

**POLICY NUMBER**  
STOBG 022.05

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Compliance & Ethics Department

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# ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

**STO** BUILDING  
GROUP

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## INTRODUCTION

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced or compulsory labour, and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

At STO Building Group ("STOBG"), we have a zero-tolerance approach to slavery of any form or type, and we fully support the principles of the UK Modern Slavery Act 2015. We've implemented and are enforcing systems and controls aimed at ensuring modern slavery is not taking place anywhere in our own business or supply chain. Consistent with our disclosure obligations under the Modern Slavery Act 2015, we've adopted and published on our website a Modern Slavery Act Statement that outlines our commitment to combating modern slavery.

We expect the same high standards from all of our suppliers, subcontractors, and other business partners. As part of our contracting process, we include specific prohibitions against the use of forced, compulsory, or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we require that our business partners hold their own suppliers to the same high standards.

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## PURPOSE AND SCOPE

This Anti-Slavery and Human Trafficking Policy ("Policy") applies to all persons working for or on behalf of STOBG in any capacity, including employees, directors, officers, agency workers, seconded workers, volunteers, and interns (collectively, "employees"), as well as any third parties that provide goods or services to STOBG, including suppliers, subcontractors, service providers, consultants, intermediaries, and agents (collectively, "Suppliers").

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## POLICY STATEMENT

STOBG is committed to fair employment practices and to preserving fundamental human rights everywhere we build. We have zero tolerance for any form of modern slavery, which is an umbrella term used to describe situations of exploitation that a person cannot refuse or

leave because of threats, violence, coercion, abuse of power, or deception.

Conduct prohibited by this Policy—whether by STOBG, its employees, or its Suppliers—includes:

- Human trafficking, including the recruitment, harbouring, transportation, provision, or obtaining of a person for labour or services, through force, fraud, or coercion for the purpose of exploitation.
- Forced, compulsory, or indentured labour, child labour, or any other practice that violates human and labour rights, according to local, national, or international standards.
- Practices that would restrict free movement of workers, including destroying, confiscating, or otherwise denying access by a worker to the worker's identity or immigration documents, such as passports or drivers' licenses.
- Misleading or fraudulent practices during the recruitment of workers or offering of employment, such as failing to disclose, in a format and language accessible to the worker, basic information or making material misrepresentations about the key terms and conditions of employment, including wages and fringe benefits, the location of work, any significant cost to be charged to the worker, and, if applicable, the hazardous nature of the work.
- Using recruiters that do not comply with local labour laws.
- Charging recruitment fees or other fees to gain or maintain employment that trap workers in debt bondage.

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## OVERVIEW OF OUR SUPPLY CHAIN

Throughout the course of our history, we have recognised the value in fostering relationships with the trade and subcontracting community, working with reliable and reputable firms that share our values. To work with STOBG, a Supplier must demonstrate that it is a viable, productive company and complete our Supply Chain Prequalification Package, which requires the Supplier to provide specific information on the measures it has taken to live up to STOBG's standards

(such as implementation of appropriate anti-slavery and health and safety policies).

Our Suppliers must agree to adhere to our Supplier Code of Conduct and Ethics (“Supplier Code”) and are responsible for providing their own suppliers with the Supplier Code and ensuring that they follow it. Under our Supplier Code, Suppliers must comply with this Policy and with the letter and spirit of all applicable laws and regulations, including those governing child labour, involuntary labour, and wages and hours.

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## STEPS TO PREVENT MODERN SLAVERY

As part of our initiative to identify and manage modern slavery risk, we have set the following objectives:

- Implementing this Anti-Slavery and Human Trafficking Policy and a Supplier Code of Conduct
- Training our staff on both policies and issuing communications to raise awareness of modern slavery and human trafficking
- Developing an updated system for supply chain prequalification, including adding modern slavery enquiries to our standard form prequalification questionnaire and implementing enhanced due diligence to help ensure that our supply chain is free from modern slavery and human trafficking
- Reviewing our existing supply chains and identifying any high-risk Suppliers and/or jurisdictions
- Seeking specific contractual commitments in our Supplier contracts
- Encouraging our employees, Suppliers, and others on our jobsites to ask questions about this Policy and to report any issues, concerns, or suspicions about modern slavery or human trafficking to a company resource or our 24/7 anonymous helpline
- Prohibiting retaliation against anyone for raising queries or concerns in good faith

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## RESPONSIBILITY FOR THIS POLICY

Our board of directors has overall responsibility for ensuring this Policy complies with our legal and ethical

obligations and that all those under our control comply with it.

The managing director of Structure Tone London has primary and day-to-day responsibility for implementing this Policy, monitoring its use and effectiveness, managing any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels is responsible for ensuring those reporting to them understand and comply with this Policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

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## COMPLIANCE WITH THIS POLICY

You must ensure that you read, understand, and will comply with this Policy. The prevention, detection, and reporting of modern slavery in any part of our business or supply chain is a responsibility that we all share. You are required to avoid any activity that might lead to, or suggest, a breach of this Policy.

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## RAISING QUERIES OR CONCERNS

If you have a query about this Policy or a concern about modern slavery in any part of our business or supply chain, you must raise it promptly with Structure Tone London’s managing director or another company resource, including:

- Your manager, department head, or business unit leader
- A member of STOBG executive management
- Your compliance liaison or the Compliance & Ethics Department
- The Human Resources Department
- The Legal Department

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chain constitute any of the various forms of modern slavery, you should consult with a company resource at the earliest stage possible.

If you wish to remain anonymous, you may contact our 24/7 helpline, operated by a third party unaffiliated with STOBG, by calling the below toll-free numbers or visiting the online portal.

**Call toll-free:** 866.593.6479 in the US & Canada  
0800.032.8483 in the UK  
1800.615.403 in Ireland

**Online:** [stobg.ethicspoint.com](http://stobg.ethicspoint.com)

You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our Suppliers to help them address coercive, abusive, and exploitative work practices in their own business and supply chain.

We encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery is taking place in any part of our business or supply chain. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Compliance & Ethics Department immediately.

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## COMMUNICATION AND AWARENESS OF THIS POLICY

Training on this Policy and on the risk our business faces from modern slavery is provided regularly to employees.

Our zero-tolerance approach to modern slavery must be communicated to all Suppliers at the outset of our business relationship with them and reinforced as appropriate thereafter.

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## BREACHES OF THIS POLICY

Any employee who breaches this Policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with any Supplier that breaches this Policy.

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## ACKNOWLEDGEMENT

I acknowledge that I have received and read a copy of the STOBG Anti-Slavery and Human Trafficking Policy (“Policy”), and I understand and agree to comply with the Policy.

I understand that STOBG has the maximum discretion permitted by law to interpret, administer, change, modify, or delete this Policy at any time, and that no statement or representation by a manager or other employee, whether oral or written, can supplement or modify this Policy. I also understand that any delay or failure by STOBG to enforce any company policy or rule will not constitute a waiver of STOBG’s right to do so in the future. I further understand that this Policy is not a contract and does not create any contractual rights between me and STOBG.

I understand that if I have questions about this Policy, I can consult a company resource such as my manager, department head, business unit leader, a member of STOBG executive management, my compliance liaison or the Compliance & Ethics Department, the Human Resources Department, the Legal Department, or STOBG’s 24/7 helpline.

Signature: \_\_\_\_\_

Name (printed): \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

