



# INTRODUCTION

STO Building Group is committed to protecting the environment and being a steward for the natural world. As a responsible and forward-thinking company, we acknowledge the role that we have in reducing the impact of our work on climate change, promoting environmental conservation, and fostering sustainability across all our operations. We are committed to compliance with environmental laws and regulations, helping to curtail our carbon footprint, and conserving natural resources by integrating environmentally friendly practices.

We believe that our success is closely linked to the well-being of our environment and efforts to protect the natural world. To this end, we are dedicated to improving our environmental practices and educating our staff, clients, trade partners, suppliers, and members of the communities in which we build to promote a greater understanding about sustainability.

## SCOPE

In the workplace and wherever we build, we will adhere to this Environmental Policy ("Policy"), other company policies, and applicable laws and regulations.

This Policy applies to STO Building Group and all of its member companies (collectively, "STOBG" or the "company"), and to all individuals performing work for or on behalf of the company in any capacity. This includes employees, officers, directors, independent contractors, agency workers, seconded staff, interns, and volunteers. For simplicity, this Policy refers to all such individuals as "employees," even if they are not directly employed by STOBG. 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 through their adherence to STOBG's [Supplier Code of Conduct](#).

This Policy should be read together with any applicable site-specific safety manual, as well as STOBG's [Visitor Policy](#), [Human Rights Policy](#), [Code of Conduct](#), [Supplier Code of Conduct](#), and other company policies that reinforce our commitment to protecting the environment and expectation that our business partners share in this commitment.

## PRINCIPLES

We're committed to managing our environmental impact as an integral part of our operations and exploring implementation of sustainable measures including the following across our organization:

### Carbon Reduction

Our organization intends to explore the measurement and analysis of emissions from our operations. We aim to cooperate with clients in exploring potential solutions for GHG (Greenhouse Gas) reductions, focusing on efficiency improvements, such as reducing fuel usage and considering electrification as a preferred option.

### Waste Reduction

Our efforts include managing waste generation in our operations and business activities. We strive to increase diversion and reuse, promoting the responsible management of waste and recycling as integral steps in our circularity journey.

### Pollution Prevention

Projects will adhere to applicable EPA (and/or local authority) standards for preventing pollution through our construction activities. Such measures are often found in our site-specific safety manuals in the Environmental Protection section. We will endeavor to address pollution from our operations by promoting the use of eco-friendly technologies, processes, and materials.

## Energy, Water and Resource Conservation

We will explore adoption of energy and water efficiencies as new technologies become available. Through our projects, we will seek to work with our clients and partners to plan for responsible resource use and to offer suggestions that enhance energy, water, and resource conservation.

## Wellness

Through our Safety 360° program, we focus on indoor air quality, hydration, nutrition, and mental health of our employees and business partners.

## Leadership

We strive to engage and inspire our employees, clients, and partners to make positive impacts on the environment and educate our staff to make them aware of the environmental impacts of their work and how to manage them where possible. We will work to be an environmentally responsible neighbor and act to correct conditions within our control that may endanger health, safety, or the environment.

As a leader in the construction industry, we will evaluate our environmental performance and identify areas for improvement.

## Biodiversity

We will help raise awareness around biodiversity, mitigation, and adaptation principles with our industry partners and take action, where appropriate.

## Client Health and Safety

We require our visitors to comply with health and safety regulations applicable to STOBG employees and the governing STOBG location, as set out in our site-specific safety manuals and STOBG's [Visitor Policy](#).

## Environmental Laws and Regulations

We will endeavor to understand and comply with environmental laws, regulations, and standards applicable to our operations, as well as any other requirements that we may agree to with our clients or stakeholders.

## Human Rights

We believe that all individuals are entitled to fundamental human rights and dignity, regardless of their race, ethnicity, gender, religion, sexual orientation, or any other personal characteristic. We are committed to upholding and promoting these rights in all our activities and interactions, and we recognize that this responsibility extends beyond the workplace and into the broader community. Our [Human Rights Policy](#) endeavors to protect human rights, to create a more just and equitable world for all.

## 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 environmental impacts of our operations, or inappropriate, unethical, or illegal conduct, can choose to contact one of several company resources, including:

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

Employees, as well as third parties, may also report concerns anonymously, where permitted by law, 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** US: 800.461.9330  
Canada: 1.800.235.6302  
Ireland: 1800.904.177  
Netherlands: 0800.904.177  
UK: 0808.189.1053

**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.

## ABOUT THIS POLICY

This Policy has been approved by STOBG executive management. The Sustainability Department is responsible for regularly reviewing and updating this Policy to promote its continued effectiveness.

If you have questions about this Policy, you can reach out to Jennifer Taranto, Vice President of Sustainability, at [sustainability@stobg.com](mailto:sustainability@stobg.com).





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GROUP