



STERLING

Illinois Contract Employee Handbook



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Disclaimers

Handbook Benefits Disclaimer: Some or all the Benefit information contained in the Sterling Handbook may not apply given variances in Customer Agreements and/or Employment Classifications. Please refer to your Offer Letter for the specific terms and conditions of your Employment and Benefit eligibility. Should you have any further questions, we encourage you to consult with Human Resources or your Sterling representative.

This version is effective January 1, 2023. The policies in this handbook shall continue in effect until modified as provided in the following: any policy which is declared by federal or state government to be illegal shall immediately become null and void. The voiding of any one policy for this reason in no way nullifies any other part of this handbook. Periodic modifications will be required to adjust to changing business conditions and regulations. Changes or additions will become effective when written notice of such changes is given by Sterling to the employee(s) covered. Written notice may be memorandums posted on company bulletin boards, direct mailings to employee(s) covered. Written notice may be memorandums posted through ADP employee portal, on Company bulletin boards, direct mailings to employees or other means deemed appropriate by the Company.

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WELCOME TO STERLING!

A company's culture is defined by the values, expectations and goals of its employees. For many years, Sterling has worked hard to build a strong, adaptive culture and align its business objectives with the shared needs and practices of our employees.

Key components of the Sterling culture include:

- *Employee Ownership*
- *Highly Effective Leadership*
- *Diverse and Challenging Work*
- *Strong Business Relationships in Multiple Industries*
- *Customer-focused environment*
- *Stable, Long-term Employment Opportunity*
- *Commitment to Learning and Skills Development*
- *Effective Systems and Processes*
- *High Integrity Workplace*

With these things and more in place, our collective mission is to build and expand the careers of Sterling employees while offering exceptional services to our customers.

We are pleased to present you with this Employee Handbook containing information about your workplace, the benefits available to you and expectations as an employee of Sterling.

We ask that you familiarize yourself with the contents of this Handbook as it will answer many questions you may have about your employment. If you need more information, please contact Human Resources or your Sterling representative.

IMPORTANT INFORMATION ABOUT THIS HANDBOOK

This handbook (including the addendum, if applicable) has been prepared by Sterling (Company) to provide employees with general information about some of the policies and programs that affect their employment. It is not intended to be a legal statement of benefits, nor a comprehensive explanation of our personnel policies and practices. Its sole function is to give employees a general understanding of how the Company views the employment relationship and approaches personnel issues.

The policies and programs outlined in this handbook are those presently in effect. It is likely that the policies and the employment-related benefits and programs of Sterling will change from time to time. Although we will periodically update this handbook to keep employees informed of changes, we may implement changes immediately, without advance notice. The Executive Team is authorized to revise, delete or otherwise change policies, and to make the final determination in interpreting or applying policies.

It is not possible to anticipate every question that might arise during employment. While this handbook provides information about topics most often of interest to employees, they may, on occasion, have a question or concern that is not addressed in the handbook. If that occurs, they should direct their questions to Human Resources or their Sterling representative.

Nothing in this handbook, or any other written or verbal communication, should be construed as creating a contract for employment or a warranty of benefits for any particular period of time, or does this handbook change the "at will" employment relationship between Sterling Staffing/Engineering and any of its employees. Employees have the right to terminate the employment relationship with Sterling at any time, with or without notice, for any reason. The Company has the same right to terminate the employment relationship at any time, with or without notice, for any reason not prohibited by law. The Company retains sole discretion to add, delete, or change anything contained in this handbook, except employment-at-will.

This employee handbook supersedes and replaces all policies and related materials made available to the employees of Sterling.

EQUAL EMPLOYMENT OPPORTUNITY

Sterling is an equal opportunity employer and believes in equal opportunity for all employees and applicants. Accordingly, all employment decisions are based on the principles of equal opportunity. These decisions include recruitment, selection, promotion, transfer, discipline, compensation, benefits, training and other personnel actions involving persons in all job titles and shall occur without regard to race, creed, color, religion, sex, age, ancestry, national origin, disability, genetic information, military status, sexual orientation, gender identity, marital status, citizenship status, order of protection status, homelessness or any other characteristic protected by law.

No individual will be denied nor receive special employment opportunities based on membership status in any protected category. Every employee of Sterling is expected to support this equal opportunity and non-discrimination commitment by conducting him/herself in a manner that is consistent with the intent and spirit of this policy.

Any individual who believes he or she has experienced or observed behavior contrary to this policy is expected to report that information to Human Resources. All such reports of action contrary to this policy will be taken seriously and investigated promptly. Individuals found to have violated Sterling's Equal Employment Opportunity Policy will be subject to corrective action, up to and including termination of employment. No individual shall be retaliated against for making a good faith report of behavior contrary to this policy.

For employees in California, Minnesota and New Jersey, please reference respective addendum section for additional equal employment opportunity policies.

COMPENSATION

EMPLOYMENT CLASSIFICATIONS

The following employment classifications have been established for overtime and benefit purposes:

Full-time: An employee who is regularly scheduled to work 30 or more hours per week on a regular and consistent basis. Full-time employees are eligible for Company benefits, provided they meet the eligibility requirements of the benefit plans.

Part-time: An employee who is regularly scheduled to work less than 30 hours per week on a regular and consistent basis.

All employees are also defined by either exempt or non-exempt status as defined by the Fair Labor Standards Act (FLSA), as amended and applicable state law.

Non-exempt: Full-time or part-time employees who are paid on an hourly basis and are not exempt from the minimum wage, overtime and timekeeping provisions of the FLSA. Non-exempt employees are eligible to receive overtime pay.

Exempt: Full-time or part-time employees who are paid on a salaried basis and are exempt from the minimum wage, overtime and certain timekeeping provisions of the FLSA. Exempt employees are paid a pre-determined amount of pay regardless of the number of hours they work each week and are not eligible to receive overtime pay.

If you are unsure of your employment classification, please contact Human Resources.

OVERTIME

Business demands may sometimes require you to work extra hours, beyond those for which you are usually scheduled. Whenever possible, Sterling or our Customer will notify you in advance if overtime will be necessary. However, you are expected to be available, and to work the extra time when needed, regardless

of what notice has been given. Absences or tardiness for scheduled overtime will count as any other day of the week toward your total attendance record.

Federal and state laws determine employee eligibility for overtime pay. **If you are nonexempt and anticipate a need to work extra hours, you must receive your supervisor's approval in advance.** Overtime is paid at a rate of time and one-half the normal base pay for all hours worked over 40 in a regular work week. Holidays do not count as hours worked for overtime purposes. Exempt employees are generally not eligible for overtime pay.

For employees in California, Colorado, Massachusetts, Michigan and New York, please reference respective addendum section for additional overtime, working hours and schedule guidelines.

PAYROLL

You will be paid weekly and your pay will be deposited into your personal checking and/or savings account(s). A direct deposit enrollment form is included in your on-boarding material. If a holiday falls on a payday, you will be paid on the preceding workday.

Your check will give you a complete record of your earnings and deductions. Only deductions required by law and those you have authorized in writing will be deducted from your pay. Please log-in to the ADP Portal to view deductions and your electronic pay stub.

Arrangements can be made to receive a debit card if necessary.

For employees in California, Michigan and Minnesota, please reference respective addendum section for additional paycheck and wage policies.

TIME REPORTING

State and federal laws require the Company to keep accurate records of time worked by all non-exempt employees. Our time-keeping system works not only to assure that we comply with the law, but also to

assure that employees are paid in full for all hours worked. The approved time record is used to compute earnings based on hours worked.

All employees are required to maintain a time record using the electronic timecard system provided for that purpose. Your pay and deductions for federal and state withholding taxes and social security taxes are determined from these figures.

Altering, falsifying, tampering with time records, or recording time on another employee's behalf may result in disciplinary action.

In order to process your paycheck in a timely manner, employees must report hours worked **no later than Noon on the Monday following the previous work week**. Electronic Timecards must also be approved by the Customer's designated Manager or "Approver" prior to this deadline.

Employee paychecks will be electronically deposited to your designated checking or savings account on the Friday following the work week being reported. Employees can alternately elect to have funds deposited to a bank card which can be provided by Sterling. Paycheck statements are available on <https://workforcenow.adp.com/workforcenow/login.html> which is the Sterling/ADP Employee portal. Please contact the Accounting Department if you have questions or need assistance.

ELECTRONIC TIMECARD SYSTEM

Sterling employees report hours worked through an Electronic Timecard System.

Log-In Credentials

On the second day of employment, employees are emailed a link to access this system which includes a username and password. If you do not receive your e-mail link, please e-mail **Accounting@sterling-engineering.com**.

Completing Timecards

The process for completing a weekly timecard is as follows:

- At the end of each work week, the employee logs-in, selects the Employee Time Sheet tab and then the appropriate calendar month and week.
- Initially, a blank sheet will be completed verifying “In and Out” times worked prior to and after daily breaks. (If hours worked are generally the same, the timecard can be copied and used for future weeks).
- Hours worked will be totaled automatically by day and for the entire week based on the “In and Out” times entered by the employee.
- In a regular work week, overtime hours will be totaled if the employee has worked in excess of 40 hours and if they are classified as a *non-exempt* employee. **All OT hours must be pre-approved by the Manager.**

Holiday and Paid Time Off

- Employees are automatically paid for Sterling designated Holidays once they have fully met eligibility requirements and need not request or report these hours on the Electronic Time Card.
- Employees must be employed by Sterling the business day prior to and the business day immediately following the Holiday in order to be paid for that Holiday.
- When an Employee elects to take a paid time off, the number of hours and day(s) being taken should be requested under the “In and Out” and “Hours Type” columns.

Completing Expense Reports

Employees are also able to complete expense reports electronically, if they have pre-approved, reimbursable expenses.

- Employees select the “Expenses” tab and list relevant information regarding expenses in a line-item format.
- All expenses reported must be completed on-line with a timesheet and verified both through PDF attached copies before reimbursement payments are issued.

For employees in California and Illinois, please reference respective addendum section for additional business expense policies.

Manager Approvals

Once the Employee Time Card (and Expense Report, if/when appropriate) is complete and has been submitted, the supervising Manager at the Customer location will receive an email prompt that the Employee Time Card is available to be viewed and “Accepted” or “Rejected”.

- The Manager will carefully review individual Employee hours and Approved Timecards are immediately forwarded to Sterling for payroll.
- If a Manager chooses to “Reject” a submitted Timecard, the Manager will note the reasons for the “reject” and the Employee will be asked to correct and re-submit the Time Card.

Reports Tab

Through Sterling’s Electronic Time-card system, both the Employee and Manager have access to all previously submitted and approved Timecards. Reports can be viewed in a Summary format and a more detailed, Timecard “copy” format.

TRAVEL

Employees that travel for Sterling or to meet client needs should default to client travel policies.

For employees in California, please reference respective addendum section for additional travel guidelines.

BENEFITS

STERLING HEALTH INSURANCE

Employees become eligible for Group Health Insurance benefits the first calendar day of the month following (60) days of employment from their date of hire. Employees who have more than one contract assignment during this time receive an accumulating credit toward the eligibility period. Employees must work a minimum of 30 hours per week in order to be eligible.

Eligible employees who complete an assignment and are placed on another assignment immediately, experience no interruption in their Health Insurance benefit. Employees who are not rehired immediately but within twelve (12) months of their end date, become eligible again for insurance the first calendar day of the month following their return to work. Employees who do not return to work within a twelve-month period must satisfy another eligibility period if rehired.

Employees who do not elect to receive the Health Insurance benefit once eligible must sign a “Waiver of Insurance” form.

The Company currently offers the following insurance benefit plans:

- *Health Insurance*
- *Prescription Plan*
- *Dental Insurance*
- *Vision Insurance*
- *Life Insurance*

Detailed benefit information may be found in the plan documents. These documents are the governing documents in the event of any inconsistency between the plan documents and this handbook and can be accessed on the Employee Portal.

If a plan that requires an employee contribution toward the cost of the premium is chosen, this amount will be deducted from your paycheck and is subject to change as we incur changes in the premium rates.

You will receive plan materials describing the insurance plans and periodic updates to the plans. It is your responsibility to read them. If there is any conflict between this handbook and the Plan, the Plan will control. Sterling reserves the right to add, amend or change all benefits, premium amounts and employee contribution amounts at any time. Please contact Human Resources with questions.

Eligibility and Enrollment

Full-time employees are eligible for company benefits if they meet the following qualifications:

- Work 30 hours or more per week
- Satisfy given the eligibility requirements (usually determined by straight time hours worked) which vary by the specific benefit

Under the medical plans, eligible employees may also cover their spouse or dependent children up to age 26. Coverage continues through the end of the month in which your dependent child reaches the age of 26.

A qualified dependent is one who is your legally married spouse, or spouse through a civil union (with license and certificate), a birth child, legally adopted child or stepchild, or child where you have legal guardianship status.

Making Benefit Changes during the Year

Benefit decisions you make at open enrollment or as a new hire will be in effect until the last day of the calendar year unless you have an IRS qualifying change in your family or employment status. A qualifying event can be defined as marriage, birth/adoption, divorce/legal separation, change in dependent eligibility, spouse gain/loss of employment or court action.

Please contact Human Resources for more information. All change requests must be received within 30 days of the qualifying event or the change may not be made until the next open enrollment period.

CONTINUATION OF MEDICAL COVERAGE (COBRA)

In the event of a death, termination of employment (including retirement), certain reductions of hours or entitlement to Medicare benefits, you and your dependents may be eligible to continue medical coverage

through Sterling at your own expense. The term medical coverage may include health insurance, dental insurance and a flexible spending account.

This benefit is provided in accordance with the requirements of the federal law on continuation of health insurance (commonly known as COBRA). Employees who are eligible for insurance continuation will be provided specific information about availability and cost and should see Human Resources for more information.

This benefit is subject to change as necessary to comply with federal or state law. Failure to make timely payment of your premiums will result in the forfeiture of continuation benefits.

HOLIDAYS

Sterling provides full-time benefit eligible employees with paid time off for the following holidays, after the initial 160 straight time eligibility period.

- New Year's Day
- Memorial Day
- Independence Day
- Labor Day
- Thanksgiving
- Christmas Day

Please consult with Human Resources or your Sterling representative for a current holiday schedule. If a scheduled paid holiday occurs during your paid time off, you will receive pay for the holiday in lieu of being charged for paid time off. If a holiday occurs while you are on an unpaid leave of absence, you will not be paid for the holiday.

If you are full-time and nonexempt and required to work on a holiday, you will be paid your regular hourly rate for all hours worked on the holiday, plus eight hours of holiday pay. All work on holidays must be pre-approved by your supervisor.

The Company is mindful there may be additional religious observances, not including the holidays already mentioned. Managers will give such occurrences due respect and consideration as paid time off or time without pay if requested, as scheduling permits.

PAID TIME OFF

Sterling appreciates how hard employees work and recognizes the importance of providing time for rest and relaxation. Time off under this policy includes elective time off, such as for a paid time off, and incidental time due to sickness or for personal affairs.

All employees will accrue paid time off on a pro-rata basis of 1 hour for every 40 hours worked up to 40 hours of paid time off per year.

After an employee successfully completes two (2) years of service, an employee will accrue paid time off on a pro-rata basis of 1 hour every 26 hours up to 80 hours of paid time off per year.

Any accrued unused time can be carried over to the following year with the maximum accrual balance of 80 total hours. Once a balance of 80 hours is reached, additional paid time off will not be accrued until the paid time off balance is brought below 80 hours.

- Employees will begin to accrue paid time off on the first day of employment.
- Paid time off will be accrued at a rate based on where the work is performed.
- Overtime hours worked will not be counted towards paid time off accruals.

Paid time off should be taken during the year received, unless otherwise required by law. Accrued, unused paid time off can be carried over to the following calendar year only if approved by Human Resources.

Employees can check their accrued PTO balance through the electronic time system or the Employee Portal.

If employees wish to use three (3) or more full days of paid time off consecutively, they must submit a request to their manager at least two (2) weeks in advance of the requested time off. Similar notice should be provided for planned time off of shorter duration. Every effort will be made to grant requests, consistent

with operating schedules. However, if too many people request the same period of time off, Sterling reserves the right to choose who may take time off during that period. Individuals with the longest length of service generally will be given preference.

If employees will be out of work due to illness or due any other emergency for which notice could not be provided, they must call in and notify their supervisor as early as possible, but at least by the start of their workday. If they call in sick for three (3) or more consecutive days, they may be required to provide their supervisor with a doctor's note on the day they return to work.

For employees working in the City of Chicago, please reference respective addendum section.

401(k) PLAN

Sterling's 401(k) savings plan is a voluntary, before-tax savings plan. Individual contributions are made through payroll deductions and are subject to IRS limitations. Employee contributions apply to direct pay, consisting of base and overtime earnings, incentives, commissions and bonuses. The Company may provide a match up to a maximum percentage of the employee's contribution.

You are eligible to participate in the 401(k) savings plan the first of the next month following the start of your employment.

An employee can readily access 401(k) account information via an automated telephone system or on the Internet, increase or decrease their individual contributions and change their investment options at virtually any time.

A Summary Plan Description will be provided to each participant. This Plan Description will outline specific benefits, investment options, illustrations of savings benefits and withdrawal options. Please see the Employee Portal on the Sterling website or contact Human Resources for more information.

Employees classified as payroll employees are not eligible for benefits under this policy.

ESOP

The Sterling Employee Stock Ownership Plan (ESOP) is a company-funded benefit that provides additional compensation to qualifying employees through stock ownership. As part of an employee – owned company, everyone has a vested interest in the current and future success of the organization.

Our collective ability to function as ambassadors of Sterling and provide effective and high-quality support to clients daily is what differentiates us and leads to additional business opportunities and growth. The ESOP creates a new chapter in our history – one in which we can continue to build on our legacy and reputation as a leading technical staffing and engineering project management provider, while expanding and diversifying the services and solutions we offer to our valued customers.

To become eligible, Employees must complete 12 months of service and work at least 1,000 hours in that 12-month period. Once eligible, ESOP annual entry dates are January 1 or July 1 and Employees begin to receive annual stock allocations based on their earnings.

There is a 3-year vesting period for the ESOP. There are also provisions for breaks in service which allow you to pick up where you left off should your employment end and you return to Sterling at a future date.

Please see the ADP Employee Portal or contact Human Resources for more information on Sterling's ESOP benefit.

Employees classified as payroll employees are not eligible for benefits under this policy.

PROFESSIONAL DEVELOPMENT PROGRAM

It is the policy of Sterling to provide professional development benefits for regular, full time staff and contractor employees.

Eligibility

Employees become eligible for the Professional Development benefit following the completion of one calendar year of employment and a minimum of 2,000 regular hours (does not include overtime hours). Additionally, the employee must be classified as a regular, full-time employee.

Process

Eligible employees must complete a “Professional Development Request” Form which can be obtained by contacting Human Resources. The Request Form should be submitted to the Human Resources Manager for approval prior to the start of a course or training.

Requests will be reviewed and approved strictly based on applicability to current or future work responsibilities with Sterling.

Terms & Conditions

1. Sterling will reimburse eligible employees 50% of the cost of individual courses or training offering. Total annual reimbursements cannot exceed \$1,000 per year for individual employees.
2. Reimbursements are paid after the successful completion of an approved course. (Employees must pre-pay for approved course and receive either an “A” or “B” grade or “Pass” in Pass/Fail course to receive reimbursement). Proof of successful completion must also be submitted to and approved by the Human Resources Manager before reimbursement is paid to the employee.
3. Employees who do not submit a Request Form and receive approval from the Human Resources Manager prior to starting the course will not be eligible for reimbursement.
4. Employees will also be required to sign a “Letter of commitment” to receive tuition reimbursement.
 - a. If an employee chooses to terminate their employment with 6 months of reimbursement, 100% of the reimbursement must be paid back to Sterling.
 - b. If an employee chooses to terminate their employment after 6 months but within 1 year of reimbursement, 50% of the reimbursement must be paid back to Sterling. (Sterling reserves the right to reduce this amount from the employee’s final paycheck)
5. Employees whose employment terminates of their own volition prior to the completion of a course will not be eligible for reimbursement.

For employees in California, please reference respective addendum section for additional professional development policies.

SOCIAL SECURITY

Social Security is a federally sponsored program that pays benefits to employees who have made regular contributions to the program during their working years. In addition to the amount you contribute to Social Security (FICA) automatically through your paycheck, the Company contributes an equal amount each pay period.

Questions about the Social Security tax deducted from your payroll check should be directed to Human Resources. A full description of Social Security benefits is available through the Social Security Administration.

UNEMPLOYMENT INSURANCE

The purpose of unemployment insurance is to replace part of your income in certain circumstances if you are laid off or terminated. The Company pays the full cost of unemployment insurance, but it does not decide who is eligible for benefit payments or the amount of the payments. This eligibility and payment amount are decided by state law.

WORKER'S COMPENSATION

Worker's compensation insurance is provided by the Company if an employee becomes injured or ill due to work-related causes. This insurance is paid for by the Company. If you are unable to work for these reasons, you may be covered. It is extremely important for you to immediately report any injury or illness that may be work-related and complete the required documentation. Failure to do so may result in loss of coverage.

For employees in California, please reference respective addendum section for additional worker's compensation policies.

SHORT-TERM DISABILITY

After one (1) year of continuous service, Sterling provides full-time employees with coverage under a Short-Term Disability plan in the event you are unable to work due to personal illness or injury, provided eligibility requirements are met. The plan will pay 50% of the base weekly wages with a maximum of \$400/week up to a maximum of 26 weeks. This plan does not apply if you are unable to work due to a work-related injury or illness. This benefit may run concurrent with family and medical leave or other leave laws, where applicable, and consistent with current state/federal law.

For employees in California, New Jersey and New York, please reference respective addendum section for additional short-term disability policies.

ATTENDANCE & TIME AWAY FROM WORK

ATTENDANCE

The success and efficient operation of our Company depends, to a large extent, on every employee being at work and contributing each day. While there may be legitimate reasons for being absent or tardy, unnecessary and unplanned absences should be minimal and not disrupt Company operations.

You are required to call in and report absences or tardiness to your Manager and Sterling representative before the start of the workday unless, of course, there is an extreme emergency. In those situations, notify your manager as soon as possible.

When you return to work after an absence due to illness or injury of three consecutive workdays or more, you will need a doctor's clearance indicating that you may return to work as well as any potential physical limitations, if any. The Company also reserves the right to request a doctor's statement or other verification document at any time, at its discretion.

If you believe your absence may be covered under the Family and Medical Leave Act (FMLA), it is your responsibility to notify your Manager and/or the Human Resources Department prior to returning to work of your intent to take FMLA Leave.

Unreported absences indicate a lack of respect for your job and the Company. If you are absent for three (3) consecutive days without notifying the Company, we will consider you as having voluntarily resigned from the Company.

LEAVES OF ABSENCE

Sterling realizes that there may be occasion when you need time away from work for personal or medical reasons. All requests should be made in writing and whenever possible, at least 30 days prior to the leave. This will allow the Company the necessary time to approve and find someone to perform the work during your absence. (See each specific leave policy for time permitted.) The Company may also require substantiation for the leave to verify the nature and length of each leave request.

You must contact Human Resources or your Sterling representative prior to the end of your leave to confirm your return to work date. A fitness for duty report from your physician is required for medical leaves. Absent extenuating circumstances, failure to return to work on the day after the expiration of leave may be considered a voluntary resignation. A request for an extension of a leave of absence must be submitted to the Company in writing prior to the expiration of the original leave of absence; however, extensions cannot be guaranteed.

Continuation of insurance benefits may be available through COBRA or applicable state laws. See Human Resources for more information.

Every effort will be made to re-employ you in your former position upon your return from an authorized leave; however, except where mandated by law, such placements cannot be guaranteed.

- ***Bereavement Leave:*** Full-time employees requiring time off for the death or funeral of a member of their immediate family are eligible for a bereavement leave of absence, up to 3 days. Bereavement leave is unpaid. For purposes of this policy, immediate family includes: the employee's spouse, domestic partner, sibling, stepsibling, parent, stepparent, child, stepchild, mother-in-law, father-in-law, sister-in-law, brother-in-law, daughter-in-law, son-in-law, grandparents and grandchildren.
- ***Jury Leave and Court Appearances:*** Sterling encourages all employees to be civic-minded. If you serve on a jury or testify as a subpoenaed witness in a judicial proceeding, you will be granted an unpaid leave of absence.

Employees are allowed time off from work for these purposes provided you present the jury or court appearance summons to Human Resources in advance. You must return to work on any workday when court duty dismisses prior to the end of the workday. Employees may use their available Paid Time Off benefit for these absences.

- ***Military Leave for Duty or Training:*** An unpaid military leave of absence will be granted if you enlist, are inducted or are recalled to active duty in the Armed Forces of the United States, for a period of up to five years. If you perform in and return from military service in the Armed Forces, the Military Reserves or the National Guard, you will retain your rights with respect to reinstatement

and length of service, as required under the Uniformed Services Employment and Reemployment Rights Act (USERRA). You will also be eligible to continue health and dental benefits under certain conditions.

Appropriate unpaid leave may be provided for reservists and members of the National Guard to participate in annual encampment or active duty training, emergency service or specialized training if all legal requirements are met.

- **Personal Leave:** Under certain circumstances, a leave may be granted for a personal reason provided it does not create an undue business hardship. Personal leave may not be taken to work for another employer or for self-employment. This leave time will be considered on a case-by-case basis. A personal leave of absence is typically limited to 30 days.

All personal leaves will be unpaid. A written request for leave must be approved by your manager and Human Resources. This request must be submitted no later than 30 days prior to the commencement of leave, or in an emergency, as soon as the need for leave is known. Approval of this leave is at the sole discretion of the Company.

The Company cannot guarantee your job upon return from a personal leave; however, if your position must be filled during your leave, you may be considered for the next available opening you are qualified to perform, provided your prior work performance has been satisfactory.

For employees in Arizona, California, Florida, Illinois, Iowa, Kentucky, Maryland, Massachusetts, Michigan, Minnesota, Nevada, New Jersey, New York, Pennsylvania, Tennessee and Wisconsin, please reference respective addendum section for additional leave policies.

FMLA – FAMILY & MEDICAL LEAVE POLICY (FEDERAL)

It is the policy of Sterling to comply with the requirements of the Federal Family and Medical Leave Acts (FMLA). Generally, an eligible employee will be granted up to 12 weeks of FMLA leave during a 12-month period on a calendar year basis. The leave may be unpaid, depending on the reason for the leave and the benefits to which the employee may be eligible. This policy will be administered in compliance with

the National Defense Authorization Acts of 2008 and Fiscal Year 2010 as they amend the Family and Medical Leave Act of 1993, and the regulations implementing the Family and Medical Leave Act of 1993 effective March 8, 2013.

State and federal laws differ in several areas, and the company will comply with both. When an absence qualifies as family leave under either state or federal law or both, the following rules apply:

- The employee is deemed to be exhausting his/her entitlement under both laws concurrently; and
- The law most generous to the employee will apply.

The taking of leave under this policy will not be used against an employee in any employment decision, including the determination of promotions, discipline, compensation, etc.

For employees in California, Illinois, Indiana, Maryland, Michigan, Minnesota, Nebraska, New Jersey, New York and Wisconsin, please reference respective addendum section for additional family medical and military leave policies.

Eligibility

To be eligible for leave under this policy, an employee must have been employed by the company for at least 12 months. In addition, in the 12 months immediately preceding the commencement of the leave, the employee must have worked at least 1,250 hours (employed for at least 1,250 hours for Illinois Family Military Leave Act) to qualify under federal law. (Note: Airline personnel are subject to different hours of service eligibility requirements). These qualification requirements are not applicable under VESSA.

Amount of Leave Available

As stated above, an eligible employee is generally eligible for up to a total of 12 weeks of protected leave within a 12-month period on a rolling-forward basis for any combination of reasons.

Under Illinois Family Military Leave Act, employers with 15 to 50 employees must provide up to 15 days of unpaid leave. Employers with over 50 employees must provide up to 30 days unpaid leave. The leave does not need to be taken all at once but must be taken during the time period prior to deployment.

Types of Leave Covered

A. Birth or Placement for Adoption or Foster Care

Family leave will be available to eligible male and female employees for the birth of a child or for placement of a child with the employee for purposes of adoption or foster care. Such leave must generally be completed within 12 months of the birth or placement.

B. Serious Health Condition of Employee

An eligible employee who experiences a serious health condition as defined by the state and/or federal law may take medical leave under this policy. A serious health condition will generally occur when the employee:

- Receives inpatient care in a hospital, hospice or nursing home;
- Suffers a period of incapacity of more than three executive full calendar days accompanied by continuing outpatient treatment/care by a health-care provider;
- Is pregnant, including severe morning sickness;
- Has a history of a chronic condition which may cause episodes of incapacity; or
- Has a permanent or long-term condition which requires continuing treatment by a health care provider.

Medical leave may be taken all at once or, when medically necessary, in smaller increments. The need for leave must be documented by the employee's treating health-care provider through the medical certification process.

An employee may be paid for all or part of a medical leave to the extent s/he is eligible for benefits such as short-term disability.

A fitness-for-duty statement will be required for an employee to return from a medical leave. Failure to provide the statement will result in a delay in the return to work.

C. Serious Health Condition of Immediate Family Member

An eligible employee may take family leave under this policy in order to care for a son, daughter, spouse or parent with a serious health condition (see above section for general definition). This leave may be taken all at once or, when medically necessary, in smaller increments. It will be necessary for the family member's treating health-care provider to document the need for leave through the medical certification process.

D. Qualifying Exigency for Military Family Leave

An eligible employee may take family leave under this policy while the employee's spouse, son, daughter, or parent (the "military member") is on covered active duty or call to active duty status for any qualifying exigency under federal law. This leave may be taken all at once or, in smaller increments. It will be necessary to submit a complete and enough certification for FMLA leave due to a qualifying exigency. Leave taken for this purpose will also run concurrently with leave available under the Illinois Family Military Leave Act as allowed. Qualifying exigency leave may be taken by family members of **regular armed service members**, as well as family members of Reserve and National Guard members, provided the service member is **deployed to a foreign country**.

E. Military Caregiver Leave

An eligible employee may take up to an additional 14 weeks (not to exceed 26 weeks total) of family leave in a single 12-month period under this policy to care for a current member of the Armed Forces, including a member of the National Guard or Reserves, or, the National Guard or Reserves who is on the temporary disability retired list, who has a serious injury or illness incurred in the line of duty on active duty (or existed before the beginning of the member's active duty and was aggravated by active duty) for which he or she is undergoing medical treatment, recuperation, or therapy; or otherwise in outpatient status; or otherwise on the temporary disability retired list. A covered service member may also be a veteran who is undergoing medical treatment, recuperation, or therapy, for a serious injury or illness and who was a member of the Armed Forces (including a member of the National Guard or Reserves) at any time during the period of 5 years preceding the date on which the veteran undergoes that medical treatment, recuperation, or therapy. This entitlement will be applied on a per-covered-service member, per-injury basis. The covered service member must be the eligible employee's spouse, son, daughter, or parent, or next of kin. It will be necessary for the covered service member's treating health-care provider, as defined by law, to document the need for leave through the medical certification process.

Notifying the Company of The Need For Family Or Medical Leave

Generally, an application for leave must be completed for all leave taken under this policy. When the need for leave is foreseeable, the employee should provide notice at least 30 days in advance. When this is not possible, notice should be provided as soon as the employee learns of the need for leave. In cases of emergency, verbal notice should be given as soon as possible (by the employee's representative if the employee is incapacitated), and the application form should be completed as soon as practicable. Failure to provide adequate notice may, in the case of foreseeable leave, result in a delay of the leave. Leave application forms are provided by the Human Resource Department.

Calling in "sick" does not qualify as FMLA leave. An employee must provide enough information regarding the reason for an absence for the company to know that protection may exist under this policy. Failure to provide this information as requested will result in the employee's forfeiting all rights under the policy. This means the absence may then be counted against the employee for purposes of discipline for attendance, etc.

Medical Certification of a Serious Health Condition

Generally, the company will require medical certification to verify that an employee or family member's illness meets the definition of serious health condition and to determine the nature and duration of the leave. In the case of a family illness, the provider must also verify that the employee is needed to care for the family member.

Periodic recertification to verify that a condition is ongoing may be required as provided by the law. The appropriate form should be obtained from the Human Resource Department and should generally be returned within 15 days. Failure to provide this certification may result in delay or denial of the leave.

Additional Certifications

If the company has reason to question the validity of a medical certification, an employee may be required to provide a second certification from a health-care provider selected and paid for by the company. If the second opinion differs from the first, a third opinion may be required. The health-care provider for the third opinion must be mutually chosen by the employee and the company and paid by the company. The third opinion, by law, is binding on all parties.

Use of Paid and Unpaid Leave

Federal FMLA, all mandate that an employer provide unpaid leave to eligible employees. However, an employee or employer may elect to substitute a paid benefit for which the employee is eligible for the employee to receive pay during the leave. In some cases, the company may require that benefits, such as paid time off, be used before the employee may take unpaid time. When paid benefits are substituted for the otherwise unpaid time, the employee is using the benefits concurrently with FMLA, and those benefits will not be available to the employee later. When paid benefits are substituted, the employee may be required to satisfy any procedural requirements of the organization's paid leave policy (for example, advance notice to use paid leave, use of paid leave in established increments, etc.).

In cases where substitution of a paid benefit is not possible, the employee will receive reduced compensation consistent with the number of hours the person works.

Intermittent or Reduced Schedule Leave

Intermittent and/or reduced schedule leave will be permitted when it is medically necessary and, (in some cases, for birth or placement for adoption). In all cases, the total amount of leave taken in a 12-month (indicate the designated 12-month period) period should not exceed the 12 weeks defined earlier in this policy.

Intermittent and reduced schedule leave must be scheduled with minimal disruption to an employee's job. To the extent an employee has control, medical appointments and treatments related to a serious health condition should be scheduled outside of working hours or at such times that allow for a minimal amount of time away from work.

The company may, in some cases, transfer an employee to an alternative position, with equivalent pay and benefits, in order to better accommodate the need for intermittent or reduced schedule leave.

Benefit Continuation During Leave

Employees may elect to continue group health insurance while on leave but must continue to pay their portion of the premium. (Other employment benefits, such as group life insurance, etc., will also be continued) during the leave, if the employee continues to pay any required contribution. Payment arrangements will be discussed with individuals upon their request for leave.

Rights Upon Return from Leave

An employee who takes leave under this policy will be reinstated to the same job or an equivalent position upon completion of the leave. If an individual has exhausted all leave under this policy and is still unable to return to work, the situation will be reviewed on a case-by-case basis to determine what rights and protections might exist under other company policies.

The law provides that an employee has no greater rights upon a return from leave than the individual would have had if s/he had continued to work. Therefore, an employee may be affected by a layoff or other job change if the action would have occurred had the employee remained actively at work. In such cases, the official date of the layoff will mean the end of FMLA leave for the employee. If the employee is recalled, if FMLA leave is required, it may then continue.

WORKER'S COMPENSATION ABSENCES

When an employee is absent due to a work-related illness or injury which meets the definition of a serious health condition, the absence will be counted against the employee's allotment of FMLA leave under federal law. In other words, the employee is using Federal FMLA leave concurrently with the worker's compensation absence.

For employees in California, please reference respective addendum section for additional worker's compensation policies.

EARLY RETURN FROM LEAVE

An employee who wishes to return to work earlier than originally anticipated should provide at least two (2) days-notice of such request. A fitness-for-duty certification may be required.

TIME AT WORK

BUSINESS ETHICS

The successful business operation and reputation of Sterling is built on the principles of fair dealings and ethical conduct of our employees. Our reputation for integrity and excellence requires all employees, directors, officers, managers and supervisors to comply with all applicable laws and to conduct business with integrity, honesty and impartiality.

No Code of Ethics can cover all circumstances or anticipate every situation. The following should serve as a guide. Should a situation arise, you should apply the overall philosophy of the code and review the circumstances with your Manager or Human Resources if there are questions. Sterling reserves discretion in the interpretation, application and enforcement of this code.

The use of good judgment based on high ethical principles will guide you with respect to lines of acceptable conduct. Compliance in this area is the responsibility of every employee. You should discuss any situations that arise which do not meet this Code of Ethics with your Manager or Human Resources. Failure to meet or comply with this Code of Ethics will lead to corrective action.

Employees who report actual or suspected violations of this policy involving others will not be subjected to retaliation or reprisals as a result of their report.

COMMUNICATIONS SYSTEMS

Sterling provides e-mail, computers/laptops, Internet, fax machines, telephone and cellular phones, voice mail systems on as needed basis, and may provide other new technologies in the future. These electronic systems are Company property and are in place to enable employees to do their jobs efficiently and productively.

You may engage in occasional personal use of electronic communication systems, including social media use (i.e., blogging, Facebook, LinkedIn, instant messaging, etc.), provided it is done during non-working time, such as breaks and lunch periods and in compliance with the Company's Communication Systems

Policy. You must use caution and discretion so that personal correspondence does not appear to be an official communication from the Company.

The systems provided by Sterling are not totally private and confidential. Even though many of them are password-protected, it is still possible for others to access the systems used. It is important to note that the Company reserves the right to intercept, monitor, copy, review, access and download any communications or files that are created or maintained on these systems for purposes of security, compliance with Company policy and for any other business reason as provided by law. You should have no expectation of privacy when using any of these systems.

The Company also reserves the right to monitor, search, review and access all business-related communications through an employee's own technology devices, accounts and resources, or through a third-party service provider, as needed for compliance with policies.

Downloading or uploading information from the Internet (other than by authorized personnel for legitimate business reasons) is restricted. You must seek approval from your Manager before downloading or uploading outside information to your computer. Downloading programs, software, graphics or pictures of any kind is prohibited as they may carry computer viruses or may violate the Company's license agreement.

Company electronic communication systems must not be used to solicit others for non-business matters, including, but not limited to commercial ventures, religious or political causes, or outside organizations.

In addition, these systems must not be used in ways that may be disruptive, offensive or harmful to others or in ways that conflict with any of the Company's policies, including Equal Employment, Harassment, Confidentiality and Security policies. Violation of these policies will lead to corrective action. E-mail must not be used to send jokes, graphics, pictures or other comments that may be discriminatory, harassing or offensive to others, or to send material that defames an individual, company, or business, etc.

Inappropriate use of any Company communication system will be grounds for corrective action, up to and including termination of employment.

COMPANY PROPERTY

Employees may be provided with various Company property and/or equipment. This may include Company vehicles, computers, cellular telephones, keys, credit cards, safety equipment, etc. You are responsible for keeping the property in good working order and available for business use at all times. If any such property appears to be damaged, defective or in need of repair, you must promptly report this to your Manager. Property lost or damaged by an employee must be replaced by that employee. Prior management approval is required before using any equipment or materials for personal use. Worn or defective property will be replaced by the Company.

Upon termination of employment, you will be required to account for and surrender all Company property and equipment you have been provided. Failure to do so may result in the Company taking legal action to obtain the return of its property.

For employees in Maryland, please reference respective addendum section for additional company property policies.

INFORMATION SYSTEMS POLICY

Acceptable Use

This Acceptable Usage Policy covers the security and use of all Company (Staffing & Engineering) information and IT equipment. It also includes the use of email, internet, voice and mobile equipment. This policy applies to all Company Engineering's employees, contractors and agents.

This policy applies to all information, in whatever form, relating to Company business activities and to all information handled by Company relating to other organizations with whom it deals.

Computer Access Control – Individual's Responsibility

Access to the Company IT systems is controlled by assigning User IDs, passwords and/or tokens. All User IDs and passwords are to be uniquely assigned to named individuals and consequently, individuals are accountable for all actions on the Company IT systems.

Individuals must not:

- Allow anyone else to use their user ID/token and password on any Company IT system.
- Leave their user accounts logged in at an unattended and unlocked computer.
- Use someone else's user ID and password to access Company IT systems.
- Leave their password unprotected (for example writing it down and placed in a visible area).
- Perform any unauthorized changes to Company IT systems or information.
- Attempt to access data that they are not authorized to use or access.
- Exceed the limits of their authorization or specific business need to interrogate the system or data.
- Connect any non- Company authorized device to the Company network or IT systems.
- Store Company data on any non-authorized Company equipment.
- Give or transfer Company data or software to any person or organization outside Company without proper authorizations.

INTERNET AND EMAIL CONDITIONS OF USE

Use of Company internet and email is intended for business use. Personal use is permitted where such use does not affect the individual's business performance, is not detrimental to Company in any way, is not in breach of any term and condition of employment and does not place the individual or Company in breach of statutory or other legal obligations. All individuals are accountable for their actions on the internet and email systems.

Individuals must not:

- Use the internet or email for the purposes of harassment or abuse.
- Use profanity, obscenities, or derogatory remarks in communications.
- Access, download, send or receive any data (including images), which Company considers offensive in any way, including sexually explicit, discriminatory or defamatory material.
- Use the internet or email to make personal gains or conduct a personal business.
- Use the internet or email to gamble.
- Use the email systems in a way that could affect its reliability or effectiveness, for example distributing chain letters or spam.

- Place any information on the Internet that relates to Company, alter any information about it, or express any opinion about Company unless they are specifically authorized to do this.
- Send unprotected sensitive or confidential information externally.
- Forward Company mail to personal email accounts (for example a personal GMAIL account).
- Make official commitments through the internet or email on behalf of Company unless authorized to do so.
- Download copyrighted material such as music media (MP3) files, film and video files without appropriate approval.
- In any way infringe any copyright, database rights, trademarks or other intellectual property.
- Download any software from the internet without prior approval of the IT Department.

WORKING OFF-SITE

It is accepted that laptops and mobile devices will be taken off-site. The following controls must be applied:

- Working away from the office must be in line with Company remote working policy.
- Equipment and media taken off-site must not be left unattended in public places and not left in sight in a car.
- Laptops must be carried as hand luggage when traveling.
- Information should be protected against loss or compromise when working remotely (for example at home or in public places).
- Considerable attention should be taken with the use of mobile devices such as laptops, smartphones and tablets. They must be protected at least by a password or a PIN.

TELEPHONY (VOICE) EQUIPMENT CONDITIONS OF USE

Use of Company voice equipment is intended for business use. All non-urgent personal communications should be made at an individual's own expense using alternative means of communications. Use of Company cell phones must be in line with the Cell Phone Policy that was presented at the time the Company cell phone was issued.

Individuals must not:

- Use Company voice equipment for conducting private business.

- Make hoax or threatening calls to internal or external destinations.
- Accept reverse charge calls from domestic or International operators, unless it is for business use.

MONITORING AND FILTERING

All data that is created and stored on Company computers and mobile devices are the property of Company and there is no provision for individual data privacy, however wherever possible Company will avoid opening personal emails. IT system logging will take place where appropriate, and investigations will be commenced where reasonable suspicion exists of a breach of this or any other policy. Company has the right to monitor activity on its systems, including internet and email use, to ensure systems security and effective operation, and to protect against misuse. Any monitoring will be carried out in accordance with audited, controlled internal processes.

It is your responsibility to report suspected breaches of the security policy without delay to your Manager, the IT department, or Human Resources.

All breaches of information security policies will be investigated. Where investigations reveal misconduct, disciplinary action may follow in line with Company disciplinary procedures, up to and including termination of employment.

CONFIDENTIALITY

Sterling employees may have access to confidential information including business information such as customer, employee and candidate lists, pricing data, financial data and marketing concepts, processes and plans, in addition to technical information such as methods, processes, techniques, computer programs and research projects and any other information not available to the public.

While employed, or thereafter, you may not copy, discuss or distribute any confidential program, material, or other information which comes into your possession as a result of employment with Sterling, other than for an approved use. Also, confidential business information must not be disclosed via e-mail, the Internet or any social media, such as blogging, Facebook, instant messaging, etc. If in doubt as to whether any program, material or other information is confidential, you must ask your Manager prior to such disclosure.

In any communication with competitors, you must avoid conversations regarding pricing, marketing and sales strategies, goals and territories, inventories, product development, and any proprietary or confidential information. Exchange of customer information should be limited to what is necessary to meet customer needs.

You may be asked to sign and comply with the provisions of a trade secrets or confidentiality agreement with the Company. Whether or not a trade secrets or confidentiality agreement is signed, all information related to Sterling not available to the public, its products or customers must be treated as confidential. It is a condition of employment that such information be maintained on a confidential basis and used prudently to serve the best interest of Sterling. You must not work for a competitor while also employed at Sterling.

Upon termination of employment, you will be required to return all materials and information, and any copies of such materials, to your Manager.

Unauthorized release or misuse of Company information will be investigated thoroughly. Any employee found to have violated this policy will face corrective action.

CORRECTIVE ACTION

It is our hope that all employees will perform their jobs satisfactorily and comply with Company expectations. The management of Sterling would like to work with employees in communicating and attempting to correct work-related problems. However, if you do not satisfactorily perform your job, or are found in violation of Company guidelines, policies, or core values, the Company may implement corrective action.

Corrective action may take several forms, including, but not limited to, verbal warnings, written warnings, suspension, or termination. The Company reserves the right in its sole discretion to omit any or all these steps or add to or modify steps in any situation. Sterling will take whatever corrective action it determines is appropriate in response to the circumstances of any given situation.

Nothing in this section or in the Company's disciplinary policies or practices changes an employee's right to terminate his/her employment with Sterling at any time, with or without notice, for any or no reason, nor does it modify the Company's right to terminate any employee's employment at any time, with or without notice, for any reason not prohibited by law.

DISABILITY ACCOMMODATION

Our Company is committed to providing equal employment opportunities to all employees, including qualified individuals with disabilities. This may include providing reasonable accommodation, where appropriate. This reasonable accommodation may include common conditions related to pregnancy or childbirth. A poster describing your rights under the law is in the Sterling office break room.

In general, it is your responsibility to notify Human Resources if you have a need for an accommodation. Upon doing so, the Company may ask you for your input, the type of accommodation you believe may be necessary, or the functional limitations caused by the disability. Also, when appropriate, the Company may need your written permission to obtain additional information from your physician or other medical or rehabilitation professionals. Any information obtained is kept in a confidential employee file.

All requests for reasonable accommodations will be considered consistent with the business needs of the Company in accordance with state and federal law. All questions should be discussed with Human Resources.

For employees in California, Colorado, Delaware, Illinois, Kentucky, Maryland, Massachusetts, Minnesota, Nebraska, Nevada, New Jersey, New York, and Utah, please reference respective addendum section for additional disability policies including those related to lactation breaks and pregnancy accommodations.

DRUGS & ALCOHOL

Sterling is firmly committed to providing a productive, safe and healthy work environment. The use of illegal drugs, abuse and misuse of alcohol, prescription drugs and lawful products (such as cannabis),

adversely affects those objectives by increasing absenteeism, lowering productivity and quality and most of all, jeopardizing the health and safety of those involved and the safety of others.

The Company reserves the right to interpret, revise or discontinue any provision of this policy. However, the Company will not discriminate against any employee or applicant for employment because of race, color, religion, sex, sexual orientation, gender identity, marital status, order of protection status, national origin or ancestry, citizenship status, age, disability, military status or an unfavorable discharge from military service, or any other basis protected by applicable local, state or federal law.

Statement of Policy

The Company recognizes that our employees' health and safety are of the utmost importance. Drug use and alcohol misuse may pose a serious threat to employee health and safety. It also jeopardizes the health and safety of non-employees, such as those working for our customers, vendors and suppliers. It is the policy of the Company to prevent any controlled substance use or abuse from having an adverse effect on our employees. The work environment is safer and more productive without the presence of drugs or alcohol in the body while on Company time or on Company property. Furthermore, all employees have a right to work in a drug-free environment and to work with individuals free from the effects of drugs or alcohol. Employees who use or abuse controlled substances are a danger to themselves, their co-workers, the public and the Company.

For purposes of this policy, "Company property" includes, but is not limited to, any building, real property, and parking area under the Company's control, or any location where an employee is performing his or her job duties, as well as vehicles, whether leased, rented, or owned.

The federal government, many States and numerous organizations have recognized the adverse impact of drug and alcohol abuse in the workplace. All employees are advised that remaining drug and alcohol free when performing assigned duties is a condition of continued employment with the Company.

The Company will conduct post-offer testing of all applicants. All employees may be subject to testing where circumstances establish that reasonable cause/suspicion of prohibited substance use exists, following "on-the-job" accidents or injuries as described in more detail below and, if required by law, customer contract or due to a safety sensitive job function, on a random basis. Employees returning to duty following

any positive test must test negative before returning and must submit to follow-up tests for as long as two (2) years.

Any employee who tests positive for any substance prohibited by this policy will be subject to disciplinary action up to and including immediate termination. Any employee who refuses to comply with a request to submit to testing or who fails to cooperate in the test process will be terminated. These procedures are designed not only to detect violations of this policy but also to ensure fairness to each employee. Every effort will be made to maintain the dignity of employees or applicants involved. Disciplinary action, up to and including immediate termination from employment will, however, be taken as necessary.

The Company prohibits the manufacture, distribution, dispensation, possession, concealment, use, sale or transfer of alcohol, controlled substances or illegal drugs, and the possession and/or purchase of drug related paraphernalia on Company property, working on Company time or while operating Company equipment (including vehicles).

All employees have an obligation to comply and support this policy. Any employee who is aware of a violation of the policy should report it to Human Resources, his/her immediate supervisor or any manager. Every effort will be made to preserve the confidentiality of the source of a report. All reports will be taken seriously. Persons submitting false reports are subject to discipline up to and including immediate termination.

Prescribed Medication

An employee taking over - the - counter or prescribed medication must be aware of any effect the medication may have on the performance of their duties. The employee must inform his/her physician of his/her job duties in order to make certain that the drug does not affect or interfere with the employee's safe and effective performance of his/her job duties. An employee must promptly report to Human Resources the use of any medication which has or may have any adverse effect on his or her ability to effectively and safely perform his or her essential job duties. All prescription and non-prescription drugs must be kept in their original packaging or container. An employee who fails to adhere to these provisions may be subject to disciplinary action, up to and including immediate discharge. Such information will be kept confidential and such employees will be reasonably accommodated to the extent required by law. Of course, consuming or possessing a prescribed drug where the prescription has expired is not lawful. Also, consuming or

possessing a prescribed drug that is not one's own prescription, or abusing one's own prescription, is not lawful.

Cannabis (Marijuana)

The Company recognizes that certain states and municipalities allow the use of cannabis and/or medicinal cannabis. Illinois' medical cannabis law permits an individual with a qualifying debilitating medical condition to register as a medical cannabis patient and avoid civil and criminal penalties under state law for certain medical uses of cannabis. Likewise, recreational cannabis law in Illinois permits an adult (21 years of age or older) to use cannabis and avoid civil and criminal penalties under state law. However, in accordance with Illinois and federal law and in order to maintain a safe, efficient and effective workforce, employees may not use or possess cannabis on Company property, working on Company time or while operating Company equipment (including vehicles). The Company also prohibits employees from reporting to work under the influence of, or in any way impaired by, cannabis; as determined in the Company's sole discretion to the fullest extent permitted by applicable law.

Company Searches

The Company may conduct searches on and of any Company property, including inspection of vehicles, lockers, desks, employee tool and lunch boxes, briefcases, packages, etc. Private vehicles parked on the Company's physical premises are included in this search policy. Refusing to submit to a search or inspection when requested by management will be cause for immediate discharge from employment. Any controlled substance found on Company property may be turned over to appropriate law enforcement authorities for investigation and possible criminal enforcement action.

Drug and Alcohol Testing Programs

To support this policy, the Company has adopted the following Uniform Drug and Alcohol Testing Program that applies to all its employees (unless otherwise noted).

- a. Post-offer Testing;
- b. Reasonable Suspicion Testing;
- c. Post-Accident Testing;
- d. Random Testing;

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- e. Return-To-Duty Testing; and
- f. Follow-up Testing.

Neither this policy nor any of its terms are intended to create a contract of employment, or to alter the existing employment or contractual relationship in any way. The Company retains the sole right to change, amend or modify any term or provision of this policy without notice.

Post-Offer Testing

After an offer of employment has been extended, the applicant must undergo a drug screen designed to identify whether or not the applicant is using illegal drugs. This drug screen will be administered by a clinic or lab selected by the Company. *All offers of employment with the Company are contingent on the Company receiving a negative drug test result verified by and independent Medical Review Officer.* This result must be received by the Company prior to the employee beginning active employment.

Should a positive test result exist, the applicant's offer of employment will be automatically rescinded by the Company. If for any reason the applicant has already begun working for the Company before the Company receives the positive test result, the applicant's employment will come to an immediate end. However, the applicant can submit documentation supporting the legitimate use for a specific drug or the specific drug that resulted in a positive determination. This documentation must be made either prior to or within 24 hours after the positive drug result is communicated to the applicant. Should the applicant's ability to safely and effectively perform his or her job be affected by the legitimate and lawful use of any drug, then the Company will attempt to provide accommodations to the extent required by law. If the offer of employment is revoked or if employment ends, the applicant who tests positive under the provisions of this policy may re-apply for employment with the Company after a time period of twelve (12) months, however, there shall be no guarantee of re-employment.

Any applicant who refuses to consent to a test or who fails to comply with any testing procedures or tests positive for the use of illegal drugs will not commence work for the company, and the job offer will be automatically rescinded. Employment is expressly conditioned on the successful passage of the post- offer drug screen.

In recognition of the requirements of the Americans with Disabilities Act (ADA), the Company will not discriminate against an applicant who has successfully completed a drug or alcohol rehabilitation program. However, the ADA does not prevent the Company from refusing to hire any applicant who tests positive for illegal drug use prior to employment.

Reasonable Suspicion Testing

The Company has the sole discretion to decide when and under what circumstances an employee is fit for work.

Testing on the basis of reasonable suspicion may include, but is not limited to: 1) observation of an employee acting or appearing in a manner which suggests drug or alcohol use, such as, behavior, appearance, judgment, coordination, job performance and/or other conduct including, but not limited to, slurred speech, glassy eyes, unsteady walk, disorientation, significant or repeated lapses of concentration, emotional outbursts, substantial mood changes, the smell of alcohol on the employee's breath, etc.; 2) instances where the Company observes or receives credible information that the employee is using or has symptoms of drugs and/or alcohol use; and/or 3) other facts which support a reasonable belief that the employee is using or has symptoms of drugs and/or alcohol use in violation of this policy.

All pertinent Company managers and supervisors will receive training to assist them in identifying characteristics or behavior of the use of prohibited substances. Any manager or supervisor who observes such characteristics or behavior must immediately notify the Company's Human Resources Manager in writing of the date, particular facts observed and employee's name. Upon the Human Resources Manager's determination that reasonable suspicion exists, testing can commence. However, once the determination that reasonable suspicion exists, under no circumstances will an employee be allowed back to work until he or she has a negative drug and/or alcohol test.

In reasonable cause cases, the Company shall require the employee to be escorted directly to and from the collection site for drug and/or alcohol testing. The employee will be transported to and from the collection site by a Company representative and/or an independent third party. Refusal to consent to testing and cooperate in testing will be considered insubordination and grounds for termination of employment.

If notice of a positive test result is received from the Medical Review Officer, then the employee will be subject to the disciplinary provisions. However, if a negative test result is received, then the employee will be immediately reinstated for work with back pay, if applicable.

Post-Accident Testing

Anyone who suffers a reportable accident on Company property and/or time must report it within two (2) hours to his or her immediate supervisor or manager, so that proper action and/or medical treatment may be provided. Failure to report any injury immediately may adversely affect an employee's benefits and rights under the law and is grounds for disciplinary action up to and including immediate discharge.

An employee will be tested for the use of controlled substances and/or alcohol as soon as possible, after a reportable accident occurring while on Company property or time and involving said employee, if it appears drug or alcohol use is reasonably believed to may have been a contributing factor.

For the purposes of this Section, a "reportable accident" means an accident resulting in:

1. The death of a human being;
2. Bodily injury to any person who, as the result of the injury, receives medical treatment --- including "first-aid";
3. Damage to property or equipment; or
4. Any near miss reportable accident as determined in the reasonable but sole discretion of management.

If notice of a positive test result is received from the Medical Review Officer following a post- accident drug and/or alcohol screen, then the employee will be subject to the disciplinary provisions. However, if a negative test result is received, then the employee will be immediately reinstated for work with back pay, if applicable.

Random Testing

The Company will also conduct random testing for all employees who hold safety-sensitive positions, as follows:

1. A Company-wide selection process which removes discretion in selection from any supervisory personnel will be adopted by the Company. Random testing will be conducted by a third party removed from the company site.
2. Random testing, once begun, will provide for testing of at least 10% of all Employees during the first twelve (12) months of random testing after this program becomes effective.

Random testing usually selects from 10% up to 100% of all safety sensitive employees. An employee **MUST** test within 24 hours of being selected.

The annualized rate for random testing following the first twelve (12) months after implementation will be no less than 10% of covered Employees.

If a notice of a positive test result is received from the Medical Review Officer following a random drug and/or alcohol screen, then the employee will be subject to the disciplinary provisions. However, if a negative test result is received, then the employee will be immediately reinstated for work with back pay, if applicable.

Return-To-Duty Testing

Any employee who has not worked for the Company for a period of 30 consecutive calendar days must undergo testing for illegal drug use upon returning from any leave of absence and commencing active employment. If a notice of a positive test result is received from the Medical Review Officer following said testing, then the employee will be subject to the disciplinary provisions in Section V of this program.

Follow-Up Testing

As part of any “Last Chance Agreement” provided for in this policy, the Company may subject the employee to certain follow-up testing upon return to work following successful completion of a rehabilitation and/or drug treatment program.

Testing Methodology

This policy and program allow for the testing for drugs and alcohol. All collection and testing centers and laboratories used to perform or analyze urine, saliva, blood and/or breath testing pursuant to this program will be appropriately accredited or certified.

Drug Screening

Testing will be conducted to screen for the presence of the following drugs and their metabolites, to the fullest extent permitted by law:

- Cannabis
- Cocaine
- Opiates
- Amphetamines
- Phencyclidine (PCP)
- Barbiturates
- Benzodiazepines
- Methadone
- Methaqualone
- Propoxyphene

Alcohol Screening

All alcohol breath testing performed under this program shall be performed to determine blood alcohol content only. Any employee having a blood alcohol content of at least 0.04 shall be deemed to have tested positive for the use of alcohol and such a result shall subject the employee to the disciplinary provisions.

The Company shall retain a qualified Medical Review Officer to receive test results from the laboratory and to carry out all actions necessary to confirm positive test results.

An appropriate "chain of custody" will be established for all testing completed in conformity to this policy and program. "Chain of custody" shall mean a procedure used to document the handling of the specimen from the time the employee gives the specimen to the collector until the specimen is destroyed.

Disciplinary Provisions

An employee who tests positive for the use of a controlled substance and/or alcohol in violation of this policy or program, as reported to the Company's designated representative (i.e. Human Resources, Human Resources Manager, Director of Risk Management) by an independent Medical Review Officer, shall be unqualified to work for the Company. Further, a positive test result shall be grounds for immediate

termination of employment. However, in rare cases, the Company may, at its sole discretion, have the option of offering the employee reinstatement on a one-time basis if the employee is not in a safety sensitive position and agrees to comply with certain reinstatement provisions.

An employee who “refuses to submit” to an alcohol or drug test as provided herein is subject to immediate termination without any right or option to certain reinstatement provisions. “Refuses to submit” means that an employee:

1. Fails to appear for any test within a reasonable time, as determined by the Company, consistent with this policy after being directed to do so by the Company.
2. Fails to remain at the testing site until the testing process is complete.
3. Fails to provide a specimen for any drug test required.
4. In the case of a directly observed or monitored collection in a drug test, fails to permit the observation or monitoring of the employee's provision of a specimen.
5. Fails to provide a sufficient amount of urine when directed, and it has been determined, through a required medical evaluation, that there was no adequate medical explanation for the failure.
6. Fails or declines to take a second test the employer or collector has directed the employee to take.
7. Fails to cooperate with any part of the testing process (e.g., refuse to empty pockets when so directed by the collector, behave in a confrontational way that disrupts the collection process, or failing to complete all documents, or failing to comply with reasonable directives); or
8. Is reported by the Medical Review Officer as having a verified diluted or otherwise adulterated sample or substituted test result.

Reinstatement of Employee After Positive Test

An employee who does not hold a safety sensitive position, and who tests positive for the use of a controlled substance and/or alcohol, thereby supplying the Company with grounds for the immediate discharge of the employee, may be offered a one-time opportunity for reinstatement provided the employee agrees to comply with the following conditions and executes the “Follow-up Testing Agreement.”

1. The employee must immediately enroll in a qualified program of evaluation and, if necessary, treatment. A qualified program of evaluation and/or treatment can be chosen by the Company or the employee, but it must be approved by the Company. Any cost of rehabilitation not covered by insurance shall be borne by the employee.

2. Upon receipt of satisfactory progress in the program of evaluation or treatment outlined in Paragraph VI.) 1. above, the employee must submit to a drug and/or alcohol test in which a negative result is obtained. The satisfactory progress report must be received by the Company no later than thirty (30) calendar days from the date that the employee was given notice of the positive test result. If more than thirty (30) days elapse, the Company shall have grounds to discharge the employee. If a positive test for the use of a controlled substance or alcohol is returned after the employee enters a program of evaluation or treatment, then the employee shall be immediately discharged.
3. An employee shall be eligible for reinstatement under this Section on a one-time basis, and the reinstatement is contingent upon the employee returning directly to work for the Company.
4. Upon reinstatement the Employee may be subject to no less than three (3) additional tests for drugs and/or alcohol without prior notice to occur within six (6) months of the reinstatement and may be subject to no less than three (3) additional tests for drugs and/or alcohol without prior notice to occur within six (6) to twelve (12) months after reinstatement. For the twelve (12) months thereafter, Employee may be subject to no less than three (3) additional tests for drugs and/or alcohol without prior notice.

EMPLOYEE APPEARANCE

All employees should be aware that they represent the Company to others. Their personal appearance and hygiene are important for promoting and influencing a positive Company image to everyone. All clothing should be in good repair and properly fitted. A general rule to follow is to dress using good judgment and avoid style extremes.

EMPLOYEE RELATIONS

Sterling is committed to providing a positive work environment and to communicate openly with employees – encouraging and expecting feedback from them about their job and the Company.

When you have questions or concerns regarding your job, performance, or other employment matters, you should bring them forward to your Manager, Sterling Representative or Human Resources who will get the answers and respond directly to you.

Generally, we encourage you to personally approach an individual you may be having a problem with and attempt to resolve the issue together. If that does not resolve the matter, you should go to your immediate Manager next. In some cases, the issue may be referred to the next higher level of management in order to be resolved.

You may speak with any member of management with whom you feel comfortable if a problem arises where you believe normal channels cannot work.

HARASSMENT & RESPECTFUL CONDUCT

Sterling is committed to providing a workplace that is free of discrimination, harassment, bullying and other offensive behaviors. All employees are expected to support this commitment by treating everyone they interact with through work, both internally and externally, in a way that is consistent with both the intent and spirit of this policy. Respectful behaviors include being courteous and considerate of others, working cooperatively and maintaining confidentiality.

In line with this commitment, Sterling prohibits discrimination or harassment of its employees by another employee, supervisor/manager/leader, or third party for any reason including, but not limited to a person's race, creed, color, religion, sex, age, ancestry, national origin, disability, genetic information, military status, sexual orientation, gender identity, marital status, citizenship status, order of protection status, homelessness or any other characteristic protected by law.

This policy applies to applicants for employment, all employees including internal staff and contract workers, the Management Team, and any other person associated with Sterling, including business partners, customers, and visitors. It applies not only to the workplace during normal business hours, but also to all work-related social functions, whether on or off the Company premises, and business-related travel.

This policy extends to all work-related interactions, whether in person, via telephone, in writing or through electronic communications such as e-mail, text messages, instant messages, blogs, electronic conferencing and social media postings regardless of whether they are made through a computer, cell phone or other electronic device or medium.

Harassment includes any unwelcome behavior that is offensive, abusive, threatening, intimidating, humiliating or degrading to another individual. The behavior can be verbal, written, visual, or physical and can arise out of in-person or electronic communications. While harassment may be based on protected class status, other offensive behavior that impairs morale and interferes with work effectiveness, including jokes and teasing, are also prohibited by this policy.

One type of harassment is sexual harassment. Sexual harassment includes unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when this conduct explicitly or implicitly affects an individual's employment, unreasonably interferes with an individual's work performance, or creates an intimidating, hostile or offensive work environment.

Sexual harassment includes unwelcome sexual behavior by either men or women toward either men or women. It also includes sex-based harassment directed at someone because of their gender. Examples of sexual harassment or other harassing or offensive behaviors include, but are not limited to:

- sexual and other offensive jokes told in person or through any electronic device,
- sexual innuendo, language or images sent through texts, instant messages, e-mail or other electronic device ("sexting"),
- intimidation, sabotaging, physical assaults or threats,
- slurs, epithets or name calling,
- posting offensive messages on social media sites,
- unwelcome sexual flirtations, advances or propositions,
- ridicule, mockery, insults or put-downs told in person or through any electronic device,
- physically displaying or sending discriminatory, sexually suggestive or other offensive objects or pictures, including photos, posters, calendars, graffiti, drawings and cartoons or language, including jokes, through any medium, including electronically, in person, interoffice mail, or any other manner,
- interference with work performance,
- leering, staring, unwelcome touching or physical closeness, and
- using Company-provided electronic devices (including computers and cell phones) to view, display or distribute pornography or other offensive content.

No one will be denied or given employment opportunities based on going along with or rejecting sexual advances or any other behavior prohibited by the policy.

Employees who report harassment or who assist in the investigation of a complaint of harassment will not be subject to retaliation, intimidation or reprisals of any kind. Any employee who engages in these behaviors against another employee because of a complaint under this policy will be subject to corrective action.

Any individual who has experienced or observed harassment or offensive behavior by anyone during their employment, should feel free to ask the person to stop at once if they feel comfortable in doing so. All employees, however, must report the behavior to their Manager or any other Manager or Human Resources even if they intend to respond to the person themselves.

Managers must promptly advise Human Resources of all harassment or offensive behavior either observed or brought to their attention by others.

Reports of offensive behavior and harassment will be promptly investigated in as discrete a manner as possible. Sterling expects anyone who participates in an investigation under this or any other policy to keep information they provide or learn of during the investigation confidential. Anyone found to have violated this policy will be subject to corrective action, up to and including termination of employment.

All Managers are responsible for the implementation of this policy and for ensuring that employees know and understand this policy. All employees will be held responsible and accountable for eliminating prohibited conduct.

Any individual who has experienced or observed harassment or offensive behavior by anyone during their employment, should feel free to ask the person to stop at once if they feel comfortable in doing so. All employees, however, must report the behavior to their supervisor, manager or any other manager, Human Resources or member of the Executive Team even if they intend to respond to the person themselves.

Questions regarding this policy should be addressed directly to Human Resources who have overall responsibility for investigating and resolving harassment complaints at Sterling.

Sterling is committed to accomplishing the goals of this policy and expects all employees to do the same. By working together, Sterling and its Customers will provide a positive, respectful and productive work environment for everyone.

For employees in California, Illinois, Massachusetts, New Jersey, New York and Tennessee, please reference respective addendum section for additional harassment and discrimination policies.

OUTSIDE EMPLOYMENT

Although it is not encouraged, the Company recognizes that personal circumstances or interests may result in an employee seeking additional employment outside the Company. If you are considering outside employment, including self-employment, you should talk with your Manager and Human Resources about the possible ramifications.

Any employment outside of Sterling must not compromise the Company's interests or the confidentiality of information. (See also Conflict of Interest and Confidentiality topics.)

In addition, the Company will not accept outside employment as an excuse for poor job performance, absenteeism, tardiness, the inability to work required hours for their position at Sterling, or any other failure to meet the performance expectations and legitimate business demands. If your work at Sterling suffers, you will be subject to normal performance management procedures.

Use of equipment, tools or confidential business information of Sterling in order to perform work for another company or your own business is prohibited.

PERFORMANCE APPRAISALS

It is the philosophy of the Company that ongoing communication and constructive feedback are important parts of the employment relationship. Normally, employees will be evaluated after a few months on the job and on an annual basis after that. Between scheduled appraisals, informal performance discussions may be held between you and your Manager to address any performance issues that warrant attention.

The performance appraisal will normally consider your experience, training and job description and your performance based on previously set objectives and goals. Other factors that normally may be considered include, but are not limited to quality of work, promptness in completing assignments, initiative, responsibility level, reliability, attendance and conduct.

Performance appraisals may be considered when making decisions concerning training needs, pay, promotion, transfer or continued employment.

PERSONNEL RECORDS

Sterling maintains confidential employee personnel records. Personnel records are the property of Sterling and access to the information they contain is restricted to those who need to know this information in order to perform their jobs.

In an effort to keep our records current and because certain changes could affect tax withholding, insurance coverage or work eligibility, employees are obligated to keep us informed in writing of any changes or status changes in name, address, telephone number, marital status, emergency contact information, immigration status and the like.

Under certain conditions, you may review specific documents in your personnel file. A written request must be made, in advance, to the Human Resources Department. A member of the Human Resources Department will be present when you review your records. Copies of documents in the personnel file are available upon written request.

For employees in Michigan and Minnesota, please reference respective addendum section for additional policies on personnel records and private information.

PHONE USE

To minimize the disruption to the workday for you and your co-workers, you should practice discretion when making personal calls. These calls should be made during lunch or break periods whenever possible. Use of Company or customer telephones for personal long-distance calling is not permitted except in emergency situations and as authorized by your Manager.

Cell Phone Use While Driving: The safety and well-being of employees is of critical importance to the organization. Everyone has a responsibility to protect themselves and others when they are conducting business on the road. If you are required to drive on Company business at any time (whether in a Company provided vehicle or personal vehicle) you are expected to adhere to all federal, state or local rules and regulations and Company policy regarding the use of electronic communication devices while driving. It is

an unsafe driving practice and potential violation of the law for drivers not to use a hand-free device and to compose or send electronic messages such as text or e-mail.

You should discuss the use of cell phones and other electronic communication devices with your manager prior to operating any vehicle on Company business.

REFERENCES

All requests regarding references for any past or present employee are to be directed to Human Resources. Only pertinent, information, such as dates of employment, job title, etc., will be released. Confidentiality of references will be strictly maintained.

SAFETY

All employees are expected to obey safety rules and exercise caution in all work activities. You must immediately report any unsafe condition to a Manager. Employees, who violate safety standards, cause hazardous or dangerous situations or fail to report or remedy such situations, will be subject to corrective action.

All accidents, no matter how minor, must be reported immediately to your Manager or Human Resources.

You are required to follow these general safety rules:

- Any illness or injury, no matter how slight, must be reported to your Manager. You should never attempt to treat your own or another employee's injury unless you have received formal first aid training.
- Any activity that may result in injuring an employee will not be tolerated.
- You are responsible for using any required personal protective equipment.
- You are responsible for using any ergonomic equipment provided by the Company.
- You should always lift objects using the proper lifting techniques.
- You should only use tools that are in good working order. Never use tools that are defective in any way.
- You are always responsible to keep your work area clean.

- You should always know the location of fire exits and fire extinguishers in your work area.

Feel free to discuss any suggestions or comments regarding safety with your Manager at any time.

SEARCHES

Sterling may conduct searches when there is reason to suspect that illegal drugs, stolen property, weapons, alcohol, or other items may be present on Company property. Searches may include, but are not limited to desks, cabinets, file drawers, computer files, vehicles, clothing, toolboxes, lunch boxes, briefcases, handbags, backpacks, bags, or other containers. You may be present at the time the search is conducted. Searches may be done at any time without notice.

Failure on the part of any employee to cooperate with a search or possession of prohibited articles on Company or customer property may be grounds for corrective action.

SECURITY

All individuals must adhere to all security measures and/or guidelines of the facility they are working in.

In addition, Sterling will not tolerate theft or unauthorized possession of the property of employees, the Company, visitors and customers and therefore, may also inspect persons entering and/or leaving the facility, packages or other belongings. This may include, but is not limited to desks, clothing, toolboxes, lunch boxes, briefcases, purses, or other containers. Employees who wish to avoid any such inspection should not bring such items onto Sterling's or customers' premises. Failure on the part of any employee to cooperate with a search on Company property will be grounds for corrective action.

Keys, key fobs properly assigned and used to enter a facility, must be kept only in your possession – not anyone else's.

TOBACCO USE

There is a concern about the effect of tobacco use on employees' health as well as the effects of secondhand smoke on non-smokers. Tobacco use is not permitted anywhere or at any time within the Company's facility. This includes the use of cigarettes, cigars, pipes, smokeless tobacco, e-cigarettes, etc. Your Manager will show you the location of designated areas where tobacco is permitted outside the building. Tobacco use in these areas is permitted only during designated break and lunch periods. You are expected to dispose of tobacco materials safely and in the proper containers.

WORKPLACE VIOLENCE

Sterling is committed to maintaining a pleasant and safe work environment – free from all forms of violence. This includes verbal or physical threats, as well as other forms of intimidation, such as abuse or destruction of property, sexual harassment, bullying, abusive language or other hostile or inappropriate behavior that may cause others to feel unsafe, anxious or threatened in the workplace.

Sterling will not tolerate any type of workplace violence by or against employees. This includes any actions that threaten employees, non-employees, customers, vendors or others in the workplace. Sterling reserves the right to determine if actions are considered threatening, violent or intimidating behavior.

In addition, employees are strictly prohibited from bringing any type of weapons to work, or from possessing them on Company or customer property. Sterling reserves the right to inspect, with or without notice for any business reason, all persons' packages or other items that comes onto Company premises to ensure compliance with policies.

Sterling strictly prohibits weapons of any type at Company-owned or leased buildings, Company-owned or leased cars and at any Company-sponsored events. This includes visible or concealed weapons, even if licensed to carry the weapon. This policy applies to all Company employees, visitors, customers and vendors.

Prohibited weapons include any form of weapon or explosive that is illegal under federal, state or local laws. This includes but is not limited to, all firearms, knives, explosive devices or any other weapons that could be used to threaten, harass, intimidate, injure or cause harm to another individual. Exceptions to this policy include police officers or security personnel who are authorized to carry weapons.

Anyone who sees a weapon in a Customer or Sterling office should contact his/her supervisor, the Human Resources department or another member of management immediately. If you feel there is an immediate need to ensure someone's safety, including your own, you may contact law enforcement authorities directly.

The Company will investigate any complaint of violence promptly and thoroughly. The investigation will be conducted confidentially to the extent possible considering the circumstances involved.

Employees who violate this policy will be subject to corrective action, up to and including termination of employment.

TERMINATION & RESIGNATION

We hope you will find your employment with us to be both personally and professionally rewarding; however, we do recognize that the employment relationship may end at some point. As an at-will employer, we understand that either you or the Company may terminate the employment relationship at any time, for any reason. If you decide to leave, the Company highly encourages a two-week written notice so that we can begin the process to adequately fill the position.

Upon termination, all keys or key fobs and other Company or customer property must be returned prior to or on your last day of employment. Under certain circumstances, if you qualify you will be contacted and offered the opportunity to continue coverage of group insurance at your own cost.

EMPLOYEE ACKNOWLEDGEMENT

I hereby acknowledge that I have received a copy of Sterling's Employee Handbook. I understand that the contents of this handbook are for general information and guidance and it does not constitute a contract. I understand that it replaces and supersedes any previous policies, manual or communications, whether written or oral. I further understand that all contents in this Employee Handbook are subject to change in accordance with applicable laws, but employees will be advised of any changes. I understand that I must refer to the on-line version of the handbook for the most current and up-to-date version of all topics.

I have entered my employment relationship with Sterling voluntarily and acknowledge that there is no specified length of employment. Employees have the right to terminate the employment relationship with Sterling at any time, with or without notice, for any reason. The Company has the same right to terminate the employment relationship at any time, with or without notice, for any reason not prohibited by law. The Company retains sole discretion to add, delete, or change anything contained in this handbook except employment-at-will.

No employee or representative of Sterling has the authority, at present or in the future, to promise any benefit or enter into an agreement for employment, oral or written, which in any way conflicts with this Employee Handbook or any of these statements, for any specified period of time and no person other than Executive Management has the authority to change any policy, benefit, rule or procedure as stated in this handbook.

It is my responsibility to read and understand the contents of this Employee Handbook and including the topics on harassment, attendance, drug and alcohol use, and safety. If I do not understand any provision of the handbook, I shall contact my Manager or Human Resources for clarification.

Employee Signature _____

Print Name _____ Date _____

Note: All employees will be required to acknowledge receipt of the Employee Handbook by signing this acknowledgement.

This copy is to be removed and placed in the employee's personnel file.

ILLINOIS ADDENDUM

PREGNANCY ACCOMMODATIONS

In compliance with Illinois law, Sterling will not discriminate against employees because of pregnancy; will engage in a timely, good faith, and meaningful exchange with employees affected by pregnancy, childbirth or related conditions; and will endeavor to provide a reasonable accommodation unless doing so will impose an undue hardship on the ordinary operation of Sterling business.

Such accommodations include modifications or adjustments to the work environment or circumstances under which the employee's position is customarily performed, including but not limited to more frequent or longer bathroom, water intake, or rest breaks; private non-bathroom space for expressing breast milk and breastfeeding; seating accommodations or acquisition or modification of equipment; assistance with manual labor, light duty, or a temporary transfer to a less strenuous or non-hazardous position; job restructuring or a part-time or modified work schedule; appropriate adjustment or modifications of examinations or training materials; assignment to a vacant position; or providing leave to recover from childbirth or pregnancy.

Employees will not be required to accept an accommodation that they did not request or to which they did not agree, nor will they be forced to take leave if another reasonable accommodation is available.

The employee may be required to provide certification from a health care provider concerning the need for a reasonable accommodation to the same extent such a certification is required for other conditions related to a disability. A certification should include:

- medical justification for the requested accommodation(s);
- a description of the reasonable accommodation(s) medically advisable;
- the date the accommodation(s) became advisable; and
- the probable duration of the reasonable accommodation(s).

Sterling will not deny employment opportunities or take adverse employment action against employees if such decision is based on Sterling's need to make a reasonable accommodation, and Sterling will not

retaliate against employees who request an accommodation or otherwise exercise their rights under the Illinois Human Rights Act.

The Illinois Human Rights Act is enforced by the Illinois Department of Human Rights ("IDHR"). The charge process for violations of the law can be initiated by contacting the IDHR at any of the offices shown below or by completing the form at <https://www2.illinois.gov/DHR/Pages/default.aspx>.

Chicago Office	Springfield Office
100 W. Randolph St.	535 West Jefferson
10th Floor	1st Floor
Intake Unit	Intake Unit
Chicago, IL 60601	Springfield, IL 62704
(312) 814-6200	(217) 785-5100

Employees with questions or concerns regarding this policy or who would like to request an accommodation should contact Human Resources.

DISCRIMINATION AND SEXUAL HARASSMENT NOTICE

In compliance with the Illinois Human Rights Act (Act) and any other related federal or local law/ordinance, all employees have the right to be free from unlawful discrimination or harassment (including sexual harassment). This means that employers may not treat people differently based on race, age, gender, pregnancy, disability, sexual orientation or any other protected class named in the Act or any other related federal or local law/ordinance. This applies to all employer actions, including hiring, promotion, discipline and discharge.

It is Sterling's policy to prohibit intentional and unintentional discrimination or harassment (including sexual harassment) of or against job applicants, contractors, interns, volunteers or employees by another employee, supervisor, vendor, customer or any third party on the basis of actual or perceived race, color, creed, religion, national origin, ancestry, citizenship status, age, sex or gender (including pregnancy, childbirth and pregnancy-related conditions), gender identity or expression (including transgender status), sexual orientation, marital status, military service and veteran status, physical or mental disability, genetic information or any other characteristic protected by applicable federal, state or local laws (referred to as

"protected characteristics"). Sterling also prohibits retaliation. All such conduct will not be tolerated by Sterling.

The purpose of this policy is not to regulate our employees' personal morality, but to ensure that no one engages in discrimination or harassment (including sexual harassment) of another individual in the workplace, including while on Company premises, while on Company business (whether or not on Company premises) or while representing Sterling. In addition to being a violation of this policy, discrimination, harassment or retaliation based on any protected characteristic as defined by applicable federal, state or local laws also is unlawful. For example, sexual harassment and retaliation against an individual because the individual reported or filed a complaint of discrimination or harassment (including sexual harassment) or because an individual aided, assisted or testified in an investigation or proceeding involving a complaint of discrimination or harassment (including sexual harassment) as defined by applicable federal, state or local laws or helped others exercise their right to complain about discrimination or harassment (including sexual harassment) as defined by applicable federal, state or local laws are unlawful.

Reasonable Accommodation

Employees also have the right to reasonable workplace accommodations based on pregnancy, disability, religious beliefs or any other reason required by applicable federal, state or local laws. This means employees can ask for reasonable changes to their job if needed because they are pregnant or disabled or because of their religious beliefs or any other reason required by applicable federal, state or local laws.

Discrimination Defined

Discrimination under this policy generally means treating an individual differently or denying or granting a benefit to an individual because of any actual or perceived protected characteristic as defined under federal, state or local law/ordinance.

Harassment Defined

Harassment generally is defined in this policy as unwelcome verbal, visual or physical conduct that denigrates or shows hostility or aversion towards an individual because of any actual or perceived protected characteristic or has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Harassment can be verbal (including slurs, jokes, insults, epithets, gestures or teasing), visual (including offensive posters, symbols, cartoons, drawings, computer displays, text messages, social media posts or e-mails) or physical conduct (including physically threatening another, blocking someone's way, etc.). Such conduct violates this policy, even if it does not rise to the level of a violation of applicable federal, state or local laws. Because it is difficult to define unlawful harassment, employees are expected to behave at all times in a manner consistent with the intended purpose of this policy.

Sexual Harassment Defined

Sexual harassment can include all of the above actions, as well as other unwelcome conduct, such as unwelcome or unsolicited sexual advances, requests for sexual favors, conversations regarding sexual activities and other verbal, visual or physical conduct of a sexual nature when:

- submission to that conduct or those advances or requests is made either explicitly or implicitly a term or condition of an individual's employment; or
- submission to or rejection of the conduct or advances or requests by an individual is used as the basis for employment decisions affecting the individual; or
- the conduct or advances or requests have the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.
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Examples of conduct that violate this policy include:

1. unwelcome flirtations, leering, whistling, touching, pinching, assault or blocking normal movement;
2. requests for sexual favors or demands for sexual favors in exchange for favorable treatment;
3. obscene or vulgar gestures, posters or comments;

4. sexual jokes or comments about a person's body, sexual prowess or sexual deficiencies;
5. propositions or suggestive or insulting comments of a sexual nature;
6. derogatory cartoons, posters and drawings;
7. sexually-explicit e-mails, text messages or voicemails;
8. uninvited touching of a sexual nature;
9. unwelcome sexually-related comments;
10. conversation about one's own or someone else's sex life;
11. conduct or comments consistently targeted at only one gender, even if the content is not sexual;
and
12. teasing or other conduct directed toward a person because of the person's gender.

Company Reporting Procedures

If the employee has been subjected to or witnessed conduct which violates this policy, the employee should immediately report the matter to any member of management. If the employee is unable for any reason to contact this person, or if the employee has not received an initial response within five (5) business days after reporting any incident of what the employee perceives to be harassment, the employee should contact Human Resources Manager. If the person toward whom the complaint is directed is one of the individuals indicated above, the employee should contact any higher-level manager in the reporting hierarchy.

Investigation Procedures

Every report of perceived harassment will be fully investigated, and corrective action will be taken where appropriate. All complaints will be kept confidential to the extent possible, but confidentiality cannot be guaranteed. Employees must cooperate with all investigations conducted pursuant to this policy.

Retaliation Prohibited

In addition, the Company will not allow any form of retaliation against individuals who report unwelcome conduct to management or who cooperate in the investigations of such reports in accordance with this policy. If the employee has been subjected to any such retaliation, the employee should report it in the same manner in which the employee would report a claim of perceived harassment under this policy.

Violation of this policy including any improper retaliatory conduct will result in disciplinary action, up to and including termination.

Reporting Procedures

Aside from the internal complaint process at Sterling, employees may choose to file a charge of discrimination or sexual harassment under the Act with the IDHR. The charge process for violations of the law can be initiated by completing the form at <https://www2.illinois.gov/DHR/Pages/default.aspx> or by contacting the IDHR at IDHR.Intake@illinois.gov, or any of these offices:

Chicago Office	Springfield Office
100 W. Randolph St., 10th Floor	535 W. Jefferson Street, 1st Floor
Intake Unit	Intake Unit
Chicago, IL 60601	Springfield, IL 62702
(312) 814-6200	(217) 785-5100
(866) 740-3953 (TTY)	(866) 740-3953 (TTY)
(312) 814-6251 (Fax)	(217) 785-5106 (Fax)

Employees also can contact the Illinois Sexual Harassment and Discrimination Helpline at 1-877-236-7703.

CHICAGO DISCRIMINATION AND NON-HARASSMENT (INCLUDING SEXUAL HARASSMENT)

In compliance with the Illinois Human Rights Act (Act), the City of Chicago Human Rights Ordinance (Ordinance) (as applicable) and any other related federal or local law/ordinance, all employees have the right to be free from unlawful discrimination or harassment (including sexual harassment). This means that employers may not treat people differently based on race, age, gender, pregnancy, disability, sexual orientation or any other protected class named in the Act, Ordinance (as applicable) or any other related federal or local law/ordinance. This applies to all employer actions, including hiring, promotion, discipline and discharge.

It is Sterling's policy to prohibit intentional and unintentional discrimination or harassment (including sexual harassment) of or against job applicants, contractors, interns, volunteers or employees by another

employee, supervisor, vendor, customer or any third party on the basis of actual or perceived race, color, creed, religion, national origin, ancestry, citizenship status, age, sex or gender (including pregnancy, childbirth and pregnancy-related conditions), gender identity or expression (including transgender status), sexual orientation, marital status, military service and veteran status, physical or mental disability, genetic information or any other characteristic protected by applicable federal, state or local laws (referred to as "protected characteristics"). The Company also prohibits retaliation. All such conduct will not be tolerated by Sterling.

The purpose of this policy is not to regulate our employees' personal morality, but to ensure that no one engages in discrimination or harassment (including sexual harassment) of another individual in the workplace, including while on Company premises, while on Company business (whether or not on Company premises) or while representing the Company. In addition to being a violation of this policy, discrimination, harassment or retaliation based on any protected characteristic as defined by applicable federal, state or local laws also is unlawful. For example, sexual harassment and retaliation against an individual because the individual reported or filed a complaint of discrimination or harassment (including sexual harassment) or because an individual aided, assisted or testified in an investigation or proceeding involving a complaint of discrimination or harassment (including sexual harassment) as defined by applicable federal, state or local laws or helped others exercise their right to complain about discrimination or harassment (including sexual harassment) as defined by applicable federal, state or local laws are unlawful.

Reasonable Accommodation

Employees also have the right to reasonable workplace accommodations based on pregnancy, disability, religious beliefs or any other reason required by applicable federal, state or local laws. This means employees can ask for reasonable changes to their job if needed because they are pregnant or disabled or because of their religious beliefs or any other reason required by applicable federal, state or local laws.

Discrimination Defined

Discrimination under this policy generally means treating an individual differently or denying or granting a benefit to an individual because of any actual or perceived protected characteristic as defined under federal, state or local law/ordinance.

Harassment Defined

Harassment generally is defined in this policy as unwelcome verbal, visual or physical conduct that denigrates or shows hostility or aversion towards an individual because of any actual or perceived protected characteristic or has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Harassment can be verbal (including slurs, jokes, insults, epithets, gestures or teasing), visual (including offensive posters, symbols, cartoons, drawings, computer displays, text messages, social media posts or e-mails) or physical conduct (including physically threatening another, blocking someone's way, etc.). Such conduct violates this policy, even if it does not rise to the level of a violation of applicable federal, state or local laws. Because it is difficult to define unlawful harassment, employees are expected to behave at all times in a manner consistent with the intended purpose of this policy.

Sexual Harassment Defined

Sexual harassment can include all of the above actions, as well as other unwelcome conduct, such as unwelcome or unsolicited sexual advances, requests for sexual favors, conversations regarding sexual activities and other verbal, visual or physical conduct of a sexual nature when:

submission to that conduct or those advances or requests is made either explicitly or implicitly a term or condition of an individual's employment; or

submission to or rejection of the conduct or advances or requests by an individual is used as the basis for employment decisions affecting the individual; or

the conduct or advances or requests have the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

For employees working in the City of Chicago, sexual harassment also is defined specifically under the Ordinance to mean any (i) unwelcome sexual advances or any unwelcome conduct of a sexual nature; or (ii) requests for sexual favors or conduct of a sexual nature when (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment, (2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual, or (3) such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment; or (iii) sexual misconduct, which means any behavior of a sexual nature which also involves coercion, abuse of authority or misuse of an individual's employment position.

Examples of conduct that violate this policy include:

1. unwelcome flirtations, leering, whistling, touching, pinching, assault or blocking normal movement;
2. requests for sexual favors or demands for sexual favors in exchange for favorable treatment;
3. obscene or vulgar gestures, posters or comments;
4. sexual jokes or comments about a person's body, sexual prowess or sexual deficiencies;
5. propositions or suggestive or insulting comments of a sexual nature;
6. derogatory cartoons, posters and drawings;
7. sexually-explicit e-mails, text messages or voicemails;
8. uninvited touching of a sexual nature;
9. unwelcome sexually-related comments;
10. conversation about one's own or someone else's sex life;
11. conduct or comments consistently targeted at only one gender, even if the content is not sexual;
and
12. teasing or other conduct directed toward a person because of the person's gender.

Company Reporting Procedures

If the employee has been subjected to or witnessed conduct which violates this policy, the employee should immediately report the matter to any member of management. Written complaints can be submitted internally using the form provided in this handbook. If the employee is unable for any reason to contact this person, or if the employee has not received an initial response within five (5) business days after reporting any incident of what the employee perceives to be harassment, the employee should contact Human Resources Manager. If the person toward whom the complaint is directed is one of the individuals indicated above, the employee should contact any higher-level manager in the reporting hierarchy.

Investigation Procedures

Every report of perceived harassment will be fully investigated, and corrective action will be taken where appropriate. All complaints will be kept confidential to the extent possible, but confidentiality cannot be guaranteed. Employees must cooperate with all investigations conducted pursuant to this policy.

Retaliation Prohibited

In addition, the Company will not allow any form of retaliation against individuals who report unwelcome conduct to management or who cooperate in the investigations of such reports in accordance with this policy. If the employee has been subjected to any such retaliation, the employee should report it in the same manner in which the employee would report a claim of perceived harassment under this policy.

Violation of this policy including any improper retaliatory conduct will result in disciplinary action, up to and including termination.

Training Requirement

Employees, other than those who supervise or manage employees, are required to participate in a minimum of one (1) hour of sexual harassment prevention training at least once a year in accordance with the IHRA/Ordinance. Anyone who supervises or manages employees is required to participate in a minimum of two (2) hours of sexual harassment prevention training at least once a year in accordance with the IHRA/Ordinance. Additionally, all employees are required to participate in one (1) hour of bystander training at least once a year in accordance with the Ordinance.

Additional Reporting Procedures

Aside from the internal complaint process at the Company described above, employees may choose to file a charge/complaint of discrimination or harassment (including sexual harassment) with the government agency or agencies set forth below.

Illinois Department of Human Rights (IDHR)

The charge process for violations of the law can be initiated by completing the form at www.illinois.gov/dhr or by contacting the IDHR at IDHR.Intake@illinois.gov, or either of these offices:

Chicago Office	Springfield Office
555 W. Monroe St., 7th Floor	535 W. Jefferson Street, 1st Floor
Chicago, IL 60661	Springfield, IL 62702
(312) 814-6200	(217) 785-5100
(866) 740-3953 (TTY)	(866) 740-3953 (TTY)
(312) 814-6251 (Fax)	(217) 785-5106 (Fax)

Employees also can contact the Illinois Sexual Harassment and Discrimination Helpline at 1-877-236-7703.

Chicago Commission on Human Relations (CCHR)

The complaint process for violations of the law can be initiated by visiting www.chicago.gov/CCHR or by contacting the CCHR at cchr@cityofchicago.org, or at:

740 N. Sedgwick Suite 400

Chicago, IL 60654

(312) 744-4111

(312) 744-1088 (TTY)

(312) 744-1081 (FAX)

Additionally, employees may choose to file a charge of discrimination or harassment (including sexual harassment) with the United States Equal Employment Opportunity Commission (EEOC) by contacting the EEOC at:

JCK Federal Building

230 S Dearborn Street

Chicago, IL 60604

Filing of Private Sector Charges/Enforcement/Federal Sector Hearings: Suite 1866

Mediation Unit/Legal Unit: Suite 2920

(800) 669-4000

(312) 588-1260 (Fax)

LACTATION BREAKS

Sterling provides employees who are nursing with reasonable break time to express breast milk after the birth of a child.

The break time provided must run concurrently with any other break time provided to employees but to the extent the lactation break does not occur during an otherwise unpaid break such time is paid.

Sterling will make reasonable efforts to provide a private location in close proximity to the employee's work area. Sterling will not retaliate against employees for exercising their rights under this policy.

PAID TIME OFF –Chicago, IL

Employees will accrue paid time off on a pro-rata basis of 2 hour for every 40 straight time hours worked up to 80 hours of paid time off per year. Employees can carry over 80 hours of PTO for the following 1-year period.

LACTATION BREAKS

Sterling provides employees who are nursing with reasonable break time to express breast milk after the birth of a child.

The break time provided must run concurrently with any other break time provided to employees but to the extent the lactation break does not occur during an otherwise unpaid break such time is paid.

Sterling will make reasonable efforts to provide a private location in close proximity to the employee's work area. Sterling will not retaliate against employees for exercising their rights under this policy.

Employees should advise management if they need break time and an area for this purpose. Please consult Human Resources with questions regarding this policy.

JURY DUTY LEAVE

Sterling realizes that it is the obligation of all U.S. citizens to serve on a jury when summoned to do so. All employees will be allowed time off to perform such civic service as required by law. Employees are expected, however, to provide proper notice of any request to perform jury duty as noted below and provide verification of their service, including fees received for jury duty service.

Employees also are expected to keep management informed of the expected length of jury duty service and to report to work for the major portion of the day if excused by the court. If the required absence presents a serious conflict for management, employees may be asked to try to postpone jury duty.

Sterling is not obligated to compensate employees for time taken off for jury duty. However, exempt employees will be paid their full salary less jury duty fees for any week in which they performed work for Sterling and missed work due to jury service.

Employees summoned for jury duty must deliver a copy of the summons to Sterling within 10 days of the date of issuance of the summons to the employee.

WITNESS LEAVE

Employees called to serve as a witness in a judicial proceeding must notify their manager as soon as possible.

Employees will not be compensated for time away from work to participate in a court case, but may use available vacation and personal time to cover the period of absence.

Employees attending judicial proceedings in response to a subpoena will not be disciplined for their absence.

FAMILY BEREAVEMENT LEAVE

Employees who are eligible for leave under the federal Family and Medical Leave Act (FMLA) and who suffer the loss of a child may take up to two (2) weeks of unpaid leave for any or all of the following purposes:

- to attend the funeral or alternative to a funeral;
- to make arrangements necessitated by the death of the employee's covered family member; or
- to grieve the death of the employee's covered family member; or
- to grieve failed pregnancies and adoptions.

For purposes of this policy, “covered family member” means the employee's child, stepchild, spouse, domestic partner, sibling, parent, mother-in-law, father-in-law, grandchild, grandparent or stepparent. The

employee's child is defined as biological, adopted or foster child, a legal ward or a child of a person standing in loco parentis. The law defines "domestic partners" broadly to include adults who are in a committed relationship, and they are not limited to legally recognized partnerships. Further, there is no requirement in the law that "covered family members" reside in the same household.

For purposes of this policy, failed pregnancies and adoptions includes: miscarriages; unsuccessful rounds of intrauterine insemination or of assisted reproductive technology procedures; failed adoption matches; (iv) adoptions not finalized due to being contested by another party; failed surrogacy agreements; diagnoses that negatively impact pregnancy or fertility; and stillbirths.

Leave under this policy is only available to employees who have not exhausted their FMLA leave entitlement at the time bereavement leave is requested. In the event of the death of multiple occurrences of any of the above in a 12-month period, the employee may take up to a total of six (6) weeks of bereavement leave during the 12-month period. Bereavement leave must be completed within 60 days of the date on which the employee received notice of the occurrence.

The employee requesting leave under this policy generally must provide Sterling with at least 48 hours' advance notice of the intention to take bereavement leave, unless providing such notice is not reasonable and practicable under the circumstances.

Employees may elect to use available paid time off while taking leave under this policy.

Sterling may require reasonable documentation in connection with leave taken under this policy.

Employees will not be subject to adverse action for exercising rights or attempting to exercise rights under this policy, opposing practices that they believe to be in violation of this policy or supporting the exercise of rights of another under this policy.

VOTING LEAVE

Employees who are eligible to vote in an election may request up to two (2) hours with pay to vote while polls are open.

Employees must notify Sterling of their intention to vote at least one (1) week prior to Election Day.

VOLUNTARY EMERGENCY WORKERS LEAVE

Sterling will not discharge employees who serve as volunteer emergency workers and are absent from or late to work due to their participation in an emergency situation. Volunteer emergency workers include volunteer firefighters, emergency medical technicians, ambulance drivers or attendants, first responders, members of county municipal emergency services and disaster agencies, and auxiliary policemen or deputies. Employees must make a reasonable effort to notify Sterling that they may be absent from or late to work.

FAMILY MILITARY LEAVE ACT

Sterling will grant eligible employees up to 30 days of unpaid family military leave if their spouse or child is called to military service with the State or the United States for more than 30 days. Family military leave must be taken during the time federal or state deployment orders are in effect.

To be eligible, the employee must have been employed for at least 12 months and have worked at least 1,250 hours during the 12-month period immediately preceding the request for family military leave. Employees may take family military leave only if they have exhausted all accrued vacation, personal, compensatory and other leave, except sick and disability leave.

The request for leave must be made at least 14 days in advance if the leave will consist of five (5) or more consecutive work days. If the leave will consist of less than five (5) days, the request must be made with as much advance notice as is practicable.

Employees that take family military leave may elect to continue benefits at their own expense during the leave.

Employees that take family military leave will be reinstated to the position they held before commencing leave, or to a position with equivalent seniority, status, employee benefits, pay and other terms and conditions of employment.

Employees must provide certification from the proper military authority to verify their eligibility for the family military leave requested.

LEAVE FOR VICTIMS OF DOMESTIC OR SEXUAL VIOLENCE

In accordance with the Illinois Victims' Economic Security and Safety Act, employees who are the victims of domestic or sexual violence, or who have family or household members who are the victims of domestic or sexual violence, may be eligible for up to 12 weeks of **unpaid** leave within any 12-month period, and upon return will be restored to the same or an equivalent position.

Prior to receiving such leave, Sterling may require the employee to substitute any and all annual or vacation leave, personal leave, and sick leave. This substitution of paid leave does not extend the total allowed leave period but runs concurrently with it. Leave for Victims of Domestic or Sexual Violence also runs concurrently with Family and Medical Leave when the reason for the leave qualifies for Family and Medical Leave, such as for a serious health condition. In these situations, the leave does not extend any unpaid time available to the employee under Family and Medical Leave.

Reasons for Leave

Eligible employees may take Leave for Victims of Domestic or Sexual Violence so that they or a member of their family or household may take part in one or more of the following actions:

- seek **medical attention** for or recover from physical or psychological injuries caused by domestic or sexual violence;
- obtain services from a **victim's services** organization;
- obtain **psychological or other counseling**;
- participate in **safety planning**, including temporary or permanent relocation, or other actions to increase their physical safety or economic security; or
- seek **legal assistance** or remedies to ensure their health and safety.

Notice of Need for Leave

Eligible employees must provide Sterling with at least 48 hours advance notice of the need for leave, unless such notice is not practicable.

Certification of the Need for Leave

To request leave, the employee must supply Sterling with a sworn statement from the employee that the employee or a family or household member is a victim of domestic or sexual violence and that leave is necessary for one of the reasons described above.

The employee seeking leave also must provide supporting documentation from one of the following sources:

- a victim's services organization;
- a member of the clergy;
- an attorney;
- a medical professional from which the employee or family or household member has sought assistance;
- a police report or court record; or
- any other corroborating evidence.

Employee Benefits

During an approved leave, Sterling will maintain the employee's health benefits as if the employee continued to be actively employed.

If paid time off is substituted for unpaid leave, Sterling will deduct the employee's portion of the any applicable health plan premium as a regular payroll deduction.

If the employee's leave is unpaid, the employee must make arrangements with Accounting prior to taking leave to pay their portion of any applicable health insurance premiums each month.

If the employee elects not to return to work at the end of the leave period, the employee will be required to reimburse Sterling for the cost of the health benefit premiums paid by Sterling for maintaining coverage during the unpaid leave period, unless the employee cannot return to work because of continuation, recurrence or onset of domestic or sexual violence or other circumstances beyond the employee's control.

Intermittent and Reduced Schedule Leave

Unpaid leave may be taken intermittently (in separate blocks of time) or on a reduced leave schedule (reducing the usual number of hours you work per work week or work day).

Periodic Reports

During a leave, the employee must provide periodic reports (at least every 30 days) regarding the employee's status and any change in the employee's plans on returning to work.

Enforcement and Retaliation

Employees will not be subject to discharge, harassment or discrimination for exercising rights or attempting to exercise rights under this policy, opposing practices that they believe to be in violation of this policy or supporting the exercise of rights of another under this policy.

If employees have any questions regarding this policy, they should contact Human Resources.

SCHOOL VISITATION LEAVE

Parents and guardians having custody of schoolchildren from kindergarten through Grade 12 are provided up to eight (8) hours per year of unpaid time off (not to exceed four (4) hours in any single day) to attend school conferences or classroom activities related to the child if the conference or classroom activities cannot be scheduled during nonwork hours. Sterling may require proof that the employee attended school conferences or classroom activities related to the child. Employees first must exhaust all accrued paid time off, then they may take unpaid time off for this purpose. However, employees will be given the opportunity to make up any lost work time. Seven (7) days' written notice (except in emergency situations when 24-hours' notice is sufficient) must be given to the manager or manager before taking any time off for school children. Employees must consult with Sterling to schedule their leave so as not to unduly disrupt operations.

BUSINESS EXPENSE REIMBURSEMENT

This policy establishes the procedures all employees must follow when they are required to incur business-related expenses on behalf of Sterling.

Employees are expected to use good judgment regarding all expenses incurred while conducting business for Sterling. Expenses must be reasonable in the circumstances, necessary and incidental to the performance of the business involved and for the primary benefit of Sterling rather than the employee.

Expense Reporting

Employees must properly substantiate all business expenses submitted for reimbursement in accordance with this policy.

Employees are responsible for properly substantiating all charges incurred on behalf of the Sterling. All expense reports should be submitted in a timely manner, no later than 30 calendar days from the date the expense was incurred. Expenses submitted more than 30 calendar days after being incurred may be denied for reimbursement, at the Sterling's discretion.

Employees are expected to submit original receipts or other supporting documentation for all business expenses incurred on behalf of the Sterling in accordance with this policy. However, if a receipt or other supporting documentation is missing, lost or nonexistent, employees should contact Cindy Goodwin, Sterling's Travel Coordinator, to discuss whether reimbursement may still be available.

Reimbursement

There are limits on the types and amounts of expenses that will be reimbursed, as follows:

- the Sterling will not reimburse employees for any of the following types of expenses: alcohol.
- the Sterling will not reimburse employees for any single expense of more than \$3. The Sterling also will not reimburse employees for expenses that attempt to evade this maximum amount, for example, where employees artificially split a single expense into two transactions so that both are under the limit.
- the Sterling will not reimburse employees for any expenses that are not required or that primarily benefit employees, rather than the Sterling. This includes, but is not limited to, expenses employees incur by purchasing smartphones or other electronic devices that the employees own, voice or data plans on such devices, Internet service at employees' residence, other home-office equipment or furniture, and like expenses. Even if items or services such as these are used for business purposes at times, employees are generally not required to purchase them in order to perform their job duties, and they are primarily for the employee's benefit rather than for the Sterling's. Accordingly, expenses for items or services of this nature will not be reimbursed by the Sterling.

- any other expenses that, in the Sterling's discretion, are unreasonable, extravagant, or not business-related, will not be reimbursed by the Sterling.

Expenses that violate any of the four guidelines above will not be reimbursed unless the employee received approval from the Cindy Goodwin, in writing, prior to incurring the expense.

The Sterling assumes no responsibility to reimburse employees for expenses that are not in compliance with this policy.

ILLINOIS: RECEIPT OF NON-HARASSMENT POLICY

In compliance with the Illinois Human Rights Act (Act) and any other related federal or local law/ordinance, all employees have the right to be free from unlawful discrimination or harassment (including sexual harassment). This means that employers may not treat people differently based on race, age, gender, pregnancy, disability, sexual orientation or any other protected class named in the Act or any other related federal or local law/ordinance. This applies to all employer actions, including hiring, promotion, discipline and discharge.

It is Sterling's policy to prohibit intentional and unintentional discrimination or harassment (including sexual harassment) of or against job applicants, contractors, interns, volunteers or employees by another employee, supervisor, vendor, customer or any third party on the basis of actual or perceived race, color, creed, religion, national origin, ancestry, citizenship status, age, sex or gender (including pregnancy, childbirth and pregnancy-related conditions), gender identity or expression (including transgender status), sexual orientation, marital status, military service and veteran status, physical or mental disability, genetic information or any other characteristic protected by applicable federal, state or local laws (referred to as "protected characteristics"). The Company also prohibits retaliation. All such conduct will not be tolerated by Sterling.

The purpose of this policy is not to regulate our employees' personal morality, but to ensure that no one engages in discrimination or harassment (including sexual harassment) of another individual in the workplace, including while on Company premises, while on Company business (whether or not on Company premises) or while representing the Company. In addition to being a violation of this policy, discrimination, harassment or retaliation based on any protected characteristic as defined by applicable federal, state or local laws also is unlawful. For example, sexual harassment and retaliation against an individual because the individual reported or filed a complaint of discrimination or harassment (including sexual harassment) or because an individual aided, assisted or testified in an investigation or proceeding involving a complaint of discrimination or harassment (including sexual harassment) as defined by applicable federal, state or local laws or helped others exercise their right to complain about discrimination or harassment (including sexual harassment) as defined by applicable federal, state or local laws are unlawful.

Reasonable Accommodation

Employees also have the right to reasonable workplace accommodations based on pregnancy, disability, religious beliefs or any other reason required by applicable federal, state or local laws. This means employees can ask for reasonable changes to their job if needed because they are pregnant or disabled or because of their religious beliefs or any other reason required by applicable federal, state or local laws.

Discrimination Defined

Discrimination under this policy generally means treating an individual differently or denying or granting a benefit to an individual because of any actual or perceived protected characteristic as defined under federal, state or local law/ordinance.

Harassment Defined

Harassment generally is defined in this policy as unwelcome verbal, visual or physical conduct that denigrates or shows hostility or aversion towards an individual because of any actual or perceived protected characteristic or has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Harassment can be verbal (including slurs, jokes, insults, epithets, gestures or teasing), visual (including offensive posters, symbols, cartoons, drawings, computer displays, text messages, social media posts or e-mails) or physical conduct (including physically threatening another, blocking someone's way, etc.). Such conduct violates this policy, even if it does not rise to the level of a violation of applicable federal, state or local laws. Because it is difficult to define unlawful harassment, employees are expected to behave at all times in a manner consistent with the intended purpose of this policy.

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Sexual harassment can include all of the above actions, as well as other unwelcome conduct, such as unwelcome or unsolicited sexual advances, requests for sexual favors, conversations regarding sexual activities and other verbal, visual or physical conduct of a sexual nature when:

- submission to that conduct or those advances or requests is made either explicitly or implicitly a term or condition of an individual's employment; or
- submission to or rejection of the conduct or advances or requests by an individual is used as the basis for employment decisions affecting the individual; or
- the conduct or advances or requests have the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Examples of conduct that violate this policy include:

1. unwelcome flirtations, leering, whistling, touching, pinching, assault or blocking normal movement;
2. requests for sexual favors or demands for sexual favors in exchange for favorable treatment;
3. obscene or vulgar gestures, posters or comments;
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5. propositions or suggestive or insulting comments of a sexual nature;
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7. sexually-explicit e-mails, text messages or voicemails;

8. uninvited touching of a sexual nature;
9. unwelcome sexually-related comments;
10. conversation about one's own or someone else's sex life;
11. conduct or comments consistently targeted at only one gender, even if the content is not sexual;
and
12. teasing or other conduct directed toward a person because of the person's gender.

Company Reporting Procedures

If the employee has been subjected to or witnessed conduct which violates this policy, the employee should immediately report the matter to any member of management. If the employee is unable for any reason to contact this person, or if the employee has not received an initial response within five (5) business days after reporting any incident of what the employee perceives to be harassment, the employee should contact Human Resources Manager. If the person toward whom the complaint is directed is one of the individuals indicated above, the employee should contact any higher-level manager in the reporting hierarchy.

Investigation Procedures

Every report of perceived harassment will be fully investigated, and corrective action will be taken where appropriate. All complaints will be kept confidential to the extent possible, but confidentiality cannot be guaranteed. Employees must cooperate with all investigations conducted pursuant to this policy.

Retaliation Prohibited

In addition, the Company will not allow any form of retaliation against individuals who report unwelcome conduct to management or who cooperate in the investigations of such reports in accordance with this policy. If the employee has been subjected to any such retaliation, the employee should report it in the same manner in which the employee would report a claim of perceived harassment under this policy.

Violation of this policy including any improper retaliatory conduct will result in disciplinary action, up to and including termination.

Additional Reporting Procedures

Aside from the internal complaint process at the Company described above, employees may choose to file a charge/complaint of discrimination or harassment (including sexual harassment) with the Illinois Department of Human Rights (IDHR).

The charge process for violations of the law can be initiated by completing the form at www.illinois.gov/dhr or by contacting the IDHR at IDHR.Intake@illinois.gov, or either of these offices:

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(312) 814-6251 (Fax)	(217) 785-5106 (Fax)

Employees also can contact the Illinois Sexual Harassment and Discrimination Helpline at 1-877-236-7703.

I have read and I understand Sterling's Non-Harassment Policy.

Employee's Printed Name: _____

Employee's Signature: _____

Position: _____

Date: _____

The signed original copy of this receipt should be given to management - it will be filed in your personnel file.

ILLINOIS: CHICAGO RECEIPT OF DISCRIMINATION AND NON-HARASSMENT (INCLUDING SEXUAL HARASSMENT) POLICY

In compliance with the Illinois Human Rights Act (Act), the City of Chicago Human Rights Ordinance (Ordinance) (as applicable) and any other related federal or local law/ordinance, all employees have the right to be free from unlawful discrimination or harassment (including sexual harassment). This means that employers may not treat people differently based on race, age, gender, pregnancy, disability, sexual orientation or any other protected class named in the Act, Ordinance (as applicable) or any other related federal or local law/ordinance. This applies to all employer actions, including hiring, promotion, discipline and discharge.

It is Sterling's policy to prohibit intentional and unintentional discrimination or harassment (including sexual harassment) of or against job applicants, contractors, interns, volunteers or employees by another employee, supervisor, vendor, customer or any third party on the basis of actual or perceived race, color, creed, religion, national origin, ancestry, citizenship status, age, sex or gender (including pregnancy, childbirth and pregnancy-related conditions), gender identity or expression (including transgender status), sexual orientation, marital status, military service and veteran status, physical or mental disability, genetic information or any other characteristic protected by applicable federal, state or local laws (referred to as "protected characteristics"). The Company also prohibits retaliation. All such conduct will not be tolerated by Sterling.

The purpose of this policy is not to regulate our employees' personal morality, but to ensure that no one engages in discrimination or harassment (including sexual harassment) of another individual in the workplace, including while on Company premises, while on Company business (whether or not on Company premises) or while representing the Company. In addition to being a violation of this policy, discrimination, harassment or retaliation based on any protected characteristic as defined by applicable federal, state or local laws also is unlawful. For example, sexual harassment and retaliation against an individual because the individual reported or filed a complaint of discrimination or harassment (including sexual harassment) or because an individual aided, assisted or testified in an investigation or proceeding involving a complaint of discrimination or harassment (including sexual harassment) as defined by applicable federal, state or local laws or helped others exercise their right to complain about discrimination or harassment (including sexual harassment) as defined by applicable federal, state or local laws are unlawful.

Reasonable Accommodation

Employees also have the right to reasonable workplace accommodations based on pregnancy, disability, religious beliefs or any other reason required by applicable federal, state or local laws. This means employees can ask for reasonable changes to their job if needed because they are pregnant or disabled or because of their religious beliefs or any other reason required by applicable federal, state or local laws.

Discrimination Defined

Discrimination under this policy generally means treating an individual differently or denying or granting a benefit to an individual because of any actual or perceived protected characteristic as defined under federal, state or local law/ordinance.

Harassment Defined

Harassment generally is defined in this policy as unwelcome verbal, visual or physical conduct that denigrates or shows hostility or aversion towards an individual because of any actual or perceived protected characteristic or has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Harassment can be verbal (including slurs, jokes, insults, epithets, gestures or teasing), visual (including offensive posters, symbols, cartoons, drawings, computer displays, text messages, social media posts or e-mails) or physical conduct (including physically threatening another, blocking someone's way, etc.). Such conduct violates this policy, even if it does not rise to the level of a violation of applicable federal, state or local laws. Because it is difficult to define unlawful harassment, employees are expected to behave at all times in a manner consistent with the intended purpose of this policy.

Sexual Harassment Defined

Sexual harassment can include all of the above actions, as well as other unwelcome conduct, such as unwelcome or unsolicited sexual advances, requests for sexual favors, conversations regarding sexual activities and other verbal, visual or physical conduct of a sexual nature when:

- submission to that conduct or those advances or requests is made either explicitly or implicitly a term or condition of an individual's employment; or
- submission to or rejection of the conduct or advances or requests by an individual is used as the basis for employment decisions affecting the individual; or

- the conduct or advances or requests have the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

For employees working in the City of Chicago, sexual harassment also is defined specifically under the Ordinance to mean any (i) unwelcome sexual advances or any unwelcome conduct of a sexual nature; or (ii) requests for sexual favors or conduct of a sexual nature when (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment, (2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual, or (3) such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment; or (iii) sexual misconduct, which means any behavior of a sexual nature which also involves coercion, abuse of authority or misuse of an individual's employment position.

Examples of conduct that violate this policy include:

1. unwelcome flirtations, leering, whistling, touching, pinching, assault or blocking normal movement;
 2. requests for sexual favors or demands for sexual favors in exchange for favorable treatment;
 3. obscene or vulgar gestures, posters or comments;
 4. sexual jokes or comments about a person's body, sexual prowess or sexual deficiencies;
 5. propositions or suggestive or insulting comments of a sexual nature;
 6. derogatory cartoons, posters and drawings;
 7. sexually-explicit e-mails, text messages or voicemails;
 8. uninvited touching of a sexual nature;
 9. unwelcome sexually-related comments;
 10. conversation about one's own or someone else's sex life;
 11. conduct or comments consistently targeted at only one gender, even if the content is not sexual;
- and

12. teasing or other conduct directed toward a person because of the person's gender.

Company Reporting Procedures

If the employee has been subjected to or witnessed conduct which violates this policy, the employee should immediately report the matter to any member of management. Written complaints can be submitted internally using the form provided in this handbook. If the employee is unable for any reason to contact this person, or if the employee has not received an initial response within five (5) business days after reporting any incident of what the employee perceives to be harassment, the employee should contact Human Resources Manager. If the person toward whom the complaint is directed is one of the individuals indicated above, the employee should contact any higher-level manager in the reporting hierarchy.

Investigation Procedures

Every report of perceived harassment will be fully investigated, and corrective action will be taken where appropriate. All complaints will be kept confidential to the extent possible, but confidentiality cannot be guaranteed. Employees must cooperate with all investigations conducted pursuant to this policy.

Retaliation Prohibited

In addition, the Company will not allow any form of retaliation against individuals who report unwelcome conduct to management or who cooperate in the investigations of such reports in accordance with this policy. If the employee has been subjected to any such retaliation, the employee should report it in the same manner in which the employee would report a claim of perceived harassment under this policy.

Violation of this policy including any improper retaliatory conduct will result in disciplinary action, up to and including termination.

Training Requirement

Employees, other than those who supervise or manage employees, are required to participate in a minimum of one (1) hour of sexual harassment prevention training at least once a year in accordance with the IHRA/Ordinance. Anyone who supervises or manages employees is required to participate in a minimum of two (2) hours of sexual harassment prevention training at least once a year in accordance with the IHRA/Ordinance. Additionally, all employees are required to participate in one (1) hour of bystander training at least once a year in accordance with the Ordinance.

Additional Reporting Procedures

Aside from the internal complaint process at the Company described above, employees may choose to file a charge/complaint of discrimination or harassment (including sexual harassment) with the government agency or agencies set forth below.

Illinois Department of Human Rights (IDHR)

The charge process for violations of the law can be initiated by completing the form at www.illinois.gov/dhr or by contacting the IDHR at IDHR.Intake@illinois.gov, or either of these offices:

Chicago Office	Springfield Office
555 W. Monroe St., 7th Floor	535 W. Jefferson Street, 1st Floor
Chicago, IL 60661	Springfield, IL 62702
(312) 814-6200	(217) 785-5100
(866) 740-3953 (TTY)	(866) 740-3953 (TTY)
(312) 814-6251 (Fax)	(217) 785-5106 (Fax)

Employees also can contact the Illinois Sexual Harassment and Discrimination Helpline at 1-877-236-7703.

Chicago Commission on Human Relations (CCHR)

The complaint process for violations of the law can be initiated by visiting www.chicago.gov/CCHR or by contacting the CCHR at cchr@cityofchicago.org, or at:

740 N. Sedgwick Suite 400
Chicago, IL 60654
(312) 744-4111
(312) 744-1088 (TTY)
(312) 744-1081 (FAX)

Additionally, employees may choose to file a charge of discrimination or harassment (including sexual harassment) with the United States Equal Employment Opportunity Commission (EEOC) by contacting the EEOC at:

JCK Federal Building
230 S Dearborn Street

Chicago, IL 60604

Filing of Private Sector Charges/Enforcement/Federal Sector Hearings: Suite 1866

Mediation Unit/Legal Unit: Suite 2920

(800) 669-4000

(312) 588-1260 (Fax)

I have read and I understand Sterling's Discrimination and Non-Harassment (Including Sexual Harassment) Policy.

Employee's Printed Name: _____

Employee's Signature: _____

Position: _____

Date: _____

The signed original copy of this receipt should be given to management - it will be filed in your personnel file.