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CONTACT
Chief Ethics & Compliance Officer
Compliance & Ethics Department

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ANTI-RETALIATION POLICY



STO BUILDING GROUP



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INTRODUCTION

At STO Building Group (“STOBG”), 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 to protect employees who raise matters in good faith from retaliatory behavior.

This Policy applies to each of the member companies of STO Building Group, and when we refer to “STOBG,” the “company” or “organization,” “we,” “us,” or “our” in this Policy, we mean the member companies of STO Building Group, both individually and collectively. All employees of STO Building Group, its member companies, subsidiaries, and affiliates must follow this Policy, as well as members of STOBG’s board of directors and third parties when acting on behalf of our organization (collectively, “employees”).

NO RETALIATION

We prohibit and will not tolerate any form of retaliation against an employee who engages in an activity protected by law (a “protected activity”), including:

- filing a good faith report, either internally or externally, about potential violations of company policy or applicable law. “Good faith” means that the person brought forward what they know in a sincere and honest report, regardless of whether the conduct turns out to be unethical.
- participating in an 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 punish an individual for engaging in a protected activity or to deter one from engaging in a protected activity. Retaliation includes 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, 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 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.

YOUR OBLIGATION TO SPEAK 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. Disregard of this duty may have serious consequences both for the employee involved and for the company. Remaining silent in the face of illegal or unethical conduct simply is not an option.

Contact a Company Resource

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

- your manager, department head, or 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 Chief Ethics and Compliance Officer.

If you prefer to submit a written report, you can use STOBG’s internal complaint form for reporting

harassment, discrimination, and retaliation, 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

Any reports made, whether anonymous or not, should include as much detail as possible in order to allow the company to investigate the matter appropriately. 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, and why you believe the incident should be reported.

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

INVESTIGATION AND DISCIPLINARY ACTION

We take all reports of potential misconduct seriously, and we investigate all such reports as quickly as possible. While we can't guarantee confidentiality in every circumstance, we make every effort to protect the identity of any employee making a report in good faith, as well as any individual involved in the investigation. Such information will be shared subject to applicable law and only on a need-to-know basis. When necessary, subject to applicable law, investigations or the results of investigations may be reported to law enforcement or to a company client.

ADMINISTERING THIS POLICY

STOBG's Compliance & Ethics Department

STOBG's Compliance & Ethics Department is responsible for developing, implementing, and interpreting this Policy. The department can be reached at Compliance@STOBuildingGroup.com. You can also reach out directly to our CEO or any other member of the department. Postal mail can be sent to STOBG's Chief Ethics & Compliance Officer at 330 W. 34th St., New York, NY 10001.

Amendments to This Policy

Our 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.

Violations of This Policy

The company will take appropriate corrective or disciplinary action for violations of this Policy or other company policies. Employees also may face discipline for failing to report misconduct. Disciplinary action may include termination of employment and, if the violation is also against the law, referral to the appropriate authorities.

ACKNOWLEDGEMENT

I acknowledge that I have received and read a copy of the STO Building Group (“STOBG”) 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. 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 understand that if I have questions about this Policy, I can consult a company resource such as my manager, department head, business unit leader, a member of 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: _____

