



POLICY TITLE

Anti-Slavery and Human Trafficking Policy

POLICY NUMBER

STO 022.02

CONTACT

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EFFECTIVE DATE

March 1, 2018

Structure Tone Organization

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and 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.

We have a zero-tolerance approach to slavery of any form or type, and we are committed to acting ethically and with integrity in all our business dealings and relationships. We have implemented and are enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

As part of our commitment to ensuring transparency in our own business and to tackling modern slavery throughout our supply chains, we have published our Anti-Slavery and Human Trafficking Statement on our website. This statement is consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all of our contractors, suppliers, consultants, and other business partners. As part of our contracting processes, 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 suppliers hold their own suppliers to the same high standards.

Application of This Policy

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

Supply Chain

Our supply chains consist of both suppliers and subcontractors. 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 become a subcontractor that works with the Structure Tone organisation, each subcontractor must demonstrate that it is a viable, productive company and agree to adhere to our Supplier Code of Conduct and Ethics. Suppliers must also complete our Supply Chain Pre-Qualification Package, which includes our pre qualification questionnaire, terms and conditions, and health and safety responsibilities.

Objectives

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

- ◆ Implementing an Anti-Slavery and Human Trafficking Policy and a Supplier Code of Conduct;
- ◆ Developing an updated system for supply chain pre-qualification, including adding modern slavery enquiries to our standard form pre-qualification questionnaire;
- ◆ Reviewing our existing supply chains and identifying any high-risk suppliers and/or jurisdictions; and
- ◆ Seeking specific contractual commitments in our supplier contracts.

Responsibility for This Policy

The 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.

Bob Ashcroft, our In-House Counsel, 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.





QUERIES OR CONCERNS

Bob Ashcroft, In-house Counsel,
bob.ashcroft@structuretone.co.uk or +44 207 204 7043

David Cahill, General Counsel,
dcahill@structuretone.com or (212) 251-9240

Brian J. Fields, Chief Ethics and Compliance Officer,
brian.fields@structuretone.com or (212) 251-9279

Compliance with This Policy

You must ensure that you read, understand, and comply with this policy.

The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

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 of any supplier tier, you must raise it promptly with a member of Executive Management, the Compliance Department, or your local HR representative. You may also contact the following directly:

- ◆ Bob Ashcroft, In-house Counsel,
at bob.ashcroft@structuretone.co.uk or +44 207 204 7043
- ◆ David Cahill, General Counsel,
at dcahill@structuretone.com or (212) 251-9240
- ◆ Brian J. Fields, Chief Ethics and Compliance Officer,
at brian.fields@structuretone.com or (212) 251-9279

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 any of the above individuals at the earliest stage possible. Employees and third-parties who wish to remain anonymous may report suspected violations through Navex Global, the Company's third-party reporting vendor, by calling 0800-032-8483 in the United Kingdom, (866) 593-6479 in the United States and Canada, or 1-8006-15403 in Ireland. Employees worldwide can visit the Company's reporting portal at <http://www.structuretone.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 chains.

We aim to 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 of whatever form is or may be taking place in any part of our own business or in any of our supply chains. 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 Department immediately.

Communication and Awareness of This Policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training is provided as necessary.

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

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 other individuals and organisations working on our behalf if they breach this policy.



ACKNOWLEDGMENT

I have received and read the Company's Anti-Slavery and Human Trafficking Policy ("the Policy"). I understand the standards and requirements contained in the Policy and understand that there may be additional policies, laws, and regulations specific to my job.

I further agree to comply with the letter and spirit of the Policy and hold myself to the standards articulated in the Policy.

I understand that if I have questions concerning the meaning or application of the Policy, any Company policies, or the legal and regulatory requirements applicable to my job, I can consult my manager, the Human Resources Department, the Company's General Counsel, or the Company's Chief Ethics and Compliance Officer.

Signature: _____

Name (printed): _____

Title: _____

Date: _____