



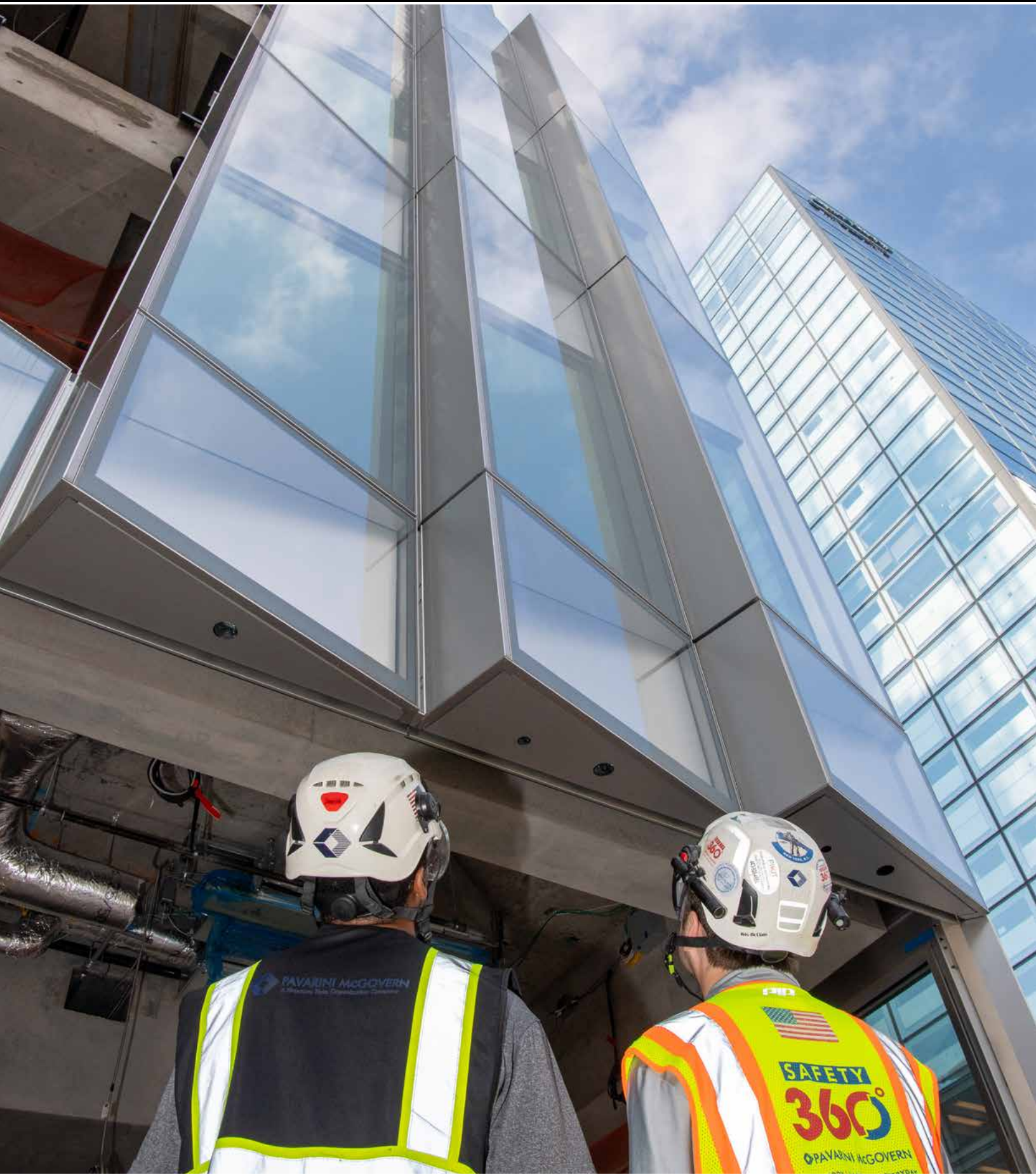


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A MESSAGE FROM LEADERSHIP

At **STO Building Group ("STOBG")**, we don't just build structures, we build the spaces that shape communities. Whether people live, learn, or work in them, these places stand as a reflection of who we are.

What sets us apart is our unique model: a family of top builders, each with its own culture, history, and local roots, connected by one powerful platform of shared resources, innovation, and expertise. Together, we deliver the highest quality results for every client, no matter which STOBG company they partner with.

Our continued success depends on more than skill and experience, it depends on **how we act every day**. That's where our **Code of Conduct** comes in.

Our Code isn't a list of rules. It's a guide to upholding our values: being **client devoted**, **collaborative**, and **genuine** in everything we do. It helps us make the right choices, stay accountable, and protect the trust we've built with our clients, colleagues, and communities.

Use our Code often. Ask questions. Speak up if something doesn't feel right. Because how we choose to act today shapes the future we build tomorrow.

Clients first. Integrity always. That's how we build.



James Donaghy
Executive Chairman



Bob Mullen
CEO



Paul Drecksel
President



OUR MISSION, VALUES, AND CODE

We are a family of builders who aim for excellence in everything we do. As an employee-owned company, we each share responsibility for protecting our reputation and contributing to long-term success.

OUR CORE VALUES GUIDE US:

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 an unparalleled experience.

OUR CODE OF CONDUCT

turns these values into everyday action. It helps us make fair, ethical decisions, collaborate with respect, and stay transparent in all our dealings.

OUR BLUEPRINT FOR INTEGRITY

Our Code is part of a larger framework of company policies that help us do business with integrity. It provides broad principles that apply to everyone, but for more detailed direction, always check the related policies on **CONNECT** or ask your manager or the Compliance & Ethics Department.

Compliance with our Code and company policies is expected from all employees.



WHAT OUR CODE IS — AND ISN'T

Our Code is our **blueprint for doing the right thing**. It means:

- Acting with integrity.
- Following the law.
- Upholding our values.
- Protecting our commitments to clients and each other.

Our Code is not a rulebook or a step-by-step manual. Instead, it's a resource that helps you make sound, lawful, and ethical decisions in real-world situations.

PUNCH LIST: Doing the Right Thing

Before you act, ask yourself:

- Is this **legal**?
- Is this **in line with our values and policies**?
- Would I feel comfortable if this became public?
- Would I be proud to explain this to a client or coworker?

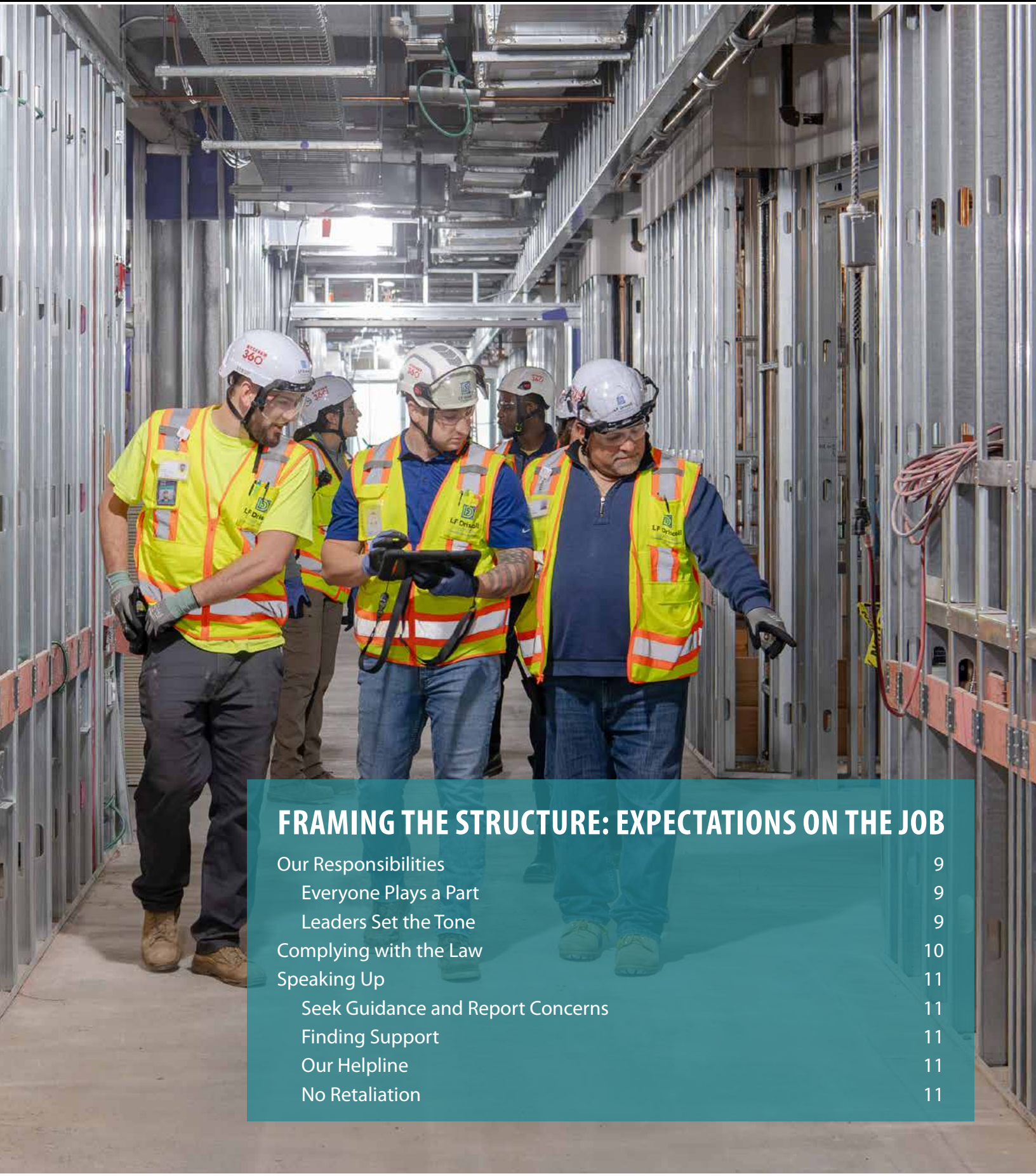
If you're not sure, **ask for help**.

HOW TO USE OUR CODE

Our Code is your reference guide to use when you have questions, when something feels uncertain, or when you need to make a tough decision. You'll also find references to related policies and contacts available on **CONNECT** or the company [website](#).

Our Code can't cover every situation. That's why we rely on **good judgment, common sense, and speaking up** when in doubt.

This policy applies to all **STO Building Group** companies and to everyone who works for them, including employees, officers, directors, independent contractors, and interns. Third parties working on our behalf are expected to follow our Code through our [Supplier Code of Conduct](#). For simplicity, our Code refers to all of these groups as "**employees**."



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OUR RESPONSIBILITIES

From the field to the office, everyone plays an important part in keeping ethics at the center of our work. Our Code sets the foundation, but it's our daily actions that keep integrity strong.



EVERYONE PLAYS A PART

Each of us must know and follow our Code and all other applicable policies. Doing so means using good judgment, asking questions, and speaking up when something doesn't feel or seem right. Every role matters, from new hires to senior leaders, because every decision reflects our values.

LEADERS SET THE TONE

Leaders have a special responsibility to model ethical behavior and create a culture where integrity comes first.

PUNCH LIST: Leading the Right Way

Managers should:

- **Lead by example.** Show honesty and fairness in every decision. Participate in required training and remind your team to do the same.
- **Talk about ethics.** Make it part of everyday team discussions.
- **Keep an open door.** Be available, listen, and guide team members who raise concerns.
- **Recognize integrity.** Hire, promote, and reward those who do the right thing.
- **Take action.** Report suspected violations promptly, support investigations, and look out for retaliation against anyone who raises a concern.



COMPLYING WITH THE LAW

We follow the law, always. Local customs, habits, or pressure to “get the job done” are never excuses for breaking the rules.

Need help understanding a law or rule? Contact the **Compliance & Ethics Department** or the **Legal Department**.

SPEAKING UP

SEEK GUIDANCE AND REPORT CONCERNS

At STOBG, speaking up is part of how we build trust. Whether you're sharing an idea, asking a question, or raising a concern, your voice matters.

If you're unsure about something, **ask early**. It's easier to prevent problems than to fix them later.

We're all responsible for reporting potential misconduct, even if we are uncertain about what exactly occurred. You don't need proof, just a **good-faith belief** that something may be wrong.

FINDING SUPPORT

You can raise questions or concerns with:

- Your manager or a senior leader
- The **Compliance & Ethics Department**
- The **Human Resources Department**
- The **Legal Department**

You can also submit a written internal complaint form to any of these resources.

OUR HELPLINE

The **STOBG Helpline** is available to anyone 24/7 and managed by an independent company. You can ask questions or report concerns and remain anonymous.

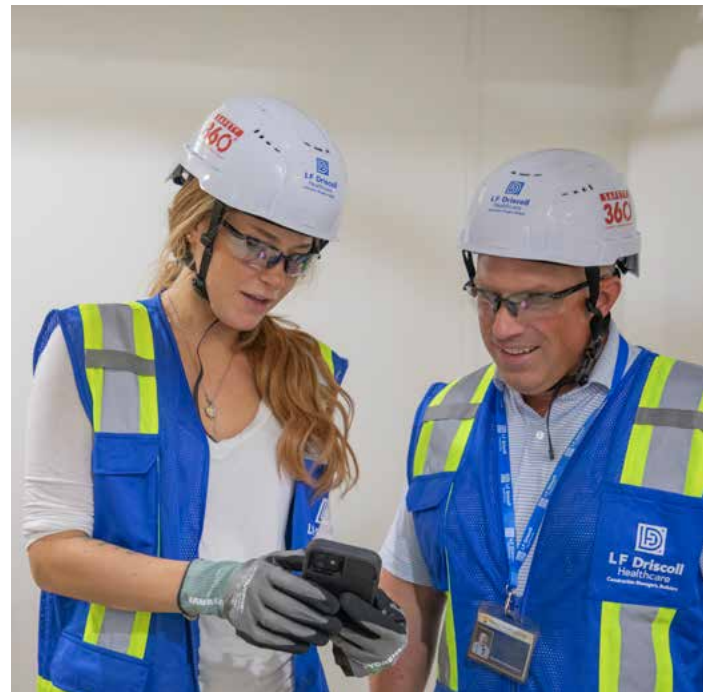
You can use the **Helpline** at compliancehelpcenter.com, which includes a listing of local toll-free telephone numbers.

Provide as much detail as possible when you make a report, so the company can perform a full and complete investigation. The company will handle concerns **fairly, promptly, and confidentially**, and take appropriate action based on the findings of the investigation.

NO RETALIATION

We strictly prohibit retaliation against anyone who reports a concern in good faith, participates in an investigation, or refuses to take part in wrongdoing.

Retaliation — like harassment, intimidation, demotion, or firing — violates our [Anti-Retaliation Policy](#) and our values. If you think retaliation has occurred, report it immediately.



PUNCH LIST: Handling Reports the Right Way

If you're a manager and someone comes to you with a concern:

- Escalate it quickly to the **Compliance & Ethics Department, the Legal Department, HR, your department head, or your business unit leader.**
- Treat the person with respect and take their concern seriously.
- Keep it confidential as much as possible and only share information on a need-to-know basis.
- Watch for and report signs of retaliation.

If the concern comes from outside the company (like a former STOBG employee, an outside attorney, or a government agency), contact the **Compliance & Ethics Department** immediately.



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WE SUPPORT A CULTURE OF INCLUSION AND BELONGING

At **STO Building Group**, we believe every person brings unique strengths, experiences, and perspectives. Our success depends on creating a workplace where everyone feels valued and has an equal opportunity to grow.

We want our teams to reflect the diverse communities where we live and build. When we welcome different ideas and backgrounds, we build stronger projects and stronger relationships.

PUNCH LIST: Building Inclusion Every Day

We help create belonging when we:

- Listen to every voice, from new hires to senior leaders.
- Include colleagues with different backgrounds and ideas.
- Speak up when we see bias or unfair treatment.
- Support an environment where everyone feels safe to do their best.



WE TREAT ONE ANOTHER WITH RESPECT

Everyone deserves a workplace that's safe, professional, and free from discrimination, harassment, bullying, or abusive behavior, whether we're in the office, on a jobsite, or working remotely.

We treat all coworkers, clients, and business partners with respect, regardless of race, color, gender, sexual orientation, national origin, religion, age, disability, or any other protected characteristic.

Discriminatory or harassing behavior of any kind has no place at STOBG. Refer to our [non-discrimination and anti-harassment policies](#) and [equal employment opportunity policies](#) for additional guidance or if you have any questions.

If you experience or witness conduct that violates these standards, report it to your manager, Human Resources, the Compliance & Ethics Department, or another company resource. You can also use the internal complaint form.



CODE CHECK: What If...

- Q.** I overhear a coworker making offensive jokes that target a group of people. What should I do?
- A.** Report it to your manager, HR, or the Compliance & Ethics Department right away. If you feel safe, you can also ask them to stop. Even "jokes" can create a hostile work environment, even if they're not directed at you or the speaker "didn't mean it."



WE KEEP OUR WORKPLACES SAFE

Safety is not just a rule, it's part of who we are. Our **Safety 360°** program is central to our culture and reflects our belief that safety is a commitment and a passion, not an obligation. It embraces a 360-degree view of safety and rests on four pillars:

- **Awareness:** We stay actively engaged in our surroundings — what's happening above, below, and beside us — and look out for one another's physical and mental well-being.
- **Behavior:** We avoid risky actions through behavior-based safety coaching, open feedback, and pre-task planning that help each of us take an active role in maintaining a strong safety culture.
- **Positivity:** We inspire safe choices through positive reinforcement — opening meetings with safety moments, recognizing "good catches," and celebrating teammates who model safe behavior.
- **Shared Responsibility:** Safety is everyone's responsibility. Each employee receives regular safety coaching, and our leaders, project teams, and safety professionals work together to build a culture of accountability and care.

PUNCH LIST: Staying Safe Every Day

We work safely when we:

- Follow all health and safety rules and jobsite protocols.
- Stop unsafe work immediately and report hazards.
- Wear and maintain proper personal protective equipment (PPE).
- Watch out for others, both physically and mentally.
- Speak up if something doesn't look or feel safe.



CODE CHECK: What If...

- Q.** I notice a subcontractor doing something risky but not technically breaking a rule. Should I speak up?
- A.** Yes. If something feels unsafe, say something. Talk to your supervisor or the Safety team right away. It's better to prevent a problem than to react to an accident.

WE MAINTAIN A DRUG- AND ALCOHOL-FREE WORKPLACE

Working under the influence of alcohol or drugs puts everyone at risk. We must never perform job duties, on company property or at a jobsite, while impaired.

There may be limited occasions where alcohol is served responsibly at approved company events. When that happens, we must always behave professionally and comply with our Code and all policies.

The use, sale, or possession of illegal drugs, unauthorized alcohol, or drug paraphernalia at work or on company property is strictly prohibited. Misusing prescription or over-the-counter medication that affects your ability to work safely is also not allowed.

Violations can lead to discipline, up to and including termination. For more details, see your **safety manual** and **employee handbook**.

PUNCH LIST: Staying Fit for Work

We protect each other by:

- Arriving fit, alert, and ready for work.
- Using medications responsibly and reporting anything that might affect safety.
- Never possessing or using illegal substances on company property or jobsites.
- Behaving responsibly and professionally if alcohol is served at approved work events.
- Asking for help if you or a coworker may be struggling with substance use.



CODE CHECK: What If...

- Q.** I think a coworker is impaired, but I'm not sure. Should I still report it?
- A.** Yes. Report your concern immediately to your supervisor or HR. You don't need proof. Safety comes first and trained staff will handle the situation confidentially.

WE HAVE ZERO TOLERANCE FOR WORKPLACE VIOLENCE

We're committed to maintaining a workplace free from threats, bullying, intimidation, online threats, or physical violence. No one should ever feel unsafe where they work.

Weapons of any kind, including firearms, knives, explosives, or anything designed to cause harm, are prohibited on company property, in company vehicles, or at any work location or work-related event, consistent with local laws and policies.

If you ever feel threatened, call **local law enforcement** if needed, and report it immediately to your manager, HR, or Safety.

For more details, see the **workplace violence policy** in your safety manual and employee handbook.

PUNCH LIST: Preventing Violence

We keep our workplaces secure when we:

- Treat everyone with respect and professionalism.
- Stay alert to signs of anger or conflict.
- Report all threats or violent behavior — even "jokes" about violence.
- Know how to contact security or law enforcement in an emergency.



CODE CHECK: What If...

- Q.** A coworker jokes about bringing a weapon to work after an argument. What should I do?
- A.** Take it seriously. Report the comment immediately to your supervisor, Safety, HR, or call law enforcement if you feel unsafe. Never assume a threat is a joke.



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WE AVOID CONFLICTS OF INTEREST

We make business decisions that serve the best interests of STO Building Group and never our personal interests. A **“conflict of interest”** (or conflict) arises when our personal relationships, outside activities, or investments improperly influence or could reasonably appear to improperly influence our work decisions. Remember that not every relationship with a client, vendor, or competitor is a conflict; ordinary business courtesies and relationship-building in line with our policies aren’t conflicts by themselves.



Conflicts can happen to anyone. What matters is how we handle them. By speaking up and being open and honest about the situation, we can work to resolve it.

If you think you may have a potential conflict, review our Conflicts of Interest Policy or contact Conflicts@STOBG.com for help. Conflicts can arise in many different situations, including with:

- **Financial Interests:** You (or a family member) own stock or a stake in a company that works or competes with STOBG.
- **Personal Deals:** You hire a company vendor or subcontractor for personal work.
- **Outside Work:** You have a side job or advisory role that overlaps with your STOBG duties.
- **Personal Relationships:** You supervise or work directly with a close friend or relative.
- **Using Company Information:** You use business leads or project details for personal gain.

When in doubt: **disclose it**. Transparency protects you and the company.



CODE CHECK: What If...

- Q. I want to hire an STOBG subcontractor for a home project. Can I?**
- A.** Maybe not, either way, you must first get written approval in line with our **Conflicts of Interest Policy**. Even personal work can appear to influence business decisions.
- Q. My best friend works for a vendor we often use. We sometimes meet for lunch, is that a problem?**
- A.** Friendships are fine, but they should never affect (or seem to affect) your professional judgment. Disclose it to your manager or the Compliance & Ethics Department so everything stays transparent.
- Q. I have a weekend side job that’s unrelated to construction. Do I need approval?**
- A.** Yes. All outside employment must be reviewed to make sure it doesn’t interfere with your STOBG responsibilities.

WE SAFEGUARD CONFIDENTIAL INFORMATION

We all handle confidential information, whether it's about our projects, clients, or team members. Protecting this information builds trust, helps us meet our legal and contractual obligations, and preserves our competitive advantage.

Confidential information can include project bids, pricing, internal communications, or employee data. We also protect personal information, such as personal identifying information, records, health data, and any other sensitive data about employees, clients, and partners. We maintain and respect privacy and comply with all relevant laws. Sharing confidential or personal information carelessly, even by mistake, can cause harm.

Always use care when handling company or client information, and follow our IT and data protection policies.



PUNCH LIST: Protecting Information

We protect confidentiality when we:

- Share information only with people authorized to see it.
- Use **non-disclosure agreements (NDAs)** when sharing data outside the company.
- Avoid discussing confidential topics in public, online, or on unsecured channels.
- Follow IT security guidelines for passwords, devices, and remote access.
- Report any loss or unauthorized access right away.



CODE CHECK: What If...

Q. What counts as “confidential”?

A. Anything that's not public and could harm STOBG, our clients, or partners if shared. That includes bids, proposals, contracts, financial data, and HR records. When unsure, treat it as confidential.

Q. Can I talk about a project on social media if it's already public?

A. Only if you've been authorized and the post follows our Social Media Policy. When in doubt, ask your manager or Marketing before sharing.

WE KEEP ACCURATE RECORDS

Accurate records show how we do business and help us stay accountable. Every invoice, budget, safety report, time entry, change order, and communication matters.

We all share responsibility for making sure our records, digital or paper, are complete, truthful, and secure.

Never alter, hide, or destroy a record that may be needed for a legal, financial, or audit purpose. If you're unsure how to handle a record, pause and ask the **Legal Department** before taking any action.

PUNCH LIST: Good Recordkeeping Habits

We handle records the right way when we:

- Keep them accurate and complete. Never alter or delete records to improve the appearance of business.
- Follow our Business Practices and Record Retention Policy.
- Retain project files, financial documents, and key communications for required time periods.
- Dispose of old records securely.
- Report any record that seems false or incomplete.



CODE CHECK: What If...

Q. What's a "business record"?

A. A business record includes any information we keep for business, legal, or audit purposes, regardless of format or medium—from project files and contracts to timesheets and permits. If you're unsure whether something is a business record, keep it and contact the Legal Department for guidance.



WE PROTECT COMPANY ASSETS

We're all trusted to protect the tools, equipment, and information that help us do our jobs. These include our offices, supplies, computers, vehicles, credit cards, and proprietary data.

Use company assets only for legitimate business purposes. Treat them with the same care you'd use with your own property.

Intellectual property, like our proposals, designs, or methods, is also a valuable asset. Never share it outside the company unless you have written permission.

PUNCH LIST: Using Company Assets Wisely

We protect company assets when we:

- Use tools and technology responsibly.
- Keep equipment secure when traveling or on jobsites.
- Report lost or stolen items immediately.
- Use company credit cards responsibly and seek reimbursement only for legitimate business expenses.
- Respect copyrights and trade secrets.



WE USE TECHNOLOGY THE RIGHT WAY

Our technology, from phones and computers to networks and AI tools, helps us connect and work efficiently. Using it responsibly keeps everyone secure.

We follow company IT Policies that protect privacy, data, and systems. We never use company resources for anything illegal, discriminatory, or unethical.

When using **AI tools**, follow our [AI Use Policy](#) to keep data secure and outputs accurate.

All data on company systems belongs to STOBG. The company may monitor usage when needed for security or compliance, consistent with local law.

PUNCH LIST: Smart Technology Use

We use technology correctly when we:

- Follow IT security and confidentiality rules.
- Protect passwords and sensitive data.
- Use company systems for work-related tasks only.
- Consult our [AI Use Policy](#) before using AI tools for company work.
- Understand that company communications can be monitored or retrieved on any device used for work purposes.

WE USE ELECTRONIC COMMUNICATIONS RESPONSIBLY

Emails and other electronic messages are part of our daily work. They should always be professional, respectful, and accurate.

Never use personal email or apps for business communication, and never use platforms that automatically delete messages. Those tools can make it hard to keep records and stay compliant.

PUNCH LIST: Responsible Communication

We communicate clearly when we:

- Use only company-approved systems for business.
- Keep messages clear and respectful.
- Use text messaging only for brief updates and not substantive business communications.
- Avoid sending sensitive information over unsecure channels.
- Follow our Record Retention Policy and IT Policies.



CODE CHECK: What If...

- Q. Can I use my personal phone for quick work messages?**
- A.** Only if you're using company-approved tools and saving communications properly. Business information must be stored according to company policy.

WE COMMUNICATE CLEARLY AND APPROPRIATELY

We represent the company with every email, meeting, and conversation. Only authorized spokespersons should make public statements or speak on behalf of STOBG.

If you're invited to speak at an event, interview, or panel, get approval from your **marketing team** and your **department head or business unit leader**. If you're expressing personal opinions, whether online or in public, make it clear you're not speaking for STOBG.



PUNCH LIST: Speaking for the Company

Direct external inquiries to the appropriate STOBG team:

- **Media:** Corporate Marketing (follow our Press Response Policy)
- **Financial:** Corporate Finance
- **Legal or Regulatory:** STOBG Legal Department or Compliance & Ethics Department
- **Employment Verification:** Human Resources



WE USE SOCIAL MEDIA THOUGHTFULLY

Social media helps us celebrate our work and stay connected, but it can also create risk. Even personal posts can reflect on STOBG.

Follow our Social Media Policy and always protect client and company confidentiality. Never share project details, images, or internal information without approval.



CODE CHECK: What If...

Q. I want to post a jobsite photo on LinkedIn. Can I?

A. Only with prior approval as set out in our Social Media Policy and if it doesn't reveal confidential information.

PUNCH LIST: Smart Posting

We use social media the right way when we:

- Follow STOBG's Social Media Policy.
- Get approval before posting project content.
- Avoid speaking on behalf of the company.
- Respect confidentiality, copyrights, and client privacy.
- Keep posts, both work-related and personal, professional and in line with company values.



WE COOPERATE IN AUDITS AND INVESTIGATIONS

Audits and investigations help us protect our company and people and ensure compliance. Always be honest and cooperative if you're asked to participate in an audit or investigation.

If you are contacted by someone outside the company — for example, an outside attorney, auditor, or regulator — in connection with an audit or investigation involving the company, promptly refer them to the **Legal Department** or **Compliance & Ethics Department** to ensure that information is shared through the proper channels.

Anyone who reports a concern or participates in an investigation in good faith is protected from retaliation, by both company policy and the law.

PUNCH LIST: Doing the Right Thing in Audits and Investigations

We cooperate fully when we:

- Respond honestly and on time.
- Provide complete and accurate information.
- Keep audit and investigation details confidential.
- Report suspected misconduct or retaliation immediately.



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WE PROHIBIT ALL FORMS OF CORRUPTION

At STO Building Group, our reputation is built on trust, not shortcuts. We earn business the right way, through honesty, transparency, and excellent work.



Corruption, including bribery, kickbacks, and other improper payments, has no place here. These actions can damage relationships, harm our reputation, and even lead to criminal penalties.

We expect everyone we work with — employees, subcontractors, suppliers, and consultants — to follow the same high standards outlined in our [Anti-Corruption Policy](#) and [Supplier Code of Conduct](#).



CODE CHECK: What If...

- Q.** A subcontractor offers me free tickets to a playoff game “to say thanks” for inviting them to bid on a big project. What should I do?
- A.** Decline politely. Gifts given around a procurement can look like an attempt to influence a decision. Follow our [Gifts & Entertainment Policies](#) and consult the Compliance & Ethics Department about the offer if unsure.
- Q.** A partner says a “small payment” to an official could speed up a permit process. Is that allowed?
- A.** No. That’s a facilitation payment. It violates company policy and can be considered a bribe under the law.
- Q.** What payments are improper or corrupt?
- A.** Any payment meant to get an unfair advantage. Examples include:
- **“Facilitation” payments:** small unofficial payments made to government officials to speed up routine government tasks (like a permit).
 - **Kickbacks:** money, gifts, or favors given as a reward for favorable treatment or to win work.
 - **Commissions, broker fees, or finder’s fees:** these types of payments can be used to buy influence or steer business, rather than for legitimate, approved services.

PUNCH LIST: Avoiding Corruption

We keep corruption out of our work when we:

- Win projects through quality, not favors or gifts.
- Refuse to offer or accept anything of value to improperly influence decisions.
- Apply the same ethical standards to everyone, including third parties we work with.
- Know and follow our [Anti-Corruption Policy](#) everywhere we work.
- Report suspected violations immediately.



WE STRICTLY PROHIBIT BRIBERY

Bribery, which is offering, giving, or receiving anything of value to gain an unfair advantage, is illegal everywhere we operate.

We fully comply with the **U.S. Foreign Corrupt Practices Act (FCPA)**, the **U.S. Foreign Extortion Prevention Act**, the **UK Bribery Act**, and all other applicable anti-corruption laws.

If anyone asks you to pay, offer, or accept a bribe, **refuse and report it immediately** to your manager, the **Compliance & Ethics Department**, or the **Helpline**.

PUNCH LIST: Zero Tolerance for Bribery

We protect ourselves and STOBG when we:

- Never give or accept money, gifts, or favors to win or keep business.
- Avoid “disguised” bribes like donations or job offers meant to improperly influence someone.
- Watch for high-risk payments, especially involving government officials.
- Report suspicious activity or pressure to act unethically.



CODE CHECK: What If...

- Q.** A local contact says “everyone pays small tips” to get jobsite utilities connected quickly. Is that OK?
- A.** No. Those “tips” are considered bribes, even if common practice in some areas. Always follow STOBG’s global standards and avoid local shortcuts.
- Q.** Is it ever OK to pay a bribe or offer a kickback if “that’s how business is done” in some places?
- A.** **No. Never.** Bribes and kickbacks are banned at STOBG everywhere we operate. Doing so can lead to fines, criminal charges, and loss of your job and our ability to do work.



WE MAKE ETHICAL BUSINESS DECISIONS ABOUT OUR PARTNERS

We choose subcontractors, suppliers, and other business partners based on their quality, reliability, and shared commitment to integrity — not based on personal benefit.

That means we don't accept or request gifts, favors, or special treatment that could affect our judgment or even appear to.

When in doubt, check with your manager or the **Compliance & Ethics Department** before accepting or giving anything of value.

PUNCH LIST: Ethical Partnering

We make ethical choices when we:

- Work with partners who share our values.
- Say “no” to special treatment, discounts, or personal favors.
- Follow company policies on gifts, meals, and entertainment.
- Pay attention to the activities of third parties working on our behalf, and report any concerns.
- Raise concerns about potential conflicts or unethical behavior.



CODE CHECK: What If...

- Q.** A supplier offers to donate to my favorite charity “in my name.” Can I accept?
- A.** No. Even charitable donations can create the appearance of improper influence. Only company-approved charitable contributions are allowed.

WE EXCHANGE GIFTS AND ENTERTAINMENT APPROPRIATELY

Giving or receiving occasional, reasonable gifts or entertainment can strengthen relationships, but they must always be **legal, modest, and transparent**.



Exchanges that are too generous, too frequent, or poorly timed can appear to improperly influence decisions and may violate policy.

Special care is required when dealing with **government officials**, who are often prohibited from accepting gifts or entertainment of any kind.

Refer to our [Gifts & Entertainment Policies](#) for guidance.

PUNCH LIST: Keeping It Appropriate

We stay compliant when we:

- Give or accept only modest, lawful gifts or hospitality in line with STOBG's values and policies.
- Never give or accept cash as a gift.
- Never accept gift cards. Giving a gift card can be OK in certain situations, including that it must be of modest value, store-specific, given downstream (OK to a subcontractor employee, not OK to a client), and approved by your business unit or corporate services leader.
- Avoid giving gifts to government officials.
- Record all gifts and entertainment accurately.
- Never solicit gifts or favors for ourselves or others.



CODE CHECK: What If...

- Q.** I was offered tickets to a vendor's corporate box at a sports game. Can I accept?
- A.** Only if it's reasonable, occasional, and approved by your manager. If it could look like an attempt to influence you, decline politely.



WE COMPETE FAIRLY AND TRANSPARENTLY

We believe in competition to win work, but always fairly. That means we never coordinate with competitors or with subcontractors, suppliers, or other business partners on pricing, bids, or markets.

Antitrust and fair competition laws protect open markets. Violations can bring serious penalties for both the company and individuals.

If someone suggests “taking turns” on bids or asks for or offers inside information, like another bidder’s pricing or other bid details, stop the conversation immediately and report it to the **Legal Department** or **Compliance & Ethics Department**.

PUNCH LIST: Competing Fairly

We do business the right way when we:

- Develop bids independently, without coordination with competitors.
- Never discuss pricing, clients, or territories with competitors.
- Refuse to accept or provide inside information about another company’s bid (e.g., price, ranking).
- Report any suspicious discussions or agreements regarding clients, subcontractors, vendors, or competitors.



CODE CHECK: What If...

- Q.** A competitor says, “Let’s not undercut each other on this one.” What should I do?
- A.** End the conversation immediately and report it. Even casual talk about bids can violate antitrust laws.
- Q.** A subcontractor tells me another general contractor’s prices. Can I use that information?
- A.** No. Using or sharing nonpublic pricing information is prohibited. Report it to the **Compliance & Ethics Department** or the **Legal Department** right away.



WE MARKET OUR SERVICES HONESTLY

Being genuine is one of our values. We show it in how we communicate with clients and partners.

We never exaggerate our qualifications or make false claims. All marketing, advertising, and proposals must be clear, accurate, and compliant with applicable laws and company standards.

Our reputation depends on honesty. We win business through our work and not by overselling what we can deliver.

PUNCH LIST: Honest Marketing

We market responsibly when we:

- Describe our services truthfully and accurately.
- Use facts, not assumptions or comparisons.
- Avoid misleading claims about competitors.

WE WORK RESPONSIBLY WITH GOVERNMENT OFFICIALS

When working on government projects, we need to keep in mind that the rules may be different and that the stakes are higher.

Even small missteps can lead to serious financial, legal, and reputational damage. Many government officials have limits or bans on gifts, meals, or entertainment.

Before engaging with any government official, check with **Legal Department** or **Compliance & Ethics Department** to make sure your actions follow all applicable laws and contract requirements.

PUNCH LIST: Working with Government Officials

We follow the rules when we:

- Obtain proper approvals before pursuing government contracts.
- Avoid offering anything of value to government officials.
- Understand and meet all reporting or disclosure requirements.
- Seek guidance before lobbying or making political contributions.



WE CHOOSE OUR BUSINESS PARTNERS WITH CARE

We hold our subcontractors, suppliers, and vendors to the same high ethical, safety, and compliance standards we follow. A partner's misconduct can create legal, financial, and reputational risk.

Before working with a new partner, we conduct risk-based prequalification and due diligence to check for performance, safety, financial, or integrity issues. Every partner must agree to follow our [Supplier Code of Conduct](#) and share it with their own vendors.

We monitor partners on an ongoing basis through regular reviews and third-party tools and respond quickly to adverse developments. If a risk is found, we take appropriate action, including enhanced reviews and mitigation plans.

PUNCH LIST: Partnering with Integrity

We choose and manage partners responsibly when we:

- Verify they follow all laws and safety standards.
- Review them through STOBG's prequalification and due diligence processes.
- Address any concerns quickly and fairly.



CODE CHECK: What If...

- Q.** A supplier has an old safety issue flagged in prequalification but offers a great price. Can we still hire them?
- A.** Not without review and approval, and only if the risk can be effectively mitigated, in strict accordance with our Authority Matrix. Cost savings never outweigh safety or ethics. Consult your safety and prequalification teams before moving forward.



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WE RESPECT AND PROMOTE HUMAN RIGHTS

At **STO Building Group**, we believe every person deserves dignity, fairness, and respect. That commitment shapes how we treat our people, how we work with partners, and how we engage with the communities where we build.

We follow our [Human Rights Policy](#) to ensure safe, respectful, and inclusive workplaces that are free from discrimination or harassment. We expect our subcontractors, suppliers, and business partners to do the same through our [Supplier Code of Conduct](#).

We have **zero tolerance** for any form of modern slavery, including human trafficking, forced labor, or child labor. Our [Anti-Slavery and Human Trafficking Policy](#) guides us in identifying and addressing these risks in our operations and supply chain.

PUNCH LIST: Supporting Human Rights

We uphold human rights when we:

- Treat everyone with fairness, respect, and dignity.
- Choose partners who share our ethical standards.
- Refuse to work with anyone involved in forced or child labor.
- Follow all local and international laws protecting workers.
- Speak up if we see behavior that violates human rights.



CODE CHECK: What If...

- Q.** I suspect a subcontractor may be using underage workers on a project. What should I do?
- A.** Report it immediately to your manager, HR, Safety, or the **Compliance & Ethics Department**.

WE BUILD WITH SUSTAINABILITY IN MIND

We know our work shapes the world around us. That's why we take responsibility for reducing our environmental impact and promoting sustainable practices.



We focus on efficiency, innovation, and collaboration — working with clients, suppliers, and partners to support sustainable outcomes on our projects and for our organization.

Our goal isn't just compliance: it's leadership. We measure our progress, set goals, and continuously look for ways to improve.

PUNCH LIST: Build Responsibly

We help protect the environment when we:

- Follow our [Environmental Policy](#) and all applicable local environmental laws and requirements.
- Use materials, equipment, and energy efficiently.
- Reduce emissions from construction equipment by limiting fuel use, avoiding idling, and prioritizing electric or low-emissions equipment when available.
- Reduce construction waste through planning, reuse, recycling, and supporting a circular economy.
- Advance sustainable design and construction methods along with low-impact alternatives.
- Share ideas and raise concerns when we see opportunities to improve environmental performance.



CODE CHECK: What If...

- Q. If something is legal, is it “good enough” environmentally?**
- A.** Not always. Compliance is the baseline. We aim to improve performance where we can. If you see a better approach, raise it.

WE GIVE BACK TO OUR COMMUNITIES

We're proud to serve the communities where we live and build. Giving back through volunteerism, philanthropy, and community engagement is part of who we are.

Our charitable giving is guided by integrity and transparency. Company-sponsored donations must go to legitimate organizations and be properly recorded in our financial systems. We never use charitable contributions to influence business decisions or gain special treatment.

Employees are encouraged to support personal causes they care about, as long as those efforts don't conflict with company values, interfere with work, or use company resources without approval.

For details, see our [Anti-Corruption Policy](#).

PUNCH LIST: Giving Responsibly

We contribute ethically when we:

- Support legitimate, approved charitable organizations.
- Avoid using company donations to influence business outcomes
- Get approval before using company resources for charitable events.
- Ensure donations are properly documented.
- Volunteer and give back in ways that reflect our company values.



CODE CHECK: What If...

Q. A friend on a nonprofit board asks me to donate STOBG services for a project. Can I agree?

A. Not on your own. Forward the request to your business unit leader or STOBG executive management for review and approval.

WE ENGAGE RESPONSIBLY IN THE POLITICAL PROCESS

STOBG may take part in public discussions or advocacy on issues that affect our industry, but always legally, transparently, and fairly.

We follow all **campaign finance, lobbying, and ethics laws** that apply to our work. Company resources, time, or funds may never be used for political purposes without prior approval.

You're free to participate personally in political activities, but you must do so **on your own time and at your own expense**. Never imply that you're speaking or acting on behalf of the company.

For more details, see our [Anti-Corruption Policy](#).

PUNCH LIST: Staying Compliant in Politics

We engage responsibly when we:

- Follow all campaign finance and lobbying laws.
- Get approval before making any political contribution on the company's behalf.
- Keep personal politics separate from company business.
- Accurately record any approved political expenditures.



CODE CHECK: What If...

Q. A coworker circulates a petition at the office for a local ballot issue. Is that allowed?

A. No. Political activity at work can create conflicts. Let management know so the company can review and decide whether to respond officially.

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OUR CODE IN ACTION

Our **Code of Conduct** is more than a policy: it's our daily guide for doing what's right. It helps us make good decisions, treat others respectfully, and protect STO Building Group's reputation.

When we follow our Code, we strengthen trust with clients, partners, and each other. Our integrity defines who we are — on the jobsite, in the office, and in our communities.

PUNCH LIST: Upholding Our Code

We uphold our Code when we:

- Make ethical choices, even when no one is watching.
- Speak up if something doesn't feel right.
- Ask questions when we're unsure.
- Support colleagues who do the right thing.



ACCOUNTABILITY AND ENFORCEMENT

Every team member is responsible for following our Code. Violations may lead to disciplinary action, up to and including termination. In serious cases, issues may be referred to legal authorities.

The **Compliance & Ethics Department** interprets and enforces our Code. Disciplinary actions are consistent with company policy and applicable law and are based on the facts and impact of the misconduct.



CODE CHECK: What If...

- Q.** What if I report a concern that turns out to be a misunderstanding?
 - A.** If you reported in good faith, you're protected. STOBG encourages all good-faith reporting.
- Q.** What if my supervisor ignores a potential Code violation I raised?
 - A.** Contact a company resource, such as the **Compliance & Ethics Department**, **Legal Department**, **HR**, or the **Helpline**.



CODE MANAGEMENT AND LEGAL INFORMATION

The **Board of Directors** oversees our Code, and the **Compliance & Ethics Department** manages its updates and application. Our Code is reviewed regularly to reflect new laws and industry standards.

The most current version is always available on **CONNECT** and the STOBG [website](#). Our Code guides behavior but is **not an employment contract**.

PUNCH LIST: Staying Informed

We stay current by:

- Reviewing updates on CONNECT.
- Completing required training.
- Asking questions when something is unclear.

RESOURCES AND CONTACT INFORMATION

For questions, guidance, or to report a concern, reach out to:

- Your manager / a senior leader
- The Compliance & Ethics Department
- Human Resources
- The Legal Department

You can also use the **Helpline** at compliancehelpcenter.com, which includes a listing of local toll-free telephone numbers.

PUNCH LIST: Reaching Out for Help

We protect our culture when we:

- Report concerns promptly.
- Provide clear, factual information.
- Maintain confidentiality.
- Support others who speak up in good faith.



STO Building Group Code of Conduct

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Policy Number: STOBG 001.07

Contact: Compliance & Ethics Department

Effective Date: October 2, 2026