

Voluntary Carbon Market Disclosures

pursuant to California Assembly Bill No. 1305

Updated January 1, 2026¹

ICF International, Inc., for and on behalf of the entities with which it is affiliated (“ICF”), makes the following disclosures pursuant to California Assembly Bill (AB) 1305, codified at Part 10 of Division 26 of the Health and Safety Code (HSC). This statement includes disclosures under HSC Sections 44475, 44475.1, and 44475.2. ICF reserves the right to amend, update, or withdraw these disclosures. These disclosures are subject to revision to remain compliant with applicable laws and regulations.

Section 44475

Not applicable to ICF. ICF does not market or sell voluntary carbon offsets within the state of California or in any other location.

Section 44475.1

We first take steps to reduce greenhouse gas (GHG) emissions, and then we voluntarily purchase verified GHG offsets equal to the remaining emissions, net of renewable energy certificates. We make statements regarding carbon neutrality and report the steps taken based on our review and verification process. Each year we disclose—in our climate report to CDP and in our Corporate Citizenship Report published [on our website](#)—the details of our GHG reduction targets, GHG inventory, progress toward goals, methodology used to measure progress, third-party verification, and purchase of GHG offsets.

In 2025, ICF purchased and used verified GHG offsets equal to the amount of our 2024 GHG emissions, net of renewable energy certificates (REC) and banked offsets purchased during 2024. In the following table we refer to those offsets as Projects A–C.

¹ These disclosures are updated at least annually and reflect information current as of the date above.

44475.1 required information	Project A	Project B	Project C
Section (a) Seller of the offsets purchased	ACT Commodities	ACT Commodities	Anew Climate
Offset registry or program	American Carbon Registry	American Carbon Registry	Verified Carbon Standard
Section (b) Offset project identification number	Project 812	Project 588	Project 1386
Section (c) Offset project name as listed in the registry or program	OMMC1	Anew - Big Six Forestry Project	Recast Energy Biomass Project
Section (d) Offset project type	Methane Capture	Improved Forest Management	Bioenergy
Identify whether carbon removal, avoided emission, or a combination of both	Removal	Combination	Avoided
Site location	Ohio	Northern Maine	Louisville, Kentucky
Section (e) Protocol used to estimate emissions reductions or removal benefits	<ul style="list-style-type: none"> • ACR-approved “Methodology for the Quantification, Monitoring, Reporting, and Verification of Greenhouse Gas Emissions Reductions and Removals from Capturing and Destroying Methane from U.S. Coal and Trona Mines” (Version 1.1 from August 2022). • ACR’s Errata & Clarifications to the Methodology (Version 1.1 from April 2023). • Methodology available at: Capturing and Destroying Methane from Coal and Trona Mines in North America - ACR 	<ul style="list-style-type: none"> • ACR Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands, Version 1.3 (April 2018) • Methodology available at: Improved Forest Management (IFM) on Non-Federal U.S. Forestlands - ACR 	<ul style="list-style-type: none"> • AMS-I.C: Indicative simplified baseline and monitoring methodology for selected small-scale CDM project activities. • Methodology available at: CDM: Thermal energy production with or without electricity --- Version 22.0
Section (f) Independent third-party verification	GHD Limited	Ruby Canyon Environmental, Inc.	SCS Global Services

Section 44475.2

Entity-level Disclosures

ICF closely monitors our GHG footprint. Each year we consider strategies to reduce our emissions and we measure our progress against science-based targets approved by the Science Based Targets initiative (SBTi). After taking steps to reduce emissions, we then voluntarily purchase high-quality, verified GHG offsets equal to our remaining emissions, net of RECs. We make statements regarding carbon neutrality and report the steps taken to accomplish or support these statements based on our review and verification process. Each year we disclose—in our climate report to CDP and in our Corporate Citizenship report published [on our website](#)—the details of our GHG reduction targets, GHG inventory, progress toward goals, methodology used to measure progress, third-party verification of ICF’s GHG inventory, and purchase of GHG offsets.

ICF makes the following statements regarding carbon neutrality and emissions reductions.

Carbon neutrality Claims	<p>ICF makes claims that ICF is “carbon neutral” for a stated year based on residual emissions after reductions, RECs for electricity, and verified offset retirements for that same year.</p> <p>ICF conducts an annual companywide GHG inventory covering Scopes 1, 2, and key Scope 3 categories; after reductions and application of RECs to emissions from electricity consumption, ICF purchases verified GHG offsets sized to meet or exceed the remaining, non-mitigated emissions for the year, and carbon-neutral statements relate to these residual, netted emissions.</p> <p>Methodologies include the GHG Protocol Corporate Standard and Corporate Value Chain (Scope 3) Standard, and the Scope 2 Guidance for market-based accounting and use of RECs.</p> <p>The Scope 1, 2, and 3 GHG inventory receives limited assurance from an independent third-party auditor (Apex Companies, LLC, as stated in ICF materials), and offsets are described as verified by reputable third parties that are accredited by the relevant offset registry.</p>
100% renewable electricity / RECs	<p>ICF makes claims that ICF sources 100% renewable electricity annually by purchasing and retiring energy attribute certificates (e.g., Green-e RECs) equal to total electricity consumption.</p> <p>ICF annually calculates electricity consumption across operations and purchases and retires RECs—Green-e certified in North America and comparable certificates elsewhere—equal to 100% of the metered or estimated purchased electricity load.</p> <p>Accounting follows the GHG Protocol Scope 2 Guidance for market-based reporting and recognition of energy attribute certificates.</p>

	<p>The corporate GHG inventory, including market-based Scope 2, is subject to limited assurance by an independent third party, and REC instruments carry program-level certification.</p>
Science-based targets and 1.5°C alignment	<p>ICF maintains a structured set of GHG reduction targets and reports progress annually. Our 2018 internal target is to reduce absolute Scope 1 and market-based Scope 2 emissions by 60% by 2025, using 2013 as the baseline year. In addition, our 2025 2°C-aligned near-term target, approved by the Science Based Targets initiative (SBTi) in 2021, commits us to reduce absolute Scope 1 and market-based Scope 2 GHG emissions by 23%, reduce Scope 3 emissions by 30%, and continue sourcing 100% renewable electricity each year. Building on this pathway, our 2030 1.5°C-aligned near-term target—approved by SBTi in 2024 and posted on SBTi’s target dashboard—replaces the prior SBTi target and commits us to reduce absolute Scope 1 and location-based Scope 2 emissions by 63.19% and Scope 3 emissions by 58.5%, while continuing active annual sourcing of 100% renewable electricity.</p> <p>Progress is measured through annual updates to the GHG inventory against the 2018 base year, with results tracked to target trajectories and disclosed in targets tables and progress visuals.</p> <p>The approach is grounded in the SBTi Near-Term 1.5°C framework (cross-sector) and the GHG Protocol Corporate Standard, Scope 2 Guidance, and Scope 3 Standard for inventory preparation and tracking.</p> <p>The GHG inventory is subject to limited assurance by an independent third party, and the near-term targets have been validated/approved by SBTi.</p>
Quantified emissions reductions achieved	<p>ICF states an overall reduction in total assured Scope 1, 2, and 3 emissions relative to baseline years, using GHG Protocol absolute and intensity metrics.</p> <p>Accuracy is demonstrated through year-over-year comparison of the assured GHG inventory to historical baselines (2013 and 2018), with results presented using GHG Protocol metrics for absolute and intensity measures; market-based Scope 2 accounting reflects REC use.</p> <p>The underlying methodology follows the GHG Protocol Corporate Standard and Scope 2 Guidance, with the Scope 3 Standard applied where intensity or value-chain categories are referenced.</p> <p>The Scope 1, 2, and 3 inventory receives limited assurance from an independent third party.</p>

<p>Offsets/crediting to address residual emissions</p>	<p>Statements that verified offset retirements support or address residual emissions for the applicable inventory year.</p> <p>Offset volumes are sized to the residual emissions after reductions and application of RECs, based on the annual GHG inventory, with projects vetted by internal experts against quality criteria.</p> <p>Emissions accounting follows the GHG Protocol, while verification aligns with widely used third-party standards in the voluntary carbon market and ISO 14064-3 referenced approaches.</p> <p>The corporate GHG inventory is subject to limited assurance by an independent third party; offsets are described as verified by reputable third-party certifiers, and governance language indicates executive authorization for REC/offset procurement.</p>
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Questions

If you have questions related to this Disclosure, please contact CorpResponsibility@icf.com.