

PROTECTING HUMAN RIGHTS

At Sterling Infrastructure, Inc. (“Sterling”), we understand that what we do has an immediate and significant positive impact on improving human conditions. Our projects build and service the infrastructure that enables our economy to run, our people to move and our country to grow. Sterling is playing a critical role in building the manufacturing facilities that are reshoring production to the United States, the data infrastructure that enables AI and other emerging technologies, the transportation infrastructure that connects us, and the homes we live in. This infrastructure is the foundation of the America of tomorrow. We embrace our responsibility to adopt and develop sustainable solutions for our industry and promote a more equitable future.

We believe our long-term success depends on the 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 fundamental and universal rights regardless of nationality, sex, national or ethnic origin, color, age, religion, language or any other status. We strive to respect the rights of all individuals, or groups of individuals, including vulnerable groups, such as women, migrant, seasonal and temporary workers, and Indigenous and Tribal Peoples.

In 2023, Sterling joined the United Nations (UN) Global Compact initiative, a voluntary leadership platform for the development, implementation and disclosure of responsible business practices. The UN Global Compact is a call to companies everywhere to align their operations and strategies with ten universally accepted principles in the areas of human rights, labor, environment and anti-corruption and to take action in support of UN goals and issues embodied in the Sustainable Development Goals (“SDGs”). Sterling’s Human Rights Policy 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 Human Rights Policy outlines our commitments and applies across all Sterling businesses and subsidiaries. We ask our suppliers, partners, contractors, subcontractors 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. Throughout the year, the Board receives briefings and assessments of risks, including environmental responsibility and sustainability, HSE compliance, ESG compliance, climate change-related factors and management of subsidiaries, construction JV partners and integration of new acquirees as well as this Human Rights Policy. 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 is available to address any questions or concerns raised by our Board. 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 policy is reviewed annually and updated as needed.

Our commitment to protecting Human Rights includes:

Respect for Human Rights

+ We strive to build a work environment based on principles of equality and diversity and comply with all applicable laws and regulations wherever we operate.



- + We are committed to upholding the highest ethical standards and complying with applicable laws and regulations, our Code of Business Conduct and Sterling's other policies. 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 this Human Rights Policy and in our [Supplier Code of Conduct](#). See the Code of Business Conduct or the Supplier Code of Conduct for details regarding code violations.
- + 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 and do not tolerate the exploitation of children at any operations, project sites or facilities.
- + We prohibit the use of all forms of forced labor, including modern forms of slavery and any form of human trafficking, involuntary servitude or debt bondage.
- + Employees have the right to freely terminate employment in accordance with applicable laws and regulations without fear of retaliation, or physical, psychological, sexual or verbal abuse.

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 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 policy.
- + We partner with our communities to help build strong, safe and healthy communities.
- + We respect the human need for sustainable water supplies, safe drinking water, and protection of both ecosystems and communities through proper sanitation.

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 are expected to 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 strive to 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 designed 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, Hours of Labor 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.
- + We compensate employees fairly relative to the industry, the local labor market and in accordance with all applicable laws and regulations, and collective bargaining agreements.
- + The working hours of our employees must be reasonable and we may not require workers to work more than the maximum hours of daily labor set by applicable law or, in the absence of such laws, with international labor standards. Overtime must be paid in accordance with all applicable laws and regulations.

- **Freedom of Association and Collective Bargaining**

We respect the 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 adopted safety and security practices and controls designed to safeguard our employees and our property.

- **Ethics Line**

- + Lighthouse Services was selected to provide an anonymous and confidential method for employees to voice their concerns and/or report misconduct.
- + The Ethics Line is a phone and internet resource established to help us achieve our commitment to do the right thing and ensure any comments submitted are received.
- + 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 are expected to report any inappropriate practice in the workplace to their manager/supervisor or an Equal Employment Opportunity 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 strategy 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 is designed to provide cybersecurity awareness.
- + Ongoing technology assessments are designed to ensure 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 help safeguard our efforts of protecting our employees both on jobsites and in our offices.

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

- Commitment
- Communication
- Sound Practices
- Training
- Accountability
- Empowerment

• Workplace Security

- + Security safeguards for employees are provided, as needed, and are maintained with respect for employee privacy and dignity.
- + We strive to maintain a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats.
- + Sterling is committed to preventing workplace violence and to maintaining a safe work environment and has adopted guidelines designed to deal with intimidation, harassment or other threats of or actual violence that may occur on site or off site during work-related activities.

• 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.
- + During the onboarding process, all employees receive training that includes, but is not limited to the following: Human Rights Policy, Sterling Employee Handbook, Code of Business Conduct, Information Technology Security Policy, Safety Handbook, Social Media Policy, Sterling Benefits Guide, Environmental Policy.