

**ANVIL**

**CODE OF ETHICS**

**REVISION 3  
JANUARY 2020**

## **MESSAGE FROM OUR PRESIDENT**

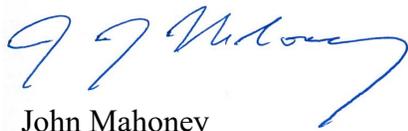
Our company was founded on the solid principles of honesty, integrity, fairness, and professional competence—values that form long-term relationships with our employees and our clients. This Code of Ethics helps clarify these principles and Anvil’s culture.

I believe it is necessary to provide our people with a document that defines Anvil’s standards of behavior. We expect this behavior from ourselves and our co-workers. Therefore, it is important for each of us to read and follow this Code of Ethics.

As you’ll see, Anvil’s Board and Senior Management have endorsed this Code of Ethics and expect everyone at Anvil to act in ways consistent with its standards. We also want you to feel comfortable to report behavior that does not reflect our culture. Therefore, we have included a confidential way to voice your concerns or report conduct that you believe breaks this Code.

Ultimately, each of us is responsible for our own behavior and how we represent Anvil. Our reputation and future success depends on retaining Anvil’s reputation for honesty and integrity. It is a priceless asset for all of us.

Thank you,



John Mahoney  
President



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**BOARD ENDORSEMENT**

Anvil's Board of Directors fully endorses and supports Anvil's Code of Ethics. The Board expects all Anvil employees to conduct business in a manner consistent with this Code, which is further supported by Anvil's Mission Statement and Operating Principles, and Policies.

The Board hereby charges Anvil's President to enforce this Code of Ethics, ensuring that each employee understands and adheres to its principles.



Gordon C. Lindell,  
Chairman of the Board



John Mahoney  
President

## **INTRODUCTION**

Anvil's success depends on our reputation, performance, and the way we treat others: employees, clients, and suppliers. As an ESOP company, we are employee-owners who are invested in Anvil's future and reputation. As employees, we work to follow a set of guiding principles—like teamwork, fairness, trust, and honesty that have built this company and continued its success.

### ***Ethics***

In the business world, as in everyday life, ethics matters. Business ethics encourage us to adhere to a higher standard than simply legal behavior. When each of us consciously acts ethically, this behavior continually promotes Anvil's culture of trust and fairness among employees and with our clients. It decreases behavior that can weaken our organization: fear, anger, suspicion, passive/aggressive behavior, and compulsive ego.

This culture produces an environment of open communication and cooperation that encourages each of us to be a contributing member of a successful team within an organization that recognizes the efforts of all.

## **PURPOSE**

Anvil's Code of Ethics (Code) is intended to help us all act ethically by guiding our decision making and behavior. It serves as the cornerstone of our commitment to conduct business in accordance with Anvil's overall philosophies, as defined in the following documents:

- [Mission Statement & Operating Principles](#)
- [General Policies](#)

In addition, Anvil's detailed policies, procedures, and Safety Program may help guide you. These are all available on Anvil's SharePoint site.

### ***Responsibilities***

All Anvil employees or anyone representing Anvil must adhere to the standards set forth in this Code. All Anvil employees acknowledge receipt and confirm that they have read this Code. Therefore, as an Anvil employee or contractor, you are required to:

- Read, understand, and follow this Code
- Seek guidance from your resource manager or supervisor if you are uncertain about the proper way to act on Anvil's behalf
- Report any suspected Code violations to your resource manager or supervisor.

Anvil resource managers and supervisors are required to:

- Create and support a culture of integrity that reflects our operating principles
- Provide tools and training necessary to follow the Code
- Support those who have reported Code violations in good faith and NEVER retaliate.

Refer to this Code when you need information or guidance when making an ethical decision. While the Code cannot possibly cover every subject matter or situation, we are confident that if

you read, understand and follow it, you will know the right questions to ask, the right individuals to consult, and the right way to make your decision.

## **RULES OF BUSINESS CONDUCT**

Anvil is committed to creating a work environment that is safe and professional. In this environment diversity is valued and people are treated with respect and dignity.

Our culture is based on meritocracy - assignments and responsibilities are based on demonstrated ability (merit) and talent rather than by legacy or popularity.

If faced with an ethical question, Anvil employees should ask themselves:

- What is my best response?
- How can I ensure it's best for my team and my company?
- Is this action legal?
- Does it comply with company policies and standards?
- Would I be comfortable telling my supervisors, fellow employees, subordinates, or family about my action?
- Would I be comfortable if my action were made public?

### ***Employee Conduct***

#### **Diversity and Inclusion**

At Anvil, every employee contributes to our growth and success. Therefore, each of us must do what we can to promote an inclusive work environment to:

- Capitalize on our different talents
- Optimize our collective strengths
- Minimize our individual weaknesses.

#### **Harassment in the Workplace**

As detailed in our [Harassment in the Workplace Policy](#), Anvil provides a work environment that is free of discrimination and harassment.

#### Discrimination

Discrimination has no place at Anvil. This behavior is in direct conflict with our operating principles. Our commitment to a diverse workforce means that we must work together to eradicate and prevent discrimination in any form. In general, discrimination arises when a person or a group is the target of unequal treatment because of certain protected characteristics, such as race, color, national origin, age, religion, gender, sexual orientation, disability, or any other status protected by law.

If you know or suspect that discriminatory behavior has taken place, report the situation immediately by contacting a supervisor you trust or any member of Anvil management.

#### Harassment

Harassment is a form of discrimination. Anvil prohibits all forms of harassment. Harassment refers to any form of conduct that creates, or attempts to create, an intimidating, hostile, abusive,

or offensive work environment where the behavior is unwelcome. Harassing conduct can be physical, verbal, written, or visual.

If you know or suspect that harassing behavior has taken place, report the situation immediately by contacting a supervisor you trust or any member of Anvil management.

### **Disrespectful Behavior**

We make every effort to hire and retain smart, accomplished, professional, talented, and pleasant people who fit within our employee-friendly work environment. Consequently, people with the following personalities have no place at Anvil:

- Boorish, belittling, condescending, or demeaning
- Unreasonably difficult and unpleasant
- Tendency to misuse management authority to bully or intimidate others and ignore our core values.

Even if you deliver revenue and help capture important projects, if your behavior alienates other talented contributors and creates an unhealthy work environment, you have no place at Anvil.

Technically, your abusive behavior may not violate laws or Anvil's anti-discrimination or anti-harassment policies, but it is contrary to our collaborative team environment, and Anvil can terminate your employment for disrespectful and unprofessional behavior.

### **Use of Communication Systems and Technologies**

Anvil expects you to use our communication systems primarily for work-related purposes and only access appropriate content. Therefore, Anvil reserves the right to:

- Monitor internet use on company facilities
- Block access to offensive, unlawful, and non-business-related internet sites
- Intercept transmission of any inappropriate materials

Attempts to access offensive or illegal content with Anvil systems or using Anvil computers to store such content may result in disciplinary actions, including termination.

### **Health and Safety**

#### ***Safety is First, Last, Always and in All Ways***

Anvil places a high value on employee safety and is committed to providing a safe workplace for all employees. We must all strive for ZERO accidents. This happens with training, awareness, and thinking through each operation to ensure personal safety. We maintain safe facilities, safe practices, and safe job sites.

We are further committed to safety in our designs, incorporating all safety codes and regulations into functional, constructible designs. We focus on how constructors can safely build our design, and how the end product will be operated efficiently and maintained safely.

Safety does not occur by chance; it requires all of us to pay careful attention. For complete information about Anvil's Corporate Safety Program, refer to the [Safety Program](#) on Anvil's SharePoint site.

### **Workplace Violence**

As part of Anvil's Health and Safety commitment, we have zero tolerance for workplace violence. Therefore, never bring personal weapons, such as guns and other implements that can be used to harm others, to work.

Employees who are violent or threaten violence in the workplace will be subject to disciplinary action, including immediate termination of employment and, when appropriate, criminal prosecution.

### **Drugs and Alcohol**

As detailed in our Safety Program's [Substance Abuse Policy](#), Anvil makes every reasonable effort to ensure a drug-free and alcohol-free workplace. Possessing or being under the influence of illegal drugs, alcohol, or misusing prescription and "over-the-counter" drugs during work puts our safety at risk. Therefore, these activities are strictly prohibited and subject to discipline, including termination.

Employees who are found to have tampered with the drug and alcohol testing process or have in their possession the equipment necessary to do so are subject to immediate termination.

Anvil provides assistance to those who seek help for a substance abuse problem. So, if you need help, contact your supervisor, resource manager, or human resources.

### **Protection of Personal Information**

As detailed in our [Privacy Policy](#), protecting employees' personal information is of special concern, particularly in today's environment of electronic information storage and exchange. Anvil exercises its best efforts to keep your personal information safe. We comply with all privacy laws that apply in jurisdictions where we do business.

### **Our Company**

#### **Anvil's Assets**

Treat and protect Anvil's assets as you would your own. All of us must protect Anvil assets from theft, damage, loss, and misuse. Anvil's physical assets, including facilities, equipment, vehicles, and computers, may only be used for legitimate business purposes.

When using Anvil funds or credit cards, exercise sound judgment in spending and promptly submit documentation to support and reconcile expenditures.

#### **Outside Inquiries**

We are occasionally contacted and asked to give comments about Anvil, projects, clients, or events that impact them. Do not respond to these inquiries unless you've been given the specific authority to do so. If an outside party, such as a journalist, financial analyst, or attorney asks you for information, direct the inquiry to Anvil's President, CFO or a designated representative.

## **Conflicts of Interest**

Conflicts of interest arise when our personal or financial interests interfere or appear to interfere with our professional judgment or objectivity. If something does not feel quite right, chances are it's not and you should ask for guidance. When dealing with conflicts, disclosure is critical.

### Personal Conflicts of Interest

When making decisions on Anvil's behalf, a personal conflict of interest exists whenever people are influenced by their own personal interests or relationships.

### Organizational Conflicts of Interest

An organizational conflict of interest may arise when Anvil's work for one client conflicts with our relationship with another client.

## **Gifts and Entertainment**

Business gifts and entertainment are courtesies designed to build working relationships with our suppliers and customers.

However, giving or receiving anything of value is not appropriate if it creates an obligation, puts you in a situation where Anvil appears biased, or influences our business decisions.

## ***Our Clients and Suppliers***

Anvil values cooperative relationships. We work closely with clients, constructors, and suppliers. We seek, rather than avoid, difficult and complex projects to take advantage of our expertise and provide interesting and challenging work for our employees while providing our clients with enduring designs and low levels of product error.

## **Confidentiality**

Confidentiality is very important to Anvil and our clients. Upon initial employment with Anvil, each employee signs a confidentiality agreement and may be asked to sign additional agreements with our clients. Employees are prohibited from disclosing information to unauthorized persons during, and after, their employment with Anvil.

## **Financial Reporting and Record Keeping**

### Accurate Reporting

No employee should ever be pressured to alter financial or other data to "meet the numbers." Any manager or employee who pressures or asks another employee to inappropriately alter financial results or other information, or who does so themselves, will be subject to discipline, up to and including termination.

Employees sometimes worry about reporting negative financial results to management, and they may want to delay doing so until the last minute. However, this tactic only worsens the problem and decreases the chances of solving or lessening the problem. Report all financial information, whether good or bad, accurately and timely.

### Accurate Record Keeping

Accuracy of our business records is essential. We must record information accurately and timely. This information includes:

- Time charges
- Expense reports
- Project information
- Cost information
- Mandatory training
- Health and safety incidents.

Falsification or fabrication of our business records contradicts our core values. Falsifying records is illegal and may result in penalties for the individual and Anvil.

### Timekeeping

Accurately reporting time worked on each project is important to track our time and labor charges and to accurately capture project costs. Whether you are charging to a client or an overhead number:

- Record all hours worked daily
- Do not average your time between days or projects
- Always charge correct projects for time worked
- Do not allow others to change time for you in our timekeeping system—it is your personal responsibility.

### Billing and Receivables

When invoicing clients for our services, we make every effort to ensure that all charges are accurate and properly billed according to the contract with each client. We expect our clients to live up to the terms of our written contracts so we will require collection of accounts receivable per the terms of each client contract.

### Financial Audits

Anvil has a financial audit performed each year by external public accountants. If you are involved in providing information to auditors it is expected you will be forthright in providing them with accurate and complete information. In addition, when clients audit specific billing information, per rights in their client contract, you must ensure that all information given to the auditors is accurate and complete to the best of your ability.

### **Procurement Practices and Antitrust**

Anvil's [Procurement Code of Ethics and Antitrust](#) explains how Anvil conducts our procurement business around the world. Our guiding principle always is to comply with the spirit and the letter of the law. We pride ourselves for honesty and integrity. Procurement must be conducted in accordance with the highest standards of honesty and integrity wherever we operate.

## ***Our Community***

### **Community Relations and Charitable Giving**

Anvil encourages all employees to engage in the communities where they live and work. To help our communities, Anvil supports projects and programs that target long-term social and health problems, as well as those that help people during personal and community emergencies. In addition, Anvil adds a 50% matching donation to qualified employee contributions made by payroll deduction.

For more information, refer to Anvil's [Charitable Contributions Policy](#).

### **Personal Political Activities**

Anvil encourages all employees to participate in the political process and to support candidates and causes of their choice. However, you cannot use company time, property, or equipment for your own political activities. When participating in political activities, do not use Anvil's name without prior approval from upper management.

All political contributions you make to causes are voluntary and are never tied to your compensation or promotional opportunities. Such contributions should never be given with an expectation of reimbursement.

### **Corporate Political Activities**

Lobbying and political activity are an important part of our democracy, but strict rules govern what corporations may and may not do in this arena. A political contribution could be construed as a bribe if it is done in exchange for an action by a government official.

Anvil does not engage in any form of bribery, including offering or accepting "kickbacks" (A "kickback" is a return of a portion of money paid under a contract, as a reward for the contract award).

## **REPORTING SUSPECTED CODE VIOLATIONS**

We owe it to ourselves and our clients to adhere to this Code. If you find yourself in a situation that seems contrary to this Code or are aware of a possible violation, there are several methods available to report your concern. You can make your complaint without risk of retaliatory action(s). We do not retaliate against those who report concerns or violations in good faith; however, knowingly making false or malicious reports is not tolerated and are grounds for dismissal.

You may report a concern or potential violation within <http://www.lighthouse-services.com/anvilcorp>. Select the "Submit Incident Report" button, and follow the instructions. Your report may be entirely confidential or you may provide your name and contact information. Anvil takes any possible violation very seriously and will follow-up on all reports and take proactive measures to address concerns. We do not retaliate.