



STRUCTURE TONE
International



Policy Number: STOBG 023.01
Contact: Compliance & Ethics Department
Effective Date: April 15, 2026

SUPPLIER CODE OF CONDUCT

TABLE OF CONTENTS

INTRODUCTION	1	RESPONSIBILITIES IN THE MARKETPLACE	6
Our Values: Who We Are	1	Don't Engage in Corrupt Activity	6
Scope	1	Compete Fairly	8
Management of This Supplier Code	2	Avoid Conflicts of Interest	8
		Abide by Our Policy on Gifts and Entertainment	8
		Know the Rules That Apply to Government Work	9
BASIC SUPPLIER RESPONSIBILITIES	2	Follow All Trade Control and Sanctions Laws	9
Comply With This Policy	2	Don't Use Nonpublic Information for Insider Trading	10
Comply With the Law	2		
Speak Up	2	RESPONSIBILITIES WITHIN YOUR ORGANISATION	10
Prohibit Retaliation	3	Keep Accurate Records	10
Cooperate in Due Diligence, Audits, Investigations, and Reviews	3	Maintain Effective Internal Controls	10
		Protect Structure Tone Property	10
RESPONSIBILITIES IN THE WORKPLACE	3	Manage Data Appropriately	10
Respect Human Rights	3	Use Artificial Intelligence Responsibly	11
Prohibit Discrimination and Harassment	4		
Respect Freedom of Association	5	RESPONSIBILITIES IN THE COMMUNITY	11
Provide a Safe and Healthy Work Environment	5	Minimise Impact on the Environment and Human Health	11
Manage Labour and Subcontractors Responsibly	6	Communicate Responsibly	12
		STAYING ALIGNED	12

INTRODUCTION

At Structure Tone, we are guided by the principle **“Clients first. Integrity always.”** We deliver industry-leading expertise and unwavering dedication to service, while upholding the highest ethical standards. Our commitment to integrity has helped us earn the trust of our clients and driven our growth around the world.

To preserve that trust, we count on our network of valued suppliers, subcontractors, and other business partners to uphold our values, standards, and principles. This Supplier Code of Conduct (“Supplier Code” or “Policy”) sets out the minimum standards of conduct expected of third parties doing business with Structure Tone International (“Structure Tone”).

We are committed to working with our business partners to help them meet their obligations under this Policy—as well as the expectations of our clients, communities, and other stakeholders. By working together, we can achieve success by doing the right thing—every day, for every client, on every jobsite.

Our Values: Who We Are

Structure Tone is a member of STO Building Group (“STOBG”), a privately-owned family of top-tier builders who operate collaboratively, innovate uniquely, and join powerfully to put our clients first. Unlike any construction company in the industry, each of our builders is empowered to stay true to its distinct business model and heritage while sharing coveted construction resources.

Each STOBG builder has its own cherished values, but these three core values bind us together.

We are client devoted.

We put our clients first. We build deep relationships and consistently raise the bar to ensure predictable, quality outcomes with our services and delivery. We are collaborative.

We are stronger together.

We work as a team and encourage curiosity and ingenuity. As partners, we foster a culture of safety, respect, and trust. We are genuine.

Our word is our bond.

We deliver what we promise and are committed to providing our clients with an unparalleled experience.

These values form the foundation of the standards in this Supplier Code.

Scope

This Supplier Code applies to all third parties that provide goods or services to Structure Tone, including suppliers, subcontractors, service providers, consultants, intermediaries, agents and other business partners (collectively, “Suppliers”).

This Supplier Code is a companion to other Structure Tone, including our:

- [Code of Conduct](#)
- [Anti-Corruption Policy](#)
- [Gifts and Entertainment Policy](#)
- [Anti-Harassment and Bullying Policies](#)
- [Equal Opportunities Policies](#)
- [Anti-Slavery and Human Trafficking Policy](#)
- [Human Rights Policy](#)
- [Environmental Policy](#)
- [Generative Artificial Intelligence \(AI\) Policy](#)

These policies are available on our [website](#) or through your Structure Tone representative.

Suppliers are expected to understand and uphold the relevant provisions of these policies when conducting business with Structure Tone and to operate in a manner consistent with the standards we apply to our own employees.

Management of This Supplier Code

This Supplier Code has been approved by Structure Tone's executive management. It is overseen by STOBG's Compliance & Ethics Department, which periodically reviews the Policy to determine whether updates are needed to reflect changes in the law, business operations, or internal policies. The most current version of the Supplier Code is available on our [website](#).

BASIC SUPPLIER RESPONSIBILITIES

Comply With This Policy

Structure Tone requires all Suppliers to comply with this Supplier Code. By accepting a contract or purchase order from Structure Tone, a Supplier agrees to follow the standards in this Policy. For Suppliers whose contracts with Structure Tone expressly incorporate this Code, compliance with the Supplier Code is also a contractual obligation.

Suppliers must ensure that their workforce understands the standards set out in this Supplier Code and what is expected of them when working with Structure Tone. Suppliers must also require their own subcontractors, suppliers, and other third parties engaged to perform work for Structure Tone to comply with this Policy. This includes doing proper due diligence and including terms in their contracts to make the standards of this Policy binding throughout their supply chain. Suppliers may be held responsible

for misconduct by any lower-tier supplier working for them on a Structure Tone contract.

Comply With the Law

Suppliers must operate in full compliance with the letter and spirit of all applicable laws and regulations, whether local, county, domestic, European Union, or international. Custom or local practice must never take precedence over legal requirements.

Where applicable laws conflict with the standards in this Supplier Code, Suppliers are expected to follow the higher legal or ethical standard. They are also expected to uphold the highest standards of honesty, integrity, and fairness, and conduct their business in a socially responsible manner.

Speak Up

Suppliers must promptly report any potential violations of this Policy or the law. Structure Tone also expects Suppliers to report any conduct by a Structure Tone employee that does not align with Structure Tone's [Code of Conduct](#).

Reports should be made to your Structure Tone representative or directly to STOBG's Compliance & Ethics Department at Compliance@STOBG.com. You may also report concerns through our 24/7 helpline, run by an independent third party:

Call toll-free Ireland: 1800.904.177
Netherlands: 0800.904.177
UK: 0808.189.1053

Go online compliancehelpcenter.com

Reports can be made anonymously. Any reports made, whether anonymous or not, should include as much detail as possible to allow the company to investigate the matter

appropriately. Structure Tone will investigate all reports promptly, thoroughly, and in line with applicable law. Suppliers may be asked to participate in an investigation, and full cooperation is expected. Investigations and the identities of those involved will be kept confidential to the extent possible. The company will take appropriate action based on the findings.

Prohibit Retaliation

Suppliers must not retaliate, or permit retaliation, against anyone who, in good faith, reports potential misconduct, raises a concern, seeks guidance, or cooperates in an investigation. "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. Suppliers must also foster a workplace environment where employees feel safe speaking up. A formal process should be in place to allow employees to report concerns without fear of retaliation. Where permitted by law, anonymous reporting should also be available.

Cooperate in Due Diligence, Audits, Investigations, and Reviews

Structure Tone reserves the right to conduct onboarding due diligence on any Supplier before initiating a business relationship. Structure Tone may also perform ongoing due diligence, monitoring, or audits at any time during the relationship to assess a Supplier's compliance with this Supplier Code. Suppliers are expected to cooperate in good faith with any due diligence, audit, investigation, or review by Structure Tone. This includes providing requested records, making employees and representatives available for interviews, and granting access to facilities for inspection.

Suppliers must also evaluate and monitor their own supply chain to ensure compliance with this Policy and, upon request by Structure Tone, conduct audits of their suppliers to verify adherence. Any non-compliance must be promptly disclosed to Structure Tone and addressed in a timely and effective manner, at no cost to Structure Tone or its clients.

In addition, to the extent permitted by law, Suppliers must promptly forward to Structure Tone any subpoenas, regulatory requests, media inquiries, or other third-party communications concerning Structure Tone.

Structure Tone will consider compliance with this Supplier Code when making procurement decisions. Violations of the Supplier Code or applicable law may be deemed a breach of contract and result in immediate termination of the business relationship. Structure Tone also reserves the right to refuse to do business with non-compliant Suppliers in the future and may pursue any other remedies available under contract or law.

RESPONSIBILITIES IN THE WORKPLACE

Respect Human Rights

Suppliers must respect all internationally recognised human rights wherever they operate and comply with all applicable labour laws, including the Employment Equality Acts 1998–2015 (Ireland), the Equal Treatment Act (Algemene wet gelijke behandeling, AWGB) (Netherlands), and the Equality Act 2010 (UK). We also expect Suppliers to uphold the principles outlined in our [Human Rights Policy](#). As part of these responsibilities, Suppliers must:

Prohibit Child Labour

Suppliers must comply with all applicable child labour laws, including the Protection of Young Persons (Employment) Act 1996 (Ireland), the Working Hours Act (Arbeidstijdenwet) youth employment provisions (Netherlands), and the Children and Young Persons Act 1933 (UK), and take steps to prevent child labour in their operations and supply chain. Suppliers may only employ workers who meet the minimum legal age requirement in the jurisdiction where the work is performed, and under no circumstances may they employ individuals younger than the age required to complete compulsory education.

Suppliers must not permit children to perform work that interferes with their schooling or vocational education or that exposes them to risks that can harm their physical, mental, or emotional development. Suppliers must notify Structure Tone immediately upon discovering or suspecting any instance of child labour in their operations or supply chain.

Prohibit Modern Slavery and Human Trafficking

This includes any form of slavery or forced, bonded, indentured, or involuntary prison labour. Human trafficking involves the recruitment, transportation, harbouring, transfer, or receipt of people by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation.

Suppliers must comply with applicable modern slavery and human trafficking laws, including the Criminal Law (Human Trafficking) Acts 2008 and 2013 (Ireland), Dutch Criminal Code provisions on forced labour and trafficking (Netherlands), and the Modern Slavery Act 2015 (UK). Upon request, suppliers are expected to provide

Structure Tone with any modern slavery statements they are legally required to publish under applicable law, including under the Modern Slavery Act 2015 (UK). They must ensure that all workers are employed voluntarily and not under threat, coercion, or force of any kind. Workers must be provided clear, accurate, and understandable information about the basic terms of their employment before beginning work. Suppliers may not allow any practice that would restrict free movement of workers, such as requiring employees to surrender any personal identification or travel or immigration documents as a condition of employment. In addition, Suppliers must not use fraudulent or misleading recruitment practices or require workers to pay fees or deposits to secure or maintain their employment.

Suppliers must notify Structure Tone immediately upon discovering or suspecting any instance of modern slavery or human trafficking in their business or supply chain.

For more information, please consult our [Anti-Slavery and Human Trafficking Policy](#).

Ensure Fair Wages, Hours, and Benefits

Workers must be paid at least the minimum legal wage, or a wage that meets local industry standards, whichever is higher, and be provided with breaks, time off, and sick leave as required by law. Suppliers must also contribute to all required social security and welfare programs, including medical and injury insurance.

Prohibit Discrimination and Harassment

Structure Tone is an equal opportunity employer and complies with all applicable non-discrimination and anti-harassment laws, including the Employment Equality Acts 1998-2015 (Ireland), the Equal Status Acts 2000-2018

(Ireland), the Equal Treatment Act (Algemene wet gelijke behandeling, AWGB) (Netherlands), and the Equality Act 2010 (UK). Our Suppliers must do the same. We expect Suppliers to have controls in place to prevent discrimination and harassment within their own operations and to abide by our [Anti-Harassment and Bullying Policies](#), and [Equal Opportunities Policies](#).

Suppliers must base employment decisions—such as hiring, promotion, and discipline—on legitimate job-related criteria. They may not discriminate in any aspect of the employment relationship based on an individual's sex, gender, sexual orientation, gender identity or expression, marital or family status, pregnancy or maternity, age, disability, religion or belief, race, colour, nationality or ethnic origin, membership in the Traveller community (Ireland), political opinion (Netherlands), or any other characteristic protected under applicable law.

Suppliers must treat their workers—and anyone they interact with in the course of performing work for Structure Tone, including Structure Tone employees, clients, subcontractors, and other personnel—with respect and professionalism. They may not engage in or permit any form of harassment, including corporal punishment; physical, sexual, psychological, verbal, or visual harassment; threats of violence; or other conduct of any kind that creates an intimidating, offensive, or hostile work environment.

Respect Freedom of Association

When permitted by law, Suppliers must respect the rights of workers to organise, join associations of their choice, bargain collectively, or refrain from doing so, without fear of discrimination, retaliation, harassment, or intimidation.

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For more information on our expectations of Suppliers in supporting and respecting human rights and fair employment practices, please consult our [Code of Conduct](#), [Human Rights Policy](#), [Anti-Harassment and Bullying Policies](#), and [Equal Opportunities Policies](#).

Provide a Safe and Healthy Work Environment

The health and safety of everyone involved in our projects is our highest priority. Suppliers must provide a clean, safe, and healthy workplace that supports accident prevention, minimises exposure to health risks, and complies with all applicable safety laws and regulations, including:

- the laws and regulations of the Health and Safety Authority (HSA) (Ireland)
- the Safety, Health and Welfare at Work Act 2005 (Ireland)
- the Safety, Health and Welfare at Work (Construction) Regulations 2013 (Ireland)
- the Safety, Health and Welfare at Work (General Application) Regulations 2007-2020 (Ireland)
- the Working Conditions Act (Arbeidsomstandighedenwet / Arbowet)
- The Working Conditions Decree (Arbeidsomstandighedenbesluit / Arbobesluit) (Netherlands)
- the Construction (Design and Management) Regulations 2015 (UK)
- the Health and Safety at Work etc. Act 1974 (UK)
- the Management of Health and Safety at Work Regulations 1999 (UK)
- the Building Safety Act 2022
- regulations enforced by the Health and Safety Executive (HSE) (UK)

Suppliers must also comply with the most current version of any applicable Structure Tone safety manuals, as well as any site-specific safety or loss

prevention programs. Suppliers are expected to fully cooperate with Structure Tone, the project owner, and any insurance carriers or loss prevention engineers to ensure a safe and compliant jobsite.

Suppliers must also maintain a system for workers to report health and safety incidents and for investigating and tracking those incidents. They must take corrective action to address reported incidents and prevent them from happening again.

A safe and healthy workplace must also be free of drugs and alcohol. Working under the influence of any substance that could impair one's judgment or performance is prohibited in all Structure Tone workplaces, including jobsites and offices, and while working on behalf of Structure Tone, including during breaks and mealtimes. The possession, sale, use, or distribution of drugs or alcohol on the job is also prohibited. This includes the misuse of prescription medications, over-the-counter drugs, or any other legal substances that may impair safe work performance.

Suppliers must also ensure that their workers do not engage in violent or threatening behaviour. Weapons of any kind are prohibited on all Structure Tone jobsites and other workplaces. Suppliers must promptly report to Structure Tone any threats, acts of violence, or unsafe conduct observed in a Structure Tone workplace.

Manage Labour and Subcontractors Responsibly

Suppliers are responsible for ensuring that all workers involved in their work for Structure Tone are authorised to work in the country where the work is performed, are properly classified, and are treated in accordance with applicable labour, employment, and immigration laws.

Suppliers must also ensure that any lower-tier subcontractors, suppliers, or labour providers they engage comply with the standards set forth in this Supplier Code. Such parties may not be used to avoid compliance with legal or contractual obligations, and Suppliers remain accountable for the conduct of all lower-tier entities working on their behalf.

Suppliers must conduct appropriate due diligence before engaging subcontractors or labour providers and must monitor their performance to confirm ongoing compliance. This includes verifying qualifications, licenses, and legal work authorisation, and taking reasonable steps, consistent with applicable law, to assess and manage potential legal, safety, or reputational risks associated with assigned personnel.

RESPONSIBILITIES IN THE MARKETPLACE

Don't Engage in Corrupt Activity

Structure Tone's [Anti-Corruption Policy](#) reinforces our commitment to acting honestly and ethically in all of our business dealings and to complying with all applicable anti-corruption laws. These laws include the Criminal Justice (Corruption Offences) Act 2018 (Ireland); the Dutch Criminal Code (Wetboek van Strafrecht) (Netherlands); the UK Bribery Act 2010 (UK); the Economic Crime and Corporate Transparency Act 2023 (UK); any legislation passed amending, updating, or consolidating these statutes; and similar laws in the countries where Structure Tone operates.

We prohibit all forms of corruption—including bribery, kickbacks, facilitation payments, other improper or corrupt payments, and any other

attempt to gain a personal benefit or business advantage through improper or illegal means.

Suppliers must share our zero-tolerance approach to corruption and comply with all applicable anti-corruption laws. Suppliers must not engage in behaviour that is, or may be perceived to be, corrupt, and must establish appropriate, risk-based anti-corruption controls, including those addressing the following:

Bribery, Kickbacks, and Improper Payments

Suppliers must not offer, promise, give, request, demand, or accept any form of bribe, kickback, or improper payment—directly or indirectly—under any circumstance, even if permitted or condoned by local law or custom. While bribery is often associated with government officials (also referred to as public officials or public servants), this prohibition applies equally to “commercial bribery” involving private sector individuals.

Bribery includes promising, offering, authorising, or giving anything of value—directly or indirectly—to a third party or someone closely connected to them, such as a family member, romantic partner, or personal associate, to improperly influence a business decision or secure an unfair advantage.

“Anything of value” has a broad meaning and includes cash, gifts, travel, hospitality, services, goods, discounts, loans, favours, business opportunities, political or charitable contributions, or any other direct or indirect benefit.

Both giving and receiving bribes are prohibited. A corrupt act is committed even if the bribe is not paid or the intended outcome is not realised. While a bribe is intended to influence future action, a kickback is a form of bribery

where a payment or reward is made after a particular action has been taken.

Failing to Prevent Bribery

Some anti-corruption laws prohibit not only corrupt acts, but also failing to prevent them. The UK Bribery Act 2010, for instance, makes it a crime for a company to fail to prevent bribery when an “associated person”—someone performing services for or on behalf of the company, such as an employee, agent, or consultant—commits bribery for company’s benefit.

Suppliers are expected to implement and maintain adequate, risk-based procedures and controls to prevent bribery and other corrupt conduct. These controls should be tailored to the nature and geography of the Supplier’s operations and reviewed regularly for effectiveness.

Facilitation Payments

Suppliers must not make facilitation payments (also called “grease payments” or “expediting payments”), even if permitted by local law or custom. These are typically small, unofficial payments made to government officials to facilitate or speed up routine governmental actions, such as issuing permits or clearing paperwork. Such payments are strictly prohibited and are not acceptable business expenses under Structure Tone policy.

Money Laundering

Money laundering is the process of using otherwise legal businesses or transactions to conceal the origins of criminal proceeds. Suppliers must comply with all anti-money laundering laws. They should only work with third parties involved in legitimate business activities and whose funds come from lawful sources.

Suppliers should be alert to “red flags,” such as requests for cash payments or other unusual payment terms.

Compete Fairly

Structure Tone believes that business success should be based on factors such as merit, quality, and price—not unethical practices. Suppliers are expected to compete honestly, fairly, and in full compliance with applicable competition laws. Suppliers must avoid any practice that discourages fair competition or creates an unlawful competitive advantage, including:

- Entering into agreements (formal or informal) to fix prices
- Engaging in bid rigging or collusion (e.g., coordinating bids to ensure a specific company wins)
- Improper coordination that provides unfair access to confidential or non-public information during bidding
- Dividing markets, customers, or territories (e.g., agreeing not to compete in certain regions or with certain customers)
- Boycotting clients or suppliers (e.g., agreeing with others to avoid doing business with a certain company)
- Blocking or restricting competitors from entering the market (e.g., using unfair tactics to keep new businesses out)



For more information on our expectations of Suppliers in preventing bribery, corruption, and anticompetitive practices, please consult our [Anti-Corruption Policy](#).

Avoid Conflicts of Interest

Structure Tone employees must act in the company's best interest and avoid conflicts of interest, or disclose them when they cannot be avoided, in accordance with our conflicts of interest policy. This includes conflicts that are actual (existing), potential (a situation that may result in a conflict), and perceived (a situation that may appear to be a conflict, even if none exists).

A conflict of interest arises when personal interests, relationships, or activities interfere with, or appear to interfere with, the ability to make objective, impartial decisions in the best interest of Structure Tone. For example, a conflict may exist if a Structure Tone employee participates in selecting or managing a Supplier that employs their relative.

Suppliers are held to the same standard. They should not have any relationship or engage in any activity—financial, personal, or otherwise—that conflicts with, could potentially conflict with, or appears to conflict with their obligations to Structure Tone. This includes personal relationships with Structure Tone employees that could compromise, or appear to compromise, the judgment or objectivity of Structure Tone personnel in relation to the Supplier.

Any actual, potential, or perceived conflict must be promptly disclosed to your Structure Tone representative. If you have any questions about conflicts of interest, you can email Conflicts@STOBG.com.

Abide by Our Policy on Gifts and Entertainment

We select Suppliers based on the value they bring to our projects—not on any gifts or entertainment they may offer. Structure Tone

prohibits the giving or receiving of gifts, entertainment, or other items of value that could influence, or appear to influence, business decisions made by our employees, clients, or partners.

This includes offering or performing free or discounted goods and services—such as home repairs, renovations, or materials—for a Structure Tone employee's personal use. These are considered gifts and are not appropriate under our policy.

We ask our Suppliers to follow these simple rules:

- Do not offer gifts, entertainment, or other business courtesies intended to influence decisions or gain favourable treatment.
- Never offer cash, gift cards, or anything of cash value to any Structure Tone employee.
- Do not offer or provide free or discounted goods or services for any employee's personal benefit, including work at a personal residence.
- Keep any business courtesies modest, occasional, and appropriate to the professional relationship.
- Do not feel obligated to give gifts or entertainment. Structure Tone employees should not request or solicit gifts or entertainment from Suppliers.
- Do not offer gifts or entertainment to third parties (such as clients, union representatives, or government officials) on Structure Tone's behalf unless permitted by Structure Tone policy.

For more information, please consult our [Gifts & Entertainment Policy](#). If you're ever unsure about

whether a gift or entertainment is appropriate, check with your Structure Tone representative.

Know the Rules That Apply to Government Work

When Structure Tone performs work funded by or on behalf of government entities—whether federal, state, local, or international—both the company and its Suppliers must follow additional laws, regulations, and contract requirements. These obligations are often more complex and stringent than those that apply to private sector work, and violations can result in serious legal, financial, and reputational consequences.

Suppliers working on government-funded projects must fully comply with all applicable requirements. These may include rules related to procurement integrity, labour and wage standards, non-discrimination, certifications, recordkeeping, and billing practices. Suppliers may also be subject to audits, reporting obligations, or restrictions on interactions with government officials.

Follow All Trade Control and Sanctions Laws

Suppliers must comply with all applicable trade laws and regulations in connection with their work for Structure Tone. This includes export control laws, economic sanctions, customs regulations, tariffs, and anti-boycott laws. Suppliers are responsible for understanding how these rules apply to their products and services when working with Structure Tone across jurisdictions.

Don't Use Nonpublic Information for Insider Trading

Suppliers must not use any material, nonpublic information obtained through their work with Structure Tone to buy or sell securities or to advise others to do so. This applies to confidential information about Structure Tone, our clients, or business partners. Suppliers must maintain the confidentiality of all such information and may only share it with authorised individuals who have a legitimate business need to know. Engaging in insider trading or misusing confidential information may violate securities laws and result in serious legal consequences.

RESPONSIBILITIES WITHIN YOUR ORGANISATION

Keep Accurate Records

Suppliers must maintain accurate, complete, and timely records related to their work with Structure Tone. This includes complying with legal and contractual requirements, applicable accounting standards, and good recordkeeping practices. Examples of required records may include bid documentation, purchase orders, change orders, invoices, timesheets, pay records, health and safety logs, injury reports, residence and work permits, employment contracts, and proof of age documentation. Suppliers must never falsify records, attempt to conceal transactions, or otherwise fail to properly document their work.

Maintain Effective Internal Controls

Suppliers must have appropriate internal controls in place to ensure compliance with applicable laws, contract requirements, and this Supplier

Code. These controls should support sound practices in areas such as financial reporting, labour management, health and safety, and procurement. Depending on the scope of the Supplier's work, this may include written policies, regular internal reviews, and processes to identify and manage key risks—such as unauthorised payments, inaccurate invoices, or misused project resources. Controls should be tested periodically to ensure they are working properly and updated when new risks arise.

Protect Structure Tone Property

Suppliers must take reasonable steps to protect all property entrusted to them by Structure Tone, including equipment, tools, technology, and confidential information. This also includes property belonging to our clients, business partners, and others involved in the project. Structure Tone property must only be used for legitimate business purposes and in accordance with legal, contractual, and project-specific requirements. Suppliers must safeguard this property using appropriate physical, electronic, and cyber security measures, prevent unauthorised access, and must not use it for personal benefit or share it without authorisation.

Manage Data Appropriately

Suppliers must comply with all data protection, privacy and security laws applicable to their activities, including: the General Data Protection Regulation (EU GDPR) (EU/EEA), the Data Protection Act 2018 (Ireland), the Implementation Act of the GDPR (Uitvoeringswet Algemene verordening gegevensbescherming / UAVG) (Netherlands), and the UK GDPR and Data Protection Act 2018 (UK). They must also comply with any contractual obligations related to handling information received from Structure Tone. This includes properly managing any

confidential business information or personal identifying information connected to a project.

Confidential or personal information may include, for example, employee or worker contact details, health and safety records, timekeeping or payroll data, project bids or estimates, and internal communications related to Structure Tone or its clients. Suppliers should treat all such information as confidential unless explicitly authorised otherwise.

Suppliers must have appropriate measures in place to protect the confidentiality, integrity, and availability of this information, including against cyber threats. They must access or share confidential or personal identifying information only when authorised and only for legitimate business purposes. Such information should never be discussed in public or unsecured settings, or communicated through text messages, personal email accounts, or non-Structure Tone-approved messaging applications. When on jobsites, be aware of your surroundings and only discuss confidential information in secured work areas.

If a suspected or actual data breach or security incident occurs, Suppliers must notify their Structure Tone representative immediately. Suppliers are also expected to cooperate with Structure Tone on all matters related to data protection, privacy, and security.

Use Artificial Intelligence Responsibly

We recognise that Artificial Intelligence (AI) can enhance efficiency and productivity, and we support its thoughtful use. However, it must be used responsibly, ethically, and in compliance with all applicable laws and regulations (including data protection laws and emerging regulations such as the EU Artificial Intelligence Act (EU) once in force), project and safety

standards, and Structure Tone's [Generative Artificial Intelligence \(AI\) Policy](#).

Suppliers must protect confidential client and Structure Tone information and may not use such information in public or generative AI tools without Structure Tone's express written consent. Suppliers are expected to follow the same safeguards outlined in our [Generative AI Policy](#), including protecting sensitive data, ensuring quality control of outputs, and complying with client AI requirements.

Any work product generated with the help of AI must be reviewed and approved by a qualified person before it is submitted to Structure Tone. AI must not replace human judgment—especially in technical or safety-sensitive areas. Suppliers remain fully accountable for the quality, accuracy, and compliance of any work product, regardless of whether AI tools were used.

In addition, if Structure Tone is required to respond to a legal or regulatory request related to a Supplier's use of AI, the Supplier is expected to cooperate and provide relevant information in a timely and complete manner.

RESPONSIBILITIES IN THE COMMUNITY

Minimise Impact on the Environment and Human Health

Suppliers must conduct their operations in a manner that respects human health and is environmentally responsible and climate conscious. We expect our Suppliers to uphold the principles set out in our [Environmental Policy](#) and to adopt similar environmental standards within their own businesses.

Suppliers must maintain all required environmental permits and registrations and comply with all applicable environmental laws, including those related to waste segregation, storage, and disposal, hazardous waste, toxic substances, and the legal procurement of materials, including timber and ozone-depleting substances. Where applicable, this includes compliance with specific laws such as the Waste (England and Wales) Regulations 2011 (UK). Suppliers are expected to provide evidence of the required permits and registrations to Structure Tone upon request. Suppliers should take steps to minimise any detrimental environmental or human health effects resulting from their activities, products, and services. Suppliers must also comply with any project-specific environmental or sustainability requirements, and are expected to align their operations with relevant sustainability practices and guidelines.

Communicate Responsibly

Suppliers may not speak publicly on behalf of Structure Tone without express written authorisation from Structure Tone's executive management or Marketing team. This includes speaking to the media, participating in interviews or public forums, or posting content that could be interpreted as representing Structure Tone.

All media, legal, regulatory, financial, or governmental inquiries must be immediately referred to the Supplier's Structure Tone representative, who will coordinate with the appropriate internal teams.

Suppliers may not photograph or otherwise record anything related to a Structure Tone project without prior written approval from the Structure Tone representative overseeing the project. They may not post any images, updates, or references to Structure Tone projects, clients,

or jobsite conditions on social media or other public platforms without prior written approval from both their Structure Tone representative and Structure Tone's Marketing team.

All Supplier communications must respect Structure Tone's confidentiality obligations and privacy expectations. Suppliers should also not post content that could imply endorsement or representation by Structure Tone. When in doubt, Suppliers should consult their Structure Tone representative before posting or sharing content related to Structure Tone.

STAYING ALIGNED

Structure Tone is proud to work with Suppliers who share our commitment to integrity, professionalism, and responsible business practices. Your partnership is essential to how we deliver exceptional outcomes.

If you have questions about this Supplier Code or any of the expectations it outlines, please contact your Structure Tone representative or STOBG's Compliance & Ethics Department at Compliance@STOBG.com.

Thank you for helping us build the extraordinary—together.

