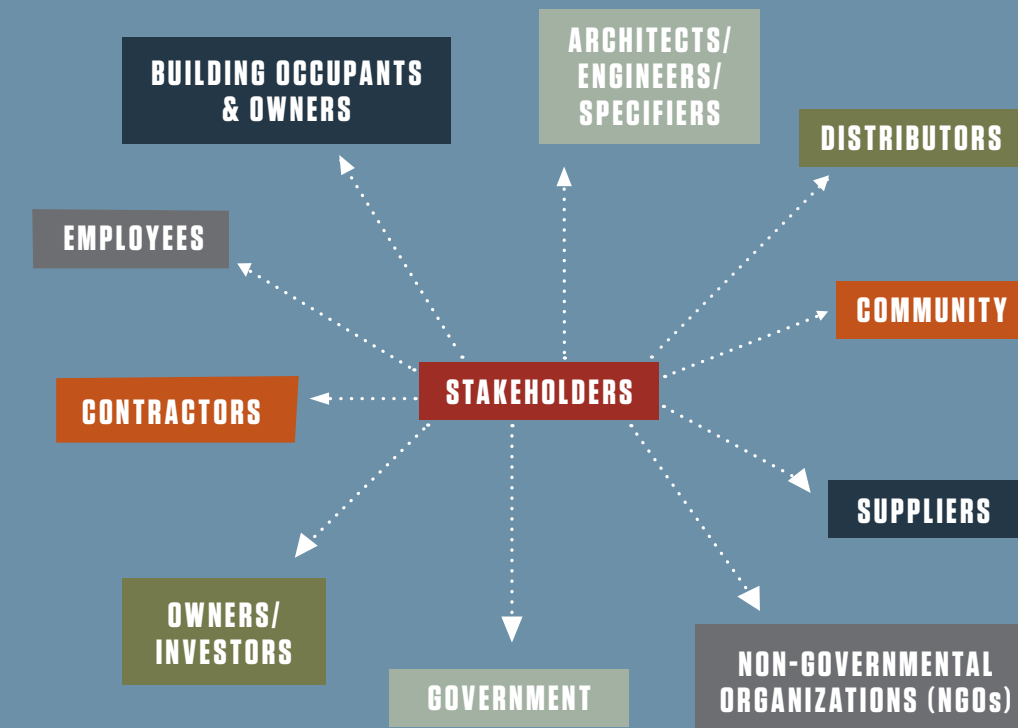
3

Individual lists were combined into an overarching top 10 list to provide a collective view of our most significant stakeholders.

4

A second survey to Council members asked them to rank the top 10 stakeholders in terms of importance.

TOP 10 IDENTIFIED STAKEHOLDERS



¹ Organisation for Economic Co-operation and Development (OECD), OECD Due Diligence Guidance for Responsible Business Conduct, 2018.



MATERIAL TOPICS



ASSESSING MATERIALITY

At ClarkDietrich, we believe that genuine sustainability goes beyond intentions and requires a clear focus on tangible impact. Last year, we laid the foundation for this impact by launching the initiative to identify our material topics. These topics highlight the areas where our operations can significantly influence the well-being of our planet, people, and prosperity. This year's report delves deeper into these crucial matters, showcasing our existing measures, planned actions, and commitment to continuous improvement in line with our material topics.

PROCESS TO DETERMINE MATERIAL TOPICS

In our ongoing commitment to transparency and responsible corporate citizenship, ClarkDietrich undertook a meticulous process to identify and determine our material topics for this year's report. As part of this initiative, 35 members of the internal Sustainability Council played a crucial role in the decision-making process, contributing their expertise and insights while following GRI's guidance and steps for material topic identification.

The GRI standard defines Material Topics as topics that represent the organizations' most significant impacts on the economy, environment, and people, including their human rights.



STEPS TAKEN:

1

UNDERSTANDING CLARKDIETRICH'S CONTEXT

The Sustainability Council, comprised of key internal stakeholders, undertook a comprehensive review of our internal and external context to gain deep insights into the factors shaping our industry, market, and organizational priorities.

2

SURVEY ON ACTUAL AND POTENTIAL IMPACTS

Following the context review, the Council members completed a survey to identify both actual and potential impacts our operations may have on the economy, environment, and society.

3

SURVEY ON POSITIVE AND NEGATIVE IMPACTS

The Council members were then asked to determine if the impacts were positive, negative or had no impact at all.

4

SURVEY ON SIGNIFICANCE OF THOSE IMPACTS

Finally, the Council members participated in a survey to assess the significance of the identified impacts, applying rigorous criteria that considered factors such as scale, intensity, and duration.

5

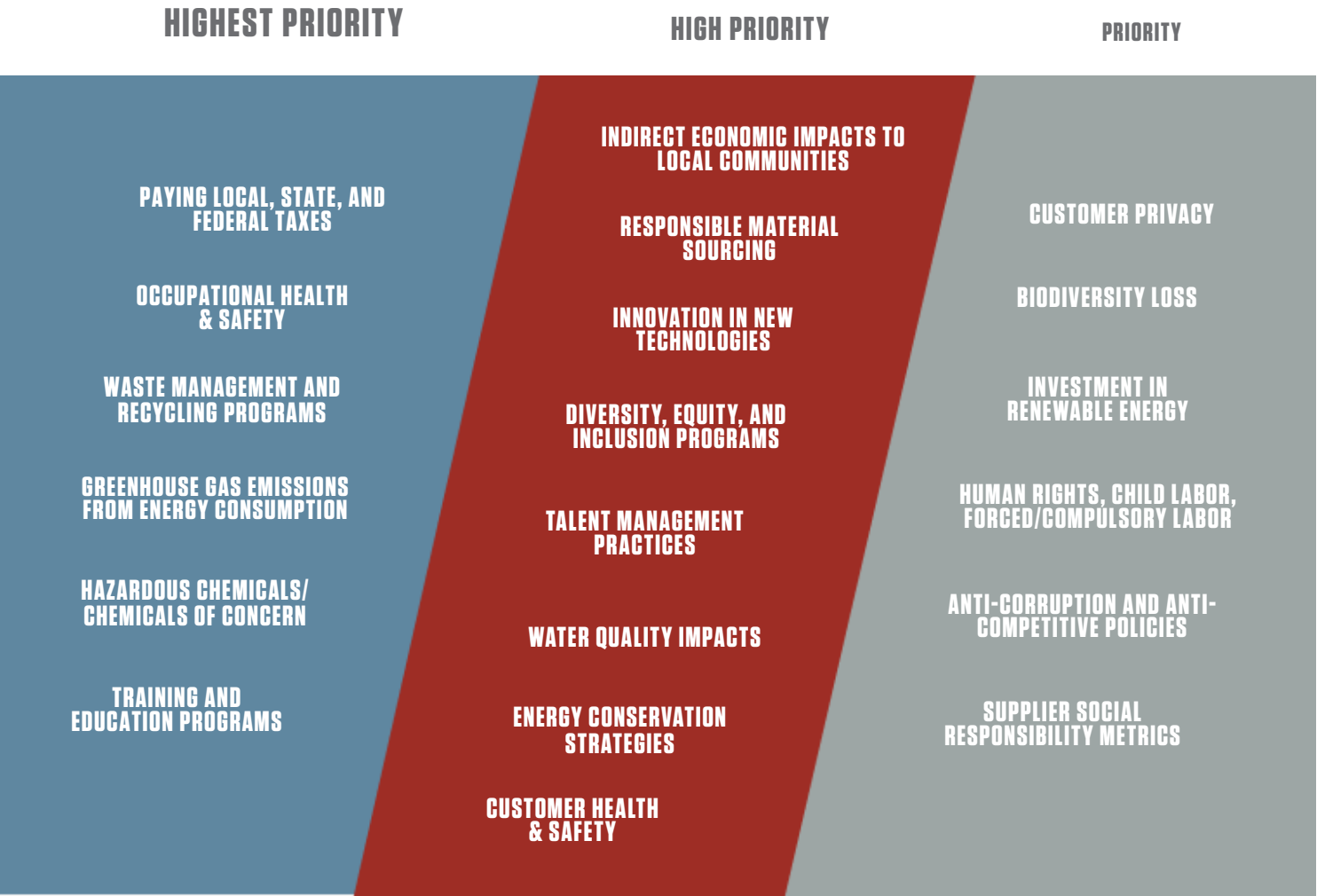
DETERMINATION OF MATERIAL TOPICS

The Top 10 Material Topics list was determined using an average ranking of the four different survey categories: Actual and Potential Impacts, Positive Impacts, Negative Impacts, and Significance of Impacts.



SUCCESSFUL ACHIEVEMENT

We are pleased to announce the successful completion of this collaborative effort within our internal Sustainability Council. Through the dedicated contributions of our team, we have achieved the crucial milestone of identifying and determining our material topics for the current reporting period.



Next Steps

Moving forward, we aim to expand the inclusivity of this process by involving external stakeholders in the coming years. This will ensure a broader and more comprehensive perspective in our sustainability reporting. In the meantime, our CSR will delve into the management of these material topics, providing detailed insights into the actual and potential impacts, existing policies or commitments, actions taken to mitigate negative impacts, and our plans to track the effectiveness of these actions.

ClarkDietrich remains committed to the continuous improvement of our sustainability practices, and we look forward to incorporating external stakeholder perspectives in our future endeavors.



SUSTAINABILITY IMPERATIVES



SUSTAINABILITY IMPERATIVES

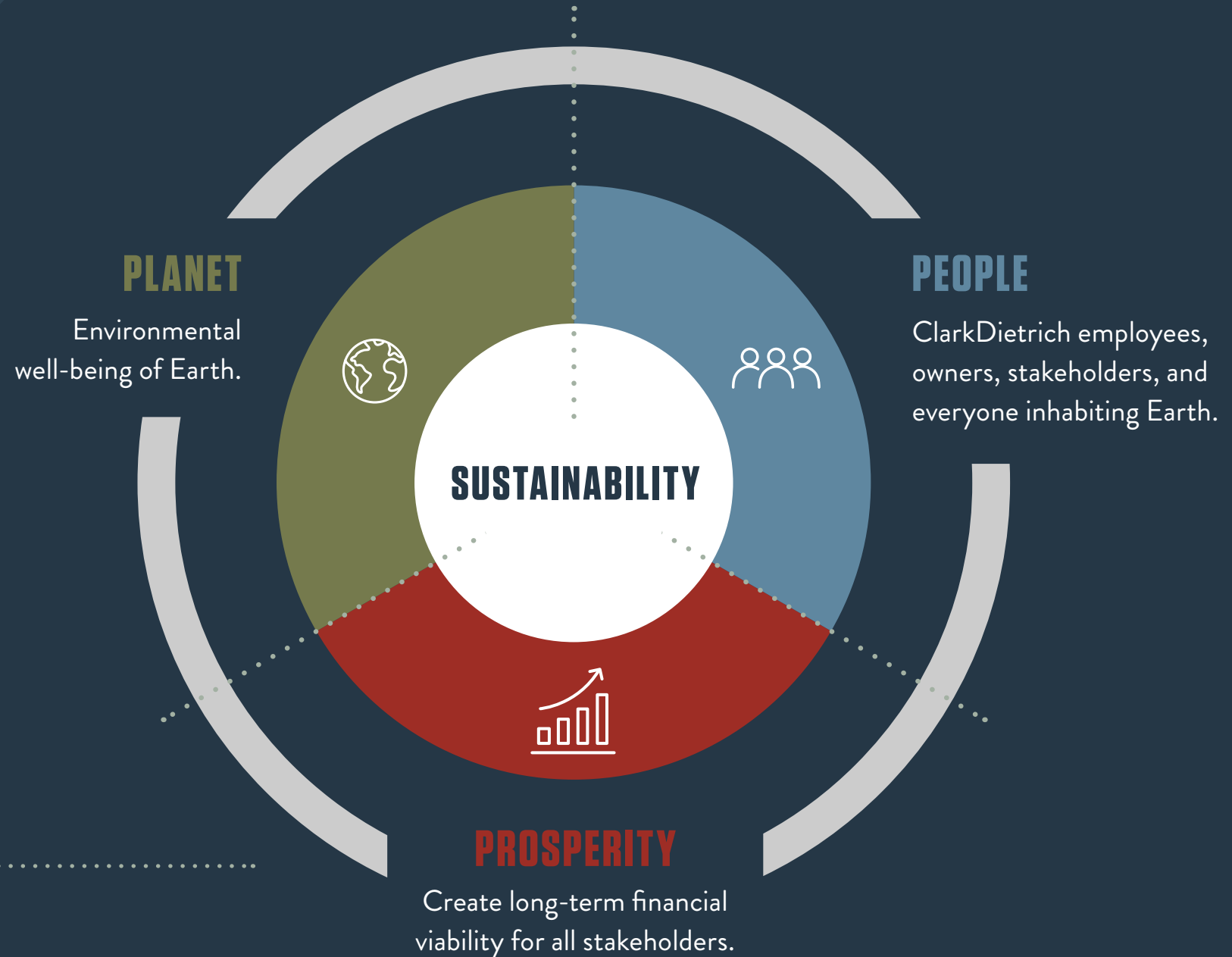
TRIPLE BOTTOM LINE

Sustainability isn't just a buzzword for ClarkDietrich. It forms the backbone of our agenda. Our Sustainability Imperatives – Planet, People, Prosperity – aren't aspirational goals tucked away in reports, they're actionable pathways to positive change.

This year, you'll see concrete examples of how we're taking responsibility for our planet, empowering our people, and contributing to a prosperous future for all.

Join us as we turn ambitions into impact.

All three imperatives must be accounted for in a business decision, otherwise it is not sustainable.





PLANET IMPERATIVE



At ClarkDietrich, we're not just helping to build structures, we're shaping a sustainable future. While "green building" has become a familiar term, we believe it's time to go beyond labels and embrace a deeper commitment to planetary well-being.

Sustainability isn't just about eco-friendly materials or certifications. It's about a fundamental shift in mindset. It's recognizing that our planet's resources are finite, and our actions today have lasting consequences for generations to come. We understand that sustainable development, as defined by the UN, requires us to "meet the needs of the present without compromising the ability of future generations to meet their own needs." Building in harmony with this environment is the crux of our Planet Imperative.

Through continuous innovation and a relentless focus on resource efficiency, we're actively increasing the sustainable attributes of our building products. This goes beyond simple certifications. It's through embedding sustainability into every stage of our product lifecycle, from sourcing and manufacturing to distribution and end-of-life solutions.

By supporting green building programs like LEED® and the Living Building ChallengeSM, we collaborate with like-minded organizations to push the boundaries of sustainable construction. These programs provide valuable frameworks, but our commitment goes further. We're actively engaged in shaping how these programs understand the steel supply chain, ensuring they continue to raise the bar for planetary responsibility.

Our Planet Imperative drives us to continuously improve the sustainability of everything we do. We know it's an ongoing journey, not a destination, and we're dedicated to making measurable progress along the way. Every step we take, every product we refine, adds up to a more positive impact on our planet.

"Everything we need for our survival and well-being depends, either directly or indirectly, on our natural environment."

- U.S. Environmental Protection Agency



CURRENT SUSTAINABILITY INITIATIVES

Environmental Product Declaration (EPD)

Low Embodied Carbon (LEC)

Building on the momentum of completing our inaugural Greenhouse Gas (GHG) inventory, we have achieved another significant milestone by finalizing an Environmental Product Declaration (EPD) specifically for Low Embodied Carbon cold-formed steel framing products. This marks a substantial leap forward for ClarkDietrich in asserting our position as a sustainable industry leader, providing building products that meet the evolving demands for sustainability within the construction sector.

In the building industry, embodied carbon refers to the greenhouse gas emissions arising from the manufacturing, transportation, installation, maintenance, and disposal of building materials. In contrast, operational carbon refers to the greenhouse gas emissions due to building energy consumption. In order to quantify greenhouse gas emissions and their potential effects on climate change, scientists use a method called life cycle assessment (LCA) to track the emissions produced over the full life cycle of a product or process. These emissions are converted into metrics that reflect their potential effects on the environment. One of these metrics is global warming potential (GWP), which is quantified in kilograms of CO2 equivalent (kg CO2e). This quantity is also commonly referred to as a carbon footprint.

Approximately 30% of all global carbon emissions are attributed to the building sector, with at least 8% resulting from the manufacturing of construction materials. .¹

Recognizing the significance of these environmental challenges, we have collaborated closely with our network of suppliers, strategically sourcing steel from specific Electric Arc Furnace (EAF) mills. This strategic sourcing enables us to supply cold-formed steel framing products with a 3rd Party Certified EPD, showcasing a 30% reduction in Embodied Carbon compared to our standard EPD.

¹ Carbon Leadership Forum. Embodied Carbon 101. <https://carbonleadershipforum.org/embodied-carbon-101/>

LIFE CYCLE IMPACT ASSESSMENT RESULTS: 1 METRIC TON OF COLD-FORMED STEEL PRODUCT



TRACI, IPCC AR5 GWP ₁₀₀ ¹ AND CML 2011-2016	Raw Material Supply (A1)	Transport (A2)	Manufacturing (A3)	A1-A3
GWP [kg CO ₂ eq]	1.54E+03	5.41E+01	6.62E+01	1.66E+03
AP [kg SO ₂ eq]	5.29E+00	2.73E-01	1.73E-01	5.74E+00
EP [kg N eq]	2.10E+00	2.35E-02	1.82E-02	2.14E+00
ODP [kg CFC 11 eq]	5.71E-05	1.39E-13	5.73E-12	5.71E-05
SFP [kg O ₃ eq]	1.22E+02	7.19E+00	3.97E+00	1.33E+02
ADP _{fossil} [MJ, LHV]	4.97E+03	7.50E+02	1.97E+03	7.69E+03





Environmental Product Declaration (EPD)

Standard Product Lines

In our commitment to sustainability, we recognize the environmental advantages associated with steel production from Electric Arc Furnace (EAF) mills, which generally exhibit a lower carbon footprint. This can be effectively demonstrated through Environmental Product Declarations (EPDs). While we acknowledge and value the positive impact of EAF steel mills, we emphasize the importance of maintaining a diverse supplier base that includes both EAF and Basic Oxygen Furnace (BOF) steel mills.

Diversifying our supplier sources by incorporating both EAF and BOF mills into our supply chain provides numerous benefits:

RESILIENT SUPPLY CHAIN

By sourcing steel from a mix of EAF and BOF mills, we create a resilient supply chain that is less vulnerable to disruptions. This helps mitigate the impact of any unforeseen challenges in the steel industry, ensuring a consistent and reliable supply.

MITIGATION OF PRICE VOLATILITY

Exclusive reliance on EAF mills could potentially lead to supply constraints, resulting in increased prices and longer delivery lead times. By maintaining a balance between EAF and BOF sources, we contribute to the mitigation of price volatility, ensuring cost stability for our operations.

COLLABORATIVE SUSTAINABILITY

Encouraging sustainability across the entire steel industry is crucial. By engaging with both EAF and BOF suppliers, we actively support the adoption of environmentally responsible practices across a broader spectrum of steel production.

MARKET RESPONSIVENESS

Maintaining a mix of supplier sources allows us to be agile and responsive to market dynamics. It provides the flexibility to adapt to changes in demand, technological advancements, and industry trends, positioning us as a proactive and adaptable player in the marketplace.

While acknowledging the environmental benefits of EAF steel production, our strategy focuses on a holistic approach to sustainability that considers economic and operational resilience. Through a balanced supplier base, we aim to achieve sustainability objectives while ensuring the stability and efficiency of our supply chain. To this end, we will also be maintaining our current EPDs which represent a mix of both EAF and BOF steel production.

LIFE CYCLE IMPACT ASSESSMENT RESULTS – ALL PLANTS

LCIA results are relative expressions and do not predict impacts on category endpoints, the exceeding of thresholds, safety margins or risks.

North American Impact Assessment Results: One Metric Ton of Cold-Formed Steel Product, January 1, 2021 (published).

TRACI v2.1	A1–A3
GWP 100 [kg CO ₂ eq]	2.38E+03
ODP [kg CFC-11 eq]	1.50E-07
AP [kg SO ₂ eq]	5.23E+00
EP [kg N eq]	2.61E-01
SFP [kg O ₃ eq]	8.42E+01
ADPE _{fossil} [MJ, LHV]	1.91E+03

LIFE CYCLE IMPACT ASSESSMENT RESULTS – WOODLAND, CA

LCIA results are relative expressions and do not predict impacts on category endpoints, the exceeding of thresholds, safety margins or risks.

North American Impact Assessment Results: One Metric Ton of Cold-Formed Steel Product, April 1, 2021 (published).

TRACI v2.1	A1–A3
GWP 100 [kg CO ₂ eq]	2.34E+03
ODP [kg CFC-11 eq]	4.42E-08
AP [kg SO ₂ eq]	4.73E+00
EP [kg N eq]	2.50E-01
SFP [kg O ₃ eq]	8.21E+01
ADPE _{fossil} [MJ, LHV]	1.89E+03

LIFE CYCLE IMPACT ASSESSMENT RESULTS – RIVERSIDE, CA

LCIA results are relative expressions and do not predict impacts on category endpoints, the exceeding of thresholds, safety margins or risks.

North American Impact Assessment Results: One Metric Ton of Cold-Formed Steel Product, January 1, 2021 (published).

TRACI v2.1	A1–A3
GWP 100 [kg CO ₂ eq]	2.30E+03
ODP [kg CFC-11 eq]	5.03E-09
AP [kg SO ₂ eq]	4.66E+00
EP [kg N eq]	2.47E-01
SFP [kg O ₃ eq]	8.10E+01
ADPE _{fossil} [MJ, LHV]	1.84E+03

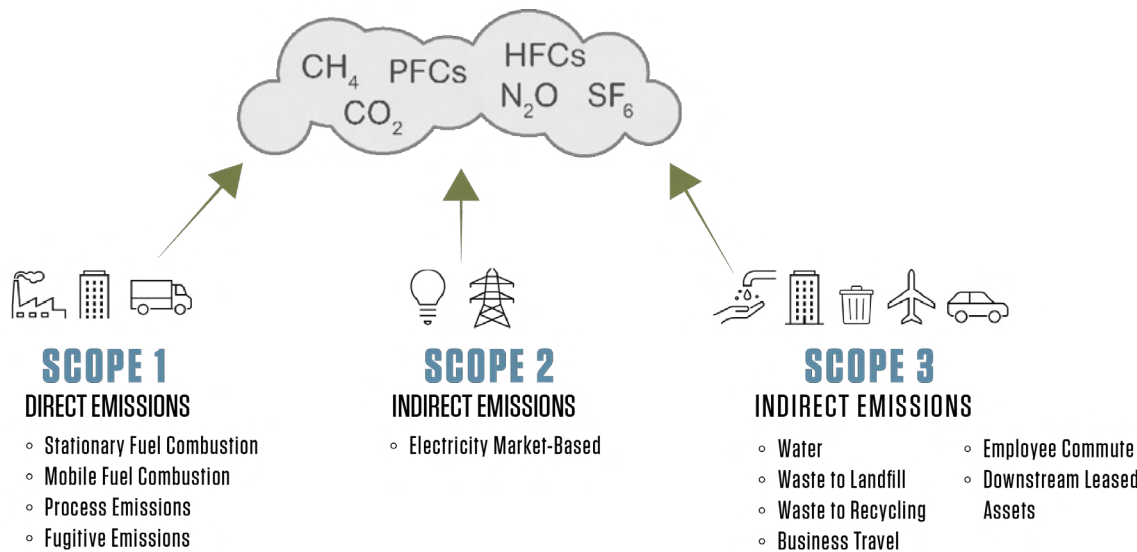
Chart Key

- GWP = Global Warming Potential
- ODP = Ozone Depletion Potential
- AP = Acidification Potential
- EP = Eutrophication Potential
- POCP = Formation potential of tropospheric ozone photochemical oxidants
- ADPE = Abiotic Depletion Potential for non-fossil resources;
- ADPF = Abiotic Depletion Potential for Fossil resources;
- SFP = Smog Formation Potential;
- ADPE_{fossil} = Abiotic Resource Depletion Potential of non-renewable (fossil) Energy resources

Greenhouse Gas (GHG) Emissions Inventory

In our second annual sustainability report, we are happy to announce that we successfully achieved the goal of completing a usage-based greenhouse gas (GHG) emissions inventory referencing the World Resource Institute’s GHG Protocol Corporate Standard, the GHG Corporate Value Chain Standard, and ISO 14064-1:2018 – Corporate Level Accounting. We used an operational control consolidation approach to determine organizational boundaries for calculating emissions.

The emission sources analyzed for scopes 1, 2, and 3 include:



Given ClarkDietrich is a private company reporting with reference to the GRI standards and our GHG inventory process is maturing, we have chosen to publicly report scopes 1, 2, and 3 emission intensities rather than gross direct and indirect emissions to base FY2022 as 100%. By reporting emission intensities annually, we plan to show progress or regression in emissions efficiencies in future reports based on this year’s calculations.

In alignment with our Environmental Product Declarations (EPDs) for steel products, we are presenting our greenhouse gas (GHG) emissions intensities as MT CO₂e per MT of Steel sold. It's important to note that the total tons of steel considered in these calculations pertain specifically to cold-formed steel framing products covered by our EPD. Consequently, any manufacturing facility producing specialty steel products not addressed in our EPD is excluded from this analysis but note that these manufacturing facilities producing specialty steel products have been factored into our company’s overall GHG emissions totals. Conversely, we have considered and included office facilities in our calculations here, to account for our corporate headquarters and engineering offices.

We also collected data for and calculated our GHG Emissions for the Extruded Vinyl manufacturing facility and our Composite Vinyl manufacturing facility. We do not currently have EPDs for these product lines.

FY2022 GHG EMISSIONS INTENSITIES FOR COLD-FORM STEEL FRAMING

Scope	MT CO ₂ e per MT Steel
Scope 1 Emissions	0.010
Scope 2 Emissions	0.020
Scope 3 Emissions	0.024
Total Emissions	0.054

MT Steel = Metric Ton (1,000 kg) of Steel
Includes 11 manufacturing facilities and 3 office facilities

FY2022 GHG EMISSIONS INTENSITIES FOR EXTRUDED VINYL PRODUCTS

Scope	MT CO ₂ e per MT Vinyl
Scope 1 Emissions	0.011
Scope 2 Emissions	0.252
Scope 3 Emissions	0.044
Total Emissions	0.306

MT Vinyl = Metric Ton (1,000 kg) of Vinyl
Includes 1 manufacturing facility

FY2022 GHG EMISSIONS INTENSITIES FOR COMPOSITE VINYL PRODUCTS

Scope	MT CO ₂ e per LF Steel
Scope 1 Emissions	0.119
Scope 2 Emissions	0.449
Scope 3 Emissions	0.071
Total Emissions	0.638

LF Vinyl = 100,000 Lineal Feet of Composite Vinyl
Includes 1 manufacturing facility

Note: MT CO₂e = Metric Tons of Carbon Dioxide Equivalent



LEED

Leadership in Energy and Environmental Design

ClarkDietrich remains committed to supporting LEED as a globally recognized symbol of sustainability achievement. Our LEED Accredited Professionals and vast product lines help customers earn LEED credits in categories like Materials & Resources and Indoor Environmental Quality.

Our steel's sustainability advantages shine through, namely:

- ▶ High recycled content translates to lower embodied carbon and environmental impact.
- ▶ Regional availability minimizes transportation emissions.
- ▶ Cut-to-length ordering reduces job site waste.
- ▶ Inherently non-emitting VOCs ensure healthy indoor air quality.

Going the extra mile:

- ▶ We achieved Clean Air Gold certification for our extruded and composite vinyl product lines, along with various steel grades and coatings.
- ▶ Our transparent EPDs and HPDs (available online) provide detailed environmental and health information about our products.

By choosing ClarkDietrich, you choose LEED-ready products and build a more sustainable future.



LIVING BUILDING CHALLENGE

LBC

Living Building Challenge

The Living Building Challenge (LBC) isn't just a green building certification, it's a revolutionary vision for buildings that truly give back to the planet. Imagine buildings generating their own energy, capturing their water, and leaving no waste behind. That's the LBC dream, pushing towards regenerative design with ambitious metrics and a deep respect for nature. It's a demanding standard, but one that inspires us at ClarkDietrich to continuously innovate our own products and find ways to align with LBC's rigorous criteria.

Steel, our core material, naturally aligns with many LBC principles. Its high recycled content minimizes embodied carbon, regional sourcing options reduce transportation emissions, and cut-to-length capabilities contribute to waste reduction. But we're not resting on these inherent advantages.

While our vinyl finishing products currently fall on the LBC Red List, we understand the importance of offering a diverse range of options and are dedicated to finding alternative solutions for sustainable building projects. Our team is diligently exploring non-Red List materials and processes for future vinyl finishing products, paving the way for LBC acceptability. We're confident that we can achieve beautiful, durable, and responsibly sourced finishes that support both personalized design vision and the planet's well-being.

Openness and transparency are also cornerstones of the LBC, and we wholeheartedly embrace these values. Our HPD library empowers architects and builders to make informed choices about the materials they use, ensuring every decision resonates with LBC's ethos. We actively engage in the LBC community, sharing our expertise and collaborating with other stakeholders to advance the cause of regenerative design.



Green Building Standards, Certification Systems and Regulations

We continue our steadfast commitment to supporting a diverse array of sustainability standards, certification systems, and regulations within the construction industry. Building upon our active engagement with LEED and the Living Building Challenge rating systems, we also recognize the importance of a broader spectrum of sustainability initiatives.

Our commitment extends to various rating systems, standards and frameworks, including the mindful MATERIALS (mM) Common Materials Framework, Federal Guidelines, WELL and Green Globes. Our customers can evaluate our products against all of these programs, including LEED and the LBC in our [SustainabilityPRO tool](#). These programs play a pivotal role in shaping sustainable practices within the industry, aligning with our ethos of responsible business conduct.

Additionally, we acknowledge the significance of regulatory frameworks in driving sustainability. Proposition 65 from the California Office of Health Hazard Assessment and the Restriction of Hazardous Substances (RoHS) are two regulations that commonly elicit questions and garner our technical support. As we move forward, we remain dedicated to actively participating in and supporting a comprehensive range of standards, certifications, and regulations that contribute to the advancement of sustainable and environmentally conscious practices in construction.

FUTURE SUSTAINABILITY INITIATIVES

Software Solutions for Tracking Metrics

ClarkDietrich is still reviewing various software packages for implementation that will allow the automated tracking, measurement, and reporting of environmental impacts, which include product Life Cycle Assessments (LCAs). The intention is to implement software that provides the ability to measure and report on Materials, Energy, Water and Effluents, Biodiversity, Emissions, Effluents and Waste, and Waste.





PEOPLE IMPERATIVE



Last year, we pledged a holistic view of sustainability, recognizing people as both beneficiaries and stewards of our planet. This year, we're proud of our "People" progress, empowering our workforce through development programs and the Sustainability Council, investing in communities through outreach and volunteer initiatives, and fostering a diverse and inclusive workplace where everyone can thrive. These are just initial steps towards a future where all who touch ClarkDietrich feel valued and empowered to contribute to a more sustainable world.

COMPANY VALUES

Our values set us apart throughout the employee lifecycle.



DO THE RIGHT THING - DO THINGS RIGHT —

Our pursuit of excellence is demonstrated by a commitment to going the extra mile in our efforts. We treat our customers, employees, investors, and suppliers, as they would like to be treated.



CREATIVE SOLUTIONS FROM EVERYONE —

We expect everyone to be a problem solver and an opportunity creator. We value innovation, encourage diverse perspectives, foster two-way communication, and recognize the work it takes to create and sustain a culture that embodies those values.



POSITIVE ENERGY AND TEAMWORK —

Our team focus and the positive energy with which we do business make ClarkDietrich a great place to work. We stand by each other. We support each other. We listen to each other. We make every effort to ensure that our work life is fulfilling and enjoyable.

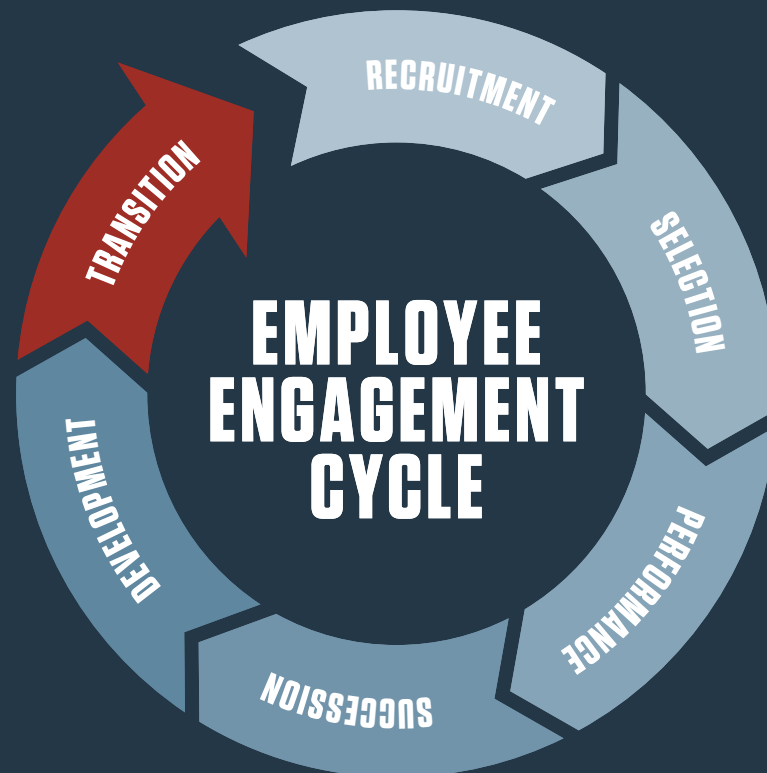


A BALANCED LIFE —

We appreciate that people work to live, not live to work; the most significant aspects of our lives occur outside the workplace. The importance of balancing our lives around work, family, and community is integral to our culture.

Succession Planning

Continually updated to meet the evolution of our workforce, our succession plans focus on developing and strengthening our leadership pipeline through identification, communication, development, and retainment of high performers and high potentials. We encourage our employees to job shadow, cross-train, obtain a mentor, take on a stretch assignment, network, visit a new plant, complete continuous education studies, and serve our local communities.



Employee Engagement & Communication

To better understand our employees, we send out engagement surveys regularly. These surveys help us quickly identify what is working and what is not working overall as a company and by department. We follow these surveys up with small group meetings led by Human Resources. These small group meetings allow our employees to voice their opinions and be heard, encouraging open feedback, communication, and collaboration.

One-on-One communication has proven to help managers and employees discuss successes, challenges, failures, and current projects/workload. One-on-One meetings also build the relationships between managers and employees. Communicating more frequently with employees on failures and successes is important in driving engagement. We encourage each manager to complete an Individual Development Plan with their employees to focus on the training and development they need to be successful.

Training

We send out a training needs assessment annually to our employees to solicit ideas for new or improved training opportunities. Based on their feedback, we design a customized training plan for the year. We offer web-based training covering a wide range of topics as well as in-person training ranging from compliance, leadership, diversity, equity, inclusion, product training, and more.





Diversity, Equity & Inclusion Mission

Aligned with our People Imperative, ClarkDietrich's Diversity, Equity, and Inclusion (DEI) mission stems from our Company Values, recognizing the integral role of individuals within the broader framework of our planet. Our commitment to DEI is rooted in fostering an inclusive environment that not only nurtures innovation but also ensures effective communication, allowing us to share and develop the best ideas for our business.

At the forefront of our DEI initiatives is our VP of Human Resources, Jennifer Smith. In 2021, she was designated Chief Diversity Officer, exemplifying our commitment to drive positive change. The Ohio Diversity Council has recognized Jennifer's leadership with the Leadership Excellence Award, a testament to her instrumental role in advancing our DEI journey.



Our DEI evolution gained momentum in recent years, with 2020 marking a pivotal moment in the establishment of the Inclusion Champion Group. Consisting of representatives from 14 facilities nationwide including our corporate office, The establishment of the Inclusion Champion Group, comprising representatives from 14 facilities nationwide and our corporate office, underscores our commitment to inclusivity. Volunteers from various departments, spanning manufacturing, sales, engineering, finance, IT, and senior leadership, contribute to our DEI efforts.



Key Milestones in our DEI Journey

In response to the socio-political climate in 2020, we launched the Workplace Teamwork Policy, emphasizing interpersonal communication through a training session led by our legal advisor.

- ▶ A revised DEI mission strategically integrates inclusiveness into our corporate strategy and community outreach.
- ▶ Introduction of DEI Monthly Insights, a newsletter promoting a sense of belonging among team members by highlighting cultural and national observations.
- ▶ Rollout of DEI mission through small group presentations to the administrative group and manufacturing hourly employees nationwide.
- ▶ Inclusion Champion Meetings with cross-departmental representation, fostering open communication through internal Microsoft Teams channels and bi-monthly discussions led by external or internal speakers.
- ▶ Identified mandatory training courses for managers in 2024, covering workplace "isms" and reinforcing our values of positive energy, teamwork, and commitment to DEI.

Our commitment to DEI goes beyond initiatives; it reflects our dedication to cultivating an inclusive culture where differences are celebrated, ensuring the well-being of our team members and the communities in which we operate.

TOGETHER, WE ARE STRONGER THAN STEEL.



Awards

Emphasizing our culture of inclusiveness, we are proud recipients of the following accolades:



These designations underscore our commitment to serving the military and veteran community comprehensively and meaningfully. The Military Friendly program recognizes organizations that demonstrate excellence in areas ranging from hiring and career advancement to customer service and charitable investment. As a Military Friendly Company, we're proud to foster inclusivity and support for our military and veteran personnel.



Benefits

In addition to compensation, opportunities for growth, and a positive workplace culture, ClarkDietrich supports our people with:



Full Benefits Package (Medical, Dental, Vision, Flexible Spending Accounts and Life Insurance)



401(k) with Company Match



Annual Incentive



Paid Time Off



Tuition Reimbursement Program



Professional Certification Reimbursement Program



COMMUNITY ENGAGEMENT

Engaging with and giving back to our communities is a cornerstone of ClarkDietrich's commitment to the People Imperative. Through ClarkDietrich Cares Days, our employees dedicate time to volunteer for local charities and organizations. From building homes with Habitat for Humanity, assembling bikes for the children of deployed Veterans, or contributing to the Indian Rock Preserve environmental education facility, our team actively participates in a diverse range of community service initiatives to benefit the areas surrounding our facilities nationwide.

On Earth Day, we extend our commitment by participating in roadside litter removal across various locations. We annually organize food

drives to support those in need, volunteer at local animal shelters and a zoo and actively contribute to the Let's Build Construction Camp for Girls. This camp empowers young girls to explore fields such as architecture, engineering, construction trades, and product manufacturing.

During the holiday season, we adopt children to ensure they have toys, coats, and shoes, embodying our collective pride as a company in volunteering our time to make a meaningful difference in the lives of others within our local communities."





Community Engagement: A Spotlight on McDonough, Georgia

The McDonough team embarked on their volunteering journey in March 2021 with [A Friend's House](#), a non-profit housing children in the foster care system and providing essential programs to help them overcome challenges and obstacles. Driven by the collective commitment of a dedicated committee comprising five employees, DJ Zellner, Ben James, Theresa Stuckman, Calvin Williams, and Carl Norman. Other key contributors include Natalie Garcia, Charles Byrd, and Michelle Lyons. Their enthusiasm and innovative ideas have been invaluable to the partnership.

The McDonough plant's impactful initiatives for A Friend's House include a multifaceted approach:

August Collection Drive: In August, we organized a collection drive for board games like Chess, Monopoly, Battleship, and various hair products for the children at A Friend's House. The McDonough team delivered a truckload of these items, receiving heartfelt appreciation for their thoughtful contributions.

Towel Donation: On July 28th, we delivered 60 towels, a gesture that was warmly received. With 23 children currently under their care, the towels significantly contribute to their daily showering and bathing routines.

In addition to these contributions, our team donated a grill, detergent, school supplies, cereal, and socks, essentials for children in their care.

"Thank you so much for the towels. I want to thank you on behalf of A Friend's House for all the help that ClarkDietrich has been to us. You have consistently provided items we have needed. Y'all are truly a part of our village."

- A Friend's House Director



PROSPERITY IMPERATIVE

While ClarkDietrich is not subject to reporting financial information to the U.S. Securities and Exchange Commission (SEC) as a privately held company, we recognize the critical role financial considerations play in our sustainability approach. Although financial data remains confidential, it is integral to our decision-making processes.

The third pillar of our sustainable strategy, aptly named "Prosperity," underscores our commitment to enterprise success while considering the well-being of our employees and shareholders. Our notion of prosperity extends beyond corporate interests to encompass the broader economy in which we operate. We recognize our responsibility to contribute positively to the communities surrounding our plants and offices, supporting their growth and prosperity in various facets of life. Through our actions, we endeavor to foster economic vitality and resilience within the communities we serve.



CORPORATE STEWARDSHIP

At ClarkDietrich, we are committed to conducting business in an ethical and responsible manner. Our commitment to the company's core values and code of conduct ensures we are fostering an ethical business culture for our customers, employees, suppliers, and communities. We value integrity and hold all our employees and executive leadership to the standards detailed in ClarkDietrich's Business Conduct Guide.

Supply Chain Transparency Efforts Around Conflict Minerals and Human Trafficking

ClarkDietrich is committed to ensuring our supply chain is ethically sourced and compliant with all applicable laws. Learn more about our supply chain transparency efforts around conflict minerals and human trafficking by following these links to our website.



[Conflict Minerals Policy](#)



[California Transparency in Supply Chains Act Disclosure](#)

Statement on Business Conduct Guide and Responsibilities

As ClarkDietrich employees, we can be proud of our reputation as an ethical and responsible Company. Our sense of integrity and fair dealings help to make us an industry leader, as shown by our consistent high rankings from customer associations. As ClarkDietrich employees, it is important that we strive to maintain a high standard of conduct in our business dealings with customers, suppliers, the public, and one another. It is important that we each work to maintain that reputation now and in the future.

This Guide has been developed to assist us in this effort. It is intended to serve as a general guide for each of us on ethical business conduct and our responsibilities to the Company. The Guide and the compliance program are integral parts of the Company's overall program for legal compliance and ethical conduct.

This Guide also serves to outline individual responsibilities under the compliance program.

If we each adhere to these few general principles and utilize the Company's compliance program, we are confident that our reputation will continue to grow and enhance our standing as a leader in our industry.





GRI CONTENT INDEX





GRI CONTENT INDEX

As noted previously, our use of GRI Standards provides a well-recognized and structured method of reporting on our impacts. Per GRI protocol, the following index provides an overview of our reported information and helps stakeholders navigate at a glance.

Statement of Use	ClarkDietrich has reported the information cited in this GRI content index for the period starting April 1st, 2023 through March 30, 2024 with reference to the GRI Standards.
GRI 1: Foundation 2021	GRI 1: Foundation 2021

GRI 2: General Disclosures 2021			
GRI Standard	#	Disclosure	Location
The Organization and Its Reporting Practices	2-1	Organizational details	About ClarkDietrich—Organizational Details
	2-2	Entities included in the organization’s sustainability reporting	ClarkDietrich & Its Reporting Practices
	2-3	Reporting period, frequency and contact point	
	2-4	Restatements of information	
	2-5	External assurance	
Activities and Workers	2-6	Activities, value chain and other business relationships	ClarkDietrich Value Chain
	2-7	Employees	Confidential
	2-8	Workers who are not employees	Not Disclosed
Governance	2-9	Governance structure and composition	Sustainability Governance Structure
	2-10	Nomination and selection of the highest governance body	
	2-11	Chair of the highest governance body	
	2-12	Role of the highest governance body in overseeing the management of impacts	
	2-13	Delegation of responsibility for managing impacts	
	2-14	Role of the highest governance body in sustainability reporting	
	2-15	Conflicts of interest	
	2-16	Communication of critical concerns	
	2-17	Collective knowledge of the highest governance body	
	2-18	Evaluation of the performance of the highest governance body	
	2-19	Remuneration policies	
	2-20	Process to determine remuneration	
	2-21	Annual total compensation ratio	



GRI Standard	#	Disclosure	Location
Strategy, Policies and Practices	2-22	Statement on sustainable development strategy	Strategy, Policies & Practices
	2-23	Policy commitments	
	2-24	Embedding policy commitments	
	2-25	Processes to remediate negative impacts	
	2-26	Mechanisms for seeking advice and raising concerns	
	2-27	Compliance with laws and regulations	
	2-28	Membership associations	Strategy, Policies & Practices / People Imperative
Stakeholder Engagement	2-29	Approach to stakeholder engagement	Stakeholder Engagement
	2-30	Collective bargaining agreements	Confidential Not Disclosed
GRI 3: Material Topics 2021			
Disclosures on Material Topics	3-1	Process to determine material topics	Material Topics
	3-2	List of material topics	
	3-3	Management of material topics	
GRI 201: Economic Performance 2016			
Topic Disclosures	201-1	Direct economic value generated and distributed	Confidential Not Disclosed
	201-2	Financial implications and other risks and opportunities due to climate change	
	201-3	Defined benefit plan obligations and other retirement plans	
	201-4	Financial assistance received from government	
GRI 202: Market Presence 2016			
Topic Disclosures	202-1	Ratios of standard entry level wage by gender compared to local minimum wage	Confidential Not Disclosed
	202-2	Proportion of senior management hired from the local community	
GRI 203: Indirect Economic Impacts 2016			
Topic Disclosures	203-1	Infrastructure investments and services supported	Confidential Not Disclosed
	203-2	Significant indirect economic impacts	



GRI Standard	#	Disclosure	Location
GRI 204: Procurement Practices 2016			
Topic Disclosures	204-1	Proportion of spending on local suppliers	Confidential Not Disclosed
GRI 205: Anti-corruption 2016			
Topic Disclosures	205-1	Operations assessed for risks related to corruption	Strategy, Policies & Practices
	205-2	Communication and training about anti-corruption policies and procedures	
	205-3	Confirmed incidents of corruption and actions taken	
GRI 206: Anti-competitive Behavior 2016			
Topic Disclosures	206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	Strategy, Policies & Practices
GRI 207: Tax 2019			
Topic Management Disclosures	207-1	Approach to tax	Confidential Not Disclosed
	207-2	Tax governance, control, and risk management	
	207-3	Stakeholder engagement and management of concerns related to tax	
Topic Disclosures	207-4	Country-by-country reporting	
GRI 301: Materials 2016			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages materials using Disclosure 3-3 in GRI 3: Material Topics 2021.	Future Sustainability Initiatives
Topic Disclosures	301-1	Materials used by weight or volume	
	301-2	Recycled input materials used	
	301-3	Reclaimed products and their packaging materials	
GRI 302: Energy 2016			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages energy using Disclosure 3-3 in GRI 3: Material Topics 2021.	Future Sustainability Initiatives
Topic Disclosures	302-1	Energy consumption within the organization	
	302-2	Energy consumption outside of the organization	
	302-3	Energy intensity	
	302-4	Reduction of energy consumption	
	302-5	Reductions in energy requirements of products and services	



GRI Standard	#	Disclosure	Location
GRI 303: Water and Effluents 2018			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages water and effluents using Disclosure 3-3 in GRI 3: Material Topics 2021.	Future Sustainability Initiatives
	303-1	Interactions with water as a shared resource	
	303-2	Management of water discharge-related impacts	
Topic Disclosures	303-3	Water withdrawal	
	303-4	Water discharge	
	303-5	Water consumption	
GRI 304: Biodiversity 2016			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages biodiversity using Disclosure 3-3 in GRI 3: Material Topics 2021.	Future Sustainability Initiatives
Topic Disclosures	304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	
	304-2	Significant impacts of activities, products and services on biodiversity	
	304-3	Habitats protected or restored	
	304-4	IUCN Red List species and national conservation list species with habitats in areas affected by operations	
GRI 305: Emissions 2016			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages emissions using Disclosure 3-3 in GRI 3: Material Topics 2021.	Greenhouse Gas (GHG) Emissions Inventory
Topic Disclosures	305-1	Direct (Scope 1) GHG emissions	
	305-2	Energy indirect (Scope 2) GHG emissions	
	305-3	Other indirect (Scope 3) GHG emissions	
	305-4	GHG emissions intensity	
	305-5	Reduction of GHG emissions	
	305-6	Emissions of ozone-depleting substances (ODS)	
305-7	Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions		



GRI Standard	#	Disclosure	Location
GRI 306: Effluents and Waste 2016			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages effluents and waste using Disclosure 3-3 in GRI 3: Material Topics 2021.	Future Sustainability Initiatives
Topic Disclosures	306-1	Water discharge by quality and destination	
	306-2	Waste by type and disposal method	
	306-3	Significant spills	
	306-4	Transport of hazardous waste	
	306-5	Water bodies affected by water discharges and/or runoff	
GRI 306: Waste 2020			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages waste using Disclosure 3-3 in GRI 3: Material Topics 2021.	Future Sustainability Initiatives
	306-1	Waste generation and significant waste-related impacts	
	306-2	Management of significant waste-related impacts	
Topic Disclosures	306-3	Waste generated	
	306-4	Waste diverted from disposal	
	306-5	Waste directed to disposal	
GRI 308: Supplier Environmental Assessment 2016			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages supplier environmental assessments using Disclosure 3-3 in GRI 3: Material Topics 2021.	Not Disclosed
Topic Disclosures	308-1	New suppliers that were screened using environmental criteria	
	308-2	Negative environmental impacts in the supply chain and actions taken	
GRI 401: Employment 2016			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages employment using Disclosure 3-3 in GRI 3: Material Topics 2021.	Strategy, Policies & Practices
Topic Disclosures	401-1	New employee hires and employee turnover	Confidential Not Disclosed
	401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Strategy, Policies & Practices; Benefits
	401-3	Parental leave	



GRI Standard	#	Disclosure	Location
GRI 402: Labor/Management Relations 2016			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages labor/management relations using Disclosure 3-3 in GRI 3: Material Topics 2021.	Strategy, Policies & Practices
Topic Disclosures	402-1	Minimum notice periods regarding operational changes	
GRI 403: Occupational Health and Safety 2018			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages occupational health and safety using Disclosure 3-3 in GRI 3: Material Topics 2021.	Confidential Not Disclosed
	403-1	Occupational health and safety management system	
	403-2	Hazard identification, risk assessment, and incident investigation	
	403-3	Occupational health services	
	403-4	Worker participation, consultation, and communication on occupational health and safety	
	403-5	Worker training on occupational health and safety	
	403-6	Promotion of worker health	
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships		
Topic Disclosures	403-8	Workers covered by an occupational health and safety management system	
	403-9	Work-related injuries	
	403-10	Work-related ill health	
GRI 404: Training and Education 2016			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages training and education using Disclosure 3-3 in GRI 3: Material Topics 2021.	Training
Topic Disclosures	404-1	Average hours of training per year per employee	
	404-2	Programs for upgrading employee skills and transition assistance programs	Confidential Not Disclosed
	404-3	Percentage of employees receiving regular performance and career development reviews	
GRI 405: Diversity and Equal Opportunity 2016			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages diversity and equal opportunity using Disclosure 3-3 in GRI 3: Material Topics 2021.	Diversity, Equity & Inclusion Mission
Topic Disclosures	405-1	Diversity of governance bodies and employees	Confidential Not Disclosed
	405-2	Ratio of basic salary and remuneration of women to men	



GRI Standard	#	Disclosure	Location
GRI 406: Non-discrimination 2016			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages non-discrimination using Disclosure 3-3 in GRI 3: Material Topics 2021.	Strategy, Policies & Practices
Topic Disclosures	406-1	Incidents of discrimination and corrective actions taken	Confidential Not Disclosed
GRI 407: Freedom of Association and Collective Bargaining 2016			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages freedom of association and collective bargaining using Disclosure 3-3 in GRI 3: Material Topics 2021.	Confidential Not Disclosed
Topic Disclosures	407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	
GRI 408: Child Labor 2016			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages child labor using Disclosure 3-3 in GRI 3: Material Topics 2021.	Corporate Citizenship
Topic Disclosures	408-1	Operations and suppliers at significant risk for incidents of child labor	
GRI 409: Forced or Compulsory Labor 2016			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages forced or compulsory labor using Disclosure 3-3 in GRI 3: Material Topics 2021.	Corporate Citizenship
Topic Disclosures	409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	
GRI 410: Security Practices 2016			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages security practices using Disclosure 3-3 in GRI 3: Material Topics 2021.	Confidential Not Disclosed
Topic Disclosures	410-1	Security personnel trained in human rights policies or procedures	
GRI 411: Rights of Indigenous Peoples 2016			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages rights of indigenous peoples using Disclosure 3-3 in GRI 3: Material Topics 2021.	Confidential Not Disclosed
Topic Disclosures	411-1	Incidents of violations involving rights of indigenous peoples	
GRI 413: Local Communities 2016			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages local communities using Disclosure 3-3 in GRI 3: Material Topics 2021.	Community Engagement
Topic Disclosures	413-1	Operations with local community engagement, impact assessments, and development programs	Not Disclosed
	413-2	Operations with significant actual and potential negative impacts on local communities	



GRI Standard	#	Disclosure	Location
GRI 414: Supplier Social Assessment 2016			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages supplier social assessment using Disclosure 3-3 in GRI 3: Material Topics 2021.	Not Disclosed
Topic Disclosures	414-1	New suppliers that were screened using social criteria	
	414-2	Negative social impacts in the supply chain and actions taken	
GRI 415: Public Policy 2016			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages public policy using Disclosure 3-3 in GRI 3: Material Topics 2021.	Strategy, Policies & Practices
Topic Disclosures	415-1	Political contributions	
GRI 416: Customer Health and Safety 2016			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages customer health and safety using Disclosure 3-3 in GRI 3: Material Topics 2021.	Confidential Not Disclosed
Topic Disclosures	416-1	Assessment of the health and safety impacts of product and service categories	
	416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	
GRI 417: Marketing and Labeling 2016			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages marketing and labeling using Disclosure 3-3 in GRI 3: Material Topics 2021.	Not Reported. Policies are managed per Federal and State guidelines and SFIA Compliance
Topic Disclosures	417-1	Requirements for product and service information and labeling	
	417-2	Incidents of non-compliance concerning product and service information and labeling	
	417-3	Incidents of non-compliance concerning marketing communications	
GRI 418: Customer Privacy 2016			
Topic Management Disclosures	N/A	The reporting organization shall report how it manages customer privacy using Disclosure 3-3 in GRI 3: Material Topics 2021.	Confidential Not Disclosed
Topic Disclosures	418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	

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Visit our [sustainability page](#) for news and updates.

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