

ESG Statement

At Alegacy, our mission and our business strategy are based on the concept that in everything we do as a Company, we should always strive to benefit our customers, employees, suppliers, and our shareholders, as well as the communities where we serve. We recognize the environmental challenges that face the world we live in and believe that doing our part in addressing them is not only the right thing to do but also our responsibility.

We are committed to operating our Company responsibly and understand that this creates long-term sustainable value for our Company by reducing costs, increasing revenue, reducing risks, enhancing our reputation, strengthening our communities, and helping us meet the expectations of our shareholders, our customers, our communities, as well as future generations. To support this commitment, we will strive to:

Environmental:

- We recycle 100% of all scrap metal products
- We recycle 100% of all waste oil and waste coolant
- We recycle 100% of all wood pallets and cardboard
- We maintain Environmental Compliance via quarterly independent audits at a minimum to include the Environmental Regulations enclosed on the Environmental Compliance Exhibit

Social:

- We provide a safe work environment and provide at a minimum the safety training enclosed on the Safety Training Exhibit
- We provide a clean, organized, and positive attitude work environment
- We provide a high paying work environment which includes benefits
- We contribute to our employee 401k plans
- Over 80% of our workforce are minority
- Our cumulative Employee Bonuses paid exceed \$6 million
- Our total capital committed to our Texas Reinvestment Zone exceeds \$45 million
- We contribute significantly to local causes including but not limited to: Waller Area Chamber of Commerce, Waller Economic Development Corp., Waller County Economic Development Partnership, Little League teams for baseball, softball, volleyball, soccer, Waller County FFA, Barnyard Buddies, Boys State, Girls State, Waller Bulldog Club, Waller Sports calendars, Family Ties, Waller County Veterans Memorial, Green Beret Foundation, Warrior National Foundation, CASA for Kids of South Central Texas

Governance:

- We are governed by a private Board of Directors consisting of the owners and chosen Management of the company.
- Board of Directors meetings occur quarterly and include non-voting advisors to the Board for Legal and Accounting/Audit, and other advisors as necessary specific to any pertinent subject.
- Board decisions strive to be for the benefit of all stakeholders:
 - Customers
 - Employees
 - Suppliers
 - Community
 - Shareholders

Environmental Compliance Exhibit

Clean Air Act

- Surface Coating Permit By Rule 106.433
- VOC Calculations for 106.433 compliance
- Non-submittal Permit By Rule compliance
- National Emission Standards for Hazardous Air Pollutants 6X - Nine Metal Fabrication and Finishing Area Source Categories compliance
- Annual notification to EPA
- Welding consumable usage
- EPA Method 22 Visual Opacity

Clean Water Act

- Stormwater Multi Sector General Permit TXR050000 compliance
- Stormwater Pollution Prevention Plan management
- Annual reporting
- Sampling kits
- Quarterly and annual inspections

Emergency Planning Community Right-to-Know Act (Chemical reporting)

- Tier II inventory and reporting
- Toxic Release Inventory Form R calculations and reporting


Resource Conservation and Recovery Act (Waste management)

- TCEQ Solid Waste Registration management
- TCEQ Annual Waste Summary reporting
- Waste determination management
- Waste profile review
- Waste manifest review
- Waste sampling
- Pollution Prevention Plan management

TxDOT (Texas Department of Transportation)

- Training employees for manifest handling and compliance

Safety Training Exhibit

H & S Alegacy Training Matrix			
	Disclaimer: This list is not an inclusive list of all specific Safety and Health training requirements and may change as regulations change. Each worker may need additional training depending on the work conditions and hazards that are present in the workplace.		
	Required Training	Frequency	Who's Required to Be Trained
First Aid / Safety	AED, First Aid & Blood Pathogens	Annual	Personnel Rendering CPR / AED or First Aid
	DOT HM - Environmental	Annual	Anyone who handles / uses / stores Environmental Chemicals
	Driving Safety	Annual	Employees that use company vehicles
	Ladders	One-time	All employees in the shop
	Lifting Devices (and Slings)	One-time	Anyone who works with Lifting Devices / Slings
	Painters- CAA NRESHAP 69X Painter Training	Annual	Anyone that does painting
Personal Protective Equipment	Fall Protection	One-time	Anyone who works on platforms, ladders or boomlifts
	Fit Testing	Annual	Anyone that is required to wear protection against respiratory hazards
	Personal Protective Equipment (PPE)	One-time	Anyone who is required to wear protection against potential hazards
	Prescription Safety Glasses	Annual	All employees that wear prescription glasses
Training	Be a Good Manager	Annual	Supervisors & Managers
	Crane Training by OMI	One Time for class and operator evaluation every 3 years	Operators of Cranes
	Cyber Security	Quarterly	All employees that use a computer
	Emergency Preparedness	Annual	All Supervisors / Managers
	Fork Lift Training by Cintas	One Time for class and operator evaluation every 3 years	Operators of Fork Lifts
	Mi-Jack Operations	One time for class and operator evaluation every 3 years	Operators of Mi-Jack Crane
	Phishing Tests	Quarterly	All employees that use a computer
	Safety Meetings	Weekly	All shop personnel
	Scissor Lift Training by Cintas	One Time for class and operator evaluation every 3 years	Operators of Sissor Lift