

## DIVERSITY, EQUITY AND INCLUSION POLICY

### SCOPE

This policy applies to all Onward Energy Management, LLC (Onward) associates, applicants seeking employment, and vendor partners.

### PURPOSE

Onward is committed to fostering, cultivating, and preserving a culture of diversity, equity, and inclusion in the workplace. Onward recognizes that a diverse workforce and inclusive environment are strategic keys in achieving a competitive business advantage. As such, Onward seeks to attract and retain talented individuals with various backgrounds and life experiences to leverage the effects of diversity to achieve business growth and performance.

### DEFINITIONS

Diversity is the mixture of individuals and range of human differences (traits and characteristics) in society. Equity is justice according to natural law or right; specifically: freedom from bias or favoritism.

Inclusion is involvement and empowerment, where the inherent worth, skill, and dignity of all individuals are not only recognized, but welcomed and allowed to exist thereby cultivating a cohesive culture.

### POLICY

Onward believes in treating all people with respect and integrity. Onward is committed to create and foster a supportive environment in which all associates are treated equitably, have equal access to opportunities and resources, and can contribute fully to the organization's success. Onward is committed to employing and providing developmental opportunities to the best people to perform the job. Onward is committed to diversity and inclusion principles that reflect society in our workforce.

Onward diversity initiatives are applicable, but not limited to our practices and policies on recruitment and selection; compensation and benefits; professional development and training; promotions; transfers; social and recreational programs; layoffs; terminations; and the ongoing development of a work environment built on the premise of gender and diversity equity.

Diversity, Equity and Inclusion management benefits individuals, teams, customers, and the company. Onward recognizes that each associate brings his/her own unique culture, capabilities, experiences, and characteristics to his/her work. This diversity encompasses, among other attributes, differences in race and ethnicity, national origin, gender, gender identity, language, age, physical ability or attributes, sexual orientation, religion or ethical value systems, socio-economic status, thinking styles, life experiences, education, and political beliefs. We value such diversity at all levels of the company in all that we do. Onward believes that the wide array of perspectives that results from such diversity promotes not only inclusion and associate engagement, but business success.

Managing diversity and inclusion makes Onward more creative, flexible, productive, and competitive.

Associates will be required to complete annual diversity and inclusion awareness training to enhance their knowledge to fulfill this responsibility. Any associate found to have exhibited any inappropriate conduct or behavior against others may be subject to disciplinary action, including and up to termination of employment.

### COMPLIANCE

Onward practices and policies are built upon this philosophy, as well as a set of values that include a strong belief that all associates should be treated with respect and integrity. In accordance with this, Onward does not discriminate against any associate or applicant for employment based on race, ethnicity, gender, gender identity, national origin, sexual orientation, religion, disability, age, or veteran status. Onward policy is to comply with all applicable Federal and State laws pertaining to non-discrimination and equal employment opportunity.

All associates of Onward have a responsibility to treat others with dignity and respect at all times. All associates are expected to exhibit conduct that reflects inclusion during work, at work functions on or off work sites, at company-sponsored and participative events, and while representing the company at professional conferences and events.

Associates who believe they have been subjected to any kind of discrimination that conflicts with the company's diversity and inclusion policy and initiatives should seek assistance from your Manager or Human Resources. If associates do not feel comfortable with reporting directly, may also do so via the Ethics and Compliance Hotline which is available 24 hours a day.