



INTRODUCTION

Artificial Intelligence (AI) can offer transformative benefits to the construction industry and across our organization, enabling our teams to work smarter, not harder. Throughout all phases of our projects and in many aspects of our daily work, AI-powered tools can enhance scheduling, risk assessment, design optimization, and safety—helping us reduce costs, mitigate delays, and elevate quality. AI also supports data-driven planning, real-time insights, and automation of repetitive tasks, freeing up our teams to focus on high-value activities, solving complex challenges, and delivering greater value to our clients. Embracing AI is part of how we continue to innovate and grow. As our industry continues to evolve, AI can help us stay agile, efficient, and forward-thinking in the way we deliver projects and support each other.

But these advancements also bring challenges related to data ownership, security, and accuracy. For example, if an AI tool is used to analyze past construction schedules to predict project timelines, it could unintentionally include confidential client information or produce inaccurate results if the underlying data isn't properly vetted. Navigating these risks carefully is essential to leveraging AI without compromising privacy, fairness, or security.

At STO Building Group, we are committed to ensuring the ethical and transparent use of AI tools. This Generative AI Policy ("Policy") establishes mandatory guidelines for using generative AI tools, which utilize machine learning and big data analysis to create content, such as text, images, and videos. The aim of this Policy is to empower you to use generative AI responsibly—safeguarding sensitive data, promoting fairness, and maintaining excellence in our work.

This Policy applies to STO Building Group and all of its member companies (collectively, "STOBG" or the "company"), including STOBG employees, officers, directors, and interns, as well as individuals who perform services for the company in an employment-type

capacity, such as independent contractors, agency workers, and temporary staff.

This Policy governs the use of both external generative AI tools, such as ChatGPT, Gemini, DALL-E, and Claude, that are not part of STOBG's enterprise suite, and internal tools that are integrated within STOBG's systems, such as Microsoft Copilot and Oracle Fusion Cloud HCM. The Policy does not apply to non-generative AI technologies, such as auto-correct features in word processors, spam filters in email, machine learning models, and search bar recommendations.

This Policy should be followed alongside STOBG's other policies and procedures. It is subject to change at STOBG's discretion to keep pace with technological advancements, regulatory requirements, and other relevant factors.

Any requests to use a third-party generative AI tool should be directed to STOBG's IT Department at IT@STOBG.com, in accordance with STOBG's [IT Policies](#).

AI USE GUIDELINES

Follow these guidelines to ensure that generative AI is used ethically, responsibly, and in alignment with STOBG's values.

1. **Prioritize your expertise.**

Use AI tools as a supportive tool rather than a substitute. Always rely on your professional judgment, experience, and skills to guide decisions. AI can enhance your work, but it's your expertise that ensures the best outcomes.

2. **Comply with client AI policies.**

Understand and comply with any applicable client or business partner AI policies. If a client's or a business partner's policy or guidance is more restrictive than STOBG's, follow theirs instead. Adhering to client or business partner policies not only helps avoid potential legal issues, but also promotes trust with our clients and business partners and smoother collaboration.

3. **Protect sensitive information.**

Do not upload, share, or input any company or client data into external AI tools. This applies to all types of company or client data, whether proprietary, confidential, or seemingly harmless. Pay particular attention to protecting the following types of data:

- a. Employee, client, or project identifiers (e.g., names, addresses, email addresses, contract details).
- b. Confidential business documents (e.g., financial reports, legal documents, intellectual property, proprietary business strategies).
- c. Private conversations (e.g., emails, texts, personal notes).
- d. Biometric data (e.g., voice recordings, fingerprints, facial scans).

Safeguarding this information ensures the integrity of both our company's and clients' data, compliance with privacy and security policies, and adherence to applicable law.

4. **Opt-out of automatic data usage.**

When given the choice, you should turn off automatic data usage. When you opt out of automatic data usage, you're choosing not to let apps or services automatically collect and share your data. Instead, you decide what information they can access, making sure only what's needed gets shared. By opting out of automatic data usage, you take control over what data is shared.

5. **Ensure quality control.**

We rely on you to take responsibility for the quality and accuracy of AI-generated content. Verify AI outputs through independent sources and apply company quality assurance standards before using or sharing the content.

6. **Review and edit AI content before sharing.**

Thoroughly review and modify AI-generated content before associating it with a company copyright, trademark, or patent. This preserves the integrity of our intellectual property and also maintains the originality and quality of deliverables.

7. **Separate personal and work AI.**

Keep personal AI use separate from company-related use. Use only appropriate channels for work-related AI inquiries and keep these sessions organized by project or task. Do not use an STOBG-provided email address for personal AI use. This helps maintain clear boundaries and promotes data security.

8. **Avoid AI for audio/video.**

AI-generated audio or video may not meet company standards. Creating original content without the use of AI ensures better control over messaging and legal or ethical considerations. If there is strong reason to use AI-generated media, secure approval from STOBG's IT Department before moving forward.

9. **Disclose AI use when it impacts outcomes.**

Disclose use of AI to your manager or department head when the use of AI directly impacts the final outcome of the content created, decision made, or problem solved. You should also let your manager or department head know when the use of AI may raise legal, compliance, ethical, or privacy concerns. If you're unsure whether the use of AI raises such a concern, reach out to the Legal or Compliance team for guidance. If AI played only a small role in producing your work product (like checking grammar or suggesting ideas), disclosure isn't necessary.

This transparency enables colleagues reviewing the content to apply appropriate scrutiny to ensure the integrity and quality of our work. Consult with STOBG's Legal or Compliance Department if you need guidance.

10. Use AI responsibly in employment decisions.

Do not use generative AI tools to assess or make decisions about a person's characteristics, employment status, or career progression. This reduces the risk of bias, upholds fairness, and ensures ethical practices in hiring, promotions, and terminations.

11. Never use AI for deceptive purposes.

AI should never be used to create deceptive content, such as deepfakes or manipulation of others' likenesses. This helps us preserve a safe and professional environment.

12. Comply with company policies.

Ensure AI use complies with all company policies, including our [Code of Conduct](#), [Anti-Corruption Policy](#), and [Non-Discrimination and Anti-Harassment Policies](#). Violations of company policy may result in disciplinary action, up to and including termination.

13. IT and monitoring policies apply.

Be aware that STOBG's [IT Policies](#) and monitoring policies apply to all use of generative AI on company devices and networks. The company reserves the right to monitor AI use to ensure adherence to company policies and security standards, consistent with applicable law.

PROHIBITED AI USES

The following AI systems and practices are prohibited:

1. Manipulative AI

AI systems that use subliminal or deceptive techniques to materially distort a person's decision-making.

2. Exploitative AI

AI systems that exploit vulnerabilities of individuals or groups due to age, disability or socio-economic status, with the object or effect of materially distorting behavior leading to harm.

3. Social scoring

AI systems that evaluate or classify individuals or groups over time based on social behavior or characteristics, leading to detrimental or unfavorable treatment.

4. Risk assessment profiling

AI systems used for making risk assessments of people to predict adverse behavior based on profiling personality traits or characteristics (i.e., "predictive policing").

5. Facial recognition databases

The creation or expansion of facial recognition databases through untargeted scraping of the internet or CCTV images.

6. Emotion inference

The use of AI to infer emotions of people in workplaces and educational institutions.

7. Biometric categorization

AI systems categorizing people based on biometric data to deduce or infer sensitive attributes like race, political opinion, or sexual orientation.

8. Real-time biometric identification

The use of real-time remote biometric identification systems in public spaces.

RAISING AN AI USAGE CONCERN

If you observe or suspect inappropriate, unethical, or non-compliant use of generative AI, please raise your concern with any one of the below resources:

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

You may also raise your concern 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.

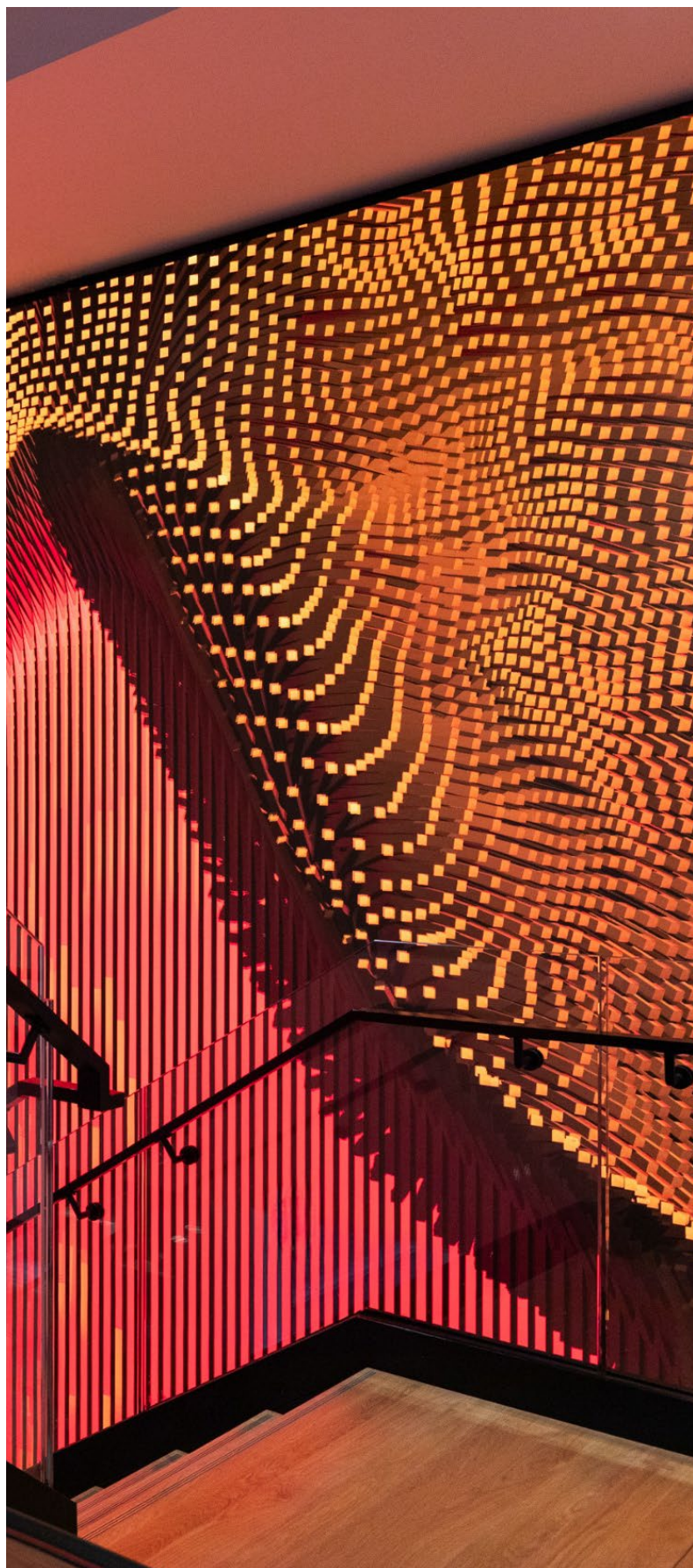
Call toll-free US: 800.461.9330
Canada: 1.800.235.6302
Ireland: 1800.904.177
Netherlands: 0800.904.177
UK: 0808.189.1053

Go online compliancehelpcenter.com

Any reports made, whether anonymous or not, should include as much detail as possible to allow the company to review the matter thoroughly.

ABOUT THIS POLICY

This Policy has been approved by STOBG's executive management team. STOBG's Compliance & Ethics Department is responsible for its development, implementation, and interpretation and will periodically review and revise the Policy as needed to reflect changes in the law, our business, or our policies and practices. The company reserves the right to amend, replace, suspend, or withdraw all or part of this Policy at any time.





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