

POLICY NUMBER
STOBG 201.07

CONTACT
Human Resources Department

EFFECTIVE DATE
March 11, 2024

Equal Employment Opportunity and Affirmative Action Policy

Policy Statement

STO Building Group (“STOBG” or the “company”), as part of its commitment to equal employment opportunity, adheres to all applicable US 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 race, color, religion, creed, sex, pregnancy (including lactation, childbirth, or related medical conditions), sexual orientation or affectional preference, gender identity or expression, age, national origin or ancestry, physical or mental disability, 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 characteristics”). We interpret these protected characteristics 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. STOBG further adheres to the specific protections against discrimination and retaliation set forth in the *Know Your Rights: Workplace Discrimination is Illegal* and *Pay Transparency Nondiscrimination Provision* notices, which are included at the end of this policy.

This 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 is a federally-assisted contractor and complies with the requirements of Executive Order 11246, as amended (“EO 11246”). STOBG takes affirmative actions to ensure equal employment opportunity.

STOBG encourages and considers requests for reasonable accommodations from any otherwise qualified applicant or employee with a physical or mental disability, unless the accommodation would impose an undue hardship on the operations of STOBG’s business

or pose a direct threat to the health and safety of the individual or others. A determination of any request for reasonable accommodation will be made on a case-by-case basis.

Implementation

STOBG’s Chief Executive Officer reaffirms support for this policy and delegates overall responsibility for administering STOBG’s equal employment opportunity program and affirmative action activities to STOBG’s Chief Human Resources Officer, Claudia Healy. The CHRO serves as the company’s Equal Employment Opportunity Officer (“EEO Officer”) and can be reached at claudia.healy@stobuildinggroup.com.

While members of management are primarily responsible for seeing that this 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.

Reporting Concerns

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. You may contact STOBG’s EEO Officer with any such concerns.

Employees who believe that they or someone else has been subjected to discrimination, harassment, or retaliation should report their concerns using the reporting procedure set forth in the company’s [US Non-Discrimination and Anti- Harassment Policy](#). As set forth more fully in that policy, you may report concerns as soon as possible to any of the following company resources:

- your supervisor or manager
- your local Human Resources representative
- a senior manager or business unit leader
- a member of executive management
- your compliance liaison or the Compliance & Ethics Department

- the Legal Department

You may also report 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

This policy does **not** require reporting discrimination, harassment, or retaliation directly to an employee's immediate 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.

The company will undertake a timely and thorough investigation, as set forth more fully in the Investigation section of the company's [US Non- Discrimination and Anti-Harassment Policy](#).

Protection From Retaliation

This policy does not limit but supplements STOBG's separate [US Non- Discrimination and Anti-Harassment Policy](#) (including its *No Retaliation* provision) and the company's separate [Anti-Retaliation Policy](#).



Know Your Rights: Workplace Discrimination is Illegal

The U.S. Equal Employment Opportunity Commission (EEOC) enforces Federal laws that protect you from discrimination in employment. If you believe you've been discriminated against at work or in applying for a job, the EEOC may be able to help.

Who is Protected?

- Employees (current and former), including managers and temporary employees
- Job applicants
- Union members and applicants for membership in a union

What Types of Employment Discrimination are Illegal?

Under the EEOC's laws, an employer may not discriminate against you, regardless of your immigration status, on the bases of:

- Race
- Color
- Religion
- National origin
- Sex (including pregnancy, childbirth, and related medical conditions, sexual orientation, or gender identity)
- Age (40 and older)
- Disability
- Genetic information (including employer requests for, or purchase, use, or disclosure of genetic tests, genetic services, or family medical history)
- Retaliation for filing a charge, reasonably opposing discrimination, or participating in a discrimination lawsuit, investigation, or proceeding
- Interference, coercion, or threats related to exercising rights regarding disability discrimination or pregnancy accommodation

What Organizations are Covered?

- Most private employers
- State and local governments (as employers)
- Educational institutions (as employers)
- Unions
- Staffing agencies

What Employment Practices can be Challenged as Discriminatory?

All aspects of employment, including:

- Discharge, firing, or lay-off
- Harassment (including unwelcome verbal or physical conduct)
- Hiring or promotion
- Assignment
- Pay (unequal wages or compensation)
- Failure to provide reasonable accommodation for a disability; pregnancy, childbirth, or related medical condition; or a sincerely-held religious belief, observance or practice
- Benefits
- Job training
- Classification
- Referral
- Obtaining or disclosing genetic information of employees
- Requesting or disclosing medical information of employees
- Conduct that might reasonably discourage someone from opposing discrimination, filing a charge, or participating in an investigation or proceeding
- Conduct that coerces, intimidates, threatens, or interferes with someone exercising their rights, or someone assisting or encouraging someone else to exercise rights, regarding disability discrimination (including accommodation) or pregnancy accommodation

What can You Do if You Believe Discrimination has Occurred?

Contact the EEOC promptly if you suspect discrimination. Do not delay, because there are strict time limits for filing a charge of discrimination (180 or 300 days, depending on where you live/work). You can reach the EEOC in any of the following ways:

Submit an inquiry through the EEOC's public portal:
<https://publicportal.eeoc.gov/Portal/Login.aspx>

Call 1-800-669-4000 (toll free)
1-800-669-6820 (TTY)
1-844-234-5122 (ASL video phone)

Visit an EEOC field office (information at www.eeoc.gov/field-office)

E-Mail info@eeoc.gov

Additional information about the EEOC, including information about filing a charge of discrimination, is available at www.eeoc.gov.



EMPLOYERS HOLDING FEDERAL CONTRACTS OR SUBCONTRACTS

The Department of Labor's Office of Federal Contract Compliance Programs (OFCCP) enforces the nondiscrimination and affirmative action commitments of companies doing business with the Federal Government. If you are applying for a job with, or are an employee of, a company with a Federal contract or subcontract, you are protected under Federal law from discrimination on the following bases:

Race, Color, Religion, Sex, Sexual Orientation, Gender Identity, National Origin

Executive Order 11246, as amended, prohibits employment discrimination by Federal contractors 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.

Asking About, Disclosing, or Discussing Pay

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

Disability

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 by Federal contractors. 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.

Protected Veteran Status

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.

Retaliation

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

Any person who believes a contractor has violated its nondiscrimination or affirmative action obligations under OFCCP's authorities 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)

If you are deaf, hard of hearing, or have a speech disability, please dial 7-1-1 to access telecommunications relay services. OFCCP may also be contacted by submitting a question online to OFCCP's Help Desk at <https://ofccphelpdesk.dol.gov/s/>, or by calling an OFCCP regional or district office, listed in most telephone directories under U.S. Government, Department of Labor and on OFCCP's "Contact Us" webpage at <https://www.dol.gov/agencies/ofccp/contact>.

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.

(Revised 6/27/2023)



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



200 CONSTITUTION AVENUE NW | WASHINGTON, DC 20210 | tel: 1-800-397-6251 | TTY: 1-877-889-5627 | www.dol.gov/ofccp

