

## CORPORATE HUMAN RIGHTS STATEMENT

At Sterling Construction Company, Inc. (“Sterling”), we understand that what we do has an immediate and significant positive impact on improving human conditions. Our water/wastewater system, road, bridge, and airport projects define the fabric of our civilization. Everything we do focuses on the needs of our ever-growing society; from water delivery systems to the transportation systems that connect our civilization. We believe our long-term success depends on our consistent value we deliver to our customers, employees, suppliers, shareholders and all stakeholders.

We respect human rights and are committed to protecting the communities where we live and work and beyond. We understand all people are entitled to these fundamental and universal rights regardless of nationality, sex, national or ethnic origin, color, age, religion, language, or any other status. We respect the rights of all individuals, or groups of individuals including vulnerable groups, such as women, migrant, seasonal and temporary workers, and indigenous communities.

Sterling’s Corporate Human Rights Statement incorporates the international human rights principles as reflected in the United Nations Guiding Principles (UNGPs) on Business and Human Rights, Universal Declaration of Human Rights (UDHR), and the International Labour Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work.

Our Corporate Human Rights Statement outlines our commitments, and applies across all Sterling businesses and subsidiaries. We ask our suppliers, partners and other third parties that do business with us to share our corporate commitments and standards.

### Implementation & Governance

Our board of directors as a whole is responsible for risk oversight, with reviews of certain areas being conducted by the relevant board committees that report to the full board. The governance/nominating committee assists our board in fulfilling its oversight responsibilities with respect to the management of risks associated with health, safety, and environment (HSE), environmental, social, and governance (ESG) compliance, and this Corporate Human Rights Statement. Our board believes that full and open communication with executive management is essential to effective risk oversight, including enterprise risk assessment and risk mitigation strategies. Executive management attends all regularly scheduled board meetings and addresses any questions or concerns raised by our board on risk management, including risks related to the Corporate Human Rights Statement. In addition, Sterling has an ethics and compliance program that has oversight from the Board of Directors, and senior management with the Chief Compliance Officer (“CCO”) leading the ethics and compliance activities.

- + This statement is reviewed annually and updated as needed.
- + We are committed to upholding the highest ethical standards and complying with applicable laws and regulations, our Code of Business Conduct and Sterling’s policies or requirements. The [Code of Business Conduct](#) applies to everybody at Sterling, regardless of title or tenure, including members of our Board of Directors, and the officers and employees of Sterling and its subsidiaries.
- + We ask our suppliers, agents, vendors, contractors, subcontractors, and joint venture partners (together referred to as “Suppliers”) to comply with applicable laws and regulations and to uphold the standards set in our [Supplier Code of Conduct](#).
- + We work to continuously identify, assess, and respond to the potential and actual human rights impacts across our operations, products, and supplier networks.

## **Child Labor, Forced Labor & Human Trafficking**

- + We prohibit the use of child labor and the hiring of individuals under the minimum age legally required.
- + We prohibit the use of all forms of forced labor including modern forms of slavery and any form of human trafficking.

## **Stakeholders & Communities**

- + Our key stakeholders are our shareholders, customers, employees, contractors, suppliers, partners, regulators, industry associations, and local communities.
- + We review internal and external processes and procedures that directly or indirectly have a potential impact on stakeholders of the Sterling's operational activities. Any findings are addressed, appropriate actions are taken, and the efficacy of our efforts is tracked.
- + We engage and consult with key stakeholders on human rights issues and seek their involvement in the development, implementation, and/or evaluation of the effectiveness of this statement.
- + We partner with our communities to help build strong, safe, and healthy communities.

## **Employees**

Sterling recognizes the needs of employees vary considerably as do the needs of our diverse businesses and that is why we encourage individual initiative and entrepreneurial spirit.

### **• Diversity, Equity and Inclusion**

- + We are committed to building a work environment based on principles of equality and diversity, and complying with all applicable laws and regulations wherever we operate.
- + We support a collaborative culture and a work environment free of illegal or unethical discriminatory practices of any kind that may impact any individual, or groups of individuals, including women and other minority groups.
- + To reinforce our commitment to equality and diversity, all employees must treat everyone equally regardless of gender, sexual orientation, transgender status, marital status, disability, religion, culture, racial origin, political preference, trade union affiliation, veteran status, pregnancy, age, or any other individual attribute protected by law.
- + We encourage a workplace that respects individual worth and supports creativity and growth.
- + Our training and professional development programs are open and applicable to all employees.

### **• Working Conditions**

- + We recognize the right to water as a fundamental human right and ensure all employees have physical access to sufficient, safe, hygienic, and secure water resources regardless of their work location.
- + We work to maintain safe and healthy working conditions and follow applicable laws and regulations across all of our operations.
- + We set standards to ensure working conditions follow regulated working time requirements, breaks, and rest periods.
- + We ask our employees, suppliers, agents, vendors, contractors, subcontractors, and joint venture partners to uphold our working condition standards.

### **• Wages and Benefits**

We are committed to compensate employees fairly with competitive wages, benefits, and are committed to the investment in their professional growth and development.

### **• Freedom of Association and Collective Bargaining**

We respect principles of freedom of association and the right to collective bargaining and recognize the right of our employees to join or refuse to join associations of their own choosing and their right to collective bargaining.

## Security and Safety Measures

To protect Human Rights, we have adapted safety and security practices and controls to safeguard our employees and our property.

- **Ethics Line**

- + Lighthouse-Services was selected to provide an anonymous and confidential method to hear employee concerns or report misconduct.
- + The Ethics Line is a phone and Internet resource established to help us do the right thing and to ensure any comments submitted are heard.
- + The Ethics Line is open not only to Sterling employees but to any party with knowledge of an ethics or compliance issue, including customers, vendors and other third parties.
- + Employees must report any inappropriate practice in the workplace to their manager/supervisor or an Equal Employment Opportunity (EEO) Contact Officer.
- + We prohibit unlawful retaliation against anyone for raising a legal or ethical concern in good faith or for cooperating with an investigation.

- **Cybersecurity**

Sterling has implemented a multi-faceted management methodology for cybersecurity to best protect company data. This approach includes: people, policies, processes and technology. In addition to protective systems and measures, we believe that ongoing employee awareness and training play a critical role in data security.

- + Sterling's cybersecurity assessments and system vulnerability tests are conducted by an independent third party.
- + Ongoing employee training provides cybersecurity awareness.
- + Ongoing technology assessments ensures Sterling remains focused on the right technologies in the right places for the largest mitigation of cybersecurity risk.

- **Workplace Safety**

Sterling's goal is to make sure everyone goes home Safe and Sound every day. We have systems in place through our Safe and Sound program that helps safeguard our efforts of protecting our employees both on jobsites and in our offices.

The [Core Principles of Safe and Sound](#):

- Commitment
- Communication
- A Safe Workplace Through Sound Practices
- Training
- Accountability
- Empowerment

- **Workplace Violence**

Sterling is committed to preventing workplace violence and to maintaining a safe work environment and has adopted the guidelines to deal with intimidation, harassment, or other threats of or actual violence that may occur on-site or off-site during work-related activities. For more details on this policy, please review our Workplace Violence Policy.

- **Training**

Training is provided at all levels of the organization to help with the identification, prevention, and mitigation of any adverse impacts on human rights.