

**POLICY NUMBER**  
STOBG 020.05

**CONTACT**  
Compliance & Ethics Department

**EFFECTIVE DATE**  
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# ANTI-RETALIATION POLICY



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## INTRODUCTION

At STO Building Group, we strive to maintain a positive work environment in which employees feel comfortable engaging in open and honest dialogue, raising questions or concerns, and seeking guidance from colleagues and supervisors. This Anti-Retaliation Policy (“Policy”) sets out our unwavering commitment to provide such an environment and protect employees who raise matters in good faith from retaliatory behavior.

This Policy applies to STO Building Group and all of its member companies (collectively, “STOBG” or the “Company”) and the employees, directors, and officers of STOBG, as well as independent contractors and third parties acting on behalf of STOBG (for purposes of this Policy only, we refer to all of these individuals collectively as “employees,” although some are not employed by STOBG).

If there is any inconsistency between this Policy and local law requirements, local law will prevail, and any associated local policies will govern.

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## NO RETALIATION

The Company prohibits any form of retaliation against an employee who engages in an activity protected by this Policy or applicable law (a “protected activity”), including:

- filing a report in good faith, either internally or externally, about potential violations of Company policy or applicable law. “Good faith” does not mean you have absolute proof or that the conduct reported has to be substantiated; rather, it means you have a reasonable basis to believe your report may be true and requires further investigation
- participating or cooperating in an internal or external investigation of potential misconduct
- raising a question or concern within the Company
- refusing to participate in improper or unlawful conduct

Retaliation is any action, statement, or behavior that is intended to deter or dissuade someone from engaging in a protected activity. Retaliation may include

intimidation; discrimination; harassment; coercion; and adverse employment action such as demotion, suspension, failure to hire or promote or consider for hire or promotion, reduction of compensation, exclusion from Company events or meetings where the person would normally be included, defamation of character, adversely impacted work conditions, failure to provide employment benefits, and termination, as well as related threats of such actions.

This Policy protects employees who make a report in good faith, even when the conduct that they reported is not substantiated. It does not, however, protect employees who knowingly make a false report, provide knowingly false or misleading information in the course of an investigation, or otherwise act in bad faith.

This Policy does not shield employees from the consequences of their own misconduct or inadequate performance. It also does not prevent STOBG from addressing employee performance or behavior separate and apart from the conduct protected by this Policy.

The Company will take appropriate corrective or disciplinary action for violations of this Policy or for failing to report misconduct under this Policy.

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## SPEAKING UP

Preventing misconduct is a responsibility shared by all of us. All employees have a duty to speak up and promptly report any suspected violation of our policies or applicable law, including conduct that occurs within STOBG or that involves one of our subcontractors, suppliers, consultants, clients, or any other party with a business relationship to STOBG.

### Contact a Company Resource

You can report potential misconduct to any of the following Company resources:

- your manager, a more senior manager, or your business unit leader
- a member of STOBG executive management
- your compliance liaison or the Compliance & Ethics Department

- the Human Resources Department
- the Legal Department

If the Company resource you report to has a conflict of interest, or if your initial report has failed to resolve the issue, you should make a follow-up report to our Compliance & Ethics Department.

If you prefer to submit a written report, you can use STOBG's internal complaint form, which is available on our intranet.

### Another Resource: Our 24/7 Anonymous Helpline

You may also report potential misconduct anonymously through our 24/7 helpline, operated by a third party unaffiliated with STOBG, by calling the below toll-free numbers or visiting the online portal.

**Call toll-free:** 866.593.6479 in the US & Canada  
0800.032.8483 in the UK  
1800.615.403 in Ireland

**Online:** [stobg.ethicspoint.com](http://stobg.ethicspoint.com)

Any reports made, whether anonymous or not, should include as much detail as possible to allow the Company to fully investigate the matter. Important details may include, for example, the names of the people involved in or witnesses to the incident, the dates and times of the incident, where the incident occurred, any relevant background information, and why you believe the incident should be reported. Providing sufficient details is especially important for concerns raised anonymously, so that the Company may conduct an appropriate review.

Employees who believe that they may have been personally involved in misconduct, whether intentionally or unknowingly, are still required to report such matters. Self-reporting will be considered when deciding whether or what corrective or disciplinary action is appropriate.

This Policy does not prohibit anyone from reporting concerns to, filing a charge or complaint with, making lawful disclosures to, providing documents or other information to, participating in an investigation or

hearing conducted by, or communicating with the US Equal Employment Opportunity Commission, National Labor Relations Board, Securities and Exchange Commission, or any other federal, state, or local agency charged with the enforcement of any laws.

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## INVESTIGATIONS

The Company takes all reports seriously and will conduct a proper, fair, and thorough investigation tailored to the circumstances, taking appropriate remedial and concluding steps as warranted. All action taken by the Company in response to a concern will depend on the nature and severity of the concern. This may include initial inquiries and fact-gathering to decide the form and scope of the investigation. An investigation into concerns raised is not an indication that they have either been confirmed or rejected.

The Company expects employees to cooperate with an investigation, subject to applicable law and any collective bargaining agreements. The Company also expects employees to provide truthful information when participating in an investigation. When an employee raises a concern, the Company will maintain confidentiality to the fullest extent possible, consistent with applicable legal requirements and the need to conduct an adequate investigation. Remember that employees can submit concerns anonymously as well.

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## ADMINISTERING THIS POLICY

STOBG's Compliance & Ethics Department is responsible for developing, implementing, and interpreting this Policy. The department can be reached at [compliance@stobuildinggroup.com](mailto:compliance@stobuildinggroup.com).

The Compliance & Ethics Department periodically reviews this Policy to determine whether revisions are required to reflect changes in the law, our business, or our policies and practices. The most recent version of the Policy can be found on our intranet and on STOBG's website.

## **ACKNOWLEDGEMENT**

I acknowledge that I have received and read a copy of the STO Building Group (“STOBG” or the “Company”) Anti-Retaliation Policy (“Policy”), and I understand and agree to comply with the Policy.

I understand that STOBG has the maximum discretion permitted by law to interpret, administer, change, modify, or delete this Policy at any time, and that no statement or representation by a manager or other employee, whether oral or written, can supplement or modify this Policy. Only STOBG’s Compliance & Ethics Department can modify this Policy. I also understand that any delay or failure by STOBG to enforce any Company policy or rule will not constitute a waiver of STOBG’s right to do so in the future. I further understand that this Policy is not a contract and does not create any contractual rights between me and STOBG. I accept that if there is any inconsistency between this Policy and my employment contract, the employment contract will prevail.

I understand that if I have questions about this Policy, I can consult a Company resource such as my manager, a more senior manager, my business unit leader, a member of STOBG executive management, my compliance liaison or the Compliance & Ethics Department, the Human Resources Department, the Legal Department, or STOBG’s 24/7 helpline.

Signature: \_\_\_\_\_

Name (printed): \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

