



Anti-Slavery and Human Trafficking Statement (2019)

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced or 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 any form of slavery, 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 slavery of any type or form is not taking place anywhere in our business or in any of our supply chains.

This statement is made on behalf of Structuretone Limited and Structuretone International Limited in line with the Modern Slavery Act 2015 ("**MSA**"), and references to "we", "us", "our", or the "Company" are to both. References to "Structure Tone" are to the global business of Structure Tone and its various entities and subsidiaries.

OUR BUSINESS

Structure Tone is a global leader in construction management and general contracting services with offices across the United States, Canada, United Kingdom, and Ireland. We deliver projects for world-class companies in the financial services, technology and telecommunications, and public sectors, as well as manage structural refurbishment projects.

We have over 1,900 professionals across 29 different offices globally and complete roughly 1,500 projects annually. For more detail on Structure Tone visit [structuretone.com](https://www.structuretone.com).

CODE OF CONDUCT

Structure Tone's core mission is to provide our clients with industry-leading expertise and unparalleled dedication to service in a manner consistent with the highest ethical business practices.

As part of this process, we have in place an Anti-Slavery and Trafficking Policy (the "**MSA Policy**") that seeks to identify and manage modern slavery risk in our business and supply chains. Structure Tone takes a zero-tolerance approach to slavery and trafficking.

In addition to our MSA Policy, we also have in place a North American Operations Supplier Code of Conduct and Ethics and Supplier Codes of Conduct and Ethics for the United Kingdom and the Republic of Ireland (collectively, the "**Supplier Code**"), which reflect our social, legal, and human rights responsibilities.

The Supplier Code helps Structure Tone select business partners that follow workplace standards and business practices consistent with our Company's core values. Our goal is to work with suppliers that embrace our core values and exemplify a genuine dedication to ethical and honest dealing. The Supplier Code sets forth the minimum standards of conduct expected of suppliers, including the need to maintain and enforce procedures designed to prohibit the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. The Supplier Code applies to all persons and entities that provide goods or services to Structure Tone and its clients including, but not limited to, vendors, subcontractors, and consultants (collectively, "**Suppliers**").

Structure Tone requires all Suppliers and their employees to commit to the Supplier Code as a condition of doing business. All Suppliers must also operate in full compliance with the letter and spirit of all applicable laws and regulations, including all laws relating to slavery and human trafficking.

ORGANISATION'S STRUCTURE

Structuretone Limited and its parent company, Structuretone International Limited, are UK group entities whose immediate US parent company is Structure Tone (UK), LLC.

We operate under a board of directors, with departments consisting of Operations, Commercial, Pre-construction, and support divisions. Subcontractors and suppliers are relied upon within all aspects of the business.

SUPPLY CHAIN

Our supply chains consist of both suppliers and subcontractors. Throughout the course of our history, Structure Tone has 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. Suppliers must also complete our Supply Chain Pre-Qualification Package, which includes our pre-qualification questionnaire, terms and conditions, and health and safety responsibilities.

RISK ASSESSMENT

We expect all relevant members of our supply chain to comply with the Modern Slavery Act 2015. Those who carry on a business or part of a business in the UK and have a turnover of over £36 million must provide a copy of their Modern Slavery Act statement. Those who do not meet the £36 million turnover threshold but voluntarily publish a Modern Slavery Act statement are asked to produce their statement as well.

The highest risk of slavery and human trafficking within our supply chain will likely stem from subcontractor personnel or representatives working on our sites, and the workforce of our raw material suppliers, particularly where they are based in high-risk countries. Given the international scope of our business, we are aware of the risks of slavery and human trafficking in certain markets, where workers can be trafficked, exploited, and forced to work.

To mitigate these risks we consider the risk of slavery and human trafficking in our selection of any new raw material suppliers and subcontractors.

A risk assessment has been carried out focusing on smaller businesses that are not required to have their own Modern Slavery Act statement and those that have higher risk international business connections. This risk assessment will continue to be updated as and when new suppliers enter our supply chain.

DUE DILIGENCE

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 as well as updating the Supplier Code;
- Developing an enhanced 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.

MONITORING AND REPORTING

The prevention, detection, and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. If employees have a concern or suspicion that modern slavery may be taking place in any part of our business or supply chain of any supplier tier, they must raise it promptly with a member of Executive Management, the Compliance Department, or their local HR representative. They may also contact the following directly:

Brian J. Fields, Chief Ethics and Compliance Officer,
at Brian.Fields@structuretone.com or +1.212.251.9279

David Cahill, General Counsel,
at Dave.Cahill@structuretone.com or +1.212.251.9240

Ian Phillpot, Finance Director,
at Ian.Phillpot@structuretone.co.uk or 020.7204.7000

Employees 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, +1.8006.15403 in Ireland, or +1.866.593.6479 in the United States and Canada. Employees worldwide can visit the Company's reporting portal at structuretone.ethicspoint.com. Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of our business or supply chain at the earliest possible stage.

TRAINING

All Structure Tone employees receive training on Structure Tone's Code of Conduct and Business Ethics ("**Code of Conduct**") that reinforces their obligation to follow applicable laws and report concerns of illegal or unethical activity, and must sign a statement acknowledging agreement with the Code of Conduct. UK employees also receive training on identifying modern slavery red flags, anti-modern slavery best practices, and the importance of complying with our MSA Policy and reporting non-compliance. Those employees must sign a statement acknowledging agreement with our MSA Policy.

RESPONSIBILITY FOR THIS STATEMENT

The board of directors has overall responsibility for ensuring this statement and its related policy comply with our legal and ethical obligations, and that our employees comply with them.

Ian Phillpot, the Finance Director for our UK office, has primary and day-to-day responsibility for implementing our MSA 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 the MSA Policy and are given adequate and regular training on it and the issues of modern slavery in supply chains.

BOARD APPROVALS

Structuretone Limited's Board of Directors approved this statement on **May __, 2019**.

This statement will be reviewed annually and published on our website.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the financial year ending 31 December 2019.

Robert Mullen

CEO, Structure Tone

Date: May __, 2019