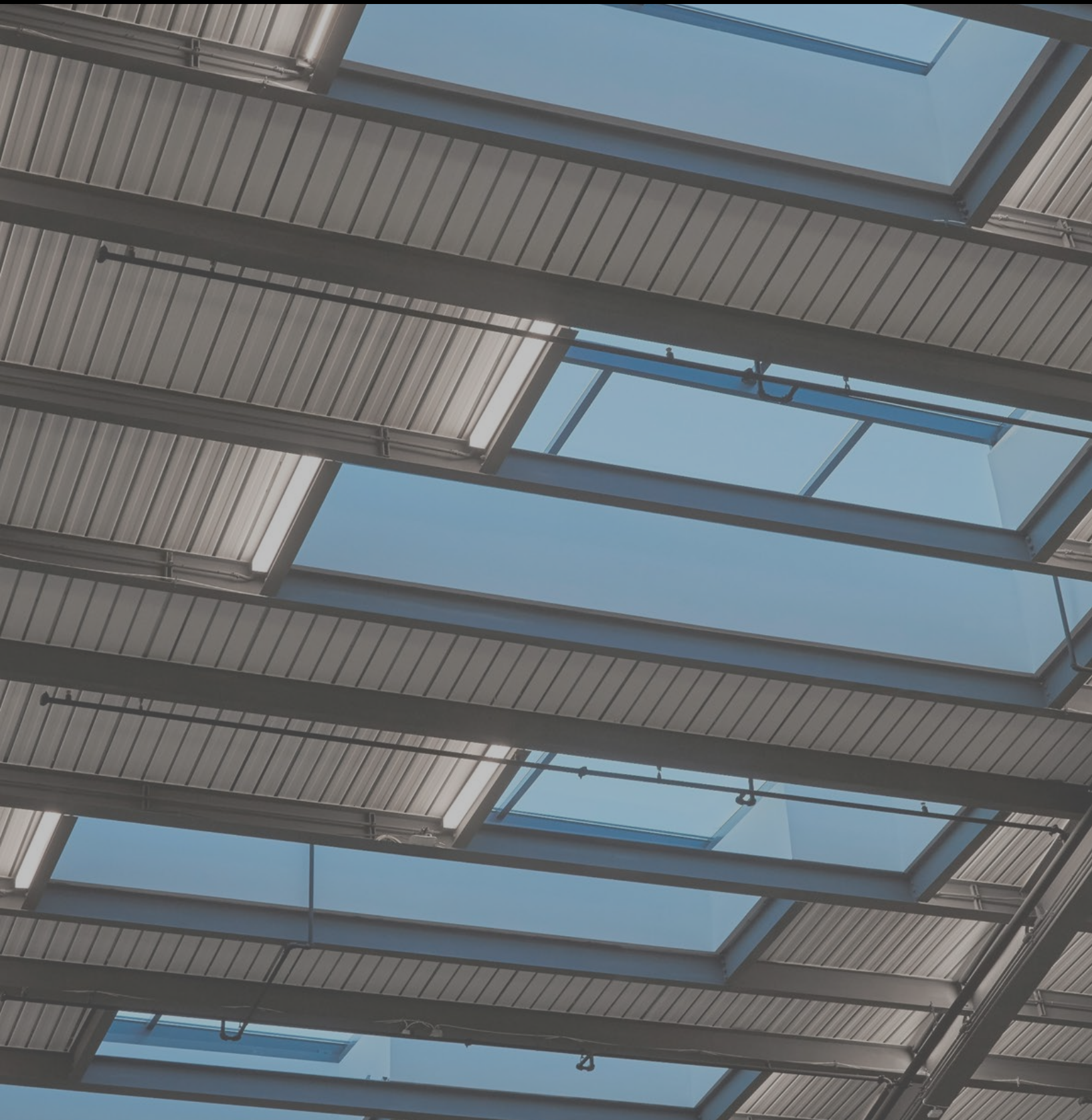




INTRODUCTION

At STO Building Group, we strive to maintain a positive work environment where individuals feel comfortable engaging in open and honest dialogue, raising questions or concerns, and seeking guidance without fear of retaliation. This Anti-Retaliation Policy ("Policy") sets out our unwavering commitment to provide such an environment and protect employees who raise matters in good faith from retaliatory behavior.

This Policy applies to STO Building Group and all of its member companies (collectively, "STOBG" or the "Company") and the employees, directors, and officers of STOBG, as well as independent contractors and third parties acting on behalf of STOBG. For purposes of this Policy only, we refer to all of these individuals collectively as "employees," although some are not employed by STOBG.

If there is any inconsistency between this Policy and local law requirements, local law will prevail, and any associated local policies will govern.

NO RETALIATION

The Company prohibits any form of retaliation against an employee who engages in an activity protected by this Policy or applicable law (a "protected activity"), including:

- raising a concern or filing a report in good faith, internally or externally, about potential violations of Company policy or applicable law
- participating or cooperating in an internal or external investigation, audit, or legal proceeding
- refusing to participate in, or objecting to, conduct they reasonably believe to be improper or unlawful
- Seeking advice, clarification, or guidance about a work-related matter

"Good faith" does not mean you have absolute proof or that the conduct reported has to be substantiated; rather, it means you have a reasonable basis to believe your report may be true and requires further investigation.

Knowingly making a false report is not considered good faith and may subject an employee to disciplinary action, up to and including termination.

Retaliation is any action, statement, or behavior that is intended to deter or dissuade someone from engaging in a protected activity or punishing someone for engaging in such protected activity. Retaliation may include intimidation; discrimination; harassment; coercion; and adverse employment action such as demotion, suspension, failure to hire or promote or consider for hire or promotion, reduction of compensation, exclusion from Company events or meetings where the person would normally be included, defamation of character, adversely impacted work conditions, failure to provide employment benefits, and termination, as well as threats of such actions.

This Policy protects employees who make a report in good faith, even if the conduct that they reported is not substantiated. It does not, however, protect employees who knowingly make a false report, provide knowingly false or misleading information in the course of an investigation, or otherwise act in bad faith.

This Policy does not shield employees from the consequences of their own misconduct or inadequate performance. It also does not prevent STOBG from addressing employee performance or behavior separate and apart from the conduct protected by this Policy.

The Company will take appropriate corrective or disciplinary action for violations of this Policy or for failing to report misconduct under this Policy.



- the Compliance & Ethics Department
- the Human Resources Department
- the Legal Department

If the Company resource you report to has a conflict of interest, you should make a follow-up report to our Compliance & Ethics Department.

If you prefer to submit a written report, you can use STOBG's internal complaint form, which is available on our intranet.

Another Resource: Our 24/7 Anonymous Helpline

Anyone—whether inside or outside the Company—can report concerns through our 24/7 helpline, which is operated by a third party unaffiliated with STOBG. Reports may be submitted—anonously if they wish—by calling the below.

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

SPEAKING UP

Preventing misconduct is a responsibility shared by all of us. All employees have a duty to speak up and promptly report any suspected violation of this Policy, other Company policies, or applicable law—whether the conduct occurs within STOBG or involves a Company subcontractor, supplier, consultant, client, or other party with a business relationship with STOBG.

Contact a Company Resource

You may raise concerns or report potential misconduct to any of the following Company resources:

- your manager, a more senior manager, or your business unit leader
- a member of STOBG executive management

Any reports made, whether anonymous or not, should include as much detail as possible to allow the Company to fully investigate the matter. Important details may include, for example, the names of the people involved in or witnesses to the incident, the date and time of the incident, where the incident occurred, any relevant background information, and why you believe the incident should be reported. Providing sufficient details is especially important for concerns raised anonymously, so that the Company may conduct an appropriate review.

Employees who believe that they may have been personally involved in misconduct, whether knowingly or unknowingly, are required to report such matters. Self-reporting will be considered in determining whether or what corrective or disciplinary action is appropriate.

This Policy does not prohibit anyone from reporting concerns to, filing a charge or complaint with, making lawful disclosures to, providing documents or other information to, participating in an investigation or hearing conducted by, or communicating with the US Equal Employment Opportunity Commission, National Labor Relations Board, Securities and Exchange Commission, or any other federal, state, or local agency charged with the enforcement of any laws.

INVESTIGATION

The Company takes all reports seriously and will conduct a timely and thorough investigation tailored to the circumstances. Appropriate remedial and concluding steps will be taken as warranted. The Company's response will depend on the nature and severity of the concern and may include initial inquiries and fact-gathering to decide the form and scope of the investigation. The fact that an investigation is conducted does not mean a report has been substantiated.

The Company expects employees to cooperate with investigation, subject to applicable law and any collective bargaining agreements. The Company also expects employees to provide truthful information when participating in an investigation.

When a concern is raised, the Company will maintain confidentiality to the fullest extent possible, consistent with applicable legal requirements and the need to conduct a thorough investigation. Remember that concerns may also be submitted anonymously.

ABOUT THIS POLICY

STOBG's Compliance & Ethics Department is responsible for developing, implementing, and interpreting this Policy. The department can be reached at Compliance@STOBG.com.

The Compliance & Ethics Department periodically reviews this Policy to determine whether revisions are required to reflect changes in the law, our business, or our policies and practices. The most recent version of the Policy can be found on our intranet and on STOBG's website.





STO BUILDING
GROUP