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INTRODUCTION

At STO Building Group, we are committed to doing the right thing—every day, for every client, on every jobsite. Corruption, which means using one’s position or influence to gain an unfair personal or business advantage, has no place at our company. This includes offering or accepting bribes or using gifts to improperly influence decisions. We also consider anticompetitive practices, like colluding with competitors or interfering with the fair selection of vendors or subcontractors, to be corruption. These behaviors are contrary to our values and undermine the trust our clients, partners, and colleagues place in us. They can also be unlawful.

Corruption can have serious consequences for both employees and the company, including fines, criminal charges, disqualification from bidding, loss of projects, and reputational harm. That is why STOBG prohibits all forms of corruption, everywhere we work, regardless of role, location, or local custom.

This Anti-Corruption Policy is part of our broader anti-corruption program designed to help you spot risks, avoid corrupt practices, and navigate gray areas. Each of us plays a role in making this program effective—by staying alert, speaking up, and holding ourselves to the standards of this Policy.

SCOPE

This Anti-Corruption Policy (“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.

This Policy also applies to third parties acting on the company’s behalf, such as vendors, subcontractors,

consultants, intermediaries, and agents (collectively, “Suppliers”). Suppliers are expected to comply with this Policy through their adherence to our [Supplier Code of Conduct](#) and ensure that their own suppliers do the same.

This Policy should be read in conjunction with other relevant company policies like our [Code of Conduct](#), [Gifts and Entertainment Policies](#), and [Conflicts of Interest Policy](#).


OUR RESPONSIBILITIES

Preventing corruption and safeguarding our integrity is a shared responsibility. Employees must know our standards, raise concerns early, and support a speak-up culture.

Follow This Policy and the Law

You are responsible for understanding and following this Policy, and for complying with all applicable anti-corruption and competition laws. These include the U.S. Foreign Corrupt Practices Act (FCPA) and Foreign Extortion Prevention Act (FEPA), the UK Bribery Act and Economic Crime and Corporate Transparency Act (ECCTA), the Canadian Corruption of Foreign Public Officials Act (CFPOA), and similar local, state, and international anti-corruption and competition laws wherever STOBG operates. These laws may apply across borders, regardless of where you are working. If laws differ, follow the stricter standard.

If you’re unsure about what the law or this Policy requires, contact the Compliance & Ethics Department. Failure to comply with this Policy may result in disciplinary action, up to and including termination, and possible civil or criminal penalties.

 **Compliance Tip:** Virtually every country around the world enforces some form of anti-corruption law. That’s why our compliance efforts are globally informed and locally responsive—to ensure we meet the highest standards across all of our markets.

Speak Up

If you know about or suspect a violation of this Policy, speak up right away. You don't need proof; raising concerns early helps protect both STOBG and our people.

You can report concerns or ask questions through any of these company resources:

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

You may also contact 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: 0800.904.177

UK: 0808.189.1053

Online: compliancehelpcenter.com

When reporting, include as much detail as you can so the issue can be reviewed thoroughly. All concerns will be handled fairly, promptly, and in line with applicable law. Confidentiality will be maintained to the greatest extent possible. Appropriate action will be taken based on the findings.

Supervisors and managers have an added duty: they must set the right example, encourage openness, and ensure any concerns brought to them are escalated promptly through the appropriate company channels.

Anyone who raises a concern in good faith, seeks advice, cooperates in an investigation, or refuses to participate in misconduct is protected under STOBG's [Anti-Retaliation Policy](#). Retaliation of any kind is prohibited and may itself result in disciplinary action.

PROHIBITED ACTIVITIES

Certain practices are always unlawful or improper. These activities are strictly prohibited, and violations have serious consequences.

Bribery, Kickbacks, and Improper Payments

STOBG prohibits all forms of bribery, kickbacks, facilitation payments, or other improper payments, no matter the amount or whether local law or custom permits them. This prohibition applies to every employee and anyone else acting on STOBG's behalf. You may not use personal funds or third parties, like consultants or subcontractors, to do anything this Policy prohibits.

Bribery

Bribery means offering, giving, asking for, or accepting anything of value to improperly influence a decision. It can involve government officials, private clients, subcontractors, suppliers, and other business partners.

Both giving and receiving bribes are violations of this Policy and the law. Offering, authorizing, attempting, or soliciting a bribe is also a violation, even if no payment is ultimately made or accepted.

Bribery can take many forms. A bribe can be made or received directly or indirectly, including through family members, romantic partners, friends, or others.

Anything of value can be a bribe, including:

- cash or cash equivalents (e.g., gift cards, vouchers)
- gifts, travel, or meals
- personal favors
- free or discounted goods or services
- job offers or internships

- charitable donations made to benefit a decision-maker
- political contributions made to secure a business advantage

Kickbacks

Kickbacks are bribes given or received *after* a decision is made, as a reward for favorable treatment. They're just as unlawful as bribes given beforehand.

For example, a kickback could include making or receiving a payment, providing or accepting free goods or services, or sending or receiving expensive gifts to a decision-maker after winning a contract.

Public and Private Sector Dealings

This Policy applies in both public- and private sector business dealings. In the private sector, corrupt payments are known as “commercial bribery,” which is equally prohibited under the law.

Failing to Prevent Bribery

Some laws, such as the UK Bribery Act, make it a crime to fail to prevent bribery. Companies may be liable for the actions of their employees or third parties, even if management did not know about it.

That's why STOBG has a company-wide anti-corruption program designed to prevent, detect, and address risks. This program includes: employee training; due diligence on third parties; clear policies on gifts, entertainment, and political and charitable contributions; financial controls; internal audits; confidential reporting channels; and clear procedures for the way STOBG responds to those reports.

👉 Compliance Tip: If you engage third parties—such as subcontractors, consultants, agents, or permit expeditors—follow our prequalification and due diligence procedures. STOBG can be held responsible for their actions, including improper payments made on our behalf. Check with the Compliance & Ethics Department when in doubt.

Facilitation Payments

Facilitation payments (also called “grease” or “expediting” payments) are small payments to government officials to speed up routine actions like permits or inspections. Even though such payments may be common in some places, they are strictly prohibited at STOBG and, in many cases, illegal.

Published fees charged by a government agency, such as an official “express processing” fee, are not considered facilitation payments if paid directly to the agency.

👉 Compliance Tip: Routine permitting and inspections may create risk if an employee feels pressured to make a small payment to speed things up. Such payments are prohibited facilitation payments, and requests for such payments must be reported immediately.

If You're Asked to Pay a Bribe

If you're ever asked or pressured to pay a bribe or other improper payment, do not make the payment. Politely refuse and explain that company policy prohibits such payments. Immediately report the request to the Compliance & Ethics Department.

In rare situations where refusing to pay a bribe comes with an immediate and credible threat to your safety or the safety of others, you may make the payment to protect yourself or others. Report the situation to the Compliance & Ethics Department as soon as you are safe.

Anticompetitive Practices

STOBG is committed to fair and honest competition. Many clients depend on competitive bidding to secure the best value and quality. Anticompetitive practices undermine that process by manipulating prices, limiting choice, or steering work unfairly.

STOBG prohibits all forms of anticompetitive behavior, including bid rigging, price fixing, market allocation, and “no-poach” or wage-fixing agreements. These illegal practices violate our policies and damage client trust.

Bid Rigging

Bid rigging occurs when bidders agree to manipulate the outcome of a competitive process.

Examples include:

- **Bid suppression:** a bidder agrees not to bid, or to withdraw a bid, so another can win.
- **Complementary (“cover” or “courtesy”) bidding:** submitting a deliberately high or incomplete bid to make another bidder appear more competitive, or to stay visible for future work without intending to perform the work.
- **Bid rotation:** competitors take turns winning or losing contracts.
- **Bid tailoring or steering (manipulation of tender specifications):** shaping bid requirements to give one bidder an unfair advantage.
- **Phantom (fictitious) bids:** using sham companies to create the illusion of competition.
- **Improper subcontracting:** a losing bidder is promised subcontract work in exchange for not bidding competitively.

👉 **Compliance Tip:** Watch for patterns where competitors always bid in the same order, submit unrealistic bids, take turns winning, drop out unexpectedly, or reappear as subcontractors to the winner. These are red flags of bid rigging and must be reported to the Compliance & Ethics Department.

Improper Coordination With Bidders

The integrity of our procurement process depends on fairness—both in how competitors bid and how we solicit, evaluate, and award work. STOBG strictly prohibits any improper coordination, collusion, or information sharing with bidders or prospective business partners.

Improper coordination includes:

- disclosing non-public bid information with one or more bidders to give them an advantage
- tailoring bid requirements to favor a particular bidder
- privately agreeing to award work in exchange for a personal benefit
- promising other work to a losing bidder in return for a noncompetitive bid

These actions violate STOBG policy, create the appearance of favoritism, and may amount to bid rigging, fraud, corruption, or other unlawful conduct.

👉 **Compliance Tip:** Even if improper coordination results in a lower price to the client, it can still be illegal because it removes genuine competition.

Price Fixing and Price Signaling

Price fixing occurs when competitors agree on prices or other bid terms instead of setting them independently. It is illegal, whether competitors agree to raise, lower, or stabilize prices or other terms. Price signaling occurs when competitors share or hint at current or future prices or commercial terms in ways that could influence how others set their prices or terms, even without a formal agreement.

Examples include agreements or communications to:

- use the same labor or material rates
- set minimum bid amounts for certain work
- use the same formula for markups or discounts
- coordinate pricing by service type (e.g., “We’ll charge more for renovations; you charge more for new builds”)

Prices and terms must be based only on STOBG’s own costs, strategy, and market conditions, not on agreements or discussions with competitors.

👉 **Compliance Tip:** If a competitor suggests that everyone use “standard” rates or minimum bid levels, leave the conversation and report it to the Compliance & Ethics Department.

Market Allocation

Market allocation occurs when competitors agree to divide customers, territories, or project types, or to avoid entering each other’s markets or lines of business.

This can involve geographic divisions (e.g., “We’ll stay out of your city if you stay out of ours”), assigning clients or sectors, or agreeing not to pursue certain projects.

👉 **Compliance Tip:** Joint ventures with competitors can raise antitrust risks if they reduce competition or share sensitive pricing information. Always involve the Legal Department early when considering a JV, alliance, or teaming agreement with a competitor.

Abuse of Market Power

A company may not use its market position to unfairly block competitors or control contractors.

Examples include:

- **Predatory pricing:** setting unsustainably low prices to drive out competitors
- **Exclusive dealing arrangements:** requiring suppliers, subcontractors, or clients to work only with your company, in a way that unfairly limits competitor or contractor access
- **Boycotting:** agreeing with others to refuse to work with a particular competitor, supplier, or client.

👉 **Compliance Tip:** Consult the Legal Department on any arrangements that could restrain competitor or contractor business in sectors in which STOBG is a significant participant.

Employment-Related Anticompetitive Practices

Fair competition extends to hiring and retaining talent. Agreements with competitors to fix wages or benefits (“wage fixing”), or to avoid hiring each other’s employees (“no-poach” agreements), are prohibited.

STOBG may, however, include limited, project-specific non-solicitation clauses in agreements with clients if they are narrowly scoped, time-limited, and necessary to ensure workforce continuity. These clauses require Legal Department review and approval. Employees must never make side agreements with subcontractors, competitors, or clients about restrictions on hiring.

Broker’s Fees, Finder’s Fees, or Commissions

Your responsibilities at STOBG may include seeking new business opportunities or requesting subcontractor proposals. You may not pay anyone to “find” us work, nor may you accept payments from anyone in exchange for awarding work. This prohibition may include broker’s fees, finder’s fees, commissions, and other third-party compensation, so consult the Legal or Compliance & Ethics Department before considering such arrangements.

👉 **Compliance Tip:** Be cautious of third parties who present themselves as “introducers” or “connectors” and ask for a fee to introduce a client or project. Consult the Legal or Compliance & Ethics Department before proceeding.

Money Laundering

Money laundering means disguising money from illegal activity as legitimate. STOBG complies with all applicable anti-money laundering laws, works only with clients and business partners that operate legal businesses with legitimate sources of funding, and is committed to detecting and deterring money laundering.

Watch for warning signs, such as:

- requests to transact in cash or cash equivalents (STOBG does not conduct business this way)
- payments involving multiple checks or multiple sources
- payments to or from entities or individuals not party to the transaction or in places where none of the work is being performed
- payments through accounts with hidden or unclear ownership
- payments through unusual accounts
- reluctance to provide requested documentation or information concerning the company or its source of funds

If you suspect that a company transaction may involve money laundering, notify your manager, the Finance Department, or the Compliance & Ethics Department immediately.


Making False, Misleading, or Inaccurate Records

The law requires us to keep accurate records of all transactions. Falsifying records (for example, disguising a bribe as a “consulting fee”) can be a crime.

Prohibited practices include:

- maintaining “off the books” accounts
- falsifying entries or hiding transactions
- mischaracterizing payments
- using personal or third-party funds to make prohibited payments

All company records, both paper and electronic, must be retained in line with legal and contractual requirements and STOBG’s internal processes and procedures, including our [Business Practices \(“How We Work”\)](#) and [Record Retention Policy](#).

 **Compliance Tip:** If you receive a legal hold notice from the Legal Department, you must preserve the identified records, even if they would normally be subject to disposal.

ACTIVITIES THAT REQUIRE CAUTION

Some business activities are not inherently improper but can pose heightened compliance risks if handled incorrectly. In these areas, sound judgment and adherence to STOBG’s policies are essential to avoiding corruption concerns.

Gifts and Entertainment

Exchanging modest gifts or entertainment can be a part of building business relationships, but it can also create corruption risk. Even well-intentioned gestures can look like an attempt to improperly influence someone.

We must exercise caution to ensure that gifts or entertainment do not create conflicts of interest or even the appearance of impropriety. To stay within our policies:

- **Keep it modest and appropriate.** No lavish or excessive gifts, and never anything that could look like a quid pro quo.
- **Never offer or accept cash or cash equivalents.** This includes gift cards, except in the limited circumstances permitted by our [Gifts and Entertainment Policy](#).
- **Never ask for gifts or entertainment.**
- **Be mindful of the recipient.** Rules for government or union officials are stricter. In most cases, you cannot give or receive anything of value without prior approval, as set out in your Gifts and Entertainment Policy.

All gifts and entertainment must comply with our [Gifts and Entertainment Policy](#), which explains the rules in more detail, including value limits, approval requirements, and recordkeeping obligations.


Conflicts of Interest

A conflict of interest occurs when your personal interests, relationships, or outside activities interfere, or appear to interfere, with your responsibilities at STOBG. Even the appearance of a conflict can damage trust.

Common examples include:

- awarding work to a company owned by a family member or friend
- having a financial interest in a supplier, subcontractor, or competitor
- taking another job that overlaps or conflicts with your STOBG role
- using your position at STOBG for personal benefit

Conflicts of interest don't necessarily involve corruption, but if not managed properly they can create the appearance of favoritism or improper influence. That's why all conflicts must be disclosed and managed in line with our [Conflicts of Interest Policy](#).

 **Compliance Tip:** If you're unsure whether a situation creates a conflict, disclose it early. Transparency helps the company manage the issue before it becomes a problem.

Political Activities

STOBG supports responsible political engagement but recognizes that contributions and lobbying carry heightened risks. They must be carried out with integrity, honesty, and transparency, and in full compliance with campaign finance, lobbying, and other applicable laws.

Use of Company Resources

Company resources—including funds, property, or services—may not be used for political purposes without the express approval of STOBG executive management or their designees. Similarly, asking employees, clients, or business partners for political contributions requires prior approval from the Compliance & Ethics Department. All political expenditures must be

accurately documented in the company's financial records.

Personal Political Activity

Employees are free to participate in the political process in their personal capacity, but only on their own time and with their own resources, and without creating the appearance that they are acting on behalf of STOBG. Importantly, employees may not make contributions in their own name with the expectation that STOBG will reimburse them.


In addition, some jurisdictions have “pay-to-play” rules that limit or even prohibit personal contributions by employees (and in some cases, by members of their household) if the company does business with public-sector entities. Before making contributions in these jurisdictions, consult the Compliance & Ethics Department.

Lobbying

Lobbying presents additional compliance risks. Lobbying generally includes contacting government officials to influence legislation, regulation, or procurement decisions. No lobbying activity may be conducted without prior approval from STOBG executive management or their designees. Any authorized lobbying must comply with all applicable registration, disclosure, and reporting requirements.

Third-party lobbyists must undergo risk-based due diligence and may only be engaged under a written agreement that: defines the services to be performed; prohibits contingent fee arrangements; requires compliance with anti-corruption laws, lobbying, and all other relevant laws and company policies; and allows for termination if violations occur.

Although lobbying is typically carried out by external professionals, certain employee interactions with government officials may qualify as “in-house lobbying.” Employees must not engage in such activity without authorization from STOBG executive management.

 **Compliance Tip:** Political contribution and lobbying rules vary widely by jurisdiction. What seems like a

small contribution may still trigger disclosure obligations or even disqualify STOBG from public contracts. Check with the Compliance & Ethics Department before committing funds, offering support, or engaging with government officials on political matters.

Charitable Giving

STOBG has a long tradition of supporting our communities. But charitable contributions can sometimes be misused to hide corruption. Corruption risks may arise when a charity doesn't exist, serves as a front or shell entity, or is associated with a government official or their family members. Even a donation that is legal can look improper if the charity is tied to a client, government official, or anyone who could influence our business.

Use of Company Resources

All company charitable giving, sponsorships, and community support—such as paying for a table at a trade association dinner, sponsoring a sports team, or supporting a client's fundraising event—must be approved by STOBG executive management, business unit leaders, or their designees.

Contributions must go only to legitimate organizations and be accurately recorded in our books and records. Contributions outside the countries where we operate require advance consultation with the Compliance & Ethics Department to ensure appropriate due diligence.


Contributions must never be used to gain an improper advantage or to influence business decisions. To avoid even the appearance of impropriety, employees involved in estimating, purchasing, or procurement may not solicit or collect contributions from business partners.

Extra care is required when a contribution or sponsorship is requested by or otherwise tied to a client, business partner, or government official. In these cases, approval by STOBG executive management, the local business unit leader, or their designees is required. When reviewing such contributions, consider factors such as:

- who controls or benefits from the charity or event and whether they include government officials, clients, or business partners
- the timing or size of the contribution compared to any relevant work STOBG is pursuing or performing
- whether the request came directly from a government official, client, or business partner
- whether the contribution could look like an attempt to influence a government action or client business decision.

Personal Charitable Giving

Employees are encouraged to support charitable causes in their personal capacity, but personal giving must avoid creating the appearance of improper influence. Personal contributions must also comply with our [Code of Conduct](#). Employees may not use personal funds to make a contribution that would otherwise be prohibited—such as buying tickets to a fundraiser for a government official who is in a position to award contracts to STOBG—as this creates a compliance risk for the company.

 **Compliance Tip:** Tickets or sponsorships for events tied to government officials can carry the same risks as direct contributions. Consider whether attending, or inviting clients or government officials could look like an attempt to influence a business decision. Consult the Compliance & Ethics Department in these circumstances before committing company or personal funds.


Interacting with Government Officials

Working with government officials is a routine part of our business, especially on public-sector projects. These interactions carry heightened corruption risk and are strictly regulated by law.

The rules on gifts and entertainment, political contributions, and charitable giving are stricter when a government official is involved. Employees must never provide anything of value to a government official with the intent to improperly influence a decision, and they

must always follow our [Gifts & Entertainment Policy](#), which contains the company's definition of a "government official."

We must also take special care when participating in government procurement, engaging in lobbying, or hiring current or former government officials. These areas are often governed by additional legal restrictions—for example, "cooling off" periods under applicable law may bar or limit employment of former government officials. Employees should direct any questions regarding these restrictions to the Compliance & Ethics Department.

 **Compliance Tip:** Even something as small as buying a cup of coffee for a government official could be considered an unlawful gift. Always check before offering anything of value.

Working with Third Parties

The anti-corruption laws that apply to us also apply to the subcontractors, suppliers, consultants, lobbyists, and other third parties we work with. We cannot use third parties to do what this Policy prohibits, such as making improper payments.

Because third parties often act on our behalf, STOBG can be held responsible for their misconduct, even if we did not know about it. That's why we must carefully select, manage, and monitor all business partners.

Engaging and Managing Third Parties

Prospective business partners go through a robust prequalification and risk-based due diligence process. In addition to reviewing financial health, safety, and technical qualifications, we also assess corruption risks—such as whether the engagement is clearly defined, how compensation is structured, ties to government officials, where services will be performed, and the partner's reputation. We may also conduct independent checks, including references, site visits, or interviews.

All third parties must agree to comply with our [Supplier Code of Conduct](#) and flow this requirement down to their own vendors. Contracts with business partners must clearly describe the goods or services being

provided, have a legitimate commercial purpose, and set reasonable, justifiable compensation. Contingent or success-based fees require advance approval from the Legal Department.

Due diligence does not end once a contract is signed. We update it regularly, monitor performance, and follow up on red flags. Any suspected misconduct by a business partner must be reported immediately.

Due diligence also applies to larger-scale partnerships, such as joint ventures, consortia, and acquisitions. Before entering into these arrangements, STOBG must conduct risk-based anti-corruption due diligence to identify ownership structures, government ties, and other compliance risk factors.

Intermediaries

Intermediaries are third parties hired to act on our behalf, often to enhance local knowledge or relationships. Examples include brokers, consultants, lawyers, legal advisors, or lobbyists who help with permits, licenses, government approvals, or client introductions.

Because intermediaries often deal directly with government officials or represent STOBG in the marketplace, they carry higher corruption risk. Before engaging one, complete due diligence is required to confirm who they are, what services they will provide, and whether they have ties to government officials.

Their work must be governed by a written contract approved by the Legal or Compliance & Ethics Department that:

- clearly defines the services to be performed
- sets reasonable, market-based compensation
- requires compliance with our [Supplier Code of Conduct](#) and applicable anti-corruption laws
- prohibits bribery and mandates accurate records
- requires cooperation with investigations
- allows termination for misconduct
- permits periodic audits and reviews

Payments must always follow the contract, be properly documented, and supported by invoices. Once engaged, intermediaries must be actively monitored, with invoices reviewed carefully and due diligence updated regularly. Any sign of misconduct must be reported immediately to the Compliance & Ethics Department.

👉 **Compliance Tip:** Red flags do not prove corruption, but they should be promptly reviewed. Watch for vague contract terms, unusually high fees, refusal to disclose ownership, insistence on cash payments, government officials recommending an intermediary, or requests to backdate or rush transactions.

Hiring Referrals From Clients, Business Partners, or Government Officials

We may sometimes be asked to help secure a job or internship for someone connected to a client, business partner, or government official. These requests are risky because they can look like a favor in exchange for a business advantage.

All candidates for employment must go through the normal recruiting process and be evaluated on merit. Referrals may be shared with management and HR, but employees must not attempt to influence hiring decisions. Offers must never be made if they are tied to promises of business or threats of retaliation. Subcontractors and vendors must also never be pressured to hire referrals.

👉 **Compliance Tip:** Offering a job to or hiring someone to win or retain business is considered a form of bribery. Report any hiring request that could be seen as influencing a business decision.

International Trade

U.S. sanctions and export controls restrict doing business with certain individuals, companies, and government agencies. While we screen our business partners to ensure they are not restricted parties, we should all stay aware of suspicious activities that may indicate that our hardware, software, or technology (i.e., technical data)

may be compromised or intended to be exported without authorization.

👉 **Compliance Tip:** An “export” can include sharing or giving access to hardware, software, or technology to a foreign national in the United States. In some cases, we may require a government license before doing so. Consult the Compliance & Ethics Department regarding any questions or potential issues.

ABOUT THIS POLICY

The Compliance & Ethics Department is responsible for developing, implementing, and interpreting this Policy. If you have questions about this Policy, you can contact the Department at Compliance@STOBG.com.

This Policy is periodically reviewed and updated as needed to reflect changes in the law, our business, or our practices. You can find the latest version on the company intranet and website.



STO BUILDING
GROUP