Oneida ESC Group, LLC

3rd Quarter Report – FY25

August 2025

OESC Board of Managers:

John L. Breuninger, Chairman

Jacquelyn Zalim

Leslie Wheelock

Oneida ESC Group, LLC (OESC), was formed in 2012 as a holding company to house subsidiaries to conduct business with the federal government, state and municipal governments and commercial and industrial customers throughout the world. OESC has nine (10) subsidiaries, Oneida Total Integrated Enterprises (OTIE), Mission Support Services (MS2), Oneida General Mechanical Corp (GMC), Sustainment and Restoration Services (SRS), Oneida Engineering Solutions (OES), Oneida Construction Services (OCS), Oneida Environmental (OE), Oneida LG2 Environmental (LG2), Oneida Professional Services (OPS), and 1822 Land and Development Company of Oneida (1822).

OESC's subsidiaries are supported by OESC with general management and administrative functions, including accounting and contracting management, human resource management, IT support, overall management, and marketing, bid and proposal. Below is a summary of OESC and its subsidiary's activities.

<u>Narrative Report</u>

a. Explanation of the core of the Corporation's business practices and market overview.

OESC's subsidiary limited liability companies focus on contracts issued by the government agencies, (federal, state, and local) and commercial customers for engineering, science (environmental) construction, professional services, and real estate development work. OESC's revenue is derived from the subsidiaries that operate in the full and open market as well as the Small Business Administration Business Development Markets primarily as 8(a), Small Business, and Disadvantage Business Enterprise designated companies when and where appropriate.

OESC and its subsidiaries are a highly technical organization providing research/Investigation, design, construction services, engineering, and project management. Oneida ESC Group operates in four core services:

- Environmental services – Assessment, investigation, design, testing, NEPA, biological, action planning, project management, and more.
- Construction– Repair, service, abatement, renovation, demolition, mechanical systems, electrical services, and new construction.
- Engineering Services – Design and project management for site and site design, mechanical, electrical, plumbing, civil, structural, transportation, survey, water / wastewater systems and storm water management.
- Professional Services - Provides diversified professional resources for training and education; research and engineering; and IT solutions.
- Real Estate Development – Commercial and light industrial tenants, Low Income Housing Tax Credit (LIHTC) multi-family housing.

Oneida Total Integrated Enterprises (OTIE) – Competes in the full and open marketplace as a small business (less than 1000 employees). Core competencies include environmental services, environmental remediation, engineering services and project management.

Mission Support Services (MS2) –Graduated from the US Small Business Administration on March 15, 2023. MS2 is focused on construction management. Core competencies include construction management services, new and renovated structures, HVAC systems and controls Utility systems - water, sewer, gas, electrical, electrical power generators, transformers, and distribution, Communication and security systems, interior remodeling, MS2 sells to the federal market, commercial and tribal markets.

Oneida Construction Services (OCS) - OCS is focused on construction management. Core competencies include construction management services, new and renovated structures. OCS has a small team of carpenters that are skilled in a variety of trades such as concrete, framing, roofing, siding, and finished carpentry. OCS sells to the federal market, commercial and tribal markets.

General Mechanical Corporation (GMC) – Operates mainly as an HVAC Contractor but has performed both General Contracting and Electrical Contracting in Eastern FL. GMC has been accepted into the SBA 8(a) Business development Program on November 2, 2022.

Sustainment & Restoration Services (SRS) – 8a Graduation date is February 18, 2024. SRS core competencies include facility investigations, corrective measures design/implementation, remedial designs/remedial actions, a ssessment, and environmental cleanup, wetland's assessment and wetlands restoration design, brownfields, phase I & II ESAs, asset inventory, evaluation, environmental engineering and design, and wastewater treatment and sewerage systems.

LG2 Environmental Services (LG2) - is a full-service environmental services company that provides a wide range of quality, responsive environmental services in southeastern US. LG2 experience and capabilities include archaeological and cultural resource assessments; natural resource assessment and management (wetlands, biological assessments, aquatic, and other biology), site contamination assessment and remediation, environmental compliance, NEPA documentation, for Federal, State, and Local government permitting projects.

Oneida Professional Services (OPS)- is a full spectrum professional services group providing a wide array of manpower solutions to government and commercial clients. Services include training and educational support services, a broad spectrum of specialized technical support for complex training environments and advanced learning for the Naval Postgraduate School, master's and PhD-level engineers and research scientists. OPS also provides manpower needs for software engineering services.

Oneida Engineering Solutions (OES) – OES focuses on performing transportation engineering services for governmental agencies (Federal, State and Local). OES provides engineering for urban/rural roadways, interstate highways, interchanges, capacity expansions, bridges, roundabouts, local streets, and parking lots. OES is certified as a Disadvantage Business Enterprise in the State of Wisconsin.

Oneida Environmental (OE) - provides archaeological and cultural resource assessments; natural resource assessment and management (wetlands, biological assessments, aquatic, and other biology), NEPA documentation for Federal, State, and Local government permitting projects.

Oneida Technology Services (OTS) - Provides a variety of information technology and cyber solutions across highly complex, highly regulated, and highly secure environments to Government and commercial customers. OTS deliver secure, mission-focused solutions for our customer's digital objectives. We provide resilient enterprise IT solutions and managed services that leverage a full spectrum of IT solutions.

1822 Land and Development Company of Oneida (1822) – 1822 is a real estate holding company that owns, leases and sub-lease various real estate holdings in and around the Oneida Nation Reservation. The overall goal is to grow the portfolio that meets the needs of the Oneida Nation and Northeastern WI.

b. Explanation of the Corporation's current place within the market

OESC operates in a fiercely competitive and expanding market. An abundance of Architecture / Engineering / Construction (AEC) firms that provide similar services to those offered by OESC. Competitive factors for our success include performance, reputation, network, price, geographic location, and availability of technically skilled personnel.

Three of the top five federal spending agencies awarding non-competitive contracts are OESC customers.

c. Explanation of the outlines of strategies by the Corporation for improved value in the market

OESC's subsidiaries are positioned to take advantage of existing relationships, contracts, and networks OTIE has established since 2008.

We continuously evaluate solutions to broaden and capture a larger share of the Federal and State markets. Each subsidiary operates based on primary NAICS codes with secondary NAICS codes that overlap with the sister companies.

d. Explanation of the Corporation's relative performance vs. competitors and identification of key competitors within the market

Our competitors include Small Businesses, Alaskan Native Corporations (ANCs); Native American Owned, and tribally owned small businesses; and Native Hawaiian Organizations (NHOs). Each of these are in a category of small business that may be awarded prime contracts without competition. Oneida ESC subsidiaries also compete against other 8(a) firms for set-aside acquisitions, including small businesses that are categorized as Woman-Owned, HUB Zone, Service-Disabled Veteran Owned small business, and others. Finally, Oneida ESC competes in full and open markets without restrictions.

Typical competitors include Small Business firms with fewer than 750 employees in NAICS 562910, Environmental Remediation. Another area of significant competition is the regional Transportation Engineering firms in Wisconsin for WI DOT work (OES).

e. Explanation of any material changes or developments in the market or nature of business the Corporation is primarily engaged in since the last reporting period.

The federal markets have experienced several material changes and developments. These span regulatory shifts, legislative actions, procurement reforms, funding adjustments, technological advancements, and major project activity.

Changes to the National Environmental Policy Act (NEPA) are intended to expedite environmental reviews and permitting, but they also introduce litigation risks that could delay project development.

One Big Beautiful Bill Act (H.R.1): Enacted July 4, 2025, this sweeping law extends many provisions of the Tax Cuts and Jobs Act and includes major changes affecting energy, natural resources, and infrastructure.

The bill addresses oil and gas leasing, renewable energy fees on federal land, and rescinds funds for several environmental programs, including clean heavy-duty vehicles and greenhouse gas reduction funds.

National Defense Authorization Act for FY 2026 (S.2296) includes significant funding and provisions for defense-related construction and infrastructure, impacting federal construction markets, especially military infrastructure.

EPA: The Trump administration proposed a 54% reduction in the EPA's budget for FY 2026, bringing it to $4.16 billion—the lowest since 1986 (inflation-adjusted). This would drastically reduce funding for science, technology, and environmental programs, and eliminate state operating grants.

DOE: The Department of Energy's Office of Science faces a 14% cut, down to $7.1 billion. OESC does not have any contracts with the DOE, but it is a growth market we are considering.

Despite cuts elsewhere, the FY 2025 budget maintains significant investment in infrastructure, with $14.3 billion allocated for transit projects and continued support for highway and bridge construction.

May 2025 saw a rebound in construction starts nonresidential building starts rose by 18%, and nonbuilding activities (highways, bridges, utilities) by 20%.

Some projects have faced delays due to legal challenges and a 90-day freeze/review mandated by the Trump administration, creating uncertainty and slowing progress on certain federal projects.

Increased adoption of AI and robotics in construction is enhancing productivity, safety, and sustainability. AI optimizes processes, while robotics automates repetitive tasks. Building Information Modeling (BIM) and digital twins are now more widely used, improving project planning, visualization, and management. Innovations such as structural battery composites and osmotic power systems are emerging, supporting energy management and sustainability in construction. Wearable technology for environmental monitoring is being deployed to protect worker health in hazardous environments. 5G networks and blockchain are enabling real-time data exchange and secure transactions, supporting the transition to cleaner energy and more efficient project management.

The activity in the last quarter has been marked by a decisive shift toward deregulation, decentralization, and budget tightening in federal environmental policy, alongside continued investment in infrastructure and rapid technological adoption in engineering and construction.

f. Identification of the primary goals and targets of the Corporation and progress made towards accomplishment of the same.

Goals for Oneida ESC Group

Growth at a sustainable rate is the primary business goal for OESC. Financial reward for OESC occurs when we align our investment strategies according to our client's mission priorities.

Targets for OESC Subsidiaries:

Opportunities continue to exist in geographies where all companies have successful past performance and where personnel involved in such projects have established strong relationships with teaming partners and clients. Opportunities continue to emerge based on the combined efforts of OESC's marketing and sales efforts. Target clients continue to include Department of Defense agencies (various bases – Navy, Air Force, and Army), The Environmental Protection Agency, Bureau of Indian Affairs, WI Department of Transportation, Milwaukee Metropolitan Sewer District, and the Oneida Nation.

New target clients include extended services on existing bases, geographical growth on "new" bases where OESC has not performed work on in the past, municipalities geographically related to OESC offices and other Tribal Nations.

g. Identification of key elements for success in strategies given, including risks, resources, and relations available and needed to successfully fulfill outlined strategies

Key elements for success in the OESC model include:

- Meeting performance indicators, including safety, staff turnover, profitability, staff utilization, backlog, and capacity.
- Adapting to a changing customer base, contract type, or key skill set. We recognize and reconfigure based on identified needs to deliver strategic growth.
- Identification of contract capacity and access is under regular review.
- Increasing our geographic footprint and capabilities.

Risk in the marketplace.

- We operate in highly competitive industries.
- Contracting is often erratic and unpredictable; cancellations or delays in pending awards by government agencies could adversely affect us.
- International operations carry additional risk.
- Loss of key personnel
- Adoption of new contract laws or regulations.

h. Identification of medium (two to five years) and long (greater than five year) prospects and sustainability of the Corporation given the present status, strategies,

and risks

Our medium and long-range prospects for sustainability are balanced by business diversification and consistent project management delivery.

We have successfully formed long-term business relationships with key US Agencies for services delivered around the world. Contracting with the US government remains a reliable strategy in terms of payment, stability, and growth opportunity.

Medium-term prospects

OESC's prospects in the two- to five-year term rely on our sturdy performance in engineering, science, and construction to existing clients; adjacent clients/services and geographic areas; and new service offerings to new clients. OESC continues to focus on business development and talent acquisition to meet our growth metrics.

Long-term prospects

OESC envisions steady growth with our key customers over the long term. OESC is nimble and agile, allowing us to focus on governments funding flows.

Continued reliance on low-price awards is a staple in our business model and we continue to adjust the pricing structure to ensure that we remain competitive. We continue to concentrate marketing efforts on maximizing our return on investment through expanding support for existing customers, developing tasks under existing contracts, and collaborating with firms that need either small business participation or our specialized expertise.

i. **Explanation of market growth (if any) experienced by the Corporation, identifying sources of growth (i.e., organic growth through market share increase, volume of business increase, acquisition of competition or other assets, etc.)**
Our growth has been mostly organic and is based on our reputation in the market. We have re-aligned our corporate brand by including Oneida in all business names moving forward. We have made a concerted effort to draw on our expertise in the polyfluoroalkyl substances (PFAS) and Perfluorooctanoic acid (PFOA) remediation market. We also see growth in our traditional engineering services such as civil, mechanical, electrical, and structural.

j. **Summary of the assets of the Corporation, including but not limited to its financial, physical, employee, customer, brand or intellectual property, and supply assets.**

OESC ASSETS
Employees OESC: Oneida ESC Group (Holding Company) - 49 EEs OTIE: Oneida Total Integrated Enterprises (Engineering and Environmental - 132 EES 1822: 1822 Land and Development Co of Oneida (Real Estate Development) - 2 EE MS2: Mission Support Services (Construction Management) - 38 EE GMC: General Mechanical Corp (HVAC/Piping and Electrical Contractor) -17 EEs SRS: Sustainment Restoration Services (Environmental Services) - 126 EEs LG2: LG2 Environmental Services (Cultural and Natural Resources) - 64 EEs OES: Oneida Engineering Solutions (Transportation and Engineering) - 46 EEs Oneida Environmental (Environmental Services) – 4 EEs OPS: Oneida Professional Services (Staffing Resources Services) - 23 EES OCS: Oneida Construction Services (Construction Management) – 1 EE Oneida Environmental (Environmental Services) -3 EEs **Customers** 75% of Revenue from Federal clients.

k. Summary and status of any legal action pending to which the Corporation is a party and any relevant government regulation to which the Corporation may be subject.

N/A

Disclosure Report

(a)

Board Member	Title	Time in Position	Date renews or expires
John L. Breuninger	Chairman of the Board	12/18/16 to present	6/2027
Jacquelyn Zalim	Board Member	3/14/12 to present	6/2028
Leslie Wheelock	Board Member	12/13/16 to present	6/2026

(b)

OESC Key Management Personnel	Title	Time in Position	Date Renews or Expires
Jeff House	President/CEO	1/1/2017	1/1/2029

(c) Summary of any financial or familial relationship between any board or Company key management personnel

None

a. Summary of any financial or familial relationship with any current member of OBC or any member of any regulatory body within Oneida such as a board committee or commission charged with regulating the Corporation's industry or activities.

None

b. Names of any other person, whether it be a business in any legal form or an individual, doing business with the Company for purposes of mutual enterprise – JV; membership in an LLC together; partnership; acquisition as a subsidiary.

OTIE has a majority interest in OTIE-RS&H JV, OCH JV, OTIE-Ahtna JV, OTIE-ERRG JV, and OTIE-Merrick JV. The Company has an equal interest in OTIE-PWT JV. The Company has a minority interest in Tetra Tech – OTIE JV and NDN-OTIE JV.

MS2 has a majority interest in MS2-MEC JV.

SRS has a majority interest in SRS-CAPE JV, SRS-ERRG JV, SRS-RFI JV, SRS Battelle JV, SRS-BB&E JV, SRS-Alliant JV and SRS-CAPE II JV. SRS has a minority interest in Alliant-SRS JV. SRS is the sole owner of LG2 Environmental Solutions, Inc.

OES has a minority interest in Dane Partners, and a majority interest in OES-Pond JV and OES-Pond II JV.

c. Summary of financial transactions or relationships between those listed in (d).

d. Names of any other person, whether it be a business in any legal form or an individual, doing business with the Company for purposes of mutual enterprise – JV; membership in an LLC together; partnership; acquisition as a subsidiary.

   i. The OTIE-RS&H JV is a joint venture formed between OTIE and Reynolds, Smith & Hills, Inc. to perform work with the Air Force Civil Engineering Center (AFCEC). The JV also holds a contract to perform work with the U.S. Army Corps of Engineers (USACE) Japan District.

   ii. The OCH JV is a joint venture formed between OTIE and CH2M Hill to perform work for EPA under the Environmental Services and Operations contract I CLIN 2 (Regions 4, 5, 6 and 7) and CLIN 3 (Regions 8, 9 and 10), and to perform work for NAVFAC Southwest under the Multiple Award Remedial Action Contract.

   iii. OTIE-PWT JV is a joint venture formed between OTIE and Pacific Western Technologies, Ltd. to perform work for USEPA under the Design and Engineering Services (DES) contract for CLIN 3 (Regions 8, 9 and 10).

   iv. OTIE-Ahtna JV is a joint venture formed between OTIE and Ahtna Environmental, Inc. to perform work for an EPA Remediation Environmental Services small business set-aside contract.

   v. OTIE-ERRG JV is a joint venture formed between OTIE and Engineering / Remediation Resources Group to submit a proposal to Naval Facilities Engineering Command Southwest for a Remedial Action Contract.

   vi. OTIE-Merrick JV is a joint venture formed between OTIE and Merrick & Company to perform A&E services for the Air Force Civil Engineering Center.

   vii. Tetra Tech – OTIE JV is a joint venture formed between Tetra Tech, Inc. and OTIE to submit a proposal to USACE Tulsa for an Environmental Remediation Services contract.

   viii. NDN-OTIE JV is a joint venture formed between The NDN Companies, Inc. and OTIE, formed under the Mentor-Protégé arrangement between NDN and OTIE. The JV was formed to submit proposals to various federal government clients for environmental work.

   ix. MS2-MEC JV is a joint venture formed between Midwest Environmental Controls and MS2 to perform work under a Demolition Abatement contract at Edwards AFB. The joint venture was approved by the US SBA on August 14, 2015.

   x. SRS-CAPE JV is a joint venture formed between SRS and CAPE Environmental Management to perform work for USACE Seattle on a Pre-placed Remedial Action Contract. The joint venture was approved by the US SBA on December 12, 2017. The JV received an 8a sole-source award from USACE Kansas City District.

   xi. SRS-ERRG JV is a joint venture formed between SRS and Engineering / Remediation Resources Group to submit a proposal to Naval Facilities Engineering Command Southwest for an Environmental Multiple Award Contract. The joint venture was approved by the US SBA on April 12, 2018.

   xii. SRS-RFI JV is a joint venture between SRS and Robotics Fabrication, Inc. to perform munitions response work for USACE Huntsville. SBA approved the JV on September 16, 2019. USACE Huntsville awarded a contract for munitions work to the JV.

xiii. SRS Battelle JV is a joint venture between SRS and Battelle, formed under the Mentor-Protégé arrangement between SRS and Battelle. The JV will submit a proposal to USACE Norfolk District for an Environmental Services contract and will submit a proposal to USACE Tulsa District for an Environmental Remediation Services contract. The joint venture was approved by the US SBA on September 21, 2020.

xiv. SRS-BB&E JV is a joint venture between SRS and BB&E, Inc. The JV submitted a proposal to Army Combat Command – Aberdeen Proving Ground for environmental compliance services at Fort Huachuca, which was not awarded to the JV. The joint venture was approved by the US SBA on October 19, 2020.

xv. SRS-Alliant JV is a joint venture between SRS and Alliant Corporation. The JV was awarded a contract with USACE Louisville for A&E services for environmental engineering.

xvi. Alliant-SRS JV is a joint venture between Alliant Corporation and SRS. The JV submitted a proposal to USACE Tulsa for a Service-Disabled Veteran Owned Small Business set-aside contract for environmental remediation services.

xvii. SRS-CAPE II JV is a joint venture between SRS and CAPE Environmental Management to perform work for USACE Kansas City District on an environmental demolition contract. The joint venture is in the process of requesting/receiving approval by the US SBA.

xviii. Dane Partners is a joint venture formed between Ayres Associates Inc., EMCS Inc., Short Elliot Hendrickson Inc., and OES to pursue projects with the Wisconsin Department of Transportation. OES has a 25% interest in Dane Partners.

xix. OES-Pond JV is a joint venture between OES and Pond Company. The JV is approved by SBA as a Mentor-Protégé. The JV submitted a proposal to USACE Sacramento District for AE Design and Investigation and submitted a proposal to the U.S. Air Force for Mechanical and Electrical Engineering Services at Hurlburt Field.

xx. OES-Pond II JV is a joint venture between OES and Pond Company. The JV is set up to receive 8(a) contracts and will request approval from SBA if the JV seeks a sole-source award.

xxi. OE-Stantec is a JV and a participant in the SBA Mentor Protégé Program. The JV is set up to receive 8(a) contracts in the environmental market.