

BODELL

construction

HOW WE WORK, TOGETHER



Our Philosophy

The philosophy of *How We Work, Together* goes beyond what we do; it details how company employees perform our unique, value adding services. It clearly describes how we behave according to two of our core values: Value-Creating Service (to clients and coworkers) and Organizational Vitality—our energy, desire for constant improvement, commitment to excellence, and our positive attitude. These characteristics bring joy to our work and help us meet client expectations. What's more, this positivity is contagious, reaching clients, partners, vendors, and the communities in which we work. This vitality is crucial for long-term employee satisfaction, but also for the economic stability and viability of our organization.

Every day we are carefully planning, innovating and building. While delivering leading-edge production facilities and advanced process systems for our clients, we are also building relationships—foundations of trust and respect. Our company wins by aligning and enhancing ourselves as a team to continuously discover, develop and deliver the most innovative, value-creating solutions to meet the unique needs of our dynamic client partners. Through the collaborative efforts of skilled employees, we provide exceptional service to clients and colleagues alike, fostering a culture of vitality and ever forward professional development.

Our success depends on constructive, respectful collaboration among talented, knowledgeable and dedicated employees. From that collaboration emerges creativity and new ideas that generate ongoing value for our clients. Our continuous innovation and constant learning are part of what sets us apart from the rest. Our big ideas would be meaningless, however, without the small, day-to-day actions of our employees. The way we perform, behave, and treat our fellow employees, partners, vendors and clients shows who we are as a company.

The company expects employees to legally and honorably perform their obligations, avoid conflicts of interest, and undertake their responsibilities in good faith and fair dealing.

We seek to promote harmony and cooperation among company employees, clients, vendors and other stakeholders in our business.

I trust that *How We Work, Together* will inspire in you the same pride and commitment it stirs in me. We, the employees of Bodell Construction, continuously seek a **better way**. Maintaining only the highest standards of ethical behavior, guided by values is **the better way**. At home or at work, our reputation is driven by performance, behavior, and our approach to challenges. I believe that anyone will be successful in doing the right thing by learning and living the principles of *How We Work, Together*.

Regards,



Michael J. Bodell II
Vice President

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The Better Team

An Exciting, Enjoyable, Safe, and
Collaborative Work Culture – The
Better Team



The Better Team

1.1 Workplace Inclusivity and Satisfaction

We believe all employees have the right to a fair and inclusive working environment of which they are proud to be a part—one that is professional, reflects our values and follows workplace etiquette. Our team deserves a safe, respectful environment, free of discrimination, harassment or hostility.

- » We believe in continual self-initiated change, improvement, learning and advancement of standards. Our company is a place where learning is valued and leveraged to deliver added value to the project-delivery process. We seek continual organizational improvement and personal advancement. This personal and organizational progress should be sought for its own sake.
- » We believe in maintaining a spirit of unity and collaboration, with a common goal of conducting business and resolving issues with both urgency and professionalism. Creating such an environment is simple when tactful candor is used in our communication with one another.
- » We believe in personal drive, camaraderie and mutual support. Acting as a unified team, in our shared passion for what we do can bring job satisfaction and improve performance. We know that when we are aligned in purpose and supported from within, we will succeed regardless of the assignment or challenge.
- » We believe everyone should be treated with dignity and respect. Bullying, intimidation or harassment of any kind is not acceptable in our workplace. Self-improvement requires acknowledgement of our own shortcomings and a willingness to be humble and teachable. Being understanding and forgiving of others is necessary for building healthy, trusting work relationships.
- » We value diversity in all forms. The unique backgrounds, experiences, education and opinions of all employees richly contribute to our collaboration. Some of our best ideas have come from the variety of views and backgrounds possessed by our employees. This collaboration builds inclusivity and job satisfaction – the better way.



The Better Team



The Better Team

1.2 Employee Privacy

We respect the privacy of our employees and comply with all laws in the collection, use and protection of personal information in connection with our business.

- » We only collect and handle the personal information of our colleagues, shareholders, business partners, suppliers, customers and associated family or next of kin when needed for legitimate business purposes. We respect the rights each of us has to review, update and correct our information.
- » We only share personal data with others when there is a legitimate business or legal need. We ensure that those with access to the information understand the importance of keeping it private.
- » When we work with others, such as suppliers and consultants, we emphasize the importance we place on privacy and the standards we expect.

1.3 Health, Safety and Environment (HSE)

We effectively control all aspects of construction through our field-level integration of "Safety, Quality Assurance and Production Efficiency." Placing a high value on HSE, quality assurance, work productivity, and cost control has a synergistic effect in the development of effective services and solutions for our clients. No work task is so critical that time cannot be taken to ensure safe construction.

At Bodell Construction:

- » We are recognized as having a premier program in health, safety and environment (HSE) across all markets in which we operate.
- » We endeavor to secure this reputation through leadership, direction and support services to provide a healthy, safe, quality-centered, performance-oriented, personally enriching culture.
- » We work to instill in our current and prospective employees an enthusiasm for our safety program and a desire to advocate for constant improvement of the program and its results.

1.4 Transparent Communication

We build trust by communicating openly and honestly, with professional candor.

- » We share accurate information about our operations and financial performance with our stakeholders, including media, investors and regulators.
- » We comply with our market disclosure obligations and share material information that may affect how the market views the Company.
- » We communicate openly and in a timely manner with employees and encourage honest conversations with each other.

The Right Way

We legally and honorably perform our obligations, avoid conflicts of interest, and undertake all responsibilities in good faith and fair dealing.



The Right Way

The Right Way...The Better Way

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2.1 Conflicts of Interest

We ensure our personal activities and interests do not conflict with our responsibilities at Bodell Construction.

- » We use good judgement to avoid conflicts of interest or even the appearance of a conflict.
- » We declare actual and potential conflicts. Where a conflict cannot be avoided we manage it appropriately.
- » We do not allow ourselves to obtain any personal advantage through our position or role within the Company.

2.2 Fair Competition

We compete ethically and lawfully in all our activities.

- » We believe in free and fair competition, respecting all applicable competition and antitrust laws across the globe.
- » We do not obtain competitive information illegally or communicate false information regarding competitors.
- » When we interact with competitors or potential competitors, we do not share confidential information which may impact how we all compete.

2.3 Bribery and Corruption

We do not commit or become involved in bribery or corruption of any form.

- » We do not buy business or favor, no matter where we operate, no matter what the situation, no matter who is involved.
- » We never offer, give, demand or accept any financial or other favor to, or from, any person to secure business or any other advantage.
- » We do not use or make payments to speed up routine administrative actions.

The Right Way



The Right Way

2.4 Confidential Information

We protect our shareholders and ourselves by responsibly managing our own and third parties' confidential information. We never use it for personal advantage.

- » Confidential information includes technical information about products or processes, vendor lists, pricing, marketing or service strategies, non-public financial reports, and information on asset sales, mergers and acquisitions.
- » We are careful about where and to whom we talk about confidential information, and where and how we store it.
- » We do not disclose or use any confidential information for personal profit or advantage.
- » We do not share inside information with anyone else including our family and friends; we never commit the offense of insider dealing in the Company or third parties' securities.



The Right Way



The Right Way

2.5 Environmental Objectives

We are committed to protecting the environmental values of the regions where we operate and to maintaining good product stewardship for the long term.

- » We understand and then mitigate the impacts our activities might have on the environment as we plan, execute, commission, and close our projects and work with our suppliers and customers.
- » We collaborate with clients seeking sustainable improvements to product life cycles, biodiversity, climate change, land use, water and air, and mine closure to provide us continued access to resources and markets.
- » We do not use or make payments to speed up routine administrative actions.



Accountability and Compliance

We take responsibility for our actions and hold others to the same standard. We comply with company policies, even when we disagree with or do not fully understand them.



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3.1 Company Property and Records

- » We use company property, financial and electronic resources to conduct company business and not for personal gain or non-authorized use.
- » We do not obtain, use or divert company property or financial resources for personal use or benefit, for activity that causes a conflict of interest, or is inappropriate or illegal.
- » We are provided with electronic resources such as email, internet and telephone, to help us do our jobs. We can occasionally use these resources for personal reasons if that use does not impact company systems, incur undue costs for the company or interfere with our work duties.
- » We keep true and accurate records of all financial transactions and non-financial company materials.
- » We do not alter, destroy or remove company property or company records unless authorized.

3.2 Intellectual Property

By protecting our intellectual property and respecting that of others, we keep our competitive advantage.

- » We protect our intellectual property (patents, copyright, trademarks and trade secrets) and closely monitor for unauthorized use of our intellectual property by others.
- » We respect the intellectual property of others, such as our suppliers, customers and competitors, and only use their intellectual property when authorized.

3.3 Relations with Civil Society

We follow all applicable laws and engage with civil society to help develop robust policy and regulation. We do not favor any political party, group or individual.

- » We engage in public policy and legislative issues that affect our business. We contribute useful information and share our experiences to help create sound policy and legislation.
- » We respect the political process. As a company we do not involve ourselves in party political matters. We do not make any payments for the purposes of election or re-election.
- » We do not restrict individual rights and freedoms; employees and contractors may support political parties, candidates or campaigns in their own time and with their own money.

Making the Right Choice

How We Work, Together provides clear boundaries to help personnel understand and assess the choices we face regarding how to behave in sometimes tough situations.



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4.1 When faced with a dilemma, ask yourself:

- » Are my actions consistent with this statement and with company policies and standards?
- » What would I advise a friend or a member of my family to do in this situation?
- » What might others think of my actions, and how might it look on the front page of the newspaper?

4.2 National laws and How We Work, Together

In every state where we work, we comply with applicable laws. When deciding whether to apply the laws of a state or the principles of this statement, use whichever is stricter. If you break the law, or violate the principles of *How We Work, Together*, or any of our policies and standards you will face disciplinary action, which could even include dismissal or termination of your contract.

If you see something that might be against the law, the principles within this statement, or any of our policies and standards, don't ignore it; report it!

See how below:

Lead by example

Help others to understand and use *How We Work, Together*. Discuss any concerns or grievances with your immediate supervisor or with human resource support personnel.

Confidential Reporting

We Listen; We Act is also a confidential and safe way to report concerns or misconduct. Any form of retaliation against a person using *We Listen; We Act* in good faith will not be tolerated.

How We Work, Together is a set of clear and simple principles to apply in everything you do while working with, or for, the company. The way you behave shows the world who you are and what you stand for. We are grateful for the employees that represent Bodell Construction and trust that all will continue to maintain and improve our reputation by acting with integrity and respect for others.

Procedure for proper use of the confidential reporting *We Listen; We Act* hot line can be found in our employee handbook.

Think ahead and take steps that will ensure you can be proud of your choices.

Our Policies and Standards

Corporate Headquarters

586 Fine Drive
Salt Lake City, UT 84115
Tel: 801.261.4343

bodellconstruction.com

Bodell Construction Policies and Standards

For more information on How We Work, Together, and the relevant policies and standards, visit the *How We Work, Together* folder in the BCC Library: <https://bodellconstruction.sharepoint.com/sites/BCCFormsLibrary>

