



Date of Issue: 28-FEB-2014

Latest Revision: 11-JAN-2019

Next Review Date: 11-JAN-2020

Department: Human Resources

Approvals:

(1) Chief Executive Officer

(2) General Counsel

(3) Chief Human Resources Officer

Equal Employment Opportunity and Anti-Discrimination Policy

Total Pages: 3

Sterling Construction Company, Inc. and each of its subsidiaries and affiliates (collectively "*Sterling*" or the "*Company*") is an equal opportunity employer and complies with all applicable federal, state, and local fair employment practices laws. The Company strictly prohibits and does not tolerate discrimination against employees, applicants, or any other covered persons because of race, color, religion, creed, national origin or ancestry, ethnicity, sex (including pregnancy), gender (including gender nonconformity and status as a transgender individual), age, physical or mental disability, citizenship, past, current, or prospective service in the uniformed services, genetic information, or any other characteristic protected under applicable federal, state, or local law. All employees (which means "*you*"), other workers, and representatives are prohibited from engaging in unlawful discrimination.

Further, it is the policy of the Company to assure that applicants are employed, and that employees are treated during employment, without regard to their race, religion, sex, color, national origin, age or disability. Such action shall include: employment, upgrading, demotion, or transfer; recruitment or recruitment advertising; layoff or termination; rates of pay or other forms of compensation; and selection for training, including apprenticeship, pre-apprenticeship, and/or on-the-job training.

The Company complies with the Americans with Disabilities Act (ADA), as amended by the ADA Amendments Act, the California Fair Employment and Housing Act (FEHA); the California Pregnancy Disability Leave Law (PDL); the California Family Rights Act (CFRA) and all applicable state or local laws. Consistent with those requirements, the Company will reasonably accommodate qualified individuals with a disability if such accommodation would allow the individual to perform the essential functions of the job, unless doing so would create an undue hardship. If you believe you need an accommodation, refer any such request to the Human Resources Department. The Company will also, where appropriate, provide reasonable accommodations for your religious beliefs or practices.

Complaint Procedure

If you are subjected to any conduct that you believe violates this policy, you must promptly speak to, write (in any form), or otherwise contact any of the following resources:

- Your direct supervisor or manager or, if the conduct involves your direct supervisor or manager the next level above your direct supervisor or manager.
- Any Human Resources representative.
- Any member of the Company's senior management team.

- The Company's Ethics & Compliance Helpline, which can be accessed:
 - By calling 1-800-398-1496, if you speak English; or
 - By calling 1-800-216-1288, if you speak Spanish (From Mexico dial 001-800-216-1288); or
 - By sending an e-mail in any language to: Reports@Lighthouse-Services.com (You must include the name of the company).
- The California Department of Fair Employment and Housing, which can be contacted toll free at (800) 884-1684 or visit <http://www.dfeh.ca.gov/>.
- The federal Equal Employment Opportunity Commission, which can be contacted toll free at (800) 669-4000 or visit <http://www.eeoc.gov/>.

Your complaint should be as detailed as possible, including the names of all individuals involved and any witnesses. If you have not received a satisfactory response within five (5) days after reporting any incident of what you perceive to be discriminatory conduct, please immediately contact the Company's Chief Compliance Officer or General Counsel. These individuals will ensure that a prompt investigation is conducted.

Investigation

The Company will ensure that a fair, timely, and thorough investigation is conducted by qualified personnel in an impartial manner that provides all parties with appropriate due process and reaches reasonable conclusions based on the evidence collected. The Company will maintain appropriate documentation and tracking to ensure reasonable progress is made. At the close of the investigation, the Company will consider appropriate options for remedial actions and resolutions. If misconduct is found, the Company shall take prompt, corrective action, as appropriate. The Company will maintain confidentiality to the extent possible. You will be informed of the results of the investigation.

Supervisor Responsibilities

Supervisors and managers have an obligation to report discriminatory conduct of which they become aware. Supervisors and managers who observe such conduct or who receive any complaints of misconduct must report the conduct or complaint to the Human Resources Department so that an investigation can be made and corrective action taken, if appropriate.

No Retaliation

No one will be subject to, and the Company prohibits, any form of discipline, reprisal, intimidation, or retaliation for good faith reports or complaints of incidents of discrimination of any kind, pursuing any discrimination claim, or cooperating in related investigations. For more information on the Company's policy prohibiting retaliation, please refer to Sterling's Code of Business Conduct, or contact the Company's Chief Compliance Officer or General Counsel.

The Company is committed to enforcing this policy against all forms of discrimination. However, the effectiveness of our efforts depends largely on you telling us about inappropriate workplace conduct. If you feel that someone else may have been subjected to conduct that violates this policy, you should report it immediately. If you do not report discriminatory conduct,

the Company may not become aware of a possible violation of this policy and may not be able to take appropriate corrective action.

Violations of this Policy

Any employee, regardless of position or title, whom is determined to have subjected another individual to discrimination or retaliation in violation of this policy will be subject to discipline, up to and including termination of employment.

Administration of this Policy

The Human Resources Department is responsible for the administration of this policy. If you have any questions regarding this policy or questions about discrimination, accommodations, or retaliation that are not addressed in this policy, please contact the Human Resources Department.

Employees Covered Under a Collective Bargaining Agreement

The employment terms set out in this policy work in conjunction with, and do not replace, amend, or supplement any terms or conditions of employment stated in any collective bargaining agreement that a union has with the Company. You should consult the terms of your collective bargaining agreement. Wherever employment terms in this policy differ from the terms expressed in the applicable collective bargaining agreement with the Company, you should refer to the specific terms of the collective bargaining agreement, which will control.

Conduct Not Prohibited by This Policy

This policy is not intended to restrict communications or actions protected or required by state or federal law.
