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CONTACT
Chief Human Resources Officer
Human Resources

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UNITED STATES NON-DISCRIMINATION AND ANTI-HARASSMENT POLICY

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INTRODUCTION

STO Building Group (“STOBG” or the “Company”) is an [equal opportunity employer](#) and committed to maintaining a work environment that is free from discrimination and harassment, where everyone is treated with respect and dignity. The Company has developed this Non-Discrimination and Anti-Harassment Policy (“Policy”) to protect STOBG employees, clients, partners, and other stakeholders from discrimination and harassment based on certain personal characteristics, such as race, ethnicity, sex, age, or disability. As a member of the STOBG family, you are protected by this Policy, and you also are required to comply with it.

POLICY

This Policy prohibits discrimination or harassment based on race, color, religion, creed, sex, pregnancy (including lactation, childbirth, and related medical conditions), sexual orientation or affectional preference, gender identity, age, national origin or ancestry, physical or mental disability or handicap, marital status, genetic information (including testing and characteristics), veteran status, citizenship status, uniformed servicemember status, or any other characteristic protected by applicable federal, state, or local law (“protected characteristic”). These protected characteristics are to be interpreted broadly to include the actual status, any perceptions and assumptions made regarding such status, and actual or perceived affiliation/association with individuals having such status.

Discrimination or harassment based on a protected characteristic is against the law and considered a form of employee misconduct. Individuals engaging in such conduct, as well as supervisors and managers who fail to report such conduct or otherwise knowingly allow such conduct to continue, are subject to disciplinary action, up to and including termination of employment. Individuals who engage in discrimination or harassment may also be subject to civil and criminal penalties.

This Policy prohibits discrimination and harassment by and against all individuals involved in the US operations of STOBG, including directors, officers, employees (regardless of position and whether temporary or permanent), and interns (collectively, “employees”), applicants for employment, as well as third parties conducting business with or on behalf of the Company, such as vendors, subcontractors, consultants, clients,

and visitors (collectively, “third parties”). If prohibited discrimination or harassment occurs in the workplace by someone not employed by the Company, the procedures in this Policy should be followed.

This Policy covers any prohibited discrimination or harassment in the workplace, including, but not limited to, our offices, jobsites, any setting in which work-related business is being conducted (whether during or outside of normal business hours, and including virtual and remote workspaces), Company-sponsored events, Company-owned or -controlled property, and online and electronic interactions with Company employees and third parties.

The Company prohibits unlawful discrimination and harassment, as well as conduct that does not rise to the level of being unlawful but falls within the definitions below. This Policy does not limit the Company's authority to address workplace conduct that the Company deems unacceptable, regardless of whether that conduct satisfies the definition of unlawful discrimination or harassment.

DEFINITIONS

Discrimination

Discrimination involves an adverse action or decision or treating a person or group of people differently because of a protected characteristic. Examples of conduct that may constitute discrimination if based on an individual's protected characteristic include:

- singling out or targeting an individual for different or less favorable treatment (e.g., more severe discipline or lower salary increase) because of their protected characteristic
- failing or refusing to promote an individual because of their protected characteristic
- terminating an individual from employment based on their protected characteristic

Harassment

Harassment is conduct that denigrates or shows hostility or aversion toward an individual because of their protected characteristic and: (1) has the purpose or effect of creating an intimidating, hostile, or offensive work environment; (2) has the purpose or effect of unreasonably interfering with an individual's work

performance; or (3) otherwise adversely affects an individual's employment opportunities.

Examples of harassment include:

- epithets, slurs, or negative stereotyping (including verbal comments and graffiti)
- threatening, intimidating, or hostile acts
- denigrating jokes or display or circulation in the workplace of written or graphic material that denigrates or shows hostility or aversion toward an individual or group (including through email, social media, and other forms of communication)
- unwelcome or inappropriate physical contact
- physical assault or stalking
- actions, words, jokes, or comments based on a protected characteristic
- threats or acts of violence against any individual
- display of a hate symbol, including for example, a noose or swastika
- unwillingness to train, evaluate, assist, or work with an employee

Sexual Harassment

Sexual harassment is a form of discrimination and harassment and is illegal. Sexual harassment includes harassment on the basis of sex, sexual orientation, self-identified or perceived sex, gender expression, gender identity, and the status of being transgender. Sexual harassment can occur regardless of the gender of the person committing it or the person who is exposed to it.

Sexual harassment includes harassment that is not sexual in nature (e.g., offensive remarks about an individual's sex or gender), as well as any unwelcome sexual advances or requests for sexual favors or any other conduct of a sexual nature, when: (1) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment, even if the complaining individual is not the intended target of such conduct; (2) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; or (3) submission to or rejection of such conduct by an individual is used as a basis for employment decisions affecting such individual.

Sexual harassment can take various forms, including:

- verbal conduct: making or using sexually derogatory comments, innuendos, epithets, slurs, sexually explicit jokes, or comments about an individual's body or dress, whistling, or making suggestive or insulting sounds
- physical conduct: unwelcome or inappropriate touching, physical violence, intimidation, touching, assault, or impeding or blocking normal movements
- visual conduct: leering, making sexual gestures, displaying of sexually suggestive objects or pictures, cartoons, posters, websites, emails, or text messages
- online conduct: derogatory statements or sexually suggestive postings in any social media platform

Sexual harassment may include a range of subtle and not so subtle behaviors. The following is a non-exhaustive list of the types of conduct prohibited by this Policy:

- physical acts of a sexual nature, such as:
 - rape, sexual battery, molestation, or attempts to commit these assaults
 - touching, pinching, patting, kissing, hugging, grabbing, brushing against or poking another person's body
- offers of employment benefits in exchange for sexual favors
- unwanted sexual advances or propositions, such as:
 - repeated and unwelcome requests for dates
 - unwelcome romantic gestures and gift-giving
 - requests for sexual favors accompanied by implied or overt threats concerning the target's job performance evaluation, a promotion, or other job benefits or detriments
 - subtle or obvious pressure for unwelcome sexual activities

- sexually oriented gestures, noises, remarks, or jokes, or comments about a person's sexuality or sexual experience
- sex stereotyping, meaning when conduct or personality traits are considered inappropriate simply because they may not conform to other people's ideas or perceptions about how individuals of a particular sex should act or look
- sexual or discriminatory displays or publications anywhere in the workplace, such as:
 - displaying pictures, posters, calendars, graffiti, objects, promotional material, reading materials, or other materials that are sexually demeaning or pornographic. This includes sexual displays on computers or cell phones and sharing such displays while in the workplace
- hostile actions taken against an individual because of that individual's sex, sexual orientation, gender identity, or the status of being transgender, such as:
 - interfering with, destroying, or damaging a person's workstation, tools, or equipment, or otherwise interfering with the individual's ability to perform their job
 - sabotaging an individual's work
 - intentional misuse of an individual's preferred pronouns
 - creating different expectations for individuals based on their perceived identities
 - bullying, yelling, or name-calling

These examples are just that—examples. It is impossible to list every type of behavior that can be considered harassment or discrimination in violation of this Policy. In general, any conduct similar to that described above that is based on or motivated by an individual's protected characteristic is prohibited.

NO RETALIATION

STOBG's [Anti-Retaliation Policy](#) is aimed at promoting an atmosphere in which employees feel safe to engage

in frank and honest communication. The policy prohibits retaliation against any employee who engages in any activity protected thereunder or under applicable law (a "protected activity") in good faith, including:

- filing a report, either internally or externally, about potential discrimination, harassment, or retaliation. "Good faith" does not mean that you have absolute proof or that the conduct reported has to be substantiated; rather, it means you have a reasonable basis to believe your report requires further investigation.
- participating or cooperating in an internal or external investigation of potential discrimination, harassment, or retaliation
- raising a question or concern within the Company about discrimination, harassment, or retaliation
- opposing or refusing to participate in discrimination, harassment, or retaliation
- assisting in an investigation, proceeding, or hearing relating to discrimination, harassment, or retaliation
- encouraging a fellow employee to report discrimination, harassment, or retaliation

Retaliation against individuals engaging in the foregoing activities is unlawful, a violation of this Policy, and, like harassment or discrimination itself, may result in disciplinary action, up to and including termination of employment. This prohibition against retaliation does not protect employees who knowingly make a false report, provide knowingly false or intentionally misleading information in the course of an investigation, or otherwise act in bad faith. Retaliation is any action, statement, or behavior that is intended to deter or dissuade someone from engaging in a protected activity. For more information, see our [Anti-Retaliation Policy](#).

If you believe you or someone else has experienced retaliation, you should report the matter by following the reporting procedure outlined below. As with complaints of discrimination or harassment, the Company will promptly investigate any complaint of retaliation and take appropriate action to prevent or rectify any retaliation.

REPORTING PROCEDURE

If you believe that you or someone else has been subjected to discrimination, harassment, or retaliation, you should report the matter as soon as possible to any of the following Company resources:

- your manager, a more senior manager, or your business unit leader
- your local Human Resources representative
- our Chief Human Resources Officer (claudia.healy@stobuildinggroup.com)
- a member of STOBG executive management
- your compliance liaison or the Compliance & Ethics Department
- the Legal Department

To submit a complaint in writing, you can use our [Complaint Form](#), which is attached to this Policy and also available on the STOBG intranet. If you're making a report on behalf of another employee, you may use the Complaint Form and note that it is on another employee's behalf. Complaint Forms should be submitted to your supervisor, manager, or local Human Resources representative.

You are not required to report any prohibited conduct to a supervisor or manager who may be hostile, who has engaged in such conduct, who is a close associate of the person who has engaged in such conduct, or with whom you're uncomfortable discussing such matters. **Any supervisor or manager who receives a complaint of discrimination, harassment, or retaliation or receives information about such conduct must immediately report it to Human Resources.**

You may also report potential misconduct anonymously through 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: 800.461.9330 in the US
1.800.235.6302 in Canada
1800.904.177 in Ireland
0808.189.1053 in the UK

Online: compliancehelpcenter.com

Any reports made, whether anonymous or not, should include as much detail as possible in order to allow the Company to fully investigate the matter. Important

details may include, for example, the names of the people involved in or witnesses to the incident, the date and time of the incident, where the incident occurred, any relevant background information, and why you believe the incident should be reported. Providing sufficient details is especially important for concerns raised anonymously, so that the Company may conduct an appropriate review.

You may also seek assistance in other available forums, as explained below in [Legal Protections and External Remedies](#).

You are encouraged, but not required, to communicate to the offending person that their conduct is offensive and unwelcome. If you observe any behavior directed at others that may violate this Policy, you are encouraged to make a report under this Policy and take reasonable action to defuse such behavior through bystander intervention, if possible, such as intervening directly or alerting a supervisor or Human Resources to assist. Physical confrontation, violence, or assault is not an appropriate method of intervention; bystanders must act in accordance with the Company's policies.

INVESTIGATION

After receiving a report of discrimination, harassment, or retaliation, the Company will undertake a fair, timely, and thorough investigation, which will be conducted by impartial and qualified personnel. The Company will maintain confidentiality surrounding the investigation to the extent possible, consistent with applicable law. Related information will only be shared with others on a need-to-know basis.

The investigation process will vary from case to case but may include interviews of the parties involved and any other individuals who may have observed the alleged conduct or may have other relevant information, as well as a review of relevant documents. Where appropriate or required by law, the subject of a report will be notified of the accusations against them and given the opportunity to respond to the allegations. The investigation will be documented and tracked as appropriate, and all documents created or used during the investigation will be kept in a secure and confidential location. The Company may take interim action (e.g., instructing the person about whom the report was made to refrain from communications with the person who made the report) as appropriate during the pendency of the investigation.

All employees are expected to fully cooperate with any ongoing investigation, subject to applicable law and collective bargaining agreements. This includes fully

cooperating with the Company's investigative team and providing complete and truthful information. Any person who fails to cooperate with a Company investigation, withholds relevant information, intentionally misleads the investigative team, or makes an unauthorized disclosure of information about the investigation or its results may be subject to disciplinary action, up to and including termination of employment.

The Company will reach reasonable conclusions based on the evidence. Anyone, regardless of position or title, who the Company determines has engaged in conduct that violates this Policy may be subject to disciplinary action, up to and including termination of employment. Not intending to harass is not a defense.

The Company may take corrective action for any inappropriate conduct discovered during the investigation, regardless of whether the conduct amounts to a violation of law or this Policy. If the person who engaged in the offending conduct is not employed by the Company, the Company will take whatever corrective action is permissible and appropriate under the circumstances.

RESPONSIBILITIES OF SUPERVISORS AND MANAGERS

All supervisors and managers are responsible for:

- implementing this Policy, which includes taking steps to prevent harassment and retaliation
- ensuring that all employees under their supervision have knowledge of and understand this Policy
- promptly reporting any complaints to Human Resources so they may be investigated and resolved in a timely manner
- taking and/or assisting in prompt and appropriate corrective action when necessary to ensure compliance with this Policy
- conducting themselves at all times in a manner consistent with this Policy

Failure to meet these responsibilities may lead to disciplinary action, up to and including termination of employment.

While this Policy applies to all STOBG employees, the Company expects supervisors and managers to serve as models of appropriate conduct for other employees. It is imperative that supervisors and managers both abide by this Policy **and** set the tone for the enforcement

of this Policy. They can do so by creating a respectful work environment, encouraging employees to share their concerns, and acting swiftly when they become aware of inappropriate behavior in the workplace, including conduct prohibited by this Policy.

LEGAL PROTECTIONS AND EXTERNAL REMEDIES

While you are encouraged to take advantage of the Company's internal reporting procedure described above, you may also choose to pursue legal remedies in administrative (through a governmental agency) or judicial (through the state or federal courts) forums. Nothing in this section, 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. California, Connecticut, Illinois, Maine, Massachusetts, New York, Oregon, Rhode Island, and Vermont employees should consult the [*Additional State-Specific Information*](#) section of this Policy for more information.

ADDITIONAL STATE-SPECIFIC INFORMATION

Please note that California, Connecticut, Illinois, Maine, Massachusetts, New York, Oregon, Rhode Island, and Vermont each have their own state-specific laws regarding discrimination and harassment. Additional information pertinent to those states is below.

California Employees

[*Additional Policy Provisions*](#)

For California employees, this Policy prohibits discrimination and harassment against employees, applicants for employment, individuals providing services in the workplace pursuant to a contract, unpaid interns, and volunteers based on any legally-recognized basis, including their actual or perceived race (including traits historically associated with race, such as hair texture and protective hairstyles), religious creed, color, national origin, citizenship status, ancestry, physical or mental disability, medical condition, genetic information, marital status (including registered domestic partnership status), sex and gender (including pregnancy, childbirth, lactation, and related medical conditions), gender identity and gender expression (including transgender individuals who are transitioning, have transitioned, or

are perceived to be transitioning to the gender with which they identify), age (40 or over), sexual orientation, Civil Air Patrol status, military and veteran status, an individual's reproductive health decisions, or any other characteristic protected by applicable federal, state, or local law.

For purposes of this Policy, discrimination or harassment on the basis of "national origin" also includes discrimination or harassment against an individual because that person holds or presents the California driver's license issued to those who cannot document their lawful presence in the United States and based on any of the following: an individual's or individual's ancestors' actual or perceived physical, cultural, or linguistic characteristics associated with a national origin group; marriage to or association with individuals of a national origin group; tribal affiliation; membership in or association with an organization identified with or seeking to promote the interests of a national origin group; attendance or participation in schools, churches, temples, mosques, or other religious institutions generally used by persons of a national origin group; or a name that is associated with a national origin group. All such discrimination or harassment is prohibited.

An employee may be liable for harassment based on sex even if the alleged harassing conduct was not motivated by sexual desire. An employee who engages in unlawful harassment may be personally liable for harassment even if the Company had no knowledge of such conduct.

The Company allows employees to self-identify their gender, name, and/or pronoun, including gender-neutral pronouns. The Company will use an employee's gender or legal name as indicated on a government-issued identification document only as necessary to meet an obligation mandated by law. Otherwise, the Company will identify the employee in accordance with the employee's current gender identity and preferred name.

External Remedies

In addition to the reporting procedure set forth above, if you believe you have been unlawfully discriminated against or harassed, you may file a complaint with the California Civil Rights Department (CRD). The CRD can be contacted by consulting the government agency listings in a phone book or at calcivilrights.ca.gov. The CRD will, in appropriate cases, investigate complaints of harassment or discrimination at no charge to the complaining party.

Depending on the outcome of a complaint, remedies include damages for emotional distress, hiring or

reinstatement, back pay or promotion, and changes in the Company's policies or practices.

Resources

The CRD Sexual Harassment Prevention training may be accessed at calcivilrights.ca.gov/shpt.

Connecticut Employees

Additional Policy Provisions

For Connecticut employees, this Policy prohibits discrimination and harassment based on race (including traits historically associated with race, such as hair texture and protective hairstyles (e.g., wigs, headwraps, braids, cornrows, locs, twists, Bantu knots, afros, and afro puffs); color; religious creed; age; sex (including pregnancy, child-bearing capacity, sterilization, fertility, or related medical conditions); sexual orientation; national origin; homelessness; family or domestic violence victim status; ancestry; marital status; veteran status; gender identity or expression; present or past history of mental, intellectual, physical, or learning disability; genetic information; erased criminal history records, or any other characteristic protected by applicable federal, state, or local law.

External Remedies

DISCRIMINATION AND SEXUAL HARASSMENT ARE ILLEGAL. In addition to the reporting procedure set forth above, if you believe you have been unlawfully discriminated against or harassed, you may file a complaint with the Connecticut Commission on Human Rights and Opportunities (CTCHRO). The CTCHRO may be reached at 450 Columbus Blvd, Suite 2, Hartford CT 06103; tel. 860.541.3400; TDD 860.541.3459; Connecticut toll-free 800.477.5737; or online at portal.ct.gov/CHRO.

Connecticut law requires that a complaint be filed with the CTCHRO within 300 days of the alleged discrimination or harassment. Remedies for harassment can include: cease and desist orders; back pay; compensatory damages; emotional distress damages; attorney's fees; and hiring, promotion, or reinstatement.

Resources

You can find additional information about the illegality of harassment and the remedies available to victims of sexual harassment at the CTCHRO's informational website at portal.ct.gov/CHRO/Sexual-Harassment-Prevention-Training/Pages/Sexual-Harassment-Prevention-Resources.

Illinois Employees

Additional Policy Provisions

For Illinois employees, this Policy prohibits discrimination and harassment based on actual or perceived race (including traits associated with race, such as hair texture and protective hairstyles (e.g., braids, locks, and twists)), color, religion, sex (including pregnancy, childbirth, and related medical conditions), national origin, ancestry, age (40 or over), marital status, physical or mental disability, military status, sexual orientation (actual or perceived), gender identity, unfavorable discharge from military service, citizenship status, or any other characteristic protected by applicable federal, state, or local law.

External Remedies

In addition to the reporting procedure set forth above, if you believe you have been unlawfully discriminated against or harassed, you may file a complaint with the Illinois Department of Human Rights (IDHR). The IDHR may be reached at the following locations:

- Chicago Office: 555 West Monroe Street, Suite 700, Chicago, Illinois 60661; tel. 312.814.6200; TTY 866.740.3953; fax 312.814.6251
- Springfield Office: 524 S 2nd Street, Suite 300, Springfield, Illinois 62701; tel. number 217.785.5100, TTY 866.740.3953; fax 217.785.5106
- Website: illinois.gov/dhr.
Email: IDHR.Intake@illinois.gov

You may also report your concerns to the IDHR's Illinois Sexual Harassment and Discrimination Helpline at 877.236.7703.

Maine Employees

For Maine employees, this Policy prohibits discrimination and harassment against any employees or applicants for employment based on their actual or perceived race (including traits associated with race, such as hair texture, Afro hairstyles and protective hairstyles (e.g., braids, locks, and twists)), color, sex (including pregnancy and related medical conditions), sexual orientation, gender identity, familial status, physical or mental disability, religion, ancestry, national origin, age, HIV/AIDS status, genetic information, membership in the National Guard or U.S. reserves, or because they sought and received a protection from abuse order, or filed a claim or asserted a right under

Maine's Workers' Compensation Act or Whistleblowers' Protection Act.

In addition to the reporting procedure set forth above, if you believe you have been unlawfully discriminated against or harassed, you may also file a formal complaint with the Maine Human Rights Commission (MHRC). The MHRC may be reached at 51 State House Station, Augusta, ME 04333-0051; tel. 207.624.6290; fax 207.624.8729.

Massachusetts Employees

Additional Policy Provisions

For Massachusetts employees, this Policy prohibits discrimination and harassment against employees or applicants for employment based on race, color, natural or protective hairstyle, religious creed, sex (including pregnancy, childbirth, and related medical conditions), gender identity, sexual orientation, national origin or ancestry, physical or mental disability, age (40 and over), military status, certain criminal records, genetic information or testing, HIV testing, a personal admission to a facility for the care and treatment of a mentally ill person, or taking of parental leave. Discrimination and harassment because of any protected class in the workplace is unlawful. The Company prohibits discrimination or harassment based on these characteristics or any other characteristic protected by applicable federal, state, or local law.

Reporting Procedure

The responsibility to investigate complaints of harassment has been assigned to Human Resources, which can be reached at hr@stobuildinggroup.com.

External Remedies

If you believe you have been unlawfully discriminated against or harassed, you may also file a formal complaint with either or both of the government agencies listed below:

- The Massachusetts Commission Against Discrimination (MCAD) is the state agency responsible for handling complaints of harassment, including sexual harassment. The MCAD can be reached at the following locations:
 - Boston Office: One Ashburton Place, Sixth Floor, Room 601, Boston, MA 02108; tel. 617.994.6000

- Springfield Office: 436 Dwight Street, Second Floor, Suite 220, Springfield, MA 01103; tel. 413.739.2145
- Worcester Office: 488 Main Street, Room 320, Worcester, MA 01608; tel. 508.453.9630
- The Equal Employment Opportunity Commission (EEOC) is the federal agency that investigates harassment claims, including claims of sexual harassment. The EEOC can be reached at:
 - John F. Kennedy Federal Building, 475 Government Center, Boston, MA 02203; tel. 800.669.4000

Complaints filed with the MCAD and the EEOC must be filed within 300 days of the incident giving rise to the claim.

New York Employees

Additional Policy Provisions

For New York employees, this Policy prohibits discrimination and harassment by or against any individuals involved in our operations based on: race (including traits historically associated with race, such as hair texture and protective hair styles), color, religion, sex (including pregnancy, childbirth, or related medical conditions, and transgender status), gender identity (including cisgender, transgender, or non-binary), familial status, national origin or ancestry, citizenship and immigration status, physical or mental disability (including gender dysphoria), genetic information (including predisposing genetic characteristics), age (18 and over), veteran status, military status, sexual orientation, marital status, certain arrest or conviction records, or status as a victim of domestic violence.

External Remedies

Discrimination and sexual harassment are illegal under the New York State Human Rights Law, Title VII of the

federal Civil Rights Act of 1964, and some local laws, including the New York City Human Rights Law.

If you believe you have been unlawfully discriminated against or harassed, you may file a complaint with the federal Equal Employment Opportunity Commission, the New York State Division of Human Rights, the New York City Commission on Human Rights, another enforcement agency (if applicable), or in certain courts of law. Agencies accept and investigate charges of sexual harassment.

The Equal Employment Opportunity Commission has district, area, and regional offices and may be contacted by visiting eeoc.gov, emailing info@eeoc.gov, or by telephone at 800.669.4000 (TTY 800.669.6820).

The New York State Division of Human Rights (DHR) may be contacted by visiting dhr.ny.gov, by telephone at 718.741.8400, or by mail to One Fordham Plaza, Fourth Floor, Bronx, NY 10458. DHR has a toll-free confidential hotline to provide counsel and assistance to individuals experiencing workplace sexual harassment. You can call DHR's toll-free sexual harassment hotline at 800.HARASS.3 (800.427.2773), Monday through Friday, 9:00 AM to 5:00 PM.

The New York City Commission on Human Rights can be contacted by visiting nyc.gov/cchr or by telephone at 212.306.7450. Employees subjected to unlawful harassment may be entitled to certain remedies, including monetary damages, civil penalties, and injunctive relief (such as an order that certain action be taken or certain behavior stop).

You can also contact the town, city, or county in which you live or work to find out whether other local agencies may be able to receive complaints. Additional information, including the physical location of agency offices and the rules and requirements for filing complaints, can also be found at the respective agency websites.

A *Stop Sexual Harassment Act Fact Sheet* is located on the next page.

STOP SEXUAL HARASSMENT ACT FACTSHEET

All employers are required to provide written notice of employees' rights under the Human Rights Law both in the form of a displayed poster **and** as an information sheet distributed to individual employees at the time of hire. This document satisfies the information sheet requirement.

The NYC Human Rights Law

The NYC Human Rights Law, one of the strongest anti-discrimination laws in the nation, protects all individuals against discrimination based on gender, which includes sexual harassment in the workplace, in housing, and in public accommodations like stores and restaurants. Violators can be held accountable with civil penalties of up to \$250,000 in the case of a willful violation. The Commission can also assess emotional distress damages and other remedies to the victim, can require the violator to undergo training, and can mandate other remedies such as community service.

Sexual Harassment Under the Law

Sexual harassment, a form of gender-based discrimination, is unwelcome verbal or physical behavior based on a person's gender.

Some Examples of Sexual Harassment

- unwelcome or inappropriate touching of employees or customers
- threatening or engaging in adverse action after someone refuses a sexual advance
- making lewd or sexual comments about an individual's appearance, body, or style of dress
- conditioning promotions or other opportunities on sexual favors
- displaying pornographic images, cartoons, or graffiti on computers, emails, cell phones, bulletin boards, etc.
- making sexist remarks or derogatory comments based on gender

Retaliation Is Prohibited Under the Law

It is a violation of the law for an employer to take action against you because you oppose or speak out against sexual harassment in the workplace. The NYC Human Rights Law prohibits employers from retaliating or discriminating "in any manner against any person" because that person opposed an unlawful discriminatory practice. Retaliation can manifest through direct actions, such as demotions or terminations, or more subtle behavior, such as an increased work load or being transferred to a less desirable location. The NYC Human Rights Law protects individuals against retaliation who have a good faith belief that their employer's conduct is illegal, even if it turns out that they were mistaken.

Report Sexual Harassment

If you have witnessed or experienced sexual harassment inform a manager, the equal employment opportunity officer at your workplace, or human resources as soon as possible.

Report sexual harassment to the NYC Commission on Human Rights. Call 212-416-0197 or visit NYC.gov/HumanRights to learn how to file a complaint or report discrimination. You can file a complaint anonymously.

State and Federal Government Resources

Sexual harassment is also unlawful under state and federal law where statutes of limitations vary.

To file a complaint with the New York State Division of Human Rights, please visit the Division's website at www.dhr.ny.gov.

To file a charge with the U.S. Equal Employment Opportunity Commission (EEOC), please visit the EEOC's website at www.eeoc.gov.

Oregon Employees

Additional Policy Provisions

For Oregon employees, this Policy prohibits discrimination and harassment based on race, color, national origin or ancestry, citizenship, religion, sex (including pregnancy, childbirth, or related medical conditions), gender identity (including gender-related identity and gender expression), sexual orientation, marital status, family status, physical or mental disability, genetic information, age (18 and over), veteran status, uniform servicemember status, unemployment status, expunged juvenile record, or having been a victim of sexual abuse, including domestic abuse, sexual assault, or stalking. The Company prohibits discrimination or harassment based upon these characteristics or any other characteristic protected by applicable federal, state, or local law. Sexual harassment prohibited under this Policy includes sexual assault, which is unwanted conduct of a sexual nature that is inflicted upon a person or compelled through the use of physical force, manipulation, threat, or intimidation. All employees are expected to comply with this Policy.

Reporting Procedure

If you believe you have been discriminated against or harassed, you should provide a written or verbal report pursuant to the reporting procedure set forth above as soon as possible. All employees are encouraged to document any incidents involving discrimination, harassment, or sexual assault as soon as possible.

External Remedies

Nothing in this Policy precludes any person from filing a formal grievance in accordance with an applicable collective bargaining agreement, the Oregon Bureau of Labor and Industries' Civil Rights Division, or the Equal Employment Opportunity Commission. Note that Oregon state law requires that any legal action taken on alleged discriminatory conduct (specifically that prohibited by ORS 659A.030, 659A.082, or 659A.112) commence no later than five years after the occurrence of the violation. Other applicable laws may have a shorter time limitation on filing.

The Company will not require or coerce an employee or prospective employee to enter into any agreement as a condition of employment, continued employment, promotion, compensation, or the receipt of benefits, that contains a nondisclosure provision, non-disparagement provision, or any other provision that has the purpose or effect of preventing the individual from disclosing or discussing unlawful employment discrimination or

harassment (including sexual assault). An employee claiming to be aggrieved by discrimination, harassment, or sexual assault may, however, voluntarily request to enter into a settlement, separation, or severance agreement that contains a nondisclosure, non-disparagement, or no-rehire provision (as defined below) and will have at least seven days to revoke any such agreement.

Under this Policy, a nondisclosure agreement is any agreement by which one or more parties agree not to discuss or disclose information regarding any complaint of work-related harassment, discrimination, or sexual assault. A non-disparagement agreement is any agreement by which one or more parties agree not to discredit or make negative or disparaging written or oral statements about any other party or the Company. A no-rehire provision is an agreement that prohibits an employee from seeking reemployment with the Company and allows the Company to not rehire that individual in the future.

Rhode Island Employees

External Remedies

In addition to the reporting procedure set forth above, if you believe you have been unlawfully discriminated against or harassed, you may also file a formal complaint with either or both of the government agencies listed below:

- The Rhode Island Commission for Human Rights (RICHR) is the state agency responsible for handling complaints of harassment, including sexual harassment. The RICHR can be reached at: 180 Westminster Street, 3rd Floor Providence, RI 02903; tel. 401.222.2661, fax 401.222.2616; TTY 401.222.2664.
- The Equal Employment Opportunity Commission (EEOC) is the federal agency that investigates harassment complaints, including claims of sexual harassment. The EEOC can be reached at: John F. Kennedy Federal Building, 475 Government Center, Boston, MA 02203; tel. 800.669.4000; fax 617.565.3196; TTY 800.669.6820.

Vermont Employees

External Remedies

In addition to the reporting procedure set forth above, if you believe you have been unlawfully discriminated against or harassed, you may also file a formal

complaint with either or both of the government agencies listed below.

- The state agency responsible for complaints of harassment is the State of Vermont Attorney General's Office – Public Protection Division Civil Rights Unit, which can be reached at: 109 State Street, Montpelier, VT 05609-1001; VT toll-free 888.745.9195; tel. 802.828.3657; TTY 802.828.3665; fax 802.828.2154; ago.vermont.gov/about-the-attorney-generals-office/divisions/civil-rights.
- The Equal Employment Opportunity Commission (EEOC) is the federal agency that

investigates harassment claims, including claims of sexual harassment. The EEOC can be reached at: John F. Kennedy Federal Building, 475 Government Center, Boston, MA 02203; tel. 800.669.4000.

Employees who believe they have been unlawfully discriminated against or harassed may file a complaint with the Attorney General's Office or the EEOC. These agencies serve as neutral factfinders and attempt to help the parties voluntarily resolve disputes.

ACKNOWLEDGEMENT

I acknowledge that I have received and read a copy of the STO Building Group (“STOBG” or the “Company”) United States Non-Discrimination and Anti-Harassment 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. Only STOBG’s Compliance & Ethics Department or Human Resources Department can 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 accept that if there is any inconsistency between this Policy and my employment contract, the employment contract will prevail.

I understand that if I have questions about this Policy, I can consult a Company resource such as my manager, a more senior manager, my 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: _____

COMPLAINT FORM

If you believe that you have been subjected to discrimination, harassment (including sexual harassment), 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 HR representative. You are not limited to the space provided and may attach additional pages.

Any forms submitted to a manager or supervisor will be promptly provided to HR. Any report of discrimination, harassment (including sexual harassment), 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.

Your Information

Name:

Title:

Company:

Work location:

Phone number:

Email:

Select preferred communication method:

☐ Email

☐ Phone

☐ In person

Supervisor Information

Name:

Title:

Complaint Information

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

Name:

Title:

Company:

Work location:

Phone number:

Email:

Relationship to you: ☐ Supervisor

☐ Subordinate

☐ Coworker

☐ 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) discrimination, harassment, 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?

If you have retained legal counsel and would like us to work with them, please provide their contact information below.

Signature: _____

Date: _____

