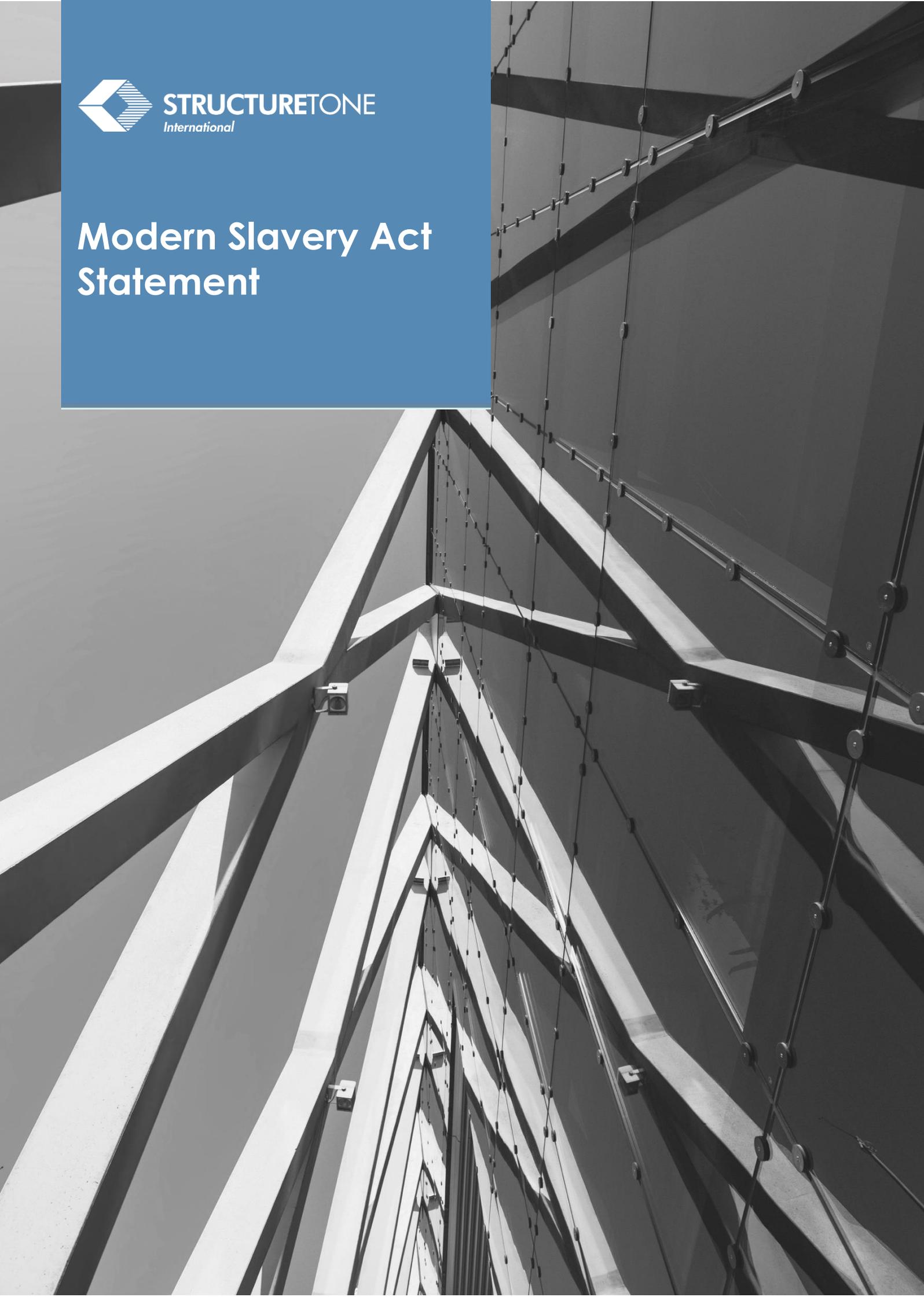




STRUCTURETONE
International

Modern Slavery Act Statement



Modern Slavery Act Statement

This statement is made on behalf of Structuretone Limited and Structuretone International Limited (collectively, "Structure Tone") in line with section 54(1) of the Modern Slavery Act 2015 ("MSA") and constitutes Structure Tone's anti-slavery and human trafficking statement for the financial year ending 31 December 2020.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced or compulsory labour, and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to any form of modern slavery, and we fully support the principles of the MSA. To that end, we've implemented and are enforcing systems and controls aimed at ensuring modern slavery is not taking place anywhere in our business or in our supply chain.

Our Business

Structure Tone is a member company of the STO Building Group ("STO"), a global leader in construction management and general contracting services, with over 3,300 professionals located in offices throughout the United States, Canada, United Kingdom, and Ireland. The STO family of companies provides a complete range of services, from site selection analysis, design constructability review, and aesthetic enhancements to renovated interior fit-outs, new building construction, and major building infrastructure upgrades and modernization. For more detail on the STO Building Group, visit structuretone.com.

Code of Conduct

Structure Tone's core mission is to provide our clients with industry-leading expertise and unparalleled dedication to service in a manner consistent with the highest ethical business practices. As part of this process, we have in place an Anti-Slavery and Trafficking Policy ("MSA Policy") that seeks to identify and manage modern slavery risk in our business and supply chain.

In addition to our MSA Policy, we also have in place a Supplier Code of Conduct ("Supplier Code"), which helps us select business partners that follow workplace standards and business practices consistent with our own. Our goal is to partner with companies that embrace our core values and exemplify a genuine dedication to ethical and honest dealing. The Supplier Code sets forth the minimum standards of conduct expected of our business partners, including the need to maintain and enforce procedures designed to prohibit the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. The Supplier Code applies to all persons and entities that provide goods or services to Structure Tone and its clients including, but not limited to, suppliers, subcontractors, vendors, and consultants (collectively, "Suppliers").

Structure Tone requires all Suppliers and their employees to commit to the Supplier Code as a condition of doing business. All Suppliers must also operate in full compliance with the letter and spirit of all applicable laws and regulations, including all laws relating to slavery and human trafficking.

Our Organisation's Structure

Structuretone Limited and its parent company, Structuretone International Limited, are UK group entities whose immediate US parent company is STO Holdings Inc. We operate under a board of directors, with departments consisting of Operations, Commercial, Pre construction, and support divisions. Subcontractors and suppliers are relied upon within all aspects of the business.

Supply Chain

Our supply chain consists of both suppliers and subcontractors. Throughout the course of our history, Structure Tone has recognised the value in fostering relationships with the trade and subcontracting community, working with reliable and reputable firms that share our values.

To work with us, suppliers and subcontractors must demonstrate that they are viable, productive companies and agree to adhere to our Supplier Code. They must also complete our Supply Chain Pre-Qualification Package, which includes our pre-qualification questionnaire, terms and conditions, and health and safety responsibilities.

Risk Assessment

We expect all relevant members of our supply chain to comply with the Modern Slavery Act 2015. Those who carry on a business or part of a business in the UK and have a turnover of over £36 million must provide a copy of their Modern Slavery Act statement. Those who do not meet the £36 million turnover threshold but voluntarily publish a Modern Slavery Act statement are asked to produce their statement as well.

The highest risk of slavery and human trafficking within our supply chain will likely stem from subcontractor personnel or representatives working on our sites and the workforce of our raw material suppliers, particularly where they are based in high-risk countries. Given the international scope of our business, we are aware of the risks of slavery and human trafficking in certain markets, where workers can be trafficked, exploited, and forced to work. To mitigate these risks, we consider the risk of slavery and human trafficking in our selection of any new raw material suppliers and subcontractors.

A risk assessment has been carried out focusing on smaller businesses that are not required to have their own Modern Slavery Act statement and those that have higher risk international business connections. This risk assessment will continue to be updated as and when new suppliers enter our supply chain.

Due Diligence

As part of our initiative to identify and manage modern slavery risk, we have implemented the following:

- ◆ an Anti-Slavery and Human Trafficking Policy that reflects our commitment to respecting human rights everywhere we operate and to ensuring there is no modern slavery or human trafficking in any aspect of our business;
- ◆ a Supplier Code, to help us work only with companies that embrace our core values and share our zero-tolerance approach to modern slavery;
- ◆ an enhanced system for supply chain pre-qualification, including adding modern slavery enquiries to our standard form pre-qualification questionnaire;
- ◆ a review of our existing supply chains and identification of any high-risk suppliers and/or jurisdictions; and
- ◆ specific contractual commitments in our supplier contracts that no form of modern slavery is used anywhere in the supplier's business or in its supply chain.

Monitoring and Reporting

The prevention, detection, and reporting of modern slavery in our business is the responsibility of all those working for us or under our control. If employees have a concern or suspicion that modern slavery may be taking place in any part of our business or supply chain of any supplier tier, they must raise it promptly with a company resource, such as their manager, department head, or business unit leader; a member of executive management; their Compliance Liaison or the Compliance and Ethics Department; the Human Resources Department, or the Legal Department.

Employees who wish to remain anonymous may contact our 24/7 helpline, operated by our a third -party unaffiliated with Structure Tone, by calling the below toll-free numbers or visiting the online portal.

Phone: 866.593.6479 in the United States & Canada
0800.032.8483 in the United Kingdom
1.8006.15403 in Ireland

Online: structuretone.ethicspoint.com

Training

All employees receive training on our Code of Conduct and Business Ethics ("Code of Conduct") that reinforces their obligation to follow applicable laws and report concerns of illegal or unethical activity, and they must sign a statement acknowledging agreement with the Code of Conduct. They also receive training on identifying modern slavery red flags, anti-modern slavery best practices, and the importance of complying with our MSA Policy and reporting non-compliance. Employees must sign a statement acknowledging agreement with our MSA Policy.

Responsibility for This Statement

The board of directors has overall responsibility for ensuring this statement and the MSA Policy comply with our legal and ethical obligations, and that our employees comply with them.

Ian Phillpot, the Finance Director for our UK office, has primary and day-to-day responsibility for implementing our MSA Policy, monitoring its use and effectiveness, managing any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels is responsible for ensuring those reporting to them understand and comply with the MSA Policy and are given adequate and regular training on it and the issues of modern slavery in supply chains.

Board Approvals

Structuretone Limited's Board of Directors approved this statement on March 30, 2020. This statement will be reviewed annually and published on our website.



Robert Mullen
CEO, Structure Tone
Date: March 30, 2020