

Omnia Dominia Labs LLC

SUSTAINABILITY POLICY

Public Corporate Policy | Subcontractor Due Diligence | Website Publication

Document Owner	Chief Operating Officer (COO)
Review Participants	Chief Executive Officer (CEO) and Project Managers
Review Cadence	Annual review, or earlier if required by law, contract, client direction, or material operating change
Effective Date	18 June 2026
Version	1.0 - Public Web and Subcontractor Due Diligence Version
Applies To	Omnia Dominia Labs LLC operations, employees, projects, and applicable subcontractor/vendor due diligence activities

1. Purpose

Omnia Dominia Labs LLC (“Omnia”) is committed to operating as a responsible, efficient, and resilient small business serving federal, academic, and commercial customers in cybersecurity, artificial intelligence, machine learning, digital twins, cyber-physical systems, and research and development. This Sustainability Policy establishes Omnia’s public commitments for sustainable operations, subcontractor due diligence, procurement, travel, cloud and IT usage, asset lifecycle management, waste reduction, and greenhouse gas (“GHG”) measurement maturity.

This policy is designed for public posting and for review by current and prospective prime contractors, subcontractors, teaming partners, customers, and vendors. It distinguishes mandatory legal and contractual requirements from aspirational practices that Omnia will pursue where practical, cost-effective, secure, and mission-compatible.

2. Scope

This policy applies to Omnia’s business operations, company-controlled procurement, company-directed travel, company-managed cloud and IT services, equipment lifecycle decisions, project execution, and vendor/subcontractor due diligence. It also applies to personnel and subcontractors when they perform work under Omnia direction or under contract terms requiring adherence to company policies.

Where a customer contract, task order, grant, cooperative agreement, subcontract, federal regulation, state or local law, or client security requirement imposes stricter requirements than this policy, the stricter requirement controls. This policy does not supersede cybersecurity, privacy, export control, classified information, controlled unclassified information (“CUI”), records retention, or contract-specific requirements.

3. Policy Principles

- **Compliance first.** Omnia shall comply with applicable laws, regulations, and incorporated contract clauses governing environmental protection, sustainable acquisition, material safety, waste handling, and reporting.
- **Efficiency by design.** Omnia will seek to reduce avoidable consumption of energy, water, fuel, compute, storage, and materials without impairing customer mission, cybersecurity, resilience, or quality.
- **Secure sustainability.** Omnia will not trade security, data protection, resilience, availability, or compliance for sustainability claims. Secure handling of customer data and company systems remains mandatory.
- **Mission alignment.** Omnia’s sustainability practices will reinforce its technical mission: efficient AI/ML, secure digital twins, energy-aware computing, and improved resilience of critical infrastructure and cyber-physical systems.

- **Practical implementation.** Omnia will pursue best practices where practicable, scalable, auditable, and economically reasonable for a small business.
- **Continuous improvement.** Omnia will use annual review, project lessons learned, supplier feedback, and available utility, cloud, travel, and procurement data to improve implementation over time.

4. Federal and Contract Alignment

Omnia is a federal-facing small business and will align this policy with applicable federal sustainability expectations when those expectations apply to Omnia's procurements, contracts, subcontracts, grants, or customer work. Omnia shall comply with all sustainability-related requirements incorporated into a binding agreement.

When applicable to a solicitation, prime contract, subcontract, or customer direction, Omnia will address requirements associated with:

- Federal Acquisition Regulation ("FAR") Part 23, including federal sustainable acquisition, environmental protection, greenhouse gas emissions, hazardous material, and material safety requirements as applicable.
- FAR 52.223-23, Sustainable Products and Services, when incorporated into a contract or subcontract, including applicable sustainable product and service requirements identified in the statement of work or other contract documents.
- FAR provisions and clauses addressing biobased products, waste reduction programs, environmental management systems, greenhouse gas representations, hazardous materials, and other sustainability or environmental requirements when incorporated by reference or full text.
- EPA and GSA sustainable purchasing resources, including EPA Comprehensive Procurement Guidelines, ENERGY STAR, WaterSense, Safer Choice, EPEAT, and the Green Procurement Compilation when relevant to covered purchases.
- DOE Federal Energy Management Program ("FEMP") energy-efficient product guidance and DOE sustainability, resource efficiency, resilience, and energy-efficiency priorities where relevant to DOE or energy-sector work.
- Executive Order-style federal sustainability objectives, as amended, replaced, or implemented through regulation, solicitation, contract, or agency guidance.

Omnia will not represent that a product, service, vendor, or activity satisfies a federal sustainability program unless that representation is supportable by records, supplier documentation, recognized ecolabels, contract language, or other reasonable evidence.

5. Sustainable Operations and Utility Practices

Omnia will manage company-controlled operations and commercial service relationships to reduce avoidable energy, water, and material consumption while maintaining secure, reliable, and resilient service delivery. Where Omnia has operational control or meaningful influence, the company will seek to:

- use efficient lighting, power management, heating, cooling, and equipment settings;
- select cost-effective energy-efficient utility, telecommunications, hosting, and service options where available;
- monitor material energy, water, telecom, and service usage where data are reasonably available;
- avoid unnecessary printing and default to digital records when permitted by contract and records-retention requirements;
- maintain appropriate cybersecurity, backup, continuity, and resilience controls for all operational services; and
- consider lifecycle cost, reliability, resilience, and sustainability when selecting service providers or operational equipment.

6. Travel, Meetings, and Field Work

Omnia will use business travel only when it supports contract performance, customer mission, technical quality, business development, legal compliance, or relationship management. Remote-first collaboration is the default for routine meetings when remote participation is effective and acceptable to the customer or partner.

- Use remote meetings, secure collaboration tools, and asynchronous coordination for routine internal and partner meetings where practical.
- Combine trips, meetings, site visits, and partner engagements to reduce duplicate travel.
- Use economy or government-compliant travel classes unless a contract, disability accommodation, safety requirement, or approved business need justifies otherwise.
- Prefer efficient rental vehicles and right-sized vehicles for the mission, route, passengers, equipment, and safety conditions.
- Use government, client, partner, or local facilities for meetings where available, secure, and cost-effective.
- Document travel purpose and chargeability in accordance with contract, accounting, and project-management requirements.

7. Sustainable Cloud, AI/ML, Data, and IT

Because Omnia's mission includes AI/ML, cybersecurity, digital twins, cyber-physical systems, and cloud-based research, sustainable computing is a material part of this policy. Omnia will seek to reduce avoidable compute, storage, and network consumption while preserving security, reproducibility, performance, customer requirements, and data integrity.

- Right-size cloud compute, GPU, memory, and storage resources to workload needs.
- Shut down idle compute resources, unused development environments, and orphaned storage where retention is not required.
- Use storage lifecycle policies, tiering, deduplication, compression, archival controls, and retention schedules where compatible with project requirements.
- Prefer efficient AI/ML practices, including use of appropriate model size, transfer learning, reusable baselines, low-precision training where valid, experiment budgets, and documented stopping criteria.
- Track material cloud cost, compute hours, GPU hours, storage volume, and, where available, cloud-provider carbon or energy reports for major projects.
- Consider region, reliability, data residency, cybersecurity, and provider sustainability reporting when selecting cloud resources.
- Use secure digital twins and energy-aware computing to improve the resilience, safety, and efficiency of critical infrastructure and industrial systems.

8. Procurement and Asset Lifecycle

Omnia will incorporate sustainability into procurement decisions where practical, affordable, and compatible with contract, cybersecurity, performance, supply-chain, and domestic-source requirements. For covered purchases, Omnia will prefer:

- ENERGY STAR-certified or FEMP-designated equipment when applicable;
- EPEAT-registered computers, displays, imaging equipment, servers, and electronics where available and suitable;
- repairable, upgradeable, durable, and recyclable products where life-cycle value supports the purchase;
- refurbished or remanufactured equipment for non-sensitive uses where performance, warranty, security, and customer requirements allow;
- U.S.-sourced or domestic supply-chain options where practicable, compliant, and mission-compatible;
- minimal, recyclable, or reusable packaging where available; and
- vendors that can provide product environmental attributes, warranty, repair, take-back, recycling, or responsible disposal information.

Omnia will not acquire lower-security, lower-quality, counterfeit, unsupported, noncompliant, or mission-inadequate equipment solely for sustainability reasons.

9. Waste Reduction, Media Sanitization, and E-Waste

Omnia will reduce waste where practical and will manage electronic assets in a manner that protects customer data, company data, intellectual property, CUI, export-controlled information, credentials, cryptographic material, and other sensitive information.

- Before reuse, donation, resale, recycling, or disposal, Omnia shall sanitize or destroy storage media using methods appropriate to the data sensitivity, customer requirements, and applicable guidance such as NIST media sanitization practices.
- Reusable equipment should be redeployed internally when secure, cost-effective, and operationally justified.
- Equipment suitable for external reuse may be donated or resold only after approved sanitization, asset-record update, and removal of company/customer markings and licensed data.
- Equipment not suitable for reuse should be recycled through certified or reputable e-waste recyclers or manufacturer take-back programs where practical.
- Omnia will retain reasonable disposal, sanitization, donation, recycling, or destruction records for controlled assets and for any assets that held sensitive data.
- Batteries, drives, networking gear, peripherals, cabling, and other electronics will be handled to avoid improper landfill disposal where reasonable recycling options exist.

10. Supplier, Vendor, and Subcontractor Expectations

Omnia will prefer subcontractors, vendors, cloud providers, equipment suppliers, travel providers, and professional-service partners that maintain comparable sustainability policies, sustainable acquisition practices, energy-efficiency practices, responsible waste controls, and transparent sustainability reporting. This preference will be balanced with technical capability, past performance, price, schedule, cybersecurity, data rights, domestic sourcing, customer requirements, and small-business participation objectives.

For subcontractor due diligence, Omnia may request or review:

- a public or internal sustainability, environmental, or responsible business policy;
- evidence of sustainable procurement practices or ecolabel-based purchasing;
- cloud, facility, or travel sustainability reporting where relevant to the work;
- e-waste, data sanitization, and asset disposal controls;
- compliance with incorporated federal contract clauses; and
- agreement to flow down sustainability-related contract requirements when applicable.

A vendor's lack of a mature sustainability program will not automatically disqualify the vendor unless required by law, contract, customer direction, or risk determination. Omnia will seek reasonable alignment and continuous improvement from its supply chain.

11. Greenhouse Gas and Resource Measurement Roadmap

Omnia will build a staged GHG and resource measurement program. Through FY2027, the commitment is to measure and reduce where practical. Beginning in FY2028, Omnia will increase measurement rigor for Scope 1, Scope 2, and material Scope 3 emissions, with additional rigor every two fiscal years.

Period	Measurement Commitment	Reduction / Management Objective	Evidence and Governance
FY2026-FY2027	Collect available utility/service, cloud, travel, procurement, and disposal indicators for major operations and projects.	Measure and reduce where practical; prioritize no-regret actions such as right-sized cloud, reduced idle compute, remote meetings, and efficient equipment.	COO annual review with CEO and Project Manager input; maintain practical records.
FY2028-FY2029	Begin annual tracking of Scope 1, Scope 2, and material Scope 3 categories, including business travel, cloud usage, purchased electronics, and e-waste where data are available.	Set internal intensity baselines, such as emissions or energy proxies per project, per cloud workload, or per revenue band.	Annual management review; identify data gaps and supplier reporting needs.
FY2030-FY2031	Improve data quality and expand supplier, travel, and cloud-provider reporting for material categories.	Adopt project-level reduction objectives for avoidable travel, idle compute, storage growth, and equipment turnover.	COO documents annual performance, exceptions, and corrective actions.
FY2032-FY2033	Use more consistent calculation methods for material emissions categories and resource indicators.	Set quantified annual or biennial targets for material categories where baselines are reliable and controllable.	Management review considers independent review or customer-facing reporting for major contracts.
FY2034 and Beyond	Maintain mature recurring measurement for material operations and supplier categories.	Consider public reporting, third-party review, and long-range intensity or net-reduction goals if proportionate to company size and customer needs.	Annual policy review and update; integrate new statutory, FAR, agency, or customer requirements.

For purposes of this roadmap, Scope 1 includes direct fuel or company-controlled combustion sources if any; Scope 2 includes purchased electricity or energy services where Omnia has sufficient control or data access; and material Scope 3 includes categories such as business travel, cloud services, purchased goods, equipment lifecycle, and waste where data are reasonably available and material to company operations.

12. Roles and Responsibilities

Role	Responsibilities
Chief Operating Officer	Owns this policy; conducts annual review; maintains implementation records; coordinates updates; reviews sustainability-related supplier due diligence and material exceptions.
Chief Executive Officer	Provides executive input; approves material policy changes; balances sustainability commitments with mission, customer, financial, and strategic needs.
Project Managers	Apply this policy to project planning, travel, cloud usage, procurement requests, subcontractor coordination, and customer reporting where applicable.
Employees and Company Representatives	Use resources responsibly; follow travel, IT, procurement, data protection, and disposal requirements; report waste, inefficiency, or noncompliance concerns.
Subcontractors and Vendors	Comply with applicable contract flow-downs and provide reasonable sustainability, procurement, disposal, and reporting information when requested.

13. Reporting, Review, and Public Availability

The COO will review this policy at least annually with input from the CEO and Project Managers. The review will consider legal and contract changes, federal acquisition updates, customer due-diligence requests, project lessons learned, cloud and travel patterns, procurement activity, and asset-disposal records.

Omnia may publish this policy on its public website and may provide it to customers, prime contractors, subcontractors, teaming partners, and due-diligence reviewers. Public posting may omit internal records, sensitive supplier information, cybersecurity details, customer-specific terms, or proprietary implementation data.

14. Exceptions and Conflicts

Exceptions to aspirational practices may be approved when necessary for customer mission, cybersecurity, contract performance, urgent response, data protection, export control, safety, cost reasonableness, availability, domestic sourcing, or technical performance. Exceptions to legal, regulatory, or contract requirements may not be approved internally unless the requirement itself allows a waiver and the waiver is properly obtained.

Any suspected conflict between this policy and a contract requirement should be escalated to the COO and responsible Project Manager before action is taken.

15. Continuous Improvement

Omnia will maintain this policy as a living corporate policy. The company will improve practices as it grows, as contract requirements evolve, as federal sustainability acquisition rules change, and as reliable measurement data become available. Omnia will prioritize actions that deliver measurable resource efficiency, reduced waste, lower operating risk, improved cyber and mission resilience, and defensible compliance evidence.

16. Approval

Approval Role	Name / Title	Date
Chief Operating Officer		17 June 2026
Chief Executive Officer		
Next Annual Review		June 2027

Appendix A - Implementation Controls

Area	Control Expectation	Example Evidence
Travel	Remote-first meetings and combined trips where practical.	Meeting records, travel approvals, itinerary consolidation.
Cloud and AI/ML	Right-sized compute, idle shutdown, lifecycle storage, model efficiency, and provider sustainability reports where available.	Cloud reports, cost dashboards, project logs, carbon dashboards.
Procurement	Preference for ENERGY STAR, FEMP, EPEAT, repairable, recyclable, refurbished, or U.S.-sourced items where suitable.	Purchase records, product specifications, vendor documentation.
E-Waste and Media	Secure sanitization before reuse/disposal and certified or reputable recycling where practical.	Asset logs, sanitization records, recycler certificates.
Vendors/Subcontractors	Preference for comparable policies and compliance with flow-down clauses.	Due-diligence questionnaires, supplier policies, subcontract clauses.
GHG Roadmap	Progressive measurement maturity from practical tracking to Scope 1, Scope 2, and material Scope 3.	Annual COO review, data extracts, gap log, improvement plan.

Appendix B - Alignment Sources Considered

This policy was drafted to align generally with official federal sustainable acquisition and resource-efficiency concepts, including the following source families. Omnia will apply the current version of any cited requirement only when it is legally applicable or incorporated into a contract, subcontract, grant, or customer instruction.

- Federal Acquisition Regulation Part 23, Environment, Sustainable Acquisition, and Material Safety.
- FAR 52.223-23, Sustainable Products and Services, and related FAR 52.223 clauses when incorporated into contracts.
- EPA sustainable purchasing programs and greener electronics resources, including Comprehensive Procurement Guidelines, ENERGY STAR, WaterSense, Safer Choice, EPEAT, and the Green Procurement Compilation.
- DOE Federal Energy Management Program energy-efficient product procurement guidance and DOE sustainability/resource-efficiency priorities.
- NIST media sanitization practices for secure wiping, destruction, reuse, and disposal of electronic media.
- Recognized GHG accounting concepts, including Scope 1, Scope 2, and material Scope 3 categories, as a measurement framework for future maturity.