



INTRODUCTION

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced or compulsory labour, and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

At STO Building Group, we have a zero-tolerance approach to slavery of any form or type, and we fully support the principles of the UK Modern Slavery Act 2015 and other equivalent legislation in our various global locations. We've implemented systems and controls aimed at ensuring modern slavery is not taking place anywhere in our own business or supply chain. Consistent with our disclosure obligations under the Modern Slavery Act 2015, we've adopted and published on our website a [Modern Slavery Act Statement](#) that outlines our commitment to combating modern slavery.

SCOPE

This Anti-Slavery and Human Trafficking Policy ("Policy") applies to STO Building Group and all of its member companies (collectively, "STOBG"), and to all individuals working for or on behalf of STOBG in any capacity, including employees, directors, officers, agency workers, seconded workers, interns, and volunteers. For simplicity, this Policy refers to all such individuals as "employees," even if they are not directly employed by STOBG.

We also expect third parties that provide goods or services to STOBG—such as suppliers, subcontractors, service providers, consultants, intermediaries, and agents (collectively, "Suppliers")—to comply with our standards through their adherence to STOBG's [Supplier Code of Conduct](#) ("Supplier Code").

This Policy should be read together with STOBG's [Human Rights Policy](#), [Supplier Code](#), and other policies that reinforce our commitment to safeguarding human rights.

POLICY STATEMENT

STOBG is committed to fair employment practices and to preserving fundamental human rights everywhere we build. We have zero tolerance for any form of modern slavery, which is an umbrella term used to describe situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, abuse of power, or deception.

Conduct prohibited by this Policy—whether by STOBG, its employees, or its Suppliers—includes:

- Human trafficking, including the recruitment, harbouring, transportation, provision, or obtaining of a person for labour or services, through force, fraud, or coercion for the purpose of exploitation.
- Forced, compulsory, or indentured labour, child labour, or any other practice that violates human and labour rights, according to local, national, or international standards.
- Practices that would restrict free movement of workers, including destroying, confiscating, or otherwise denying access by a worker to the worker's identity or immigration documents, such as passports or drivers' licences.
- Misleading or fraudulent practices during the recruitment of workers or offering of employment, such as failing to disclose, in a format and language accessible to the worker, basic information or making material misrepresentations about the key terms and conditions of employment, including wages and benefits, the location of work, any significant cost to be charged to the worker, and, if applicable, the hazardous nature of the work.
- Using recruiters that do not comply with local labour laws.
- Charging recruitment fees or other fees to gain or maintain employment that trap workers in debt bondage.

OVERVIEW OF OUR SUPPLY CHAIN

Throughout the course of our history, we have recognised the value in fostering relationships with the trade and subcontracting community, working with reliable and reputable firms that share our values. To work with STOBG, a Supplier must demonstrate that it is a viable, productive company and complete our Supply Chain Prequalification Package, which requires the Supplier to provide specific information on the measures it has taken to live up to STOBG's standards (such as implementation of appropriate anti-slavery and health and safety policies).

Our Suppliers are required to adhere to our [Supplier Code](#), which incorporates this Policy and reflects our commitment to responsible and ethical business practices. Suppliers are responsible for communicating these expectations to their own suppliers and ensuring they uphold the same standards. Under the [Supplier Code](#), Suppliers must comply with the letter and spirit of all applicable laws and regulations, including those related to child labour, involuntary labour, and wages and working hours.

STEPS TO PREVENT MODERN SLAVERY

As part of our initiative to identify and manage modern slavery risk, we have set the following objectives:

- Implementing this Anti-Slavery and Human Trafficking Policy and our [Supplier Code](#)
- Training our staff on both policies and issuing communications to raise awareness of modern slavery and human trafficking
- Developing an updated system for supply chain prequalification, including adding modern slavery enquiries to our standard form prequalification questionnaire and implementing enhanced due diligence to help

ensure that our supply chain is free from modern slavery and human trafficking

- Reviewing our existing supply chains and identifying any high-risk Suppliers and/or jurisdictions
- Seeking specific contractual commitments in our Supplier contracts
- Encouraging our employees, Suppliers, and others on our jobsites to ask questions about this Policy and to report any issues, concerns, or suspicions about modern slavery or human trafficking to a company resource or our 24/7 anonymous helpline
- Prohibiting retaliation against anyone for raising queries or concerns in good faith

RESPONSIBILITY FOR THIS POLICY

Our board of directors has overall responsibility for ensuring this Policy aligns with our legal obligations and ethical standards and that it is effectively implemented across all STOBG companies.

STOBG leadership in each business unit is responsible for implementing this Policy, monitoring its use and effectiveness, managing any queries about it, and reviewing internal controls to ensure they are effective in preventing and addressing modern slavery.

Management at all levels is responsible for ensuring that individuals under their supervision understand and comply with this Policy and receive appropriate and regular training on this Policy and on the issue of modern slavery in supply chains.

COMPLIANCE WITH THIS POLICY

You must ensure that you read, understand, and will comply with this Policy. The prevention, detection, and

reporting of modern slavery in any part of our business or supply chain is a responsibility that we all share. You are required to avoid any activity that might lead to, or suggest, a breach of this Policy.

RAISING QUERIES OR CONCERNS

If you have a query about this Policy, a belief or suspicion that a breach of this Policy has occurred or may occur in the future, or a concern more generally about modern slavery in any part of our business or supply chain, you must raise it promptly with a company resource, such as:

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

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chain constitute any of the various forms of modern slavery, you should consult with a company resource at the earliest stage possible.

You may also raise concerns through our helpline. Available 24/7 and operated by an independent third party, the helpline allows anyone—not just employees—to ask questions or report concerns, with the option to remain anonymous.

Call toll-free US: 800.461.9330
Canada: 1.800.235.6302
Ireland: 1800.904.177
Netherlands: 0800.022.0441
UK: 0808.189.1053

Online compliancehelpcenter.com

You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our Suppliers to help them

address coercive, abusive, and exploitative work practices in their own business and supply chain.

We encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery is taking place in any part of our business or supply chain. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Compliance & Ethics Department immediately.

COMMUNICATION AND AWARENESS OF THIS POLICY

Training on this Policy and on the risks our business faces from modern slavery is provided regularly to employees.

Our zero-tolerance approach to modern slavery must be communicated to all Suppliers at the outset of our business relationship with them and reinforced as appropriate thereafter.

BREACHES OF THIS POLICY

Any employee who breaches this Policy may face disciplinary action, up to and including dismissal. STOBG reserves the right to review or terminate its relationship with any Supplier that fails to meet the standards set forth in our [Supplier Code](#).



STO BUILDING
GROUP