

Equal Employment Opportunity Policy

Policy No.	STO 026.02
Contact	Senior Vice President, Corporate Human Resources EEO/Diversity Manager, Corporate Human Resources
Effective Date	February 18, 2020

STO Building Group ("STO"), as part of its commitment to Equal Employment Opportunity, adheres to all federal, state, and local laws with respect to Equal Employment Opportunity. STO's policy is to afford Equal Employment Opportunity to qualified individuals regardless of age, alienation or citizenship status, ancestry, color, creed, disability, domestic partnership or civil union status, gender identity and/or expression, gender, genetic information, marital status, national origin, pregnancy, race, religion, sex, sexual orientation, veteran or active military service member status, or any other classification protected under federal, state, or local law. STO further adheres to the specific protections against discrimination under federal law to applicants and employees of STO. See *EEO is the Law, Supplement to EEO is the Law, and Pay Transparency Nondiscrimination Provision*.

This Equal Employment Opportunity 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.

STO 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. STO employs and advances qualified individuals with disability at all levels of employment, including the executive level.

The Senior Vice President, Corporate Human Resources, is responsible for administering STO's Equal Employment Opportunity Program and so performs the following duties:

- ◆ 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:
 - measure effectiveness of this policy and implementing programs, including supervisors and managers' adherence to the Equal Employment Opportunity policy;
 - indicate the need for remedial action;
 - 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 STO's corporate principles.

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 STO is the Senior Vice President, Corporate Human Resources, 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.

Any employee who wishes to file a complaint for harassment (including sexual harassment), discrimination, or retaliation may do so by filling out STO's internal complaint form, available on the STO intranet. The complaint form may be submitted to your manager or to the Human Resources Department.

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 the Human Resources Department:

- ◆ your department head or business unit leader
- ◆ a member of executive management
- ◆ your Compliance Liaison or the Compliance & Ethics Department
- ◆ the Legal Department
- ◆ STO's 24/7 helpline, which allows for anonymous reporting. You can call the helpline toll-free at 866.593.6479 or visit the online portal at structuretone.ethicspoint.com.

STO will conduct an internal investigation promptly 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 while still allowing a full investigation of the complaint. All participants must maintain and respect the confidentiality of the investigation process.

Retaliation is prohibited against a person who complains of discrimination 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, STO 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 STO's Equal Employment 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 STO 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

