

Ebony Smith & Associates, Inc.
Environmental, Social, Governance (ESG) Policy

Effective Date: July 31, 2022

Approved By: Ebony Smith, CEO

Introduction

At Ebony Smith & Associates, we strive to do business continuously and consistently in a manner that improves the lives of our team members, partners, suppliers, vendors, and clients, as we take measures to enhance our community and minimize environmental impacts. We understand that true sustainability is a framework that helps each stakeholder understand how we manage risks and opportunities relating to environmental, social, and governance criteria.

Core Values

All that we do at Ebony Smith & Associates is aligned with one or more of the following core values:

- Create raving fans with customer focus
- Nurture trust
- Deploy strategic thinking like oxygen
- Iteration is our passion
- Be the coach the client needs (Brand Promise)
- Focus on innovation
- Deliver value at every touch point
- Building win-win partnerships
- Pain + Reflection= Progress (formula)
- Diversity and Inclusion
- Education

Environmental Impacts

At Ebony Smith & Associates, we make a conscious and continuous effort to take all reasonable steps to minimize our environmental footprint by developing programs and policies to reduce energy and water consumption and increase waste diversion. To that end, we are committed to:

- Increasing our use of green products and services.
- Increasing environmental health by:
 - Using alternative technologies
 - Selecting environmentally friendly materials
 - Monitoring energy efficiency
 - Minimizing water usage

- Eliminating or reducing environmental health hazards and hazardous materials.
- Educating employees, vendors, and end users.
- Minimizing solid wastes.
- Working with suppliers and vendors who uphold the same or substantially similar commitments to environmental sustainability.

Sustainable Development Goals (SDGs)

Ebony Smith & Associates is committed to supporting the United Nations SDGs by the year 2030 in the following ways:

- Identifying where we can reduce any negative environmental and societal impacts.
- Auditing supplier practices to ensure they are adhering to our Supplier Diversity Policy and Code of Conduct.
- Continued use of sustainable materials.
- Offer continued education and training to employees and customers to raise awareness of SDGs and how we support them.
- Advocate for change at local, state, and national levels.

Social Impacts

At Ebony Smith & Associates, we pride ourselves on building and maintaining the strongest relationships possible with our employees, contractors, suppliers, customers, and the communities in which we work. Our policy is that each person or company with whom we work is aligned with our values and mission, specifically with respect to Business Integrity, Labor Rights, and Diversity, Equity, and Inclusion, including our Supplier Diversity Statement.

Mandatory requirements for Ebony Smith & Associates employees and our suppliers, vendors, and all third parties with whom we do business include the following:

Business Integrity.

Our business is conducted lawfully and with integrity. All of our employees and others with whom we do business must:

- Not engage in bribery.
- Disclose any conflicts of interest.
- Not accept gifts, hospitality, or entertainment in exchange for influencing future business.
- Engage in competitive behavior in compliance with all relevant anti-trust or other laws and regulations.
- Conduct all business dealings transparently.
- Safeguard all confidential material.
- Comply with all federal, state, territorial, and international laws, including those related to data protection and anti-trust.

- Report any concerns without retaliation.

Supplier Relations

We believe in earning our customers' trust by acting responsibly and doing the right thing for our employees, our contractors, our customers, and our communities, and we expect the same from our suppliers.

We expect all of our suppliers to respect and comply with the criteria set out in this policy, and we will continue to work with and support those suppliers who demonstrate continuous improvement.

We encourage our suppliers to be open and honest about the challenges they face, so we can help them find practical solutions. However, repeated non-compliance may lead to review or termination of contracts.

This policy applies to all of our suppliers no matter where they operate in the world, and is reviewed annually.

Labor Rights.

Ebony Smith & Associates is committed to upholding human rights, not only with respect to its own employees, but also for others with whom it does business with regard to anti-corruption, labor rights, fair and safe working conditions, and environmental compliance.

The following represent our core principles in this respect:

- Business is conducted lawfully and with integrity.
- Work is conducted on the basis of freely agreed upon and documented terms of employment.
- All workers are treated equally and with respect and dignity.
- Work is conducted on a voluntary basis.
- All workers are of an appropriate age.
- All workers are paid fair wages for their countries of operation.
- Working hours for all workers are reasonable.
- Workers' health and safety are protected at work.
- Workers have equal access to fair procedures and remedies.
- Business is conducted in a manner which embraces sustainability and reduces environmental impacts.

Diversity, Equity, and Inclusion.

At Ebony Smith & Associates, a certified woman-owned and minority-owned business, we embrace and encourage our employees' and contractors' differences in age, color, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, physical and mental ability, political affiliation, race, religion, sexual orientation, socio-economic status, veteran status, and other characteristics that make our employees and contractors unique. Specifically:

- Diversity is a core value. We believe the power of diversity enriches all of us by revealing various perspectives to better understand and engage with the world, identify challenges, and discover, design, and deliver solutions.
- We are passionate about building and sustaining an inclusive and equitable working and learning environment.
- We are committed to building and maintaining a company culture that celebrates and values diversity.
- We believe the values of equity and social justice are enhanced and strengthened by working and learning from people with diverse experiences from all over the world.
- Our goal is not only to advance equity and justice at Ebony Smith & Associates, but to improve equity and justice on a global scale.

Our diversity initiatives, built on gender and diversity equity, include, but are not limited to, our practices and policies on recruitment and selection; compensation and benefits; professional development and training; promotions and transfers; and layoffs and terminations. To that end, we encourage and enforce:

- Respectful communication among all stakeholders.
- Teamwork that allows for, and encourages, various perspectives.
- Flexible work schedules.

GRI 405-1 Disclosure

- a. Percentage of individuals within the organization's governance bodies in each of the following diversity categories:
 - i. Gender – 100% female
 - ii. Age group: under 30 years old, 30-50 years old, over 50 years old (1)
 - iii. Other indicators of diversity where relevant (such as minority or vulnerable groups) – 100% minority

- b. Percentage of employees per employee category in each of the following diversity categories:
 - i. Gender – 80% female, 20% male
 - ii. Age group: under 30 years old (1), 30-50 years old (3), over 50 years old (1)
 - iii. Other indicators of diversity where relevant (such as minority or vulnerable groups) – 100%

GRI 405-2 Disclosure

- a. Ratio of the basic salary and remuneration of women to men for each employee category, by significant locations of operation. US operations 100% women
- b. The definition used for 'significant locations of operation'.

Violations & Redress

All employees and contractors of Ebony Smith & Associates have a continuous responsibility to treat others with dignity and respect during, and outside of, work. Any employee or contractor found to have exhibited any inappropriate conduct in violation of this policy may be subject to disciplinary action.

Employees who believe they have been subjected to any kind of discrimination that conflicts with this policy should immediately seek assistance from the CEO.

Supplier Diversity Statement

At Ebony Smith & Associates, we actively support and strive to engage with businesses that fall into one or more of the following diversity categories:

- Minority-owned Business Enterprises (MBE)
- Woman-owned Business Enterprises (WBE)
- Lesbian, Gay, Bisexual, Transgender -owned Business Enterprises (LGBTBE)
- Disability-owned Business Enterprises
- Small Disadvantaged Businesses (SDB)
- Historically Underutilized Businesses (HUB Zone)
- Veteran-owned Businesses (VBE)
- Service-disabled Veteran-owned Businesses (SDVBE)

Governance Impacts

Ebony Smith & Associates is dedicated to continuous improvement, transparency, and accountability.

Cybersecurity Maturity Model Certification

Ebony Smith & Associates is in compliance with the Department of Defense’s (DoD) Cybersecurity Maturity Model Certification (CMMC) program 2.0 at both the Level 1 (Foundational) and Level 2 (Advanced) levels of cybersecurity tracking and monitoring.

National Institute of Standards and Technology

Ebony Smith & Associates is on track to attain National Institute of Standards and Technology’s (NIST) Cybersecurity Framework (CSF) by March of 2023.

Business Continuity Plan

As a part of our proactive approach to business, Ebony Smith & Associates has analyzed potential threats, vulnerabilities, and weaknesses that could occur in times of crisis. In response, we have created a Business Continuity Plan to help us react quickly and efficiently to any such risk of business interruption in the future.

Audits & Revisions

We believe that policies, such as this ESG Policy, are living, breathing documents that must have the ability to grow and adapt with the company. While we do not anticipate changes to the intent and core elements of this policy, the methods in which we accomplish our goals may need to be modified from time to time to reflect changes in the company, industry, law/regulations, and world around us. As such, the ESG Policy set forth herein shall be reviewed, and practices audited, by the CEO, Ebony Smith, and designees on an annual basis, at a minimum, and recorded below:

Revision History

This Policy will be reviewed on a regular basis and if changes are made, they will be documented in the table below.

Policy Reviewed Date	Reviewed By	Change(s) Made
Jan 15, 2023 (scheduled)		