2021 Performance

2022 Environmental Social, and Governance (ESG) Report

9/30/2022
A Message From Our Chief Executive Officer

Environmental, Social and Governance (ESG) are the three pillars of performance by which our business impact on society, and its effect on environmental sustainability, can be evaluated. Our business works within the ESG principles to build the most value for the company financially, socially, environmentally, and to earn the trust of our customers and each other. The ESG Program focuses on the following:

**ESG**

**Environment**
- Impact on Climate /Emissions
- Sustainability
- Energy Efficiency
- Air and water pollution
- Waste management
- Biodiversity and habitat protection

**Social**
- Human Rights
- Community Impact
- Employee relations
- Diversity & Inclusion
- Anti-Discrimination
- Health and safety
- Child and forced labor

**Governance**
- Alignment of interests between owners, executives & employees
- Purposes & Principles
- Code of Conduct
- Compliance
- Anti-corruption measures
- Data Protection
- Anti-corruption measures

Belcan’s ESG report details our strategy and performance in each area and provides several examples of how our company is weaving the principles of ESG into all layers of the business. The document is available to the public and all stakeholders – especially our valued employees.

Using performance data and input from stakeholders, we will continue to improve the ESG Program, striving to have a positive impact within the business, community, and the environment.

Feel free to share your ideas for how we can do better by emailing esg@belcan.com.

**Lance Kwasniewski**
Chief Executive Officer
Our Purpose & Principles

Earning trust is at the core of Belcan’s identity as a company. We aim to build trust with everyone we come in contact with, earning a reputation as the world’s most trusted services partner. Trust begins with a clear purpose statement driving our everyday behaviors throughout Belcan – Engineering Better Outcomes.

Engineering Better Outcomes.

- **Engineering** is an expression of our DNA and reflects our skillful ability to problem solve and deliver on commitments made in close collaboration with not just customers, but all Belcan stakeholders.

- **Better** is about continuous improvement of customer experience design and delivery through more innovative processes, tools, practices, and utilization of talent.

- **Outcomes** are expected by customers in the evolving global services market with our focus on delivering the highest value solutions. And all stakeholders deserve better outcomes from Belcan as well.

For over 60 years, Belcan has been a company with a conscience and a strong sense of obligation to the people we serve who depend on for our success. We believe we have a responsibility to make a positive impact for all our stakeholders.

Belcan’s Purpose and Principles are the foundation for Belcan’s customer value proposition, customer service approach, communications, training, and community relations. Our core principle is Earned Trust with three supporting principles: People First, Performance Driven, and Passion with Purpose.
Our Business

Belcan is a global supplier of design, software, manufacturing, supply chain, information technology, and digital engineering solutions to the aerospace, defense, space, government services, automotive, and industrial markets. Belcan engineers better outcomes for customers – from jet engines, airframe, and avionics to heavy vehicles, automobiles, and cybersecurity. Belcan takes a partnering approach to provide solutions that are adaptable, integrated, and value-added, and has been earning the trust of its customers for over 60 years.

Company Facts
- Founded in 1958
- Over 50 Locations Throughout North America, Europe, & India
- Over 10,000 Professionals
- Over 900 Active Customers
- Annual Revenue of ~$1B
- Adaptive & Agile Delivery Models
- Business Execution in Over 30 Countries
- Cincinnati, Ohio Headquarters

Global Delivery Network

Industry Expertise
- Aerospace
- Defense
- Space
- Marine
- Automotive
- Off-Highway
- Government
- Industrial

Product Engineering
- Design & Development
- Engineering Analysis
- Product Definition
- Sustaining & Aftermarket Centers

Software & Digital Engineering
- Software Development & Connectivity
- Digital Integration
- Secure Digital Technology
- Product & Systems Engineering

Manufacturing & Supply Chain
- Manufacturing & Quality Engineering
- Supply Chain Advisory
- Digital and OT Cyber

Resource & Workforce
- Engineering & IT Recruiting
- Construction Project Solutions
- MSP/VIMS/RPO

Government
- Cyber, Cloud & IT Modernization
- C5ISR & Mission
- Managed Services

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The Belcan Edge

**Solutions, Speed and Scalability drive The Belcan Edge.**
Quality outcomes you can count on every time.

<table>
<thead>
<tr>
<th>Solutions</th>
<th>Speed</th>
<th>Scalability</th>
</tr>
</thead>
<tbody>
<tr>
<td>Belcan takes an integrated, collaborative approach to provide innovative solutions across the full product life cycle, with an unrelenting focus on the highest quality outcomes.</td>
<td>Speed matters, and Belcan delivers. Our responsive professionals rapidly engage with clients in a velocity-driven environment where productivity is key.</td>
<td>Belcan’s experienced technical resources and agile processes adapt quickly to the changing customer requirements common in today’s fast-paced market, anticipating client needs and generating superior business outcomes.</td>
</tr>
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</table>
Customer Service
Belcan’s customer service philosophy is deeply rooted in our guiding principles. We are committed to earn and keep the trust of our customers through integrity, accountability, and respect:

- **Integrity** – Is doing the right thing all the time. We will comply with all regulatory requirements and always protect Belcan’s and our Customer’s intellectual property.
- **Accountability** – We take responsibility for our actions.
- **Respect** – We understand the Golden Rule of treating others as you would like to be treated and extend beyond it to the Platinum Rule—treat others as they would like to be treated.

The global pandemic continued to have an impact on the business in 2021, with much of our work being conducted remotely to ensure the health and safety of our employees, customers, and the community. Belcan’s IT infrastructure implemented at the start of the pandemic, paired with our effective operating system and the ingenuity of our employees, enabled us to maintain the business continuity essential to meet customer needs as they began to recover from the pandemic.

Quality Assurance
Belcan’s culture of quality begins with our Quality Management System (QMS). Belcan’s QMS includes delivery centers with certifications dating back over 25 years. Our system is mature and dynamic with the flexibility to adjust to customer needs while maintaining the necessary controls to consistently provide deliverables that meet and exceed customer requirements.

In accordance with the Belcan Quality Policy, Belcan is committed to continuously improving the effectiveness and efficiency of the QMS through our internal audit program, customer feedback process, lessons learned, and interested party input. As opportunities for improvement are identified, key stakeholders are gathered to define the problem, investigate potential causes, determine the root cause, propose mistake-proofed solutions, and ensure the effectiveness of the solutions. The activities related to this process are recorded and stored in Belcan’s Action System.
Belcan utilizes the QMS to successfully manage all projects – from first contact, to performing work, to completion of the final deliverable and customer feedback. A trained Project Manager is assigned to each work package to manage and ensure project success. Key quality objectives are to deliver projects on time, on budget, and with technical excellence. Controls are put in place throughout the project lifecycle to ensure deliverables meet the requirements of the applicable inputs, specifications, and contract. When applicable, this includes ensuring all inspections, tests, and calibrations are performed in accordance with Belcan’s production planning and manufacturing methods, as well as flowing down applicable requirements to sub-tier suppliers to ensure overall compliance with the subcontract.

Our mature QMS, combined with our culture of productivity improvement, creates substantial gains for the customer in efficiency and cost effectiveness. Belcan maintains several customer certifications and supporting registrations to several standards in the Engineering Solutions and Government Solutions business units. In 2021, 15 external audits were conducted by associated registrars and customers resulting in zero (0) major or minor nonconformances. We also received very positive comments from auditors on the effectiveness of our Quality Management System at all AS9100 locations.

**Voice of the Customer (VoC) Metrics**

Delivering exceptional customer service requires continuous monitoring of the customers’ perception of Belcan while seeking opportunities to deliver better outcomes both internally and externally. Customer feedback is collected periodically through various means. Collectively, the feedback helps determine what we are doing right, where improvement is needed, and what immediate and long-term actions are necessary to correct nonconformities.

**Technology Initiatives and Innovation**

Belcan employees work with customers to resolve some of the most challenging engineering and technology issues and deliver better outcomes through technology, engineering advancements, patents, software tools, development of standard work, etc. Our internal innovation culture has led to many customer awards, national industry awards, and individual employee awards.

We recognize that our employees are our most valued assets, with tremendous expertise and in-depth knowledge of our business and industries. Therefore, in 2021, a Great Ideas portal was launched to collect employees’ innovative ideas, both customer-related and internal. Rewards are given for implemented business ideas, and the program has seen great success.

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Environment

Risk Mitigation
Belcan’s operations are primarily conducted in an office space that is leased, therefore the facility environment is controlled by the property owner. However, we collaborate with the property owners to continuously improve the facility impact on the environment, when possible and where appropriate. In 2021, Belcan retained a third party to assist in gathering energy usage data from Belcan leases to monitor emissions usage at our leased facilities. It was determined that our primary emissions are related to fuel combustion (process and operation) and electricity. The 2021 metrics are shared below.

Emission Metrics
A third party calculated Belcan’s US Operations total annual [Scope 1 + Scope 2] greenhouse gas emissions equivalent to 997 metric-tons of CO2 per year. It was determined that 4% of the emissions are represented by Scope 1 emissions (39 mt CO2e), and 96% by Scope 2 emissions (957 mt CO2e), from the purchase of electricity for its operations. The Scope 1 emissions primarily consist of fuel combustion (combustion of natural gas accounts for all the Scope 1 emissions). No significant fugitive emissions or emissions from transportation were recorded. Outside of the US, our operations calculated their total annual [Scope 1 + Scope 2] greenhouse gas emissions equivalent to 202 metric-tons of CO2 per year. It was determined that 19% of the emissions are represented by Scope 1 emissions (38 mt CO2e), and 81% by Scope 2 emissions (202 mt CO2e), from the purchase of electricity/gas for its operations. With most of their operations working remotely in 2021, no significant fugitive or transportation emissions were recorded.

<table>
<thead>
<tr>
<th>Location</th>
<th>Scope 1 (mt CO2e/y)</th>
<th>Scope 2 (mt CO2e/y)</th>
<th>Scope 1+2 (mt CO2e/y)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Belcan US</td>
<td>39</td>
<td>967</td>
<td>997</td>
</tr>
<tr>
<td>Belcan International</td>
<td>38</td>
<td>164</td>
<td>202</td>
</tr>
</tbody>
</table>

Scope 1: On-site, direct GHG emissions; includes fossil fuel combustion (heating, cooling, HVAC), fleet fuel consumption, fugitive emissions (e.g., refrigerants).

- Belcan leases office space for all facilities and therefore emissions from fuel is not our direct responsibility.
- Belcan leases office space for all facilities and therefore emissions from bioenergy is not our direct responsibility.
- Belcan leases office space for all facilities and therefore emissions from refrigerants and other process gases with a GWP is not our direct responsibility.
- Belcan does not own or lease company vehicles.

Scope 2: Indirect emissions from the generation of purchased energy (e.g., electricity); relevant for tech companies that own data centers and use a large quantity of electricity.

- Belcan leases office space for all facilities; therefore, heat and steam are not our direct responsibility.
- Belcan consumes energy from the landlord’s equipment. Third-party services manage and pay our electricity bills.
- Belcan works with landlords to replace HVAC systems with high efficiency HVAC systems and install LED lights with heat sensing control systems to automatically turn on and off lights.
- Belcan consolidated operations into fewer facilities in 2021. This reduces commuting time between local offices and results in less electric and HVAC usage.
- Belcan does not own or lease company vehicles.

Scope 3: All other indirect emissions that occur in an organization’s value/supply chain; includes purchased materials, services, commuting or business travel, and/or emissions related to waste disposal.
Sustainable Facility Operations
Common practices in our facilities are:

- Using environmentally friendly cleaning products.
- Implementing chemical safety practices – storage, use, and disposal.
- Installing more efficient HVAC systems, when applicable. Controls on the HVAC system allow less use when the building is not occupied.
- Upgrading to LED lighting and implementing motion sensors to turn lights on and off.

Environment Initiatives
Other initiatives having a positive impact on the environment are:

- Implemented a hybrid work model, which reduces emissions related to commuting.
- Consolidated and closed several facilities.
- Recycling – robust recycling programs at all facilities.
- IT recycling – all computer equipment and peripherals.
- Teleconferencing in lieu of travel.
- Travel only for essential business, with manager approval. Use of collaboration tools for conferencing is encouraged.
- Reducing water use – restrooms are fitted with water saving fixtures, where practicable.
- Filtered water bottle refilling stations to reduce use of plastic bottles.
- Conserving energy – powering off computers, placing printers/copiers on standby mode, reducing lighting in areas not occupied.
- Purchasing eco-friendly supplies.
Social

Our Employees
The global pandemic continued to have a significant impact on our employee base both professionally and personally. Their diverse backgrounds, resilience, and ideas for working differently inspired our business to implement a hybrid work environment. Additionally, they worked tirelessly to penetrate new markets while maintaining high customer satisfaction within existing customers. Their dedication to their profession, engineering better outcomes, and ensuring Belcan’s success, has resulted in new work in emerging markets. As long-term customers recover from the pandemic, they are turning to us as a preferred supplier to meet their resource demands.

One of Belcan’s guiding principles is “People First,” and we are proud to have celebrated the many successes of our team members, presenting over 1500 ‘Wings of Success Awards’ to our employees in 2021 in recognition of their outstanding commitment to excellence. Customers also recognized employees for their excellence in project execution. For example, three Belcan team members received a 2021 Customer Leadership Award for their efforts related to Digital Transformation & Digital Technology (DT) tools and streamlining various commercial aftermarket maintenance, repair, and overhaul (MRO) activities. DT tools are used by 35+ engine centers and 32 airlines with more than 1,500 users.
**Learning & Development**
Belcan supports employee learning and development on the first day of employment and throughout their career at Belcan, including orientation, technical, leadership, and skills training. Mentoring, external training, and tuition reimbursement are also available.

Employees with Belcan network credentials have access to Belcan University, our e-learning portal that includes required training for all employees, along with a library of optional, self-paced, e-learning courses, digital books, audio books, and videos to enhance their skills. Employees located in states that require Harassment Prevention Training also have access to the applicable content within Belcan University.

Compliance training continued to be a primary focus to ensure adherence to policies and procedures, export control requirements, customer-specific requirements, and state requirements. In addition, many employees undergo training to support their professional development by taking advantage of the content available in Belcan University at their own pace.

Human Resources is focused on ensuring an effective learning curve for new hires and providing new manager training for recent promotions. Additionally, the Quality organization within each business unit ensures employees and managers are trained on quality assurance processes applicable to the work they perform. Lastly, managers establish training paths and coaching for their direct reports to equip employees with the tools and knowledge needed to succeed.

**The Apprentice Program**
Belcan’s Apprentice Program provides a career path for candidates who are seeking alternatives to college, or for those interested in a career change without any formal training in the area the apprenticeship is geared toward. The program provides mentorship and guidance as the apprentice learns the basic skills in a technical area. This program has been instrumental in developing talented and dedicated employees, many of whom would not otherwise have the opportunity to change careers or gain the training required to attain an entry-level position within the field of interest.

**Employee Communication Engagement**
Belcan’s philosophy on employee engagement is to provide consistent, accurate, and timely information in both emergency and non-emergency situations that best serves the company’s mission, goals, reputation, and image. Communication methods include town halls, newsletters, intranet, surveys, emails, etc. In 2021, we launched a new intranet called Belcan Connecting Communities. Using extensive input gathered from across the business, the team created a modern, user-friendly, collaborative site that greatly enhances company-wide communication and the overall employee experience. New tools allow for increased interaction and correspondence amongst the entire Belcan team to spark engagement, innovation, and enjoyment.

Within the intranet, employees can post a story, obtain key documents, and access business tools. They can also communicate directly through the Contact Us feature, which includes the Belcan Hotline for anonymous reporting. Employees are also invited to participate in other forms of communication.

**Employee Satisfaction**
For the past several years, in alignment with our principle of People First, we have solicited feedback from our employees through an annual company-wide employee survey. The data gathered from our passionate employees has led the company to make advancements in the areas of recognition opportunities, professional development opportunities, promotion opportunities, career ladders, succession planning, etc.
Employee Health & Safety
Belcan is committed to maintaining a healthy, safe, injury-free, and illness-free workplace. This includes complying with all applicable health and safety regulations; establishing policies, procedures, and training to minimize risk; providing an avenue for employees to report concerns and/or incidents; analyzing incident data to identify systematic improvements to our Health and Safety Program; and continuing to assess the impact of our operations on our employee’s health and safety.

A global Environmental, Health & Safety (EHS) Committee was formed in mid-2020 to provide a renewed focus on EHS. Along with local operational EHS representatives, they aim to:

- Maintain current EHS policies, procedures, and training
- Increase employee awareness of the EHS Program throughout the organization
- Help prevent accidents/illnesses/injuries
- Meet requirements of environmental and occupational health (laws and regulations)
- Continually improve Belcan’s EHS program

In 2021, the EHS Committee completed the following actions:

- Reviewed and updated several EHS policies and procedures
- Formalized the EHS Training Matrix and established EHS training for all new hires
- Formalized the EHS Incident Investigation Procedure
- Established EHS Performance Tracking Metrics
- Supported the launch of the Belcan Hotline on the company intranet, which enables employees to report health and safety concerns anonymously

Employee Access to Benefits
Benefit enrollment details are provided to employees during their first week of employment and annually during the annual benefit enrollment period. Employee benefits to support their well-being include health care, wellness program, assistance program, flexible schedule, hybrid work arrangements, retirement savings, etc.

Diversity & Inclusion
Diversity and Inclusion are fundamental to the success of our company because innovation requires breakthrough ideas that can only be obtained from a diverse workforce empowered to challenge conventional thinking.

Belcan’s Diversity Philosophy is to build an inclusive work environment to attract and retain talented people, encourage innovation, and inspire top performance from employees to achieve superior business results by putting people first.

- Belcan is an Equal Employment Opportunity/Affirmative Action Employer who extends employment opportunities based on individual merit and qualifications.
- Belcan is committed to the practice of Equal Employment to ensure that all employees are recruited, hired, selected for training, transferred, promoted, granted privileges of employment, laid off, demoted, or discharged without regard to their race, color, religion, sex, disability, national origin, age, genetic information, or any other protected status covered by U.S. federal, state, or host nation laws.
- Belcan has a written Affirmative Action Plan and will make a conscious effort to provide special programs designed to recruit, hire, and ensure the upward mobility of qualified minority group members, women, disabled individuals, and veterans.

It is the policy of Belcan not to discriminate against any employee or applicant for employment because of race, color, religion, sex, gender identity or sexual orientation, national origin, age, marital status, genetic information, disability, or because he or she is a protected veteran. It is also the policy of Belcan to take affirmative action to employ and to advance in employment, all persons regardless of race, color, religion, sex, gender identity or sexual orientation, national origin, age, marital status, genetic information, disability, or protected veteran status, and to base all employment decisions only on valid job requirements. This policy shall apply to all employment actions, including but not limited to recruitment, hiring, upgrading, promotion, transfer, demotion, layoff, recall, termination, rates of pay or other forms of compensation and selection for training, including apprenticeship, at all levels of employment.
Belcan is committed to the principles of Affirmative Action and Equal Employment Opportunity. To ensure dissemination and implementation of Equal Employment Opportunity and affirmative action throughout all levels of the company, Belcan has established and maintains an internal audit and reporting system to allow for effective measurement of Belcan’s programs. In furtherance of the company’s policy regarding Affirmative Action and Equal Employment Opportunity, Belcan has developed a written Affirmative Action Program which sets forth the policies, practices, and procedures to ensure that the company’s policy of nondiscrimination and affirmative action is accomplished.

Belcan makes its equal employment opportunity policy known internally by:

- Posting federal and state non-discrimination posters as well as Belcan’s policy statement in locations in all facilities where notices to employees and applicants for employment are customarily placed and on Belcan intranet/employee sites.
- Including the policy in management handbooks and supervisory manuals.
- Explaining the policy thoroughly in new employee orientation and management training programs.
- Conducting periodic meetings with executive, management, and supervisory personnel to explain the intent of the policy, SVP & General Counsel’s commitment, and individual responsibilities for effective implementation.
- Training management and other employees engaged in employment, placement, training and transfer or promotion processing in the applicable local, state, and federal equal employment opportunity laws, our Affirmative Action Program, and their individual responsibility in assisting Belcan to meet its equal opportunity objectives.

Belcan meets its commitment to diversity by analyzing all major job groups in its operation to ascertain whether incumbency of minority group persons and females is sufficient based on comparison with estimated availability. Belcan routinely self-evaluates its workforce taking into consideration such matters as human resource needs, available training, and the availability of females and minorities in the company’s recruiting area possessing the required skills.

Belcan also has an applicant tracking system to monitor and analyze the pool of diverse candidates applying for employment with Belcan. Belcan has established a plan to address any under-utilization of diverse employees.

We are committed to gender equality and pay. Human Resources regularly reviews and reports on gender pay and works to address any gaps that exist.

Diversity and inclusion training content is available on our global Belcan University portal. The content supports employee awareness and provides best practices for managers to build teams that support diversity and inclusion. The content is promoted periodically within Belcan University and on our global intranet.
Our Community

Belcan’s purpose is to Engineer Better Outcomes and this extends to the communities in which we live and work. We are proud to have participated in over 100 charitable and community relations activities, improving our communities in the following meaningful ways.

A2I Program
Belcan partners with universities and industry-leading customers for the Academic to Industry (A2I) program, which creates opportunities for students including real-world application of learning, on-the-job training / mentorship by subject matter experts, and proactive relationship development. The A2I program was launched in 2019, partnering with a defense, space, and security OEM to pilot the program.

Unlike the traditional summer internship and co-op programs, Belcan structures teams of three to four A2I students selected from universities based on background and experience, and teams them with senior Belcan technical lead engineers. After an initial week of Belcan-related training, the teams are assigned to work simple-to-medium complexity tasks which are needed by the customer. The Belcan senior technical leads serve as both mentors and focal points supporting the teams in their activities and providing one-on-one mentoring.

University Relations Program
The University Relations Program engages universities and students prior to graduation in the journey to boost students’ learning and development. The program develops and expands relationships with local universities from which we hire the most employees, including both co-ops and graduates. Effective relationships lead to increased familiarity with Belcan among the university student body, improving both the quantity and quality of new graduate candidates.

In 2021, the pandemic prevented in-person career fairs. Our focus in 2022 will be to formally document event engagements and corresponding outcomes.

K-12 STEM Program
Belcan’s core community relations focus is to promote the study of Science, Technology, Engineering, and Math (STEM) to help shape and empower the next generation of scientific problem solvers. STEM outreach exposes students to the wonders of technology and the breadth of career options available. Belcan’s STEM program provides an opportunity to introduce Belcan’s mission, provide role models, and encourage STEM paths to help expand the future talent pipeline. By sharing our collective knowledge and experience, we demonstrate Belcan’s guiding principles of People First and Passion with Purpose.

Focused on the K-12 levels, Belcan’s STEM program can broaden students’ exposure to STEM fields and enhance diversity. STEM volunteer involvement (as individuals or groups) nurtures Belcan’s pride and supports our engaging culture.

2021 Spotlight on STEM Initiatives:
One prong of our STEM support involves FIRST (For Inspiration and Recognition of Science and Technology) robotics teams and competitions. Belcan employees at our West Palm Beach (WPB) location have been volunteering with local area teams for over 20 years, supporting teams such as FIRST Robotics Competition teams 179, The Swamp Thing (Riviera Beach), 180, S.P.A.M. (Stuart) and 1523, M.A.R.S. (Jupiter). The WPB office has also provided financial donations directly to the FIRST organization for sponsorship of South Florida FIRST Robotics Competition and LEGO League regional events. Several other Belcan offices also support FIRST Lego and Robotics.

Many local science museums held annual engineering/STEM Day for kids. The Belcan team in Peoria, IL and several other locations often participate with a booth sponsoring a STEM activity.
Belcan Cyber Academy
Belcan has a long and rich history of investing in the development of technical talent in our communities. This legacy, in combination with our advanced technology initiatives, has given rise to a program that provides a much-needed talent source for the growing cyber demand. Belcan founded the Belcan Cyber Academy in 2018, which brings Cyber Security and IT certifications to high school students in the Cincinnati area. This is a three-year program beginning sophomore year with foundational coursework focused on information and cyber security. The program was launched at Robert A. Taft Information Technology High School, a Title I funded school. Belcan’s goal with the Cyber Academy is that all students, no matter where they live, have a pathway to the three “E’s” – Employment, Enrollment, or Enlistment. Belcan expanded the program to include the Lakota Local School District in 2019.

Charitable Organizations
Belcan’s purpose is to Engineer Better Outcomes and this expands to the communities in which we live and work. We are proud to have participated in over 100 charitable and community relations activities, improving our communities in meaningful ways. We empower and encourage our employees to engage in our communities by actively volunteering.

Employees raised money for several charities in 2021, including the Forgotten Soldiers, Special Olympics, Ronald McDonald House, St. Jude, Let’s Fly Away – Teen Challenge, and Cincinnati Area Schools – School Supplies.

Employees led multiple community support, food, clothing, and toy drives with participation on a voluntary basis. 2021 examples of local drives include:

- Garden Door Ministry clothing and food drive – full bags of clothes and food
- James Lane Allen elementary school supply fundraiser - collected tissues, crayons, stickers, craft supplies, playground balls, individually wrapped snacks, etc.
- Pajama Program – 152 pairs of pajamas and 187 books
- Local Phoenix Food Bank, Peanut Butter & Jelly – 174 pounds of food
- Noah’s Ark, Pet Supply Drive – collected toys, food, newspaper for the pet center
- Ronald McDonald Charities – 10 pounds 4.2 ounces; employees bringing in pop tabs
- Toys for Tots – 10+ gifts
- Project Santa – both engineering and supply chain supported 3 families for a total of 8 children for their Christmas holiday
- Paint Your Heart Out – handed out gallons of paint, painted houses
- Blood Drives – donated 27 units of blood
In 2021, Belcan established formal ESG Steering Groups to oversee our reporting requirements and ESG Program initiatives. They are tasked with formally documenting, continually improving, and reporting progress and ESG Program performance to the Executive Sponsors. The Steering Groups meet on a regular basis. Senior leadership maintains regular dialogue with our owners through formal Board meetings, ad hoc meetings, and calls.

Prior to documenting the Belcan ESG Program, it was important to understand how our business aligns to the ESG principles. Two surveys were completed for AE Industrial Partners, LP (Belcan’s owners) and we contracted with an outside, third party ESG consultant to evaluate our operations against ESG requirements. The survey results gave us the insight needed to clearly understand what we have in place and what process improvements are needed to better implement a robust ESG Program.

The Belcan Environmental, Social and Governance (ESG) Policy outlines the ESG standards that Belcan strives to meet. The policy can be found on the Belcan Intranet under Resources, within the Compliance Document Library. Belcan operations around the world have access to the policy.

Corporate Governance Policies
Our purpose and principals form the underlying basis for our corporate governance policies.

- Code of Conduct
- Anti-Corruption Policy
- Anti-Slavery and Human Trafficking Policy
- Complying with Antitrust Laws
- Conflict of Interest
- Whistleblower Policy
- Anti-Harassment Policy
- Environmental, Social, and Governance Policy

Anonymous Reporting
Belcan has several avenues whereby employees may report real or perceived instances of misconduct anonymously:

- Belcan Hotline – Available to all employees through the company intranet to report whistleblower concerns, harassment complaints, and safety concerns.
- Belcan’s Government Solutions security officer promotes the DOD Defense Hotline telephone number on all email communications to employees.
Cybersecurity and Risk Management
Belcan is socially conscious of the need to protect the confidentiality and integrity of data for the customers and individuals. Our cyber strategy includes the development of a cohesive and globally spread internal cyber program using the latest and advanced security toolset. Belcan continues to emphasize and invest in technologies and processes to protect ourselves and our clients from potential breaches and cyber vulnerabilities. Working within the government space and being entrusted with critical sensitive information, Belcan ensures adequate cyber and security practices are being followed across the enterprise with a qualified and dedicated team of cybersecurity personnel led by the Chief Security & Data Officer. This team ensures all cyber security and privacy regulations required to run the business are being considered globally.

Belcan’s cyber program is robust and has all aspects needed to protect confidential and sensitive information such as Information Security and Privacy Policies, Threat protection and vulnerability management, incident response, data backup, continuous monitoring of the effectiveness of controls within the organization.

Belcan employees receive robust training that includes Security Awareness Training, Phishing Training, Simulation and Reinforcement Education, Controlled Unclassified Information Overview and Labeling Training, Insider Threat Training and Export Control Training.

The Belcan Leadership is well entrenched in cybersecurity efforts and risk management. There is ongoing assessment of the risk appetite globally with a regular cadence of meetings to determine any exposure to the organization. Risks identified are prioritized and addressed to ensure the improvements are made to the cyber posture of the organization. The Technology group at Belcan and the data governance group oversee the risks as it relates to IT.

Belcan’s efforts for cyber risk management incorporate frameworks like the global ISO 27001, European Union General Data Protection Regulation (GDPR) and the US NIST series and Cybersecurity Maturity Model Certification (CMMC). Belcan was an early adopter of NIST 800-171 and DFARS 252.204-7012 compliance regulation technology and capability requirements. Belcan has achieved Cyber Essentials certification in all UK locations. UK systems performing government work require and adhere to HMG standards 1 & 2. NISPOM requirements are applied and in effect for all classified areas within Belcan. Belcan can adhere to any additional customer security requirements, as required. Periodic third-party assessments are conducted to ensure our security controls are validated, continuity of operations is tested and policy, and procedures are reviewed.

Data Protection
Belcan continues to make significant investments to ensure Intellectual Property (IP) and private information receives the industry’s best level of protection. Cyber Security and IP Protection are core competencies within Belcan. Belcan has a team of dedicated, highly skilled, IP protection analysts responsible for 24/7/365 monitoring of Global IT cyber theft threats. Belcan employs the very best cyber mitigation technique Subject Matter Experts in the industry, that are solely focused on proactive avoidance of IP leakage and cyber threat breaches.

Belcan deploys and operates a combination of best-in-class cyber and IP protection technology tools and exclusive custom-developed platforms to form a formidable barrier preventing IP leakage. Belcan has invested millions of dollars and hours over the past 5 years to ensure we are keeping pace with new and highly sophisticated global IP theft threats. A combination of artificial intelligence, analytics, and human intellect / insight is used to ensure we maintain a proactive capability posture, as well as behavioral analytics to eliminate the threat of IP leakage.
Supply Chain Management

Belcan does not provide services, nor conducts manufacturing or production operations that results in increased risk to the environment. We engage suppliers to support internal business needs and necessary customer requirements. We expect our supply chain to:

- Conduct business ethically and with integrity
- Uphold internationally recognized human and employment rights of workers and treat their employees with dignity and respect
- Maintain a healthy and safe work environment
- Operate in an environmentally responsible and sustainable manner to minimize their impact on the environment
- Maintain business continuity and compliance
- Facilitate continuous improvement

As of 2021, a formal supplier sustainability program has not been developed due to the nature of our services business. However, we do collaborate with suppliers on sustainability efforts, such as purchasing office supplies made from recycled material and ensuring computer hardware and peripherals are recycled. Before we contract with suppliers, we evaluate them for alignment with our purpose and principles.

When engaging a new supplier as part of a customer contract, our Quality Management System requires the supplier to complete the Purchasing New Supplier Assessment Application, which includes questions and input related to ESG. Suppliers are evaluated and selected based on their demonstrated capabilities, as well as their alignment to our expectations and customer requirements.
CONCLUSION
At Belcan, ESG initiatives and activities are of utmost importance to build value for the company and all stakeholders, and to earn the trust of our customers and each other.

ABOUT BELCAN
Belcan is a global supplier of design, software, manufacturing, supply chain, information technology, and digital engineering solutions to the aerospace, defense, space, government services, automotive, and industrial markets. Belcan engineers better outcomes for customers—from jet engines, airframe, and avionics to heavy vehicles, automobiles, and cybersecurity. Belcan takes a partnering approach to provide solutions that are adaptable, integrated, and value-added, and has been earning the trust of its customers for over 60 years. For more information, please visit www.belcan.com.