Climate-Related Financial Risk Disclosure

Pursuant to California Senate Bill 261

1. GOVERNANCE

Describe your organization's governance structure, if any, for identifying, assessing, and managing climate-related financial risks.

Truebeck is in the early stages of developing a more formal governance framework for identifying, assessing, and overseeing climate-related risks and opportunities. At present, climate-related considerations are addressed through existing management processes that support operational and financial performance, project delivery, workforce safety, and regulatory compliance. These processes also inform the Company's approach to strategy, risk management, and environmental performance metrics, as described in Sections 2 through 4 below. As climate-related regulatory requirements evolve, including California's SB 261, Truebeck anticipates enhancing the structure, documentation, and consistency of management-level oversight related to climate-related matters.

The Company's Executive Management Team ("EMT")—comprised of the Co-Founders, President, Chief Operating Officer, and Chief Financial Officer—serves as the primary governing body responsible for oversight of enterprise-level risks and strategic matters. The EMT meets weekly to review operational, financial, and compliance issues affecting the business. Climate-related risks and opportunities are not currently reviewed as standalone agenda items; however, they may be addressed as part of broader discussions related to regulatory compliance, project execution, safety, supply chain considerations, and market conditions. Through these discussions, the EMT indirectly oversees climate-related considerations that may affect project execution, workforce safety, compliance obligations, and longer-term market positioning, supporting management's evaluation of climate-related risks and opportunities within broader strategic and risk management processes.

Management responsibility for climate-related considerations is currently distributed across functional areas, including operations, preconstruction, safety, project management, and corporate services. These functions encounter climate-related factors

through routine activities such as jobsite safety planning, scheduling and logistics coordination, assessment of site-specific conditions, and evaluation of subcontractor and supplier performance. While these activities are not organized under a formal climate governance program, they provide a practical, operations-based mechanism for identifying climate-related risks at the project level and serve as an initial foundation for broader enterprise-level consideration.

As climate-related disclosure requirements and stakeholder expectations continue to evolve, Truebeck anticipates assessing options to further define management roles, accountability, and internal reporting processes related to climate-related risks and opportunities. Over time, the Company expects to explore scalable and proportionate processes to support periodic review of climate-related considerations, internal coordination, and ESG-related compliance and reporting.

2. STRATEGY

Describe the actual and potential impacts of climate-related risks and opportunities on the company's operations, strategy and financial planning (where material).

As described in the Governance section, Truebeck's Executive Management Team oversees enterprise-level risks and strategic considerations through existing management processes. Within this context, the Company recognizes that climate-related risks and opportunities have the potential to affect construction operations, workforce safety, supply chains, financial performance, and long-term market conditions.

For purposes of evaluating climate-related risks and opportunities, Truebeck currently defines short-term risks as those that may emerge over the next one to two years, medium-term risks as those that may develop over a three- to five-year horizon, and long-term risks as those that may materialize beyond five years. These time horizons are used consistently across strategic planning and risk management discussions and may be refined over time as regulatory guidance and internal capabilities evolve.

Over the short and medium term, physical climate-related risks may increasingly affect project execution and operational continuity. These risks may include extreme heat, wildfire

smoke, flooding, drought, and severe storm events, which have the potential to impact jobsite safety, construction schedules, temporary infrastructure, and material logistics. These considerations are addressed through existing safety, operational, and project management practices, which also serve as the Company's primary mechanism for identifying and managing climate-related risks, as described in the Risk Management section. Where physical climate-related risks are identified as potentially material, Truebeck anticipates further evaluating their potential financial impacts, including effects on project costs, timelines, and overall project viability, and incorporating those considerations into broader strategic planning and investment decision-making processes.

Over the medium and longer term, transition-related risks may emerge as climate regulation, building codes, and market expectations continue to evolve. These risks may include increased emissions reporting expectations for contractors, changes to energy efficiency and electrification requirements, rising demand for low-carbon construction materials, and potential shifts in insurance availability, pricing, or financing criteria related to climate exposure. While these developments may introduce new compliance and cost considerations, they may also create opportunities for firms with experience delivering complex, sustainable, and climate-resilient construction projects.

Truebeck has developed experience in sustainable construction practices, including mass timber construction, prefabrication, all-electric building systems, smart façade technologies, and the evaluation of lower-carbon materials. Although these practices are not currently part of a formal climate strategy, management recognizes that growing demand for energy-efficient, low-carbon, and climate-resilient buildings may present longer-term business opportunities. Management's consideration of these opportunities is informed by EMT-level discussions regarding market trends, client demand, regulatory developments, and the Company's existing technical capabilities.

Truebeck has not conducted formal climate scenario analysis, and climate-related scenario planning is not currently integrated into enterprise-level risk or strategic planning. In future reporting cycles, the Company expects to evaluate whether qualitative or quantitative scenario analysis may be feasible and relevant, taking into account evolving regulatory guidance, industry practices, and internal data availability. Such assessments, if

undertaken, may focus on potential long-term impacts to labor safety, material availability, project scheduling, and operational continuity under a range of plausible climate conditions.

2. RISK MANAGEMENT

Describe how the reporting entity identifies, assesses, and manages climate-related risks including a description of:

- ***The process the reporting entity uses for identifying, managing and assessing climate-related risks, and how those considerations and processes are integrated into the organization's overall risk management.***
- ***Frequency of review and escalation processes.***
- ***Criteria used to evaluate materiality and likelihood/impact***
- ***Strategies for mitigating identified risks***
- ***Climate risk integration with broader Enterprise Risk Management (ERM) framework***

As described in the Governance and Strategy sections, Truebeck does not currently maintain a standalone process dedicated specifically to climate-related risk identification and assessment. However, climate-related factors are considered through existing risk management activities embedded in construction safety, project scheduling, site condition assessments, temporary utilities planning, and supply chain coordination.

Climate-related risks are presently evaluated qualitatively and in the context of broader operational and project-level risks. In assessing potential relevance, management considers factors such as the likelihood of occurrence, potential impacts on worker safety, project schedules, costs, regulatory compliance, and business continuity, as well as the materiality of those impacts to overall operations. Climate-related considerations that arise during project execution are addressed through established escalation pathways consistent with existing safety, operational, and project management protocols. Risks assessed as potentially significant may be elevated through management channels and

discussed with the Executive Management Team as part of broader operational and strategic reviews.

Truebeck's approach to climate-related risk management is currently integrated into existing enterprise risk management practices rather than treated as a standalone risk category. As climate-related disclosure requirements and market expectations continue to evolve, the Company anticipates evaluating how climate-related considerations may be more formally incorporated into its broader enterprise risk management framework, including appropriate review frequency, escalation criteria, and governance mechanisms.

While no formal climate-risk mitigation program has been established, Truebeck currently employs a number of operational practices that may support the management of climate-related risks. These include project-specific Sustainable Action Plans addressing waste diversion, dust control, temporary power, and environmental impact minimization; the use of renewable diesel at jobsites; evaluation of opportunities for electrified equipment; partial adoption of electric and hybrid vehicles within the corporate fleet; assessment of low-carbon and sustainable building systems through design-assist processes; and engagement with trade partners to evaluate innovative materials and construction methods. These practices also inform management's ongoing evaluation of potential environmental metrics and future reporting approaches, as described in the Metrics and Targets section.

3. METRICS AND TARGETS

Disclose the metrics and targets used to assess and manage relevant climate-related risks and opportunities adopted to reduce and adapt to climate-related risk, where such information is material (energy, water, waste, emissions, etc.)

As described in the Governance, Strategy, and Risk Management sections, Truebeck currently manages environmental impacts and climate-related considerations primarily through operational practices rather than through a formalized climate metrics and targets framework.

The Company has implemented a number of sustainability practices that support responsible resource management, including the use of 100 percent renewable diesel for

onsite fuel usage at jobsites, partial adoption of electric and hybrid vehicles within the corporate fleet, and consistent application of sustainable construction practices across its project portfolio. Truebeck's jobsites divert approximately 70 percent of construction waste from landfills, and the Company has delivered numerous projects certified under LEED, WELL, and Fitwel rating systems. In addition, Truebeck's offices are designed to LEED Gold standards.

Truebeck is evaluating whether and how to formalize these activities within a broader climate-related metrics framework. Potential areas of continued evaluation include fleet composition and fuel usage, waste diversion tracking for both corporate offices and project sites, energy consumption associated with temporary power and construction trailers, adoption of sustainable materials and building systems, and the feasibility of establishing a comprehensive greenhouse gas emissions baseline to support future climate-related risk assessment and reporting.

At this time, Truebeck has not adopted formal climate-related performance targets. Before establishing specific goals or timelines, the Company intends to further evaluate data availability, internal resource requirements, regulatory developments, and alignment with client expectations and industry practice. Truebeck actively monitors emerging guidance and regulatory initiatives relevant to climate-related disclosure, including those issued by the California Air Resources Board and frameworks aligned with the Task Force on Climate-related Financial Disclosures. Monitoring these external frameworks helps inform management's evolving approach to governance, risk management, and environmental reporting.