POLICY TITLE
Supplier Code of Conduct and Ethics (Republic of Ireland)

POLICY NUMBER
STO 007IE.02

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The Structure Tone Organization refers to a group of separate legal entities including Structure Tone, LLC; Structure Tone Southwest, LLC; ST Tech Services, LLC; STO Holdings, Inc.; Structure Tone Ltd. (UK); Structure Tone Limited (Ireland); Pavarini North East Construction Co., LLC; Pavarini McGovern, LLC; L.F. Driscoll Company, LLC; and Govan Brown & Associates Limited, as well as their subsidiaries, joint ventures, divisions, or affiliates. Each member company is an independent legal entity operating and providing services solely under its own name.

Structure Tone Organization

STRUCTURE TONE EUROPE SUPPLIER CODE OF CONDUCT AND ETHICS (REPUBLIC OF IRELAND)

Introduction

The Structure Tone Organization is committed to uncompromising integrity, transparency, and the highest standard of business conduct wherever it operates. This commitment is integral to our success. We do the right thing—every day, for every client, on every job site. The Company believes that partnering with ethical and socially-responsible businesses positively impacts the Company's worldwide clients, employees, and the communities in which we do business.

This Supplier Code of Conduct and Ethics (Ireland) (the "Supplier Code") helps Structure Tone Limited (Ireland) and its subsidiaries, joint ventures, divisions, and affiliates from time to time ("Structure Tone" or the "Company") select business partners that follow workplace standards and business practices consistent with our Company's core values. We look to work with suppliers that embrace our core values and exemplify a genuine dedication to ethical and honest dealing.

This Supplier Code has been developed and adopted by Structure Tone to ensure consistency with Structure Tone's own Code of Conduct and Business Ethics (the "Business Ethics Code") while incorporating additional guidance on compliance with the Prevention of Corruption Acts 1889–2010, any legislation passed amending, updating, or consolidating same, and

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applicable legislation in other jurisdictions where Structure Tone operates. The most current version of the Business Ethics Code, to which Structure Tone also requires its suppliers to comply (in addition to this code), is available at the Company's website at structuretone.com/compliance. The Business Ethics Code is hereby incorporated by reference and made a part hereof as if fully set forth herein.

Implementation and Enforcement

This Supplier Code has been considered and approved by Structure Tone's Executive Management Team. It sets forth the minimum standards of conduct expected of businesses that provide goods or services to Structure Tone. This Supplier Code applies to all persons and entities that provide goods to or perform services for or on behalf of Structure Tone and its clients including, but not limited to, agents, intermediaries, vendors, sub-contractors, and consultants (collectively, "Suppliers").

Suppliers are required, as part of Structure Tone's pre-qualification process for contractors, to provide specific information on the measures that they have taken (including implementation of appropriate anti-bribery, anti-slavery, and health and safety policies) to ensure that they live up to Structure Tone's high standards. Structure Tone also requires all Suppliers to commit to this Supplier Code (and to ensure that their employees and other associates commit to it) as a condition of doing business. Failure to act in a manner consistent with this Supplier Code may therefore result in the Supplier's breach of a project-specific contract and loss of the business relationship. Structure Tone reserves the right to refuse to do business with non-compliant Suppliers in the future. All Suppliers must also operate in full compliance with the letter and spirit of all applicable national, regional, and local laws and regulations. Structure Tone reserves the right to audit our Suppliers for compliance with this Supplier Code.

Suppliers are responsible for their employees, vendors, sub-suppliers, and subcontractors of any tier that perform any part of a contract or perform any work at a Structure Tone job site. Suppliers are responsible for providing their employees, vendors, sub-suppliers, and subcontractors with this Supplier Code and ensuring that they operate according to its terms. Structure Tone reserves the right to audit our Suppliers' vendors, sub-suppliers, and subcontractors in the event there is an actual or alleged violation of this Supplier Code.

For questions, comments, or training support with respect to a Supplier's obligations under this Supplier Code, Suppliers are encouraged to contact their Structure Tone representative or Structure Tone's Compliance and Ethics email address: Compliance@structuretone.com.

Employment Practices

All Suppliers must maintain and enforce policies requiring compliance with the following employment practices:

1. ***Child Labour:*** Suppliers must comply with all applicable child labour laws. Additionally, Suppliers may only employ workers who meet the applicable minimum legal age requirement in the jurisdiction in which they are working, but in no event may

Suppliers employ workers younger than the age for completing compulsory education.

2. ***Involuntary Labour:*** Suppliers' obligations include, but are not limited to, compliance with Structure Tone's Anti-Slavery and Human Trafficking Statement and Policy. Suppliers may not use any indentured, involuntary, or forced labour. They may not employ any form of slavery or involuntary servitude. Suppliers may not require employees to relinquish any personal identification or travel documentation as a condition of employment.
3. ***Wages and Hours:*** Suppliers will set working hours, wages, and overtime pay in compliance with all applicable laws. Workers must be paid at least the minimum legal wage, or a wage that meets local industry standards, whichever is greater.
4. ***Discrimination:*** Suppliers may not discriminate in recruitment, hiring, training, or employment practices (including compensation, promotion, discipline, or retirement) on the basis of personal characteristics or beliefs, including race, color, gender, nationality, religion, age, disability, union membership, sexual orientation, maternity, marital status, or any other category protected by law that does not affect the individual's ability to perform the required work.
5. ***Harassment:*** Suppliers must treat all workers with respect and dignity. They may not subject workers to corporal punishment, or physical, sexual, psychological, or verbal harassment. Suppliers must provide an environment that allows employees to raise concerns without fear of retaliation.
6. ***Freedom of Association:*** When allowed by law, Suppliers must respect the rights of workers to bargain collectively, freely organize, and join associations of their own choosing (or refrain from joining).
7. ***Statutory Worker Benefit and Welfare Funds:*** Suppliers must contribute to all statutory benefit and welfare funds to which employers are required by law to contribute, including medical and injury insurance.
8. ***Reporting:*** Suppliers should have a formalized system that allows employees to report their concerns, any possible violation of Supplier policy, and any possible violation of this Supplier Code, without fear of retaliation. Where law allows, employees should be permitted to report issues anonymously.

Health, Safety and Environment

The health and safety of Structure Tone employees and other personnel associated with its projects is the Company's highest priority. Our Suppliers must have established policies and procedures that provide their workers with a clean, safe, and healthy work environment that supports accident prevention, minimizes exposure to health risks, and is in compliance with all applicable, legally-mandated standards. This includes, but is not limited to, all laws and regulations of the Health and Safety Authority (HSA), Safety, Health and Welfare at Work Act 2005, and the Safety, Health and Welfare at Work (General Application) Regulations 2007.

The maintenance of a safe and healthy workplace also requires that the workplace be free of drugs, alcohol, and violence. The use, possession, purchase, sale, or the offer to sell, provide, or share illegal drugs during work on a Structure Tone job site is strictly prohibited, as is being in possession of, or under the influence of, medication prescribed wrongfully or for someone else. Suppliers must inform their Structure Tone representative if they suspect that any member of their workforce is under the influence of illegal drugs, prescription drugs, or over-the-counter medication that could affect the employee's ability to work safely or efficiently.

Similarly, work must never be performed while under the influence of alcohol. Alcohol may not be consumed on a Structure Tone job site or while working on behalf of Structure Tone, including during breaks and meal times. Violence at the workplace is also not tolerated. Suppliers must not engage in violent behavior or bring weapons of any kind onto the job site.

Suppliers must have a system for workers to report health and safety incidents, and to investigate and track such incidents. Suppliers must implement a corrective action plan to address reported incidents and mitigate future risk.

Further, Suppliers must maintain policies and procedures that require their operations to be conducted in an environmentally responsible manner and in accordance with applicable environmental laws. Materials that are considered harmful to the environment, including, but not limited to, dangerous chemicals, should be used only in accordance with government regulation.

Suppliers are responsible for obtaining, faithfully executing, and complying with the most current version of all applicable Structure Tone corporate safety manuals. These materials are available on the Company's website at structuretone.com/safety.

Suppliers (and by extension their vendors, sub-suppliers, and subcontractors) are also required to participate in and enforce the site-specific safety and loss prevention programs established for the project for which they are providing goods or services. Further, all Suppliers must cooperate fully with Structure Tone, the designated owner of the job site, and all insurance carriers and loss prevention engineers to achieve loss and accident prevention.

Anti-Corruption

Structure Tone strictly prohibits any form of corruption, bribery, kickbacks, and any other improper payments or trading in influence, and the Company expects its Suppliers to enforce anti-bribery and corruption policies that prohibit the same. Bribery is the direct or indirect giving or receiving of anything of value or other advantage intended to improperly influence business, professional, or official (State) judgment or reward the improper exercise of any such judgment. Anti-bribery and corruption laws also capture simply offering or attempting to give (as to the prospective giver) or soliciting or attempting to obtain (as to the prospective receiver) something of value or other advantage in return for an act or

omission of the recipient in relation to his or her office or position or in order to exert improper influence.

Bribes may include any direct or indirect benefit or consideration, including money, gifts, travel expenses, services, entertainment, holidays, below-market loans or products, reciprocal favours, or political or charitable contributions. Bribes, kickbacks, and similar payments are strictly prohibited under any circumstances. *Quid pro quos*—the giving of one thing in return for another—are strictly prohibited by Structure Tone. ***This ban applies even if local laws or practices permit or condone such activity.*** Making any payment while being reckless as to whether it will be used in whole or part for the commission of a bribery or corruption offence may also be prohibited.

Structure Tone employees are subject to the anti-corruption provisions of the Business Ethics Code and of the Company's Global Anti-Corruption Manual (the "Anti-Corruption Manual"), which is available on the Company's website at structuretone.com/compliance. In any dealings with Structure Tone or any work at a Structure Tone job site, Suppliers are bound by the same anti-corruption provisions of the Business Ethics Code and Anti-Corruption Manual, in addition to this Supplier Code, as if they were directly employed by the Company. The most current version of the Anti-Corruption Manual is hereby incorporated by reference and made a part hereof as if fully set forth herein.

Under the laws of some jurisdictions (including the UK Bribery Act), Structure Tone can itself become criminally liable for bribes offered or paid by its "associated persons," i.e., persons providing services for or on behalf of Structure Tone, if Structure Tone has not put in place adequate procedures to prevent such bribery.

To this end, Suppliers are required to comply with the Prevention of Corruption Acts 1889–2010, any legislation passed amending, updating, or consolidating same, the UK Bribery Act of 2010, the US Foreign Corrupt Practices Act, the Canadian Corruption of Foreign Public Officials Act, the Canadian Criminal Code, and any laws enacted to comply with the UN Convention Against Corruption and the OECD Convention on Combating Bribery of Foreign Officials, as well as local anti-corruption laws in each jurisdiction in which they do business (collectively, "Anti-Bribery Laws").

Anti-Bribery Laws prohibit directly or indirectly paying, offering, promising, or authorising the giving of any money or anything of value to any Government Official[1] either:

- for the purpose of influencing any act or decision of a Government Official in his or her official capacity or inducing such Government Official to do or omit to do any act in violation of the lawful duty of such Government Official; or

[1] *"Government Official" includes (1) any employee, official, officer, or person acting for or on behalf of a (a) foreign, domestic, regional, or local government, or any department, agency, organization, or instrumentality thereof, (b) commercial or nonprofit entity in which a government body has any ownership interest or the ability to control ("Instrumentality"), (c) public (quasi-governmental) international organization, such as the United Nations, World Bank, or World Health Organization, or (d) political party; (2) any judge or ambassador; or (3) any holder of, or candidate for, political or public office.*

- for the purpose of (i) inducing such Government Official to use his or her influence with a government or any organization or Government Instrumentality thereof; or (ii) assisting in obtaining business, retaining business, directing business, or securing any improper business advantage.

Many Anti-Bribery Laws, such as the Prevention of Corruption Acts 1889–2010, prohibit bribes among private sector employees as well as Government Officials. The Prevention of Corruption Acts 1889–2010 criminalize offering, giving, and receiving or agreeing to receive a bribe and attempts to give or receive a bribe, which encompasses "any gift, consideration or advantage as an inducement to, or reward for, or otherwise on account of" the recipient "doing any act or making any omission" in relation to his or her office or position or the business affairs of his or her principal. The law prohibits the use of payments to induce (bribery) or reward (gratuity) improper conduct or otherwise.

Additionally, under the Prevention of Corruption Acts 1889–2010, no distinction is drawn between facilitation payments and other types of payments that would attract liability. Facilitation payments are typically small payments paid to a government official to "facilitate" or "expedite" a routine, non-discretionary governmental action. ***Facilitation payments are often illegal and always prohibited by Structure Tone.***

By continuing to perform work for Structure Tone, the Supplier represents and certifies that the Supplier, its owners, directors, officers, and employees:

1. are familiar with and agree to comply with applicable Anti-Bribery Laws;
2. have kept and will keep complete and accurate records of all transactions and expenses related to the Supplier's business in Structure Tone's products and services and that such records accurately state in reasonable detail the purpose of each expense and the receipt and distribution of assets;
3. have conducted appropriate due diligence on parties to which the Supplier pays commissions, referral, marketing, or other fees related to its Structure Tone business, and that the Supplier has no reason to believe that any of its agents, resellers, representatives, consultants, or any other persons retained or paid by the Supplier in connection with any Structure Tone business have violated the Anti-Bribery Laws;
4. have developed an adequate, risk-based anti-bribery and corruption policy and have implemented a program to provide appropriate training on anti-bribery and corruption compliance to the Supplier's owners, directors, officers, and employees and to inform the Supplier's agents, resellers, representatives, consultants, and any other persons engaged in its business related to Structure Tone of their obligations to comply with the Anti-Bribery Laws and the Supplier's own internal policies; and
5. confirm that all information provided by the Supplier to Structure Tone in the Prequalification Questionnaire Process remains accurate and complete and that the Supplier will inform Structure Tone as soon as possible if any of it ceases to be so.

The Supplier agrees to cooperate in good faith in any investigation by Structure Tone and its auditors, attorneys, and representatives in the event of any actual or alleged violation of the Anti-Bribery Laws, this Supplier Code, or the Structure Tone policies incorporated by reference herein. Such cooperation includes providing Structure Tone and its representatives prompt and complete access to relevant records and to its owners, directors, officers, employees, and agents for interviews. The Supplier further agrees that if future developments cause the representations and certifications provided herein to no longer be accurate or complete, it will promptly send Structure Tone a written report detailing the causes and extent of the circumstances giving rise to this and will take all steps that may be required to remedy such inaccuracy or incompleteness.

Conflicts of Interest, Gifts, Entertainment, and Business Courtesies

Structure Tone's Suppliers must have and enforce policies that prohibit providing and receiving improper benefits through their relationships with Structure Tone.

Structure Tone employees are subject to the conflict of interest rules articulated in the Business Ethics Code. While acting as a party to any contract with Structure Tone and/or working on any Structure Tone job site, Suppliers are bound by the same conflict of interest provisions of the Business Ethics Code as if they were directly employed by the Company.

Structure Tone employees are also subject to the gifts and entertainment ("Corporate Hospitality") provisions of the Business Ethics Code, the Anti-Corruption Manual, and Structure Tone's Gift and Entertainment Policy (the "G&E Policy"). The most current version of the G&E Policy is hereby incorporated by reference and made a part hereof as if fully set forth herein. It is available on the Company's website at structuretone.com/compliance. In any dealings with Structure Tone or any work at a Structure Tone job site, Suppliers are bound by the same Corporate Hospitality provisions of the Business Ethics Code and G&E Policy as if they were directly employed by the Company.

Modern Slavery

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. Structure Tone is committed to acting ethically and with integrity in all of its business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in the Company's business or in any of its supply chains.

As a business, Structure Tone is committed to complying with its legal obligations in accordance with both domestic and EU law (including, but not limited to, the Criminal Law (Human Trafficking) Act 2008 as amended by the Criminal Law (Human Trafficking) (Amendment) Act 2013 and any other legislation passed amending or replacing same).

Structure Tone is also committed to ensuring that there is transparency in the Company's business and in its approach to tackling modern slavery throughout its supply chains, consistent with the Company's disclosure obligations under the UK Modern Slavery Act 2015. Structure Tone has adopted an Anti-Slavery and Human Trafficking Statement that reflects its zero-tolerance attitude towards slavery and trafficking in all areas of its business and its supply chain. Structure Tone has also put in place an Anti-Slavery and Human Trafficking Policy that seeks to identify and manage risk in its business and supply chain.

Structure Tone expects the same high standards from all of its Suppliers and other business partners, and as part of its contracting processes, the Company requires specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. Structure Tone expects that its Suppliers will hold their own suppliers to the same high standards.

Anti-Money Laundering

Structure Tone employees are subject to the anti-money laundering provisions of the Business Ethics Code and the Anti-Corruption Manual. Structure Tone's Suppliers must also follow applicable anti-money laundering laws that require the reporting of cash and other suspicious transactions. In any dealings with Structure Tone or any work at a Structure Tone job site, Suppliers are bound by the same anti-money laundering provisions of the Business Ethics Code and Anti-Corruption Manual as if they were directly employed by the Company.

Recordkeeping

Suppliers must maintain accurate and complete records and documentation of all work performed for or with Structure Tone. This includes, but is not limited to, receipt and invoices, employment contracts, health and safety logs, industrial injury reports, residence and work permits, work time and pay records, bid backup documentation, purchase orders, change orders, proof of work tickets, and proof of age documentation.

Financial Controls

Suppliers must:

1. maintain an effective system of internal financial controls;
2. keep accurate and complete financial and operational books, records, and accounts;
3. create and maintain business records in accordance with applicable legal and contractual requirements; and
4. keep accurate and complete records prepared for Structure Tone or its clients, including records of work performed and expenses.

Confidentiality and Structure Tone Resources

Structure Tone is committed to protecting the confidentiality of Company information, including sensitive information relating to its business interests, employees, business partners, and clients. Suppliers must abide by all regional and national laws and regulations concerning data privacy and confidentiality. Personal data and non-public information must be treated in accordance with applicable law and in a manner that is consistent with contractual obligations. Suppliers must maintain, handle, and, if applicable, process any confidential information internally and on a need-to-know basis only, with utmost care and in accordance with applicable law.

Structure Tone employees are subject to the data privacy and confidentiality provisions of the Business Ethics Code. In any dealings with Structure Tone or any work at a Structure Tone job site, Suppliers are bound by the same data privacy and confidentiality provisions of the Business Ethics Code as if they were directly employed by the Company.

Suppliers must also take all reasonable steps to safeguard Structure Tone resources, including property, assets, and intellectual property. Specifically, Suppliers must:

1. protect Structure Tone resources utilised in the course of performing work;
2. use Structure Tone's resources only for legitimate business purposes to further the interests of Structure Tone; and
3. comply with and protect the intellectual property rights of Structure Tone, its clients, and other third parties associated with the relevant project at all times.

News and Social Media

Suppliers may not represent themselves to the media as speaking on behalf of Structure Tone unless expressly authorised to do so by Structure Tone's Executive Management team. Media enquiries must be immediately referred to your Structure Tone representative.

Suppliers also should maintain processes to ensure that their use of social media does not negatively affect Structure Tone's reputation.

Competing Fairly

Structure Tone believes that only legitimate factors such as merit, quality, and price should determine who succeeds in the marketplace. Our Suppliers are expected to compete honestly and fairly, and refrain from engaging in collusive bidding, price discrimination, anti-competitive behavior, and other unfair trade practices.

Structure Tone's employees are subject to the antitrust provisions of the Business Ethics Code and the Anti-Corruption Manual. In any dealings with Structure Tone or any work at a Structure Tone job site, Suppliers are bound by the same antitrust provisions of the Business Ethics Code and Anti-Corruption Manual as if they were directly employed by the Company.

Communication and Reporting

Suppliers are expected to assist Structure Tone in enforcing this Supplier Code by making a copy of the Supplier Code available to all employees and communicating the Supplier Code's principles to supervisors and employees with specific job site responsibility. Suppliers must also communicate this Supplier Code to their vendors, sub-suppliers, and subcontractors. Suppliers have an affirmative duty to report any allegation of wrongdoing or corruption or any violation of this Supplier Code. Violations should be reported to the Supplier's Structure Tone representative responsible for the particular project or to Structure Tone's Compliance and Ethics email address: Compliance@structuretone.com. To the extent permitted by law, persons reporting concerns may request that they remain anonymous. Suppliers may also make anonymous reports through Structure Tone's 24/7 third-party reporting line via phone at 1.8006.15403 in Ireland. Employees worldwide can visit the Company's reporting portal at structuretone.ethicspoint.com.

Structure Tone will investigate all reports thoroughly and in a manner that is consistent with applicable law. A Supplier may be asked to participate in an investigation, and Structure Tone expects Suppliers to cooperate unconditionally. Investigations will be kept confidential to the extent possible. When necessary and in accordance with applicable law, investigations or the results of investigations may be reported to law enforcement or to a Structure Tone client.

Structure Tone strictly prohibits retaliation against any person reporting in good faith a suspected violation of applicable law or regulation, this Supplier Code, or the Structure Tone policies incorporated by reference into this Supplier Code.

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This Supplier Code is not a contract and may be amended by Structure Tone at any time without specific notice to Suppliers. It does not confer rights on any Supplier, nor does it impose obligations on Structure Tone. Please contact Structure Tone's Legal Department if you believe that any provision of the Supplier Code conflicts with the specific terms of your contract.

Acknowledgment of Structure Tone Supplier Code of Conduct and Ethics (Applicable to Vendors, Subcontractors, and Consultants)

Structure Tone and its subsidiaries, joint ventures, divisions, and affiliates (collectively, "Structure Tone" or the "Company") is committed to the highest ethical and legal standards in the conduct of its business. Structure Tone requires all registered vendors, subcontractors, and consultants ("Suppliers") with which the Company conducts business to acknowledge and agree to abide by the policies and principles set forth in Structure Tone's Supplier Code of Conduct and Ethics (Ireland) (the "Supplier Code"). All registered Suppliers are required to commit to this Supplier Code as a condition of doing business.

ACKNOWLEDGMENT

I, on behalf of _____ *(the name of the vendor/subcontractor/consultant)*, hereby acknowledge and agree to abide by the policies and principles of this Supplier Code and ensure that the employees, officers, directors, agents, and representatives of _____ *(the name of the vendor/subcontractor/consultant)* are aware of and abide by such policies and principles in the process of preparing and submitting bids and proposals for Structure Tone work, for provision of goods and services to Structure Tone, and during the performance of all agreements entered into with Structure Tone for such purposes. I agree that failure to comply with its terms will entitle Structure Tone to terminate any or all contracts with the relevant Supplier with immediate effect.

Authorized Signatory: _____

Name (printed): _____

Title: _____

Date: _____