

Corporate Sustainability & Environmental Policy

The *Fenway Group* is committed to promoting sustainability and being a responsible corporate citizen by considering people and the planet in all that it does. Our goal is to integrate sustainability into all our business decisions and practices. To meet the intent of our sustainability objectives *Fenway Group* will ensure that all employees are and will remain fully aware, knowledgeable, and supportive of this sustainability policy that their commitment and adherence will allow for continued implementation, adherence, and improvement both internally and throughout all business activities. The implementation and success of the *Fenway Group* Sustainability Policy is predicated on daily business operations, staff compliance, and achieved annual benchmarks for overall Plan effectiveness, change recommendations and successful elements for continuation.

Environmental Policy

Focus: *Fenway Group* commitment to being an environmentally responsible company will continue to be expressed through the products and services it offers and how we operate as a company. *Fenway Group* Sustainability Policy establishes business practices that, at a minimum, will comply with local, state, and federal environmental regulations while being viewed as a benchmark company for green practices. Our goal is to ensure that our Sustainability Policy furthers good green/sustainable business practices that thwarts pollution, incorporates product life cycle rational as an essential aspect of design, use, and the end-of-life product management with progress towards the continuous improvement of *Fenway Group* overall environmental performance with a reduced carbon footprint. As such our environmental policy and related goals will continue to be clearly communicated to our employees, suppliers, and customers. Fenway Group has been committed to sustainable practices since its inception. The company will continue to maintain our operation without the use of photochemistry, continue to employ the use of soy-based inks, maintain a robust paper and cardboard program, continue and enhance energy efficient lighting and machinery, with local procurement and carbon offsets when we cannot reduce.

Entryway Systems Cleaning and Maintenance Policy

Focus: *Fenway Group* is committed to reducing dirt, dust, water, snow, and other particles entering the facility at all entryways.

Cleaning and Maintaining: Custodial personnel vacuum each entryway systems every night. In addition, front entrance mats are steam cleaned at least every month and more frequently on an “as needed” basis.

Material Selection: Entryway systems materials have the following performance features:

- www.nfpa.gov
- www.cdc.gov/niosh/
- Must have low electrostatic propensity levels of less than 2.5 KV rubber backing.

Low Environmental Impact Cleaning Policy

Focus: *Fenway Group* is committed to reducing the exposure of building occupants to potentially hazardous chemical, biological and particle contaminants, which adversely impact air quality, health, building finishes, building systems, and the environment.



Implementation: It is *Fenway Group* policy at the facility, to employ cleaning and maintenance personnel who meet the performance requirements to sustain low environmental impact cleaning. All cleaning staff and third-party vendors receive documented training in chemical and cleaner dispensing, and dilution equipment.

Solid Waste Management

Focus: *Fenway Group* Sustainability Policy is to include a 100% Recycling Diversion goal for the recycling of waste from corporate sourcing operations. *Fenway Group's* focus is to minimize waste through efficiency measures, promotion of recycling, and employing the use of products with recycled content to reduce landfill waste. While *Fenway Group* does not generate waste per se, our objective is to meet the management of solid waste is through establishing targets for products that enter our facility with the potential of entering the waste stream and implement efforts that will, overtime, divert all waste from our operations thus minimizing *Fenway Group* contribution to landfill waste. Our Packaging/Shipping Department is to use as much recyclable material as possible, including paper banding, tape, boxes. The goal is zero plastics or other non-recyclable materials.

Chemical Management

Focus: Where and when germane, *Fenway Group* will work to mindfully reduce or eliminate chemicals that are hazardous to human health and our ecosystem throughout our functional operations and inclusive of all buildings from maintenance to janitorial cleaning services and cleaning products. *Fenway Group's* approach to its chemical inventory, for any reason, will be to identify and track all new and existing chemicals entering and departing our facility that could have a negative impact on the health of our employees, as well as the environment. Chemical inventory records will include maintaining accessible and current Material Safety Data Sheets (MSDS) through an electronic filing system accessible for all authorized members of our safety and compliance team. This commitment includes a systematic review and evaluation for adherence and compliance of our chemical management and hazard plans in accordance with jurisdictional regulations.

Transportation

Focus: *Fenway Group* is committed to reducing transportation related emissions through idling reductions, carrier selection, and reductions in unnecessary intercompany movement. This also includes the company owned and operated vehicles.

Implementation: To this end *Fenway Group* has initiated an idling reduction policy for all fleet vehicles. Plus, we have implemented an anti-idling program with our drivers. Guidelines have been issued on the importance of reducing air pollution, conserve on gas, and engage GPS equipment always. Additionally, in selecting 3rd party carriers for both inbound and outbound freight this environmental policy will be paramount before a carrier is selected for transporting any materials and final products. *Fenway Group* is to continue to maintain engagements with local vendors to both reduce the carbon footprint while supporting the local economy. Continue to purchase carbon offsets from organizations like CarbonFund.org and NativeEnergy.org. We consolidate deliveries for finished jobs and create routes that allow more drops/ route (versus singular drops). We also purchase carbon



offsets for approximately 35,000 miles per year for our van deliveries. For clients outside of our delivery area we use UPS or USPS to minimize our carbon footprint.

Corporate Ethics

Focus: In support of the integrity and reliability to our success as a business all *Fenway Group* management and employees will be expected to conduct their business affairs in accordance with all applicable laws of the United States, The Commonwealth of Massachusetts, City of Brookline and Boston, and observe the highest standards of business ethics; to act honorably while considering the impact of our decisions on our stakeholders while representing *Fenway Group* outside the confines of our facility. This policy is to be regularly communicated to all *Fenway Group* employees.

Community Involvement

Focus: It is important to *Fenway Group* to be able to make the biggest impact possible on our community and the organizations we support, both locally and nationwide. *Fenway Group* is committed to and seeks out activities that contribute to the community in which we operate and live. Activities include volunteerism, donations, and sponsorship opportunities and others that might be brought to our attention. We will continue to make every effort to involve our employees in these decisions and encourage their participation.

Sustainable Purchasing Policy

Focus: *Fenway Group* is dedicated to the following best practices in Sustainable Purchasing. The company's intention is to reduce waste and lessen harmful environmental impacts. *Fenway Group* goal is to provide a healthy environment to all its employees and prevent their exposure to harmful chemicals:

1. **Office Paper:** Office paper will contain post-consumer material. Our major purchase is paper, which is purchased through reliable FSI and SFP wholesale suppliers like Lindenmeyr Munroe and Central Paper. The company will continue to work with these suppliers to ensure their shipments are delivered from their closest warehouse to minimize carbon emissions.
2. **Office Equipment:** Office equipment will be reused within the organization. Once it has reached its full life the materials will be recycled or donated to charity. When making purchase decisions for appliances and office equipment we equipment that meets the latest regulatory and environmental standards such as EnergyStar®, EPEAT® Goldi and TCO. That includes all Monitors, Refrigerators, Microwaves, and convenience printers.
3. **Paints and Coatings:** All paints and coatings will not exceed the limits of Green Seal Standard GS 116 requirements as listed below. Exceptions to this may include mechanical rooms, which are not regularly occupied, and certain paints required meeting the needs of the area.
4. **Carpet:** Any carpet procured for the facility should follow recommended best practices, which comply with the requirements of the Carpet & Rug Institute (CRI) Green Label Plus Testing Program. Carpet tiles are preferred for maintenance and ease of installation.

5. **Carpet Cushion:** Any carpet cushion procured should follow recommended best practices which comply with the requirements of the CRI Green Label Testing Program 7.2.5 Composite Panels and Agrifiber Products, as updated. Any composite panels and Agrifiber products purchased shall not contain added urea formaldehyde resins.
6. **Furniture/Furnishings and Building Material:** Material purchased will be given more consideration if it/they are composed of any one of the following criteria: Contents are at least 70% salvaged material from off site or outside of the organization
 - Contents are at least 70% salvaged material from onsite through an internal organization's materials and equipment reuse program
 - Contents are at least 10% post-consumer or 20% postindustrial material
 - Contains at least 50% rapidly renewable materials
 - Is Forest Stewardship Council (FSC) certified wood
 - Contains at least 50% harvested and processed or extracted and processed within 500 miles of the project.

Sustainable Cleaning Products and Materials Purchasing Policy:

Focus: *Fenway Group* and its contractors purchase cleaning products, biodegradable disposable janitorial paper products, and trash bags, which reduce the environmental impact/footprint. The biodegradable disposable janitorial paper products and trash bags comply with the EPA Comprehensive Procurement Guidelines. Exceptions to these policies may include special circumstances where the specified products are unable to satisfy the critical needs of the organization. All outside vendors or contractors are asked to use EPA Comprehensive Procurement Guidelines, Simple Green, FSI Certified, Green Seal GS 37 cleaning products or products that comply with the California Code of Regulations maximum allowable VOC levels. Maintain the purchasing of eco-friendly toilet paper and paper towels while purchasing rag service to reduce waste whenever possible.

Fluorescent Lamp Purchasing Policy

Focus: *Fenway Group* is committed to maintaining reduced mercury content of the light bulbs acquired for use in the facility with changes from fluorescent to LED designed lighting. *Fenway Group* will review the need for lamp purchases annually and develop compliant. Quarterly reports will track progress on a compliant lighting program and identify any barriers to meeting the objective as established and updated by the Federal [EPA](#). Periodic energy audits will be conducted through *Fenway Group's* energy supplier, Eversource, with the report reviewed for appropriate implementation.

Sustainable Sites Guidelines

Focus: Standards are provided in several of the sections below describing the recommended general sustainable site practices that we've negotiated with the Landlord. In each section, additional best practices are listed. It is recommended that the best practices be employed over time to uphold the mission of *Fenway Group* to have a maintainable and operationally cost-effective facility.

Implementation: The goal of *Fenway Group* is to impact the site of the facility as little as possible while being sustainably compliant. Reduced disturbance through conscious efforts and management helps lessen the environmental impact and maintain the health of our employees.

Water System

Focus: (1) Eliminate the purchase of bottled water and thus eliminate truck deliveries of water resulting in an additional reduction of our carbon footprint. (2) Improve the reduction in water use through the public water system.

Implementation: (1) Upgrade the Fenway Group's water system through Reverse Osmosis (RO) filtration. This implementation has been accomplished resulting in the elimination of bottled water, plastic waste, and excess carbon emissions due to deliveries. (2) Through smart machine mechanics Fenway Group is now a low user of water in its production process, with no toxic chemistry entering the waste stream. Based on MWRA guidelines Fenway Group is considered a low-level user of water. This will be maintained and improved as new equipment becomes available allowing the company to be carbon neutral by 2030.

Landscape Waste

Focus: Minimize the quantity of green waste taken to the landfill by using mulching mowers and/or utilize green waste haulers to remove green waste and recycle it for reuse

Snow Removal

Focus: The *Fenway Group* has an understanding with the Landlord that ice melt is used on main walkways and stairs only when there is ice and on an as needed basis.

Best Practices: *The Fenway Group* emphasizes with the Landlord the use of *Calcium Chloride*, which is particularly useful on road surfaces. *Calcium Chloride* dissolution is exothermic, and the compound is relatively harmless to plants and soil; however, recent observations in Washington State suggest it may be particularly harsh on roadside evergreen trees. It is also more effective at lower temperatures than *Sodium Chloride (Rock or Road Salt)*. The practice of *Potassium Chloride* in some [de-icing](#) products while designed to be safer for pets and plants, is inferior in melting quality to *Calcium Chloride*. *Magnesium Chloride* for ice melting is very corrosive and not suggested. *Sodium Chloride (Rock or Road Salt)* is harsh on the integrity of concrete and asphalt when regularly applied. While it is generally accepted that ongoing use of any deicer (ice melt) will eventually contribute to some degradation of the concrete surface to which it is applied, some deicers are gentler on concrete than others.

Cleaning of Building Exterior

Focus: We engage with the Landlord whenever possible for the use of a vinegar/water mixture or a mild soap/water mixture to clean the exterior of the building windows. We seek to ensure that no chemicals or solutions are used to clean the building exterior. When cleaning of the building exterior is required, our suggestion is the use of the power wash method. If graffiti has been applied to the building, an appropriate chemical, having minimal or no VOC's, is discussed with the Landlord to remove the graffiti. The *Fenway Group* engages with the Landlord regarding best practices, however, the only application we make is supplementary to the Landlord's initial application, where we employ Standard Practices.

Best Practices: Avoid the use of cleaning compounds that can harm vegetation and pollute groundwater.

Paints and Sealants Used on Building Exterior

Focus: When the Landlord employs the use of paints or sealants for building maintenance we speak to these guidelines: All adhesives and sealants used on the exterior of the building must have a

Volatile Organic Compound (VOC) emissions content that does not exceed the California South Coast Air Quality Management District. All paints and coating used on the exterior of the building must have VOC emissions that do not exceed the VOC and chemical component limits of Green Seal's Standard GS 1111 requirements.

Plantings

Focus:

- Use native or adapted plants
- Use plants with no or minimal watering requirements
- Use plants that have minimal maintenance requirements
- Use recycled soil amendments and bark mulches
- Consider using rocks, sand, and plants adapted to very dry conditions in smaller steep, or difficult to maintain areas where viewing traffic is high
- Use plants to reduce heating and cooling needs

Animal and Vegetation Pest Control

Best Practices: The preference for the treatment and exclusion of all pests and animals is through the process of Integrated Pest Management (IPM) with pesticides used on a limited basis. We work with the Landlord to ensure the use of safer soaps and castor bean oils can be used as pesticides. A program is in place to work with the contractor to avoid and remove invasive plants. The IPM program has the vendor describe strategies for us to apply to reduce sources of food, water, and shelter for pests in the building and on the grounds. This is done in working with the Landlord.

Irrigation Management

Best Practices: We work with the Landlord to ensure the use of a drip or bubbler system where appropriate. And where possible, adopt the Installation of an automated irrigation system that uses daily weather data, slope, soil types, planting coefficients, and precipitation and infiltration rates to calculate actual water requirements daily.

Fertilizer Use

Best Practices: This as well is in tandem with the Landlord to target fertilizers around the rooting zone or base of specific plants as much as possible. Ensure that the use of fertilizer applications is conducted on an as needed basis. Focus on organic fertilizers where weed control is not evident.

Waste Reduction and Recycling Policy

Focus: The goal of the facility's recycling policy is to manage waste containment and removal with an emphasis on waste reduction, reuse, and recycling. *Fenway Group* is committed to diverting at least >50% of the total waste stream from landfills by means of source reduction, resource reuse, and recycling at its facility. In addition, *Fenway Group* is committed to recycling 100% of all batteries, lighting units, fluids, drink containers, electronic equipment and more.

At *Fenway Group*, every effort is made for waste diversion. Throughout the facility, there are bins for recycling with the appropriate signage on what materials may be recycled. Notification is regularly sent to employees asking for their cooperation with recycling and an explanation as to why these recycling efforts have been implemented.

Implementation: *Fenway Group* is continually making strides to improve source reduction. Before purchasing material, equipment and services, the facility's procurement personnel will consider minimal packaging, energy efficiency, and post-consumer material, recycling post-use. Other questions considered are:

- Is the product size/magnitude necessary?
- Is the product really needed?
- Is the product easy to maintain and repair?
- Are all the features of the product necessary?
- Was the product produced locally?
- Can any features be eliminated?
- Can any features be eliminated?
- Was the product produced locally?
- How far did it travel?

Fenway Group also considers that specifications of materials which require "new materials only" should include the maximum recycled content (especially post-consumer) and salvaged materials where practical. *Fenway Group* uses recyclable materials wherever possible and applicable and avoids materials for which no recycling facilities or collection systems exist for those products end of useful life. The recycling process, however, should provide a net environmental benefit and should minimize adverse environmental effects. *Fenway Group* assures that paper generation is reduced through duplex copying, and using electronic communications inclusive of newsletters, notices and bulletin boards. In addition, remanufactured toner cartridges are considered through old cartridges returned to the manufacturer either directly or through Staples or similar retail stores.

Recycling Procedures

Focus: Work areas have individual recycling bins. Recycling bins display clear and concise instructions and are conveniently placed throughout the premises. Generally, in copier rooms, break rooms and general office and production areas. *Fenway Group* policy is to participate in local recycling programs that maintain verifiable recycling practices for all waste products.

Tracking & Reporting

Focus: Materials collected in the recycling containers are picked up and deposited in small and large recycling bins provided by a local recycling contractor. Subsequently, the contractor transports the material to a sorting facility where it is processed. The contractor provides a detailed list of the material weight that was recycled or sent to a landfill and report on a quarterly basis to the facility manager. The materials generally included are corrugated cardboard, paper, metals, and plastics. We contract with Capitol Paper Recycling who collects approximate 40 totes/week of off cut paper and wastepaper. They also collect a 10 cubic yard dumper of cardboard weekly. We approximate that to be 4 tons/week of recycling. We have also worked with the landlord to create centralized plastic and bottle recycling areas for the tenants. We also use Save That Stuff [<https://www.savethatstuff.com/>] that further supports our Zero Waste Policy.

Construction Indoor Air Quality Management Guidelines

Focus: The following guidelines apply to any HVAC project. For any construction work, it is recommended that a Construction Indoor Air Quality (IAQ) Plan is developed. The following guidelines have been developed to protect the health of the construction workers and the occupants of the facility by employing best practices to enhance IAQ during and after construction. The following guidelines have been developed to meet the recommended Control Measures of the Sheet Metal and Air Condition Contractors National Association (SMACNA) IAQ Guidelines for Occupied Buildings

under Construction. Any construction projects are coordinated with the Landlord to ensure the IAQ Plan is adhered to.

Procedures:

Indoor Air Quality Plan: Listed below are minimum standards and best practices for IAQ for building construction projects, which are the minimum standards addressed with the Landlord. The practices are organized in the major categories as presented in the SMACNA guidelines. It is advised that the developed Construction Indoor Air Quality (IAQ) Plan be written in parallel format to the sections below. The best practices listed provide an array of IAQ practices that may be applicable to a construction project. It is recommended that a Construction IAQ Management Plan be developed by using the minimum standards and applying the best practices that most appropriately concern the construction project at hand. When evaluating the best construction IAQ practices to incorporate into the Construction IAQ management plan assess the pros and cons of each practice to best determine the appropriate actions for the current project.

HVAC Protection: This Best Practices Plan is implemented when the system must remain operational during construction, use temporary filters. Filters should be a Minimum Efficiency Reporting Value (MERV) of 8 or equivalent efficiency and be used at each return air grill as determined by ASHRAE 52.2 1999. When the system is off all supply ducts, equipment, and openings should be sealed with plastic for further protection. Additionally, thermostats are programmed to reduce HVAC during weekends and off hours.

Recommended Best Practices: If possible, avoid using permanently installed air handlers for temporary heating and cooling during construction – particularly during demolition:

- If an un-ducted plenum over the construction zone must be used, isolate it by having all ceiling tiles in place.
- Check and seal all leaks in the return ducts and air handlers
- The system should be isolated from the surrounding environment as much as possible
- Do not store construction or waste materials in the mechanical room
- If considerable accumulation of particles can be observed under diffusers or if ventilation is restricted, consideration should be given to cleaning the ducts and associated equipment. This decision should be based on a detailed visual inspection of the system.

Source Control: When feasible use low emitting products. The materials that need to be considered for low emissions are as follows with the associated standard: Carpet (CRI Green Label Plus Carpet Testing Program) and Carpet cushion (CRI Green Label Testing Program).

Adhesives and sealants (VOC emissions do not exceed VOC limits of the South Coast Air Quality Management District Rule #1168 or Bay Area Air Quality Management District Regulation 8, Rule 51)10 - Paints and coatings (VOC emissions do not exceed VOC limits of Green Seal's GS11 requirements) - Cleaning solutions (Green Seal GS 37 or California Code of Regulations maximum allowable VOC levels) - Wall coverings - Furniture (GreenGuard Indoor air Quality Certified).

Recommended Best Practices: Use electrically powered equipment (such as forklifts and chain saws) when feasible and switch from diesel to bottled gas for equipment such as generators or forklifts. Exhaust pollution sources to the outside through an available exhaust system or portable fan vented

to the outside. Depending on the nature of the material and the location of the exhaust, special filtration may or may not be necessary.

If exhaust is not feasible a portable air cleaner may be effective in addressing these circumstances:

- Keeping lids on containers of wet products or waste materials
 - A surface which is a persistent odor source may be controlled by applying a sealer
 - Recover, isolate, and ventilate containers housing toxic materials
 - Locate the storage of pollutant sources outside the range of occupied areas
- 10.2.4 Pathway Interruption
- 10.2.4.1 Recommended Best Practices
- Depressurize the work area by adjusting the balance of the HVAC and exhaust systems or installing portable exhaust fans. A general rule of thumb is to exhaust the space at a rate of 10% greater than the rate of supply. The exhausted air may or may not need to be filtered, depending on the nature of the materials, location of the exhaust and any applicable regulations
 - If areas of the building are occupied during construction, increase supply air and reducing return and exhaust air in the area
 - Erect barriers to contain the construction area. This can range from dust curtains to a plastic seal around the site. The barrier should be based on the materials involved and the implications of the dust or odor escaping from the site
 - Locate pollution sources to favorable locations regarding air quality. Depending on the weather conditions, ventilate using 100% outside air to exhaust contaminated air directly to the outside during installation of VOC emitting materials.

Housekeeping

Recommended Best Practices: Control dust with wetting agents or sweeping compounds and use efficient dust collection methods

- Increase the cleaning frequency for dust
- Porous building materials should be protected from exposure to moisture and stored in a clean area prior to installation.
- Keep all surfaces clean (including higher ledges and inside mechanical equipment)
- Remove spills or excessive applications of solvent containing products as soon as possible
- Keep site as dry as possible and remove accumulated water
- Use a HEPA filter in vacuums to prevent the aerolization of settled dust.

Scheduling: Sequence the installation of materials to avoid contamination of absorptive materials such as insulation, carpeting, and ceiling tile and gypsum wallboard. Protect stored on site or installed absorptive materials from moisture damage.

Recommended Best Practices: When working in an occupied building, schedule to ensure that construction activity and building occupancy do not overlap

- Upon completion of construction, replace all filtration media immediately prior to occupancy
- When using materials with a high pollution potential consider scheduling their installation during off hours to allow time for the materials to air out.

Post Construction: After construction ends a baseline indoor air quality testing procedure for the affected space in the building should be conducted. **Construction Waste Management Policy:**

Intent: The following policy will assist *Fenway Group* facility in: Identifying, reusing, salvaging, and recycling of job site waste with any construction undertaken:

- Recycling and waste management goals
- Developing a Construction Waste Management Plan
- Submitting a Construction Waste Management Report

It is recommended that *Fenway Group's* architect(s) and/or construction contractors incorporate the waste management policy in the project's documents and specifications. While all construction is handled by the Landlord, and we do not make final decisions we do work in concert with the Landlord regarding Best Practices.

Environmental Considerations:

Focus: It is recommended that construction projects minimize the creation of construction, deconstruction, and demolition waste to protect and restore natural habitat and resources. Factors that contribute to waste such as over packaging, improper storage, ordering errors, poor planning, breakage, mishandling, and contamination, shall be minimized. A waste management plan shall be developed to ensure that existing site and building materials are reused, salvaged, or recycled. Waste disposal in landfills shall be minimized.

If any waste materials encountered during the deconstruction/demolition or construction phase are found to contain lead, asbestos, polychlorinated biphenyls (PCBs, such as fluorescent lamp ballasts), or other hazardous substances, they are to be handled and removed in accordance with local, state, and federal laws and requirements concerning hazardous waste. These materials are excluded from the construction waste stream. Salvage and reuse any material, furniture and equipment identified as usable. A contractor construction Waste Management Plan must be submitted to *Fenway Group's* Landlord prior to and work engagements following the identification of such materials. Any such plan must include the types of materials identified and a tracking plan with a construction management report that includes specific materials, disposition, and receipts from approved recycling facilities.

Labor and Human Rights

Focus: *Fenway Group* policy is to protect and respect the basic human rights of our employees, associates, customers and all whom we meet daily. *Fenway Group* commits to providing decent work hours, wages, working conditions as well as upholding all local, state, federal, and global regulations prohibiting forced, compulsory, and child labor.

Diversity and Inclusion

Focus: *Fenway Group* is an equal opportunity employer that is dedicated to treating employees fairly; providing competitive wages, benefits, and good working conditions; maintaining a strong communication link between supervisor/manager and employees; and providing an attractive, challenging, safe and fun environment in which to work. Employment and promotion decisions will be factored by qualifications of an individual and without regard to personal characteristics, including race, color, religion, national origin, sex, sexual orientation, age, veteran status, disability, or any other basis protected by federal, state, or local fair employment practice laws. The *Fenway Group's* Equal



Employment Opportunity Policy is an essential part of the company's overall commitment to attract, hire and develop a strong, talented, and diverse work force. The selection of subcontractors is based on the best qualified subcontractors and their employment practices to ensure a mutual diverse and inclusive workforce. *Fenway Group* supports the inclusion of minority and women owned businesses in its selection of subcontracting and we work to grow this segment of our business.

Health & Safety

Focus: *Fenway Group* is committed to continually improve its performance through an effective safety management program that is OSHA compliant. *Fenway Group* will continue to comply with all health and safety regulatory requirements to maintain a safe workplace. In fulfilling this commitment, *Fenway Group* will continue to strive to eliminate any actual or potential safety threats to our employees and the company's wellbeing. Risk assessments, related to specific job functions, are conducted annually to identify potential job hazards and those who might be at risk. *Fenway Group* will continue to conduct periodic risk assessments, issue written reports, with revised safety procedures as indicated to ensure acceptable health guidelines are in place, safety procedures are current, with the welfare of all employees remaining paramount in conducting our business. Safety rules continue to be strictly enforced to ensure employees are safe and secure. *Fenway Group* management continues to provide information, instruction, training, and supervision that is necessary to ensure that each worker is safe from injury and risks to their health. This policy includes a commitment to consult and cooperate with workers in all matters relating to health and safety management at *Fenway Group*, such as:

1. **Healthy Environment – No Smoking Policy:**

Focus: It is the goal of *Fenway Group* to promote a smoke free and healthy working environment. It ensures that no employee is exposed to secondhand smoke and reduces the risk of fire.

2. **Guiding Principles:** To promote the well-being and health of *Fenway Group* employees

- To communicate a positive and responsible corporate image
- To demonstrate that the health and safety of employees is paramount.

3. **Directives:** The smoking of any substances and products including but not limited to tobacco while inside the building is prohibited. Any smoking outside of the building must be done at designated sites.

4. **Communication:** It is a company policy that we are a "non-smoking company." All job advertisements, job descriptions and job offer letters refer to this policy. Reference to this policy is included in the hiring paperwork for all new employees.

5. **Enforcement:** Management is responsible for ensuring that the policy is applied consistently. Management is responsible for enforcing the policy ranging from courteous reminders through disciplinary action if needed.

Note: While *Fenway Group* sustainability policy details an overarching program under standard working operations such procedures will remain in place, as best as possible, during special situations where personnel are operating from remote domicile facilities, as with COVID-19.

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