

POLICY NUMBER
STOBG 026.03

CONTACT

STOBG Chief Human
Resources Officer

EFFECTIVE DATE

December 16, 2020

EQUAL EMPLOYMENT OPPORTUNITY AND AFFIRMATIVE ACTION POLICY

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AND AFFIRMATIVE ACTION POLICY

STO BUILDING GROUP

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STO BUILDING GROUP (“STOBG”), AS PART OF ITS COMMITMENT TO EQUAL EMPLOYMENT OPPORTUNITY, ADHERES TO ALL FEDERAL, STATE, AND LOCAL LAWS WITH RESPECT TO EQUAL EMPLOYMENT OPPORTUNITY.

STOBG’s policy is to afford equal employment opportunity to qualified individuals regardless of affectional preference, age, alienation or citizenship status, ancestry, color, domestic partnership or civil union status, gender identity and/or expression, gender, genetic information, marital or partnership status, medical condition, mental or physical disability or handicap, national origin, pregnancy (including pregnancy, childbirth, and medical conditions related to pregnancy, childbirth, or breastfeeding), race, religion or creed, sex, sex stereotyping (including assumptions about a person’s appearance or behavior, gender roles, gender expression, or gender identity), sexual orientation, status as a victim of domestic violence/stalking/sex offenses, unemployment status, veteran or active military service member status, or any other characteristic protected by federal, state, or local law (“Protected Characteristics”). We interpret these Protected Characteristics broadly to include both the actual status and also any perceptions and assumptions made regarding these statuses. STOBG further adheres to the specific protections against discrimination and retaliation under federal law to applicants and employees of STOBG. *See EEO is the Law, Supplement to EEO is the Law, and Pay Transparency Nondiscrimination Provision.*

This Equal Employment Opportunity and Affirmative Action Policy (“Policy”) encompasses all aspects of the employment relationship, including applications, application of services, benefits, compensation, demotion, discipline, downgrading, employee benefit plans, hiring, initial employment, layoff, performance evaluations, policies wage/salary administration, promotion and transfer, reassignments, recreation programs, recruitment, rehires, retirement, termination of employment, training and apprenticeship, upgrading, seniority, and other terms and conditions of employment as provided by law. STOBG ensures that employment decisions are based only on valid job requirements.

STOBG has established affirmative action programs under Executive Order 11246 (“EO 11246”), Section 503 of the Rehabilitation Act of 1973 (“Section 503”), and the Vietnam Era Veterans’ Readjustment Assistance Act of 1974 (“VEVRAA”). STOBG engages in affirmative action measures to ensure that qualified applicants are employed, and that employees are treated during employment, without regard to their race, color, religion, sex, sexual orientation, gender identity, national origin, disability or protected veteran status.

STOBG encourages and considers requests for reasonable accommodations from any applicant or employee with a physical or mental disability barring undue hardship. A determination of any request for reasonable accommodation will be made on a case-by-case basis. STOBG employs and advances qualified individuals with disability at all levels of employment, including the executive level.

STOBG's Chief Executive Officer reaffirms support for this Policy and delegates overall responsibility for the implementation of the affirmative action activities to the Chief Human Resources Officer, who is responsible for administering STOBG's equal employment opportunity program as follows:

- Develop policy statements, equal employment programs, internal and external communication techniques, and programs;
- Assist in the identification of problem areas;
- Assist management in arriving at a solution to problems;
- Design and implement audit and reporting systems that will:
 - o measure effectiveness of this Policy and implementing programs including supervisors and managers' adherence to the Policy;
 - o indicate the need for remedial action;
 - o determine the degree to which the equal employment objectives have been met;
- Serve as liaison between the company and enforcement agencies;
- Serve as liaison between the company and minority organizations, women's organizations, advocate organizations for other protected groups and community action groups concerned with equal employment opportunity; and
- Ensure adherence to this Policy by periodically submitting reports to senior management on supervisory personnel that will include ratings on their office's equal employment opportunity progress according to STOBG's corporate principles.

Employees and applicants for employment will not be subjected to harassment, intimidation, threats, coercion or discrimination because they have engaged or may engage in (1) filing a complaint, (2) opposing any act or practice made unlawful by, or exercising any other right protected by, any federal, state, or local law requiring equal opportunity, including Section 503, the affirmative action provisions of VEVRAA, and EO 11246, or (3) assisting or participating in any investigation, compliance evaluation, hearing, or any other activity related to the administration of any federal, state, or local law requiring equal opportunity, including Section 503, the affirmative action provisions of VEVRAA, and EO 11246.

WHAT TO DO IF YOU BELIEVE DISCRIMINATION HAS OCCURRED AND PROTECTION FROM RETALIATION

If you feel that you have been treated unfairly in any aspect of your application, candidacy, or employment, we want to assure you that you have an opportunity to present your concerns. The equal employment opportunity officer ("EEO Officer") for STOBG is the Chief Human Resources Officer, who can be reached at HR@structuretone.com. The EEO Officer will make special efforts to ensure that all supervisory personnel understand and effectively implement this Policy. Supervisory employees will be evaluated on their adherence and commitment to this Policy.

A form for submitting a written complaint of harassment (including sexual harassment), discrimination, or retaliation is attached to this Policy and available on our intranet page, and all employees are encouraged to use this complaint form. Employees who are making a report on behalf of other employees are encouraged to use the complaint form and note that it is being submitted on another employee's behalf. STOBG strongly encourages employees to use this internal complaint procedure as a starting point so that the company can promptly address conduct. The complaint form should be submitted to your manager or Human Resources representative.

Note that filling out our internal complaint form is encouraged but it is not required. You may raise a complaint for harassment, discrimination, or retaliation with any of the following, in addition to your manager and local Human Resources representative:

- your department head or business unit leader
- a member of executive management
- your compliance liaison or the Compliance & Ethics Department
- the Legal Department
- STOBG's 24/7 helpline, which allows for anonymous reporting. You can call the helpline toll-free at [866.593.6479](tel:866.593.6479) or visit the online portal at structuretone.ethicspoint.com.

This Policy does **not** require reporting discrimination, harassment, or retaliation directly to an employee's immediate supervisor or to any individual who is creating the harassment, discrimination, or retaliation.

STOBG will conduct an internal investigation promptly, thoroughly, and impartially, upon receipt of an oral or written complaint. Prompt reporting is encouraged but late reporting will not prevent appropriate remedial action. Reports and interviews will be maintained as confidential as possible, consistent with applicable federal, state, and local law, while still allowing a full investigation of the complaint. In investigating and in imposing any corrective action, the company will attempt to preserve confidentiality to the extent that the needs of the situation permit and as consistent with applicable federal, state, and local law. Nothing in this paragraph, or any other portion of this Policy, is intended to prohibit employees or applicants from consulting an attorney for purposes of soliciting legal advice or from assisting or participating in any investigation, compliance evaluation, hearing, or any other activity related to the administration of any federal, state, or local law.

Retaliation is prohibited against a person who complains of discrimination, cooperates in an investigation, or otherwise opposes discrimination under federal, state, or local laws, or otherwise opposes an unlawful employment practice.

At the conclusion of the investigation and/or within a reasonable time thereafter, STOBG will contact the employee and communicate the company's findings, if appropriate. Any employee, including senior managers or supervisory personnel, participating in or condoning discriminatory practices, may be subject to disciplinary action, up to and including termination of employment.

While members of management are primarily responsible for seeing that STOBG's Equal Employment Opportunity and Affirmative Action Policy is implemented, all staff share in the responsibility for assuring that the Policy is effective and applies uniformly to everyone.

It is the responsibility of each and every employee of STOBG to give our policy of equal employment opportunity real meaning through full support and participation.

Equal Employment Opportunity is **THE LAW**

Private Employers, State and Local Governments, Educational Institutions, Employment Agencies and Labor Organizations

Applicants to and employees of most private employers, state and local governments, educational institutions, employment agencies and labor organizations are protected under Federal law from discrimination on the following bases:

RACE, COLOR, RELIGION, SEX, NATIONAL ORIGIN

Title VII of the Civil Rights Act of 1964, as amended, protects applicants and employees from discrimination in hiring, promotion, discharge, pay, fringe benefits, job training, classification, referral, and other aspects of employment, on the basis of race, color, religion, sex (including pregnancy), or national origin. Religious discrimination includes failing to reasonably accommodate an employee's religious practices where the accommodation does not impose undue hardship.

DISABILITY

Title I and Title V of the Americans with Disabilities Act of 1990, as amended, protect qualified individuals from discrimination on the basis of disability in hiring, promotion, discharge, pay, fringe benefits, job training, classification, referral, and other aspects of employment. Disability discrimination includes not making reasonable accommodation to the known physical or mental limitations of an otherwise qualified individual with a disability who is an applicant or employee, barring undue hardship.

AGE

The Age Discrimination in Employment Act of 1967, as amended, protects applicants and employees 40 years of age or older from discrimination based on age in hiring, promotion, discharge, pay, fringe benefits, job training, classification, referral, and other aspects of employment.

SEX (WAGES)

In addition to sex discrimination prohibited by Title VII of the Civil Rights Act, as amended, the Equal Pay Act of 1963, as amended, prohibits sex discrimination in the payment of wages to women and men performing substantially equal work, in jobs that require equal skill, effort, and responsibility, under similar working conditions, in the same establishment.

GENETICS

Title II of the Genetic Information Nondiscrimination Act of 2008 protects applicants and employees from discrimination based on genetic information in hiring, promotion, discharge, pay, fringe benefits, job training, classification, referral, and other aspects of employment. GINA also restricts employers' acquisition of genetic information and strictly limits disclosure of genetic information. Genetic information includes information about genetic tests of applicants, employees, or their family members; the manifestation of diseases or disorders in family members (family medical history); and requests for or receipt of genetic services by applicants, employees, or their family members.

RETALIATION

All of these Federal laws prohibit covered entities from retaliating against a person who files a charge of discrimination, participates in a discrimination proceeding, or otherwise opposes an unlawful employment practice.

WHAT TO DO IF YOU BELIEVE DISCRIMINATION HAS OCCURRED

There are strict time limits for filing charges of employment discrimination. To preserve the ability of EEOC to act on your behalf and to protect your right to file a private lawsuit, should you ultimately need to, you should contact EEOC promptly when discrimination is suspected:

The U.S. Equal Employment Opportunity Commission (EEOC), 1-800-669-4000 (toll-free) or 1-800-669-6820 (toll-free TTY number for individuals with hearing impairments). EEOC field office information is available at www.eeoc.gov or in most telephone directories in the U.S. Government or Federal Government section. Additional information about EEOC, including information about charge filing, is available at www.eeoc.gov.

Employers Holding Federal Contracts or Subcontracts

Applicants to and employees of companies with a Federal government contract or subcontract are protected under Federal law from discrimination on the following bases:

RACE, COLOR, RELIGION, SEX, NATIONAL ORIGIN

Executive Order 11246, as amended, prohibits job discrimination on the basis of race, color, religion, sex or national origin, and requires affirmative action to ensure equality of opportunity in all aspects of employment.

INDIVIDUALS WITH DISABILITIES

Section 503 of the Rehabilitation Act of 1973, as amended, protects qualified individuals from discrimination on the basis of disability in hiring, promotion, discharge, pay, fringe benefits, job training, classification, referral, and other aspects of employment. Disability discrimination includes not making reasonable accommodation to the known physical or mental limitations of an otherwise qualified individual with a disability who is an applicant or employee, barring undue hardship. Section 503 also requires that Federal contractors take affirmative action to employ and advance in employment qualified individuals with disabilities at all levels of employment, including the executive level.

DISABLED, RECENTLY SEPARATED, OTHER PROTECTED, AND ARMED FORCES SERVICE MEDAL VETERANS

The Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, 38 U.S.C. 4212, prohibits job discrimination and requires affirmative action to employ and advance in employment disabled veterans, recently separated veterans (within

three years of discharge or release from active duty), other protected veterans (veterans who served during a war or in a campaign or expedition for which a campaign badge has been authorized), and Armed Forces service medal veterans (veterans who, while on active duty, participated in a U.S. military operation for which an Armed Forces service medal was awarded).

RETALIATION

Retaliation is prohibited against a person who files a complaint of discrimination, participates in an OFCCP proceeding, or otherwise opposes discrimination under these Federal laws.

Any person who believes a contractor has violated its nondiscrimination or affirmative action obligations under the authorities above should contact immediately:

The Office of Federal Contract Compliance Programs (OFCCP), U.S. Department of Labor, 200 Constitution Avenue, N.W., Washington, D.C. 20210, 1-800-397-6251 (toll-free) or (202) 693-1337 (TTY). OFCCP may also be contacted by e-mail at OFCCP-Public@dol.gov, or by calling an OFCCP regional or district office, listed in most telephone directories under U.S. Government, Department of Labor.

Programs or Activities Receiving Federal Financial Assistance

RACE, COLOR, NATIONAL ORIGIN, SEX

In addition to the protections of Title VII of the Civil Rights Act of 1964, as amended, Title VI of the Civil Rights Act of 1964, as amended, prohibits discrimination on the basis of race, color or national origin in programs or activities receiving Federal financial assistance. Employment discrimination is covered by Title VI if the primary objective of the financial assistance is provision of employment, or where employment discrimination causes or may cause discrimination in providing services under such programs. Title IX of the Education Amendments of 1972 prohibits employment discrimination on the basis of sex in educational programs or activities which receive Federal financial assistance.

INDIVIDUALS WITH DISABILITIES

Section 504 of the Rehabilitation Act of 1973, as amended, prohibits employment discrimination on the basis of disability in any program or activity which receives Federal financial assistance. Discrimination is prohibited in all aspects of employment against persons with disabilities who, with or without reasonable accommodation, can perform the essential functions of the job.

If you believe you have been discriminated against in a program of any institution which receives Federal financial assistance, you should immediately contact the Federal agency providing such assistance.

“EEO is the Law” Poster Supplement

Employers Holding Federal Contracts or Subcontracts Section Revisions

The Executive Order 11246 section is revised as follows:

RACE, COLOR, RELIGION, SEX, SEXUAL ORIENTATION, GENDER IDENTITY, NATIONAL ORIGIN

Executive Order 11246, as amended, prohibits employment discrimination based on race, color, religion, sex, sexual orientation, gender identity, or national origin, and requires affirmative action to ensure equality of opportunity in all aspects of employment.

PAY SECRECY

Executive Order 11246, as amended, protects applicants and employees from discrimination based on inquiring about, disclosing, or discussing their compensation or the compensation of other applicants or employees.

The Individuals with Disabilities section is revised as follows:

INDIVIDUALS WITH DISABILITIES

Section 503 of the Rehabilitation Act of 1973, as amended, protects qualified individuals with disabilities from discrimination in hiring, promotion, discharge, pay, fringe benefits, job training, classification, referral, and other aspects of employment. Disability discrimination includes not making reasonable accommodation to the known physical or mental limitations of an otherwise qualified individual with a disability who is an applicant or employee, barring undue hardship to the employer. Section 503 also requires that Federal contractors take affirmative action to employ and advance in employment qualified individuals with disabilities at all levels of employment, including the executive level.

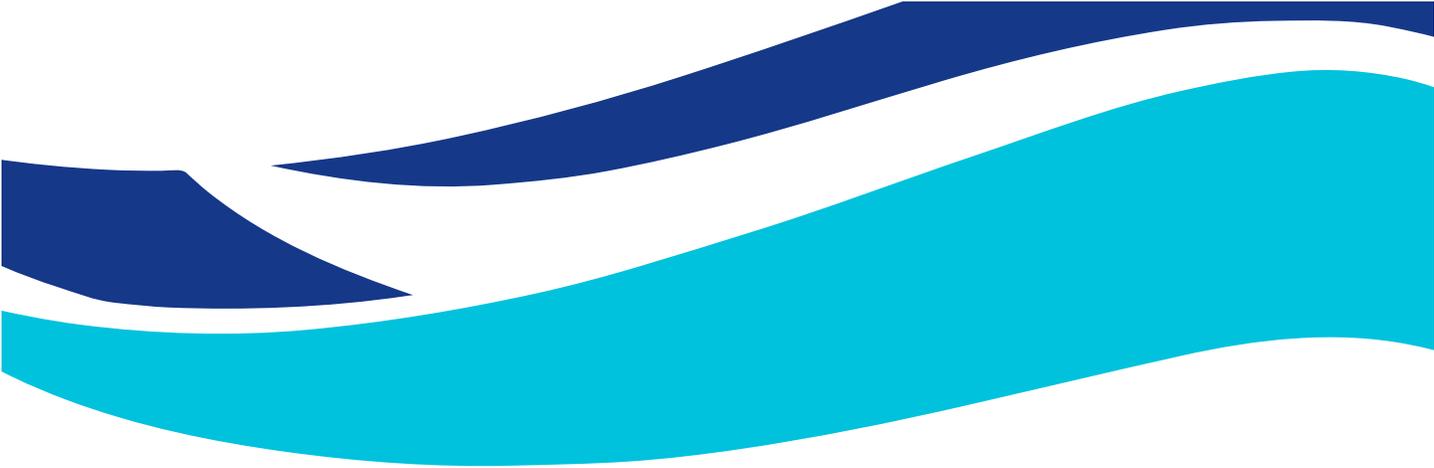
The Vietnam Era, Special Disabled Veterans section is revised as follows:

PROTECTED VETERANS

The Vietnam Era Veterans’ Readjustment Assistance Act of 1974, as amended, 38 U.S.C. 4212, prohibits employment discrimination against, and requires affirmative action to recruit, employ, and advance in employment, disabled veterans, recently separated veterans (i.e., within three years of discharge or release from active duty), active duty wartime or campaign badge veterans, or Armed Forces service medal veterans.

Mandatory Supplement to EEOC P/E-1(Revised 11/09) “EEO is the Law” Poster.

If you believe that you have experienced discrimination contact OFCCP: 1-800-397-6251 | TTY 1-877-889-5627 | www.dol.gov.



PAY TRANSPARENCY NONDISCRIMINATION PROVISION

The contractor will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with the contractor's legal duty to furnish information. 41 CFR 60-1.35(c)

If you believe that you have experienced discrimination contact OFCCP
1.800.397.6251 | TTY 1.877.889.5627 | www.dol.gov/ofccp



COMPLAINT FORM FOR REPORTING HARASSMENT (INCLUDING SEXUAL HARASSMENT), DISCRIMINATION, OR RETALIATION

If you believe that you have been subjected to harassment (including sexual harassment), discrimination, or retaliation, or have witnessed or become aware of such conduct, you are encouraged to complete this form and submit it to your manager, supervisor, or local Human Resources representative. If you are more comfortable reporting verbally or in another manner, your employer should complete this form and provide you with a copy. Any forms submitted to a manager or supervisor will be promptly provided to Human Resources.

Any report of harassment (including sexual harassment), discrimination, or retaliation, whether reported in writing or verbally, will be promptly, thoroughly, and impartially investigated. You will not be retaliated against for filing a complaint in good faith.

Complainant Information

Date: ___/___/___

Name: _____ Job Title: _____

Work Address: _____ Email: _____

Phone: (_____) - _____ - _____

Select Preferred Communication Method: Email Phone In person

Supervisory Information

Name: _____ Job Title: _____

Work Address: _____ Email: _____

Phone: (_____) - _____ - _____

Complainant Information

1. Your complaint of harassment (including sexual harassment), discrimination, or retaliation is made about:

Name: _____ Job Title: _____

Work Address: _____ Email: _____

Phone: (_____) - _____ - _____

Relationship to you: Supervisor Subordinate Co-Worker Other

2. Please describe what happened and how it is affecting you and your work. Please use additional sheets of paper if necessary and attach any relevant documents or evidence.

3. Date(s) harassment, discrimination, and/or retaliation occurred:

Is the conduct continuing? Yes No

4. Please list the name and contact information of any witnesses or individuals who may have information related to your complaint:

The last question is optional, but may help the investigation.

5. Have you previously complained or provided information (verbal or written) about related incidents? If yes, when and to whom did you complain or provide information?

Signature: _____ Date: ___/___/_____

Adoption of this form does not constitute a conclusive defense to charges of unlawful discrimination or harassment. Each claim will be determined in accordance with existing legal standards, with due consideration of the particular facts and circumstances of the claim, including but not limited to the existence of an effective non-discrimination/anti-harassment policy and procedure.

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