

**POLICY NUMBER**  
STOBG 202.01

**CONTACT**  
Chief Human Resources Officer  
Human Resources

**EFFECTIVE DATE**  
December 20, 2023

# Human Rights Policy



**STO** BUILDING  
GROUP



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## Introduction

STO Building Group (“STOBG” or the “Company”) is committed to respecting and promoting human rights and addressing any adverse human rights impacts that may arise from its operations. We aim to protect and preserve human rights whenever and wherever we build, in accordance with the United Nations Universal Declaration of Human Rights and Guiding Principles on Business and Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, and other internationally recognized human rights standards.

Given our work in shaping the built environment, we recognize the importance of contributing to the greater good through our actions and conduct. This commitment begins with how we treat employees and extends to respecting the human rights of all individuals impacted by our operations, including clients, subcontractors, suppliers, and members of the communities in which we build.

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## Scope

In the workplace and wherever we build, we will adhere to this Human Rights Policy (“Policy”), other Company policies, and applicable laws and regulations.

This Policy applies to STOBG and all its member companies and employees, including directors, officers, independent contractors, and other persons with an employment-type relationship with STOBG (collectively, “employees”). All employees must conduct themselves in a manner consistent with this Policy.

The Company also expects its business partners, including subcontractors, suppliers, vendors, and other third parties acting on its behalf, to uphold the principles set out in this Policy and adopt similar policies within their own businesses.

This Policy should be read together with our [Code of Conduct](#), [Supplier Code of Conduct](#), [Anti-Slavery and Human Trafficking Policy](#), [Anti-Corruption Policy](#), and other Company policies that reinforce our commitment to safeguarding human rights and expectation that our business partners share in this commitment.

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## Principles

STOBG commits to the following human rights principles:

### Diversity, Equity, Inclusion, and Belonging

We believe that supporting diversity, equity, inclusion, and belonging is the right thing to do for our people and our business. We strive for a culture where all feel they belong and have opportunities to be their best selves. The Company's initiatives in this area extend beyond employees to our suppliers and other business partners, as we seek to build a more diverse and inclusive workforce on our jobsites and in our partnerships.

### Equal Employment Opportunity

STOBG's policy is to afford [equal employment opportunity](#) to qualified individuals regardless of race, ethnicity, sex, age, disability, or any other characteristic protected by applicable law (“protected characteristics”). The Company seeks to ensure that employment decisions are based only on valid job requirements.

### Discrimination- and Harassment-Free Workplace

The Company is committed to maintaining a workplace where everyone is treated with respect and dignity. Our [non-discrimination and anti-harassment policies](#) are intended to protect employees, clients, business partners, and other stakeholders from discrimination and harassment based on protected characteristics.

### Freedom of Association and Collective Bargaining

The Company respects employees' rights to freedom of association and to join collective bargaining organizations as permitted by applicable law. Where employees are represented by a legally recognized union, the Company is committed to establishing a constructive social dialogue and bargaining in good faith with their freely chosen representatives.

### Wages and Hours

The Company provides reasonable working hours and fair wages and benefits to employees in accordance with applicable law and collective bargaining agreements. We are committed to maintaining full compliance with applicable work hours and overtime laws.

## Prohibition on Modern Slavery and Human Trafficking

The Company has an [Anti-Slavery and Human Trafficking Policy](#) that sets out its commitment to identifying and managing modern slavery risk in its operations and supply chain. The policy prohibits all forms of modern slavery—including forced, compulsory, or indentured labor; child labor; human trafficking; and other situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, abuse of power, or deception—whether carried out by our Company, our employees, or our suppliers and other business partners.

## Health and Safety

The Company is fully committed to the safety of everyone in our workplaces and on our jobsites—from our employees and workforce to our clients and their visitors. We live out this commitment and culture through our Safety 360° program. The program's philosophy embraces encouraging behavioral change and taking a 360-degree view of safety and supports our journey to working with our trade partners to reduce and eliminate safety incidents.

## Land and Natural Resources

The Company supports the protection of rights associated with land and natural resources, including those aimed at preventing forced evictions or contamination and destruction of water bodies and fisheries. Additional information on our environmental approach can be found in our [Environmental Policy](#).

## Anti-Corruption

STOBG recognizes that corruption can enable human rights abuses and that mitigating corruption risk can help safeguard human rights. Our [Anti-Corruption Policy](#) prohibits all forms of corruption, such as bribery and collusive acts, and requires caution in areas that present a high risk of corruption, such as gifts and entertainment and working with intermediaries.

## Supply Chain Management

The Company is committed to working with its suppliers, subcontractors, and other business partners to ensure that they respect human rights and comply with applicable laws and regulations. Our suppliers are subject to rigorous prequalification and due diligence and are required to uphold the principles set out in this Policy through their commitment to our [Supplier Code of Conduct](#).

## Community Engagement and Impact

STOBG respects the rights of communities affected by its operations and, in coordination with our clients, will engage with them in a transparent and meaningful manner. The Company works to assess and manage the potential human rights impacts of its operations, including those related to land acquisition, resettlement, and indigenous peoples' rights.

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## Speaking Up

We promote an atmosphere in which employees feel safe to engage in open and honest communication. Any employee who wishes to report a concern about potential or actual adverse human rights impacts of our operations, or inappropriate, unethical, or illegal conduct, can contact a number of company resources, including:

- their manager, a more senior manager, or their business unit leader
- their local Human Resources representative
- a member of STOBG executive management
- their compliance liaison or the Compliance & Ethics Department
- the Legal Department

Employees, as well as third parties, may also report concerns anonymously through our 24/7 helpline, operated by an independent third party, by calling the below toll-free numbers or visiting the online portal.

**Call toll-free:** 800.461.9330 in the US  
1.800.235.6302 in Canada  
1800.904.177 in Ireland  
0800.189.1053 in the UK

**Online:** [compliancehelpcenter.com](https://compliancehelpcenter.com)

Reporters, whether anonymous or not, are encouraged to include as much detail as possible to allow the Company to fully investigate the matter.

STOBG's [Anti-Retaliation Policy](#) prohibits retaliation against any employee who makes a good faith report. "Good faith" does not mean that you have absolute proof or that the conduct reported must be substantiated; rather, it means you have a reasonable basis to believe your report may be true and requires further investigation.

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## About This Policy

STOBG is committed to providing the necessary resources, training, and support to ensure effective implementation of this Policy. The Company engages in dialogue with stakeholders to address human rights

concerns and regularly reviews this Policy to ensure its alignment with evolving human rights standards.

If you have questions about this Policy, you can reach out to our Human Resources team at [hr@stobuildinggroup.com](mailto:hr@stobuildinggroup.com).

