



TFIC GROUP COMPANIES – DIVERSITY, EQUITY AND INCLUSION POLICY

The Diversity, Equity and Inclusion (“DEI”) Policy of Treadwell Franklin Infrastructure Capital LLC (“TFIC”) extends to all wholly and partially owned operating company subsidiaries of TFIC (the “TFIC Group Companies”), including TFIC, James W. Sewall Company (“Sewall”), Infraspect™, and Frazier Signal Technologies.



DEI Mission

TFIC Group Companies are dedicated to promotion of workplace diversity and the principles and practices outlined herein.

The commitment of TFIC Group Companies goes far beyond the mere recognition of all types of diversity and a pledge to embrace and respect diversity through fair, equitable treatment and fostering an inclusive working environment. It goes well beyond compliance with EEOC and similar guidelines.

TFIC Group Companies’ commitment is one to actively promote, and pursue ways to celebrate and engender greater diversity of culture, race, religion, age, gender, sexual orientation, and physical and mental ability. Our companies’ determination to further diversity derives from an innate knowledge that a multi-dimensional workforce that reflects the population at large, results in a healthier and sustainable work environment and one that succeeds, empowered by inclusion – body, mind and spirit.

And our commitment to promotion of diversity does not end with our own workforce, but extends also to our customers and clients, vendors and subcontractors, regulators, consultants, and the wider community in which we work.

Recognizing the part of the country in which we work and where we spend most of our time, and recognizing the demographics of the region, TFIC and TFIC Group Companies are especially aware of the importance and value of the active adherence and pursuit of a diverse community.

The principles and guidelines herein are formulated in that spirit and with that mission.

All-employee Mandate

Each employee of TFIC Group Companies is responsible for the adherence and promotion of the DEI Policy and the DEI Mission. Employees are responsible generally for their behaviors relative to the DEI Policy, and in particular each employee is responsible for (i) the conscious and intentional actions toward equitable treatment and inclusion, (ii) creating and maintaining a workplace where harassment and discrimination are not permitted or tolerated, (iii) ensuring speech, actions and behaviors, including patterns of behaviors that respect the equality and dignity of all

diverse peoples, and (iv) building and internalizing awareness of bias and prejudices, conscious or unconscious, and moving to eliminate behaviors or actions that impede the DEI Mission.

Management / Leadership Mandate

Management and leadership are responsible, first, for ensuring all staff comply with, support and promote the diversity, equity and inclusion principles in the DEI Policy. This is the first priority of managers, and the key to ensuring the DEI Mission is successful.

Management and leadership are also responsible with regard to their own actions and activities, to ensure adherence to the DEI Policy, including:

1. Addressing workplace behaviors inconsistent with the DEI Policy, EEOC guidelines or compliance with any employment law, TFIC Group Company policies, work rules or practices.
2. Enact hiring/recruiting related activities and all employment related decisions and methods are non-biased, non-discriminatory, and supportive of the DEI Mission.
3. Demonstrate visible support for staff practicing DEI Policy compliant behaviors.
4. Emphasizing hiring and management practices that embrace and include the widest, most diverse population.
5. Enforcing DEI Policy, and any other employment law or rule infractions, through reporting to Human Resources, as the DEI Policy responsible party, or to TFIC Group Company principals, as appropriate.

Most importantly, Management must demonstrate its support of the DEI Policy and DEI Mission by modeling and practicing the principles engendered therein. No DEI Mission can succeed unless it is first internalized and propagated by leadership.

Zero Tolerance

TFIC Group Companies will not tolerate workplace harassment, discrimination, bullying, bias, hate-speech, or similar actions contrary to the DEI Policy, in any form. TFIC Group Companies base hiring and employment decisions on merit, qualifications, achievement, skills, performance and capabilities, without regard to age, race, culture, gender, sexual orientation, physical disability, or any other status or condition not directly related to or impactful on an employee's ability to perform his/her/their function.

Any activities by any employee that is inconsistent with the DEI Policy or contrary to the DEI Mission must be reported to Human Resources, as the DEI Policy responsible party, or to TFIC Group Companies principals, as appropriate.

Reporting; Retaliation; Consequences.

If an employee believes that they or another individual, whether that person is an employee or a member of the wider community, has been subjected to conduct prohibited by the DEI Policy, the employee is urged and expected to report the relevant facts promptly to Human Resources, as the DEI Policy responsible party, or to TFIC Group Companies principals, as appropriate.

No threats or acts of retaliation of any kind against any individuals reporting conduct they reasonably believe to violate the DEI Policy, will be tolerated by TFIC Group Companies.

Employees who do not comply with this DEI Policy or are found to have engaged in conduct inconsistent with the DEI Policy will be subject to disciplinary action.

DEI Policy Matters

Nothing in this policy is intended to be inconsistent with, or to controvert the laws or regulations of the EEOC or any other federal, state, or local law or statute. In the case that this policy or any element hereof is deemed to be inconsistent with or in conflict with any such law or statute, the relevant law or statute will prevail.

TFIC Group Companies retain the right to alter, amend, suspend, or terminate this policy as necessary, and in accordance with local law. The DEI Policy does not create any contractual rights or obligations, whether expressed or implied.

Subject to local law, the English-language version of this DEI Policy will prevail.

