



POLICY TITLE

Anti-Retaliation Policy

POLICY NUMBER

STO 020.02

CONTACT

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December 1, 2015

Structure Tone Organization

ANTI-RETALIATION POLICY

The Structure Tone Organization (collectively, "Structure Tone" or "the Company")¹ is committed to promoting a positive work environment—free of intimidation, retaliation, and harassment. Crucial to this objective is fostering an atmosphere in which employees feel comfortable engaging in open and honest dialogue, raising questions or concerns, and seeking guidance from colleagues and supervisors.

This Policy articulates the Company's unwavering commitment to providing such an environment and to protecting employees who raise matters in good faith. The policy applies to all Structure Tone employees, and to members of the board of directors, agents, consultants, contracted labor, and others when they are acting for, or on behalf of, Structure Tone.

Structure Tone takes all reports of potential misconduct and policy violation seriously. It seeks to address any alleged misconduct as quickly as possible and to prevent the recurrence of future situations. The Company will appropriately investigate all claims of misconduct or wrongdoing brought to its attention regardless of the source, the reporting channel,

¹ The companies of the Structure Tone organization refers to a group of separate legal entities including Structure Tone, LLC, Structure Tone Southwest, LLC, Structure Tone International Limited (UK), Structure Tone Limited (Dublin), Pavarini Construction Co., LLC, Pavarini McGovern, LLC, and L.F. Driscoll Company, LLC, 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.

or the object of such claim. If the Company substantiates any claims of misconduct, it will take appropriate corrective or disciplinary measures.

Employees' Obligation to Report Misconduct

Preventing misconduct is a responsibility shared by Structure Tone and all of its employees.

All employees have a duty to speak up and promptly report any suspected violation of the Company's policies or applicable laws. Employees have a duty to act when they suspect something is wrong. Likewise, supervisors are held responsible for ensuring that this policy is observed, and their own performance evaluations will incorporate their subordinates' records of compliance. Our leaders serve as role models and resources for proper business conduct, and they will be held accountable for subordinate conduct that they know *or should have known* exists and violates this policy. For those reasons they have enhanced responsibilities and must promote a culture of ethics and compliance.

The Company takes these obligations seriously. Disregard of these duties and failing to act appropriately when doing so is required may have serious consequences both for the individual and for the Company. Remaining silent in the face of illegal or unethical conduct simply is not an option.

Reporting Channels

Prompt reporting of suspected misconduct through the appropriate channels provides the Company the opportunity to undertake an investigation and remedy any wrongdoing.

Employees may report suspected or potential policy or legal violations internally through any one of various methods provided in the Code of Conduct or other Structure Tone policies, including: (i) their immediate supervisor; (ii) their local human resources representative; (iii) the Company's General Counsel; (iv) any member of the Compliance Department (including the Company's Chief Ethics and Compliance Officer ("CECO")); or (v) the Compliance Department's intake email address: compliance@structuretone.com. In the event of a conflict of interest concerning the reporting channel applicable to your report, or if your initial report has failed to resolve the issue, you should make a follow-up report to the CECO or to the General Counsel. All claims received from external sources, including former employees (or on behalf of former employees), current or former government employees, or attorneys, must be referred to the Compliance Department and/or the General Counsel as promptly as possible.

Employees may also report anonymously through the Company's third-party reporting vendor, Navex Global. Such matters can be reported anonymously via telephone by calling (866) 593-6479 in the United States, 0800-032-8483 in the United Kingdom, or 1-8006-15403 in Ireland. Employees worldwide can visit the Company's reporting portal at <http://structuretone.ethicspoint.com>. Navex Global allows for anonymous reporting 24 hours a day, seven days a week. In some countries, however, an individual may need to reveal his or her identify before





making the report to qualify for protection under that country's anti-retaliation laws. Please check with your local human resources representative for more information concerning your country's anti-retaliation laws.

Any reports made, whether anonymous or not, should include as much detail as possible in order to allow the Company to investigate the matter appropriately. Important details may include, for example, the names of the people involved in or witnesses to the incident, the dates and times of the incident (approximate or exact), where the incident occurred, and why the person believes the incident should be reported. Insufficient detail may result in an inability for the Company to address the matter appropriately. Employees who believe that they may have been personally involved in misconduct or a policy violation are still required to report such matters. Self-reporting will be considered when deciding whether or what disciplinary action is appropriate.

While the Company cannot guarantee confidentiality in every circumstance, it will make every effort to protect the identity of any employee (where the identity is known) making a report in good faith, as well as any individual involved in the investigation. Such information will be shared subject to applicable law and only on a need-to-know basis as the investigative circumstances dictate. The laws of some countries, however, require that a report remain confidential unless the employee making the report provides consent to the report being revealed. For this reason, you may be asked to provide consent to facilitate the investigation process and enable the Company to reach a satisfactory outcome. For example, to investigate a report, it may be necessary to share the report with individuals such as other Structure Tone personnel, external consultants or, in appropriate circumstances, law enforcement. It may also be necessary to disclose the facts and substance of the report to the person being investigated.

Investigation and Disciplinary Action

Structure Tone will investigate employee reports of suspected misconduct as quickly as possible. The Company may advise you of the progress of an investigation, such as of any disciplinary action being taken against any employee suspected of misconduct.

Anyone, regardless of position or title, who the Company determines has engaged in conduct that violates a Company policy or applicable law may be subject to disciplinary action, up to and including termination of employment. Employees also may face discipline for failing to report suspected impropriety when doing so is required.

When necessary, subject to applicable law, investigations or the results of investigations may be reported to law enforcement or to a client of the Company.

No Retaliation

Structure Tone promotes an atmosphere in which employees feel safe to engage in frank and honest communication—without fear of retaliation. To uphold this principle, Structure Tone maintains a strict anti-retaliation policy to protect those who report in good faith suspected violations of

Company policies and procedures, or applicable law. "Good faith" does not require that the conduct be substantiated; rather, it means only that the reporter came forward with all of the information he or she had and made a sincere and honest report. Employees may be disciplined if they provide false or misleading information or otherwise act in bad faith.

Structure Tone will not tolerate conduct that deters employees from raising genuine concerns or interferes with employees' duty to report potential violations. It is Structure Tone's policy that employees who raise issues or ask questions, report potential violations of Company policy or law, and participate in Company investigations, will not suffer reprisal, harassment, intimidation, threats, coercion, discrimination or retaliation, or adverse employment action, such as demotion, suspension, termination, failure to hire or promote, adversely impacted work conditions, failure to provide work benefits, or the creation of a hostile work environment. This policy does not shield employees from the consequences of their own misconduct, though self-reporting will be taken into consideration as the investigation proceeds. This policy also does not constrain Structure Tone in addressing employee performance or behavior separate and apart from the conduct protected by this policy.

Allegations of intimidation or retaliation will be investigated and, where substantiated, met with severe discipline up to and including immediate termination. Any person who believes that he or she has witnessed or been the subject of a violation of this policy should immediately notify the CECSO.



ACKNOWLEDGMENT

I have received and read the Company's Anti-Retaliation 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: _____