



**Stanley Consultants**

VERSION 1.0 | OCTOBER 27, 2021

# CODE OF BUSINESS CONDUCT

*Our Principles of Ethics and Integrity*



## DEAR MEMBERS AND BUSINESS PARTNERS:

**Stanley Consultants is committed to doing business with integrity.** For over 100 years, we have developed strong relationships and improved lives over the course of our rich history. As we focus on the future and the continued need to build a connected, sustainable, and enriched world, each of us has an opportunity and responsibility to take ownership in how Stanley Consultants represents itself and does business. Our actions do not just impact us, they also affect our clients and their customers, the communities where we work, our business partners, and our colleagues. We all play a part in ensuring that the highest ethical standards guide how we do business and how we interact with each other.

### **SC Companies, Inc. Code of Business Conduct »**

The Company's Code of Business Conduct is the ethical compass for our directors, officers, members, partners, vendors and suppliers. It provides direction on how we collaborate, engage with the marketplace to compete for business opportunities, support communities where we live and work, and most importantly, communicate what we expect from ourselves and each other. It also provides clear expectations as to how each of us should make business decisions while working at Stanley. This information is critical as we deliver the highest quality of service to our clients and value to our member-owners.

At the heart of this document is an expectation that each of us consider how our decision-making impacts personal, team and Company credibility and reputation. That, as members and partners of Stanley, we demonstrate good business judgment, sound ethical principles, and follow the standards outlined in our Code of Business Conduct.

Our Code of Business Conduct does not attempt to address every situation that we may encounter in our complex business. From time to time, each of us may encounter ethical dilemmas or persons who do not follow our business standards. There may be times when we are not sure how to handle a difficult situation, become aware of a possible violation of laws or our policies, or simply have a question about the right course of action. In these situations, members and partners should contact **EthicsPoint**, our confidential employee and supply chain hotline, or contact Stanley's Legal Department at [ethics@stanleygroup.com](mailto:ethics@stanleygroup.com). Members can also voice any concerns with their department manager or Human Resources representative.

If you are not sure about what to do next, please ask. We welcome your questions, will keep your queries confidential, and protect you against retaliation for raising good faith concerns about how we do business. The Board of Directors, the Executive Leadership Team, and I have reviewed and approved our Stanley Consultants Code of Business Conduct. It begins with all of us and applies to all of us, whether a member, business partner, vendor, or suppliers and irrespective of title, tenure, or location. We can be proud that every subsidiary, joint venture, and affiliated company within the Stanley Consultants family subscribes to our code.

**How we do business matters.** Making ethical business decisions in everything we do sits at the heart of our core values and is key to our continued success as outstanding corporate citizens. Thank you for upholding these values, as we continue to make Stanley Consultants a place where business is done with integrity and where we all are proud to work.

Sincerely,



Kate C.E. Harris  
Chairman and Chief Executive Officer

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## Policy Owner

The Chief Legal Officer is responsible for both content and oversight of this Policy.



# Code of Business Conduct and You

## » OUR PRINCIPLES OF ETHICS AND INTEGRITY

Without exception, every member, director and contractor of SC Companies, Inc.; Stanley Consultants, Inc. and all affiliates, subsidiaries and limited liability companies (collectively, “Stanley Consultants”) must act with integrity in everything we do. Acting with integrity begins with understanding and abiding by the laws, regulations, Stanley Consultants policies and contractual obligations that apply to our roles in the company, our work and the mission of Stanley Consultants. Our Board of Directors has adopted this Code of Business Conduct, which applies to all members, directors and contractors to provide the company’s expectations as to our conduct and guidelines for our decision-making and behavior.

This Code of Business Conduct cannot address every situation you may encounter. In many instances, we expect you to apply sound and reasoned judgment and your values to guide your actions and comply with the Code’s spirit and intent. If you are ever unsure about what to do in a particular situation, your manager, the Human Resources Department or the Legal Department at Stanley Consultants can help you.

## » REPORTING CONCERNS AND ASKING QUESTIONS

If you encounter what you believe to be a potential violation of law, regulation, this Code of Business Conduct, or Stanley Consultants policy, you are urged to speak up. Speaking up is not only the right thing to do, it is also **required** by our policies. You can use [EthicsPoint](#) to report your concerns confidentially or anonymously online or by calling (888) 234-1467. You can also seek guidance from our Legal Department at [ethics@stanleygroup.com](mailto:ethics@stanleygroup.com).

We investigate all incidents reported through the anonymous hotline or otherwise and take prompt and appropriate disciplinary action when warranted. Stanley Consultants will keep the information it receives and the identity of those who report violations confidential, whenever permitted to do so by law.

## » PROTECTION FOR WHISTLE BLOWERS AGAINST RETALIATION

At Stanley Consultants, we have an open-door policy, which means that members have the opportunity to discuss issues of concern openly and candidly with management, Human Resources or the Legal Department. We do not retaliate against those who report concerns in good faith. Those who are brave to “blow the whistle” on wrongful acts and those who cooperate with our investigations are protected against retaliation. Anyone who engages in an act of retaliation will be subject to disciplinary action, up to and including termination. If you believe you have been a victim of retaliation, you should report it immediately to our Legal Department.

## » VIOLATIONS OF THE CODE OF CONDUCT

Violating this Code of Business Conduct, Stanley Consultants policies, laws and regulations or our contractual obligations not only has potential legal and regulatory consequences, but also compromises Stanley Consultants’ reputation. Unethical or illegal acts can never be justified. No member, regardless of his or her position, is ever authorized to commit, or direct another member to commit, an unethical or illegal act. In addition, members cannot direct or influence any third party to act in any way that is prohibited by law, this Code, any Stanley Consultants policy, or any contractual obligation. All violations of this Code of Business Conduct, Stanley Consultants policies, contractual obligations, or laws will be taken seriously and may result in discipline, up to and including termination of employment and possible legal action, including referral to law enforcement.

## » SUBCONTRACTORS, SUPPLIERS, JOINT VENTURE PARTNERS AND REPRESENTATIVES

This Code of Business Conduct articulates our expectations of our partners and establishes minimum expectations for performance of agreements with Stanley Consultants. In large part, this Code applies to all subcontractors, suppliers, vendors, joint venture partners, agents and representatives (hereinafter, collectively “Business Partners”) with whom Stanley Consultants conducts business, and this Code is a part of every contract you have with Stanley Consultants.

# Mutually Beneficial Relationships Fuel Our Success

**Our wholehearted commitment to building long-term, trusted relationships with other members, our clients and Business Partners boosts collaboration and engagement, attracts top talent, aligns Stanley Consultants and stakeholder outcomes and powers our successes.**

## » WE LEAD BY EXAMPLE

As leaders at Stanley, our members are individually and collectively responsible for creating and maintaining a positive working environment where members, clients and Business Partners treat one another with genuine respect, are inspired to excel and are comfortable asking questions and raising concerns. If you manage others, then you are a **role model** and are expected to:

- Help the people you supervise to understand this Code and our ethical principles.
- Foster an environment that encourages compliance with our ethical principles.
- Escalate ethical concerns to the appropriate resources within Stanley Consultants.
- Demonstrate your commitment to our culture of integrity by doing the right thing.
- Never allow retaliation against those who raise concerns or those who are required to participate in an investigation.
- Treat those who work with you fairly and with respect.

## » WE BELIEVE THAT DIVERSITY MAKES US BETTER

At Stanley Consultants, we recognize the value of different cultures, religious views, backgrounds, experiences, ages, genders, races, ethnicities, and sexual orientations. We believe that our diversity contributes to our success and makes us stronger. We embrace our differences and treat each other with respect and fairness. Commitment to diversity, equity and inclusion are not just words at Stanley Consultants: **this is how we conduct our business.**

Members are expected to promote a positive, diverse, fair and inclusive work environment, including the unequivocal practice and protection of equal employment opportunities laws that prohibit discrimination due to:

- Race
- Color
- Religion
- Sex/Gender (including pregnancy, sexual orientation or gender identity)
- National Origin
- Age
- Disability
- Genetic Information (including family medical history)
- Veteran Status

Our clients and Business Partners are required to show this same level of respect for diversity, integrity and equity when conducting business with Stanley Consultants and when interacting with our members and other parties. See [Equal Opportunity Employment Policy](#).

## » WE DO NOT DISCRIMINATE OR HARASS

Stanley Consultants is committed to a work environment based on respect. We do not tolerate discrimination or harassment. We make employment and supplier selection decisions based on merit, and not because of a person's sex, race, color, age, religion, gender, gender identity or expression, sexual orientation, national origin, disability, genetic information, or any other status protected by law. Harassment in the workplace can be verbal or physical and may vary based on culture and customs of where the work is performed. Any conduct that is abusive, offensive, or has the effect of creating an intimidating work environment is unacceptable at Stanley Consultants. See [Sexual Harassment and Other Forms of Harassment Policy](#).

## » *WE ENGAGE IN POLITICS RESPONSIBLY*

We encourage our members, as well as our Business Partners, to be politically active and to support candidates and causes of their choice. Members should avoid campaigning while at work and avoid creating an appearance that their personal political views are shared or supported by Stanley Consultants.

## *Integrity: Do the Right Thing*

**It is in our DNA to act with honor, integrity, openness and fairness at all levels of the organization, and to care about the consequences of our decisions, large and small.**

## » *WE DO NOT ENGAGE IN CORRUPTION*

Stanley Consultants does not offer or pay bribes to obtain, retain or facilitate business and we do not conduct business with those who do. We understand and comply with laws against corruption in countries where we work, and we expect our members and our Business Partners to be vigilant to avoid even an appearance of corruption in our business. Anything of value offered to influence a business decision can constitute a bribe that violates our policies and our clients' policies. We will not tolerate violations of the U.S. Foreign Corrupt Practices Act (FCPA), UK Bribery Act, or any Stanley Consultants policy concerning corruption. Any member who fails to abide by these important principles will be terminated, and any Business Partner who fails to abide by these principles will have its contracts terminated and business relationship severed.

Procurement consultants ("Agents") and others who are paid contingent on contract awards represent a special corruption risk for Stanley Consultants. Such arrangements require Chief Executive Officer approval and such service providers are vetted carefully before we agree to engage their services.

Kickbacks are special forms of bribery where a portion of a contract value is "kicked back" by a service provider to a person responsible for a contract award. Stanley Consultants is vigilant to avoid kickbacks in our business and will terminate any member, vendor or supplier who engages in the practice.

## » *WE RECOGNIZE AND MANAGE CONFLICTS OF INTEREST*

Conflicts of interest arise when our personal or financial interests interfere, or appear to interfere, with objectivity in our business decisions. Decisions we make on behalf of Stanley Consultants and in our personal lives should be carefully considered to avoid real and perceived conflicts of interest. We expect our members to recognize conflicts of interest and to deal with them through timely disclosure to the Legal Department or management. Early disclosure of a potential conflict can resolve most conflicts of interest and avoid an embarrassing situation that can lead to loss of business or employment. An appearance of a conflict may be just as damaging as an actual conflict. Facing a potential conflict of interest is not a violation, but not disclosing it in a timely manner can lead to termination of your employment with Stanley Consultants. If a conflict cannot be addressed through disclosure, it can often be addressed through re-assignment of personnel or change in how the business decisions are made.

## » *WE RECOGNIZE WHEN GIFTS AND ENTERTAINMENT COURTESIES ARE NOT APPROPRIATE*

Business gifts and entertainment can be used effectively to enhance working relationships, celebrate successes and promote our brand. All business courtesies should be guided by good judgment, discretion, moderation, and transparency. Giving or receiving anything of value is not appropriate if it creates an obligation, appearance of bias, or when it is intended to influence a business decision. Because the giving and receiving of business courtesies can create a conflict of interest, we must use these courtesies very carefully to make sure that they are appropriate, support legitimate business goals and do not impact our reputation. Gifts and entertainment for government officials are subject to special and very strict rules and therefore such gifts and entertainment are prohibited unless approved by our Legal Department. See [Gifts and Entertainment Policy](#).

## » *WE VET CONFLICTS BEFORE SERVING AS DIRECTORS ON BOARDS*

Serving on a board of directors can be prestigious, and it can serve a worthy cause. Unfortunately, it also can lead to a conflict of interest if the organization is controversial, does not align with our core values, or competes with Stanley Consultants or our clients. To avoid potential conflicts of interest, serving on a board of directors for any organization (whether or not such service is compensated, whether or not the organization does business with Stanley Consultants, and whether or not it is for-profit) requires advance written approval. Discuss the opportunity with your manager before accepting it, and if approved, contact our Legal Department for a formal conflict clearance.

## » *WE CAREFULLY CONSIDER ADDITIONAL EMPLOYMENT OUTSIDE STANLEY CONSULTANTS*

When you work for Stanley Consultants as a full-time employee, we expect your undivided time and attention. Accepting outside employment, while working for us, can impact your productivity and may also create a conflict of interest. Before accepting any employment or business commitment outside of Stanley Consultants, including providing consulting or related services, consult with your manager and receive written approval. Members with outside jobs or businesses must continue to meet performance standards of their role within Stanley Consultants and may not conduct personal or outside business during working hours or do so using Stanley Consultants property, information, supplies, equipment, or our information technology (IT) network.

# *Commitment and Accountability*

**All members naturally consider how impactful their roles and day-to-day actions are to Stanley Consultants, our clients and the world in which we operate, and are committed to pursuing excellence while remaining personally responsible for complying with relevant laws, regulations and applicable policies.**

## *WE RECOGNIZE THE IMPORTANCE OF ACCURATE RECORDS*

- » Accuracy of our business records is essential. We must record our time charges, expense reports, project cost information, mandatory training, and health and safety incidents accurately and timely. Falsification or fabrication of our business records contradicts our core values. Falsifying records is illegal and may result in penalties for the individual member and Stanley Consultants. Report any concerns about accounting or auditing irregularities to our Chief Financial Officer, our Chief Legal Officer or any member of the Stanley Consultants Board of Directors.

## » *WE UNDERSTAND HOW TO DO BUSINESS WITH GOVERNMENT CLIENTS*

One of our largest clients is the U.S. Government. The work we do for the U.S. Government varies in type and location, but what does not vary are the additional requirements that we must observe while doing this work. When working on U.S. Government contracts, make sure you understand the special, often much stricter requirements that govern this work. Our policy is to always involve our Contracts Specialists in the Federal Business Unit or the Legal Department on all U.S. Government work. Below is a summary of a few key laws, regulations and concepts that apply to the procurement and delivery of U.S. Government work. This summary does not attempt to be exhaustive.

- **Timekeeping:** Members that perform work for the U.S. Government must follow our established time reporting practices in order to comply with the terms of our U.S. Government contracts. Accurate reporting of time worked on each project is important to keep track of our time and labor charges and to accurately capture project costs. U.S. Government time charging rules are straightforward and apply equally to all hours worked when you are charging to a client or overhead number:
  - Record all hours worked daily.
  - Do not average time between days and between projects.
  - Always charge correct projects for time worked.
  - Do not allow others to charge time for you in our timekeeping system – it is your personal responsibility.

If you have any questions about time charging or have concerns on how time may be charged by others on a U.S. Government project, ask your manager or use [EthicsPoint](#) to report your concerns confidentially or anonymously.

- **Federal Acquisition Regulations (FAR):** FAR is the principal set of rules that governs the U.S. Government contracts procurement process, including how U.S. Government contracts are solicited, negotiated and awarded; how contractors account for their costs; and how U.S. Government projects are documented and audited. Our Contracts Specialists in the Federal Business Unit and the Legal Department are well versed in FAR and you should always rely on these members to assist you with FAR compliance.
- **Truth in Negotiations Act (TINA):** TINA requires U.S. Government contractors to provide accurate project cost and pricing information to support procurement negotiations. Contractors must certify that information provided to the U.S. Government is accurate, current, and complete.
- **False Claims Act (FCA):** The False Claims Act helps the U.S. Government to surface waste and abuse of property and resources by inviting taxpayers to report such violations and even file lawsuits against U.S. Government contractors. FCA covers any improper claim for payment under a contract with the U.S. Government. The financial consequences of a FCA violation can be very large (sometimes three times the amount of any wrongful claim), and you do not need to intend to defraud the U.S. Government to have FCA liability. Always follow our U.S. Government contracting procedures when requesting payment or dealing with possible overpayment for U.S. Government work.
- **Procurement Integrity ACT (PIA):** PIA and several other U.S. laws mandated ethical conduct rules for U.S. Government officials and U.S. Government contractors. It prohibits U.S. Government employees from soliciting or accepting, and U.S. Government projects contractors (and their representatives) from offering, future employment, gifts, gratuities or entertainment as a quid pro quo for contract awards. PIA also prohibits unauthorized disclosure or solicitation of proprietary U.S. Government information developed by government agencies for contract procurement purposes.
- **Contingent Fees:** Federal law and Stanley Consultants policy prohibit the payment of contingent fees for soliciting or obtaining U.S. Government contracts. Violations of the contingent fee prohibition may result in rejection of a contractor's proposal, annulment of a tainted contract, and suspension or debarment from future U.S. Government work. Before engaging any consultant to assist with our business development activities for U.S. Government or U.S. Government-funded work, consult with our Legal Department.
- **Anti-Kickback Act (AKA):** The Anti-Kickback Act prohibits Stanley Consultants and our members from accepting, soliciting or offering kickbacks to secure U.S. Government work. It also prohibits inclusion of kickbacks into the contract price of any U.S. Government prime contract or subcontract. Violation of AKA may result in criminal sanctions (fines and imprisonment) and significant civil penalties against individuals involved and Stanley Consultants. It can also result in suspension or debarment of Stanley Consultants from performing U.S. Government work. Stanley Consultants and our members do not engage in kickbacks in connection with U.S. Government or any client's work.
- **Organizational Conflicts of Interest:** Organizational Conflicts of Interest (OCIs) arise when our work for one client may provide us with an unfair advantage, or impact our objectivity, about a project we may perform for a U.S. Government client. Before engaging in work that may result in a real or perceived OCI with a U.S. Government client, consult the Legal Department. U.S. Government OCI rules are very strict, and even an inadvertent violation may result in sanctions. Organizational conflicts of are not unique to our work with U.S. Government clients; they can also occur when we work for state and local municipalities and commercial clients.
- **Human Trafficking and U.S Government Work:** The U.S Government has a zero-tolerance policy for its contractors and their employees supporting, directly or indirectly, trafficking in persons, procurement of commercial sex acts, or the use of forced labor (collectively known as "human trafficking"). Stanley Consultants is dedicated to combating all forced, bonded or involuntary labor, human trafficking and other forms of modern slavery, including sex trafficking.



- **Mandatory Disclosures of Violations:** When working on U.S. Government projects, you must promptly disclose to your project manager if you have reason to believe that we violated laws or received overpayment for our work and refer the matter to the Legal Department, who will help you make a determination whether or not we have a disclosure obligation. It is our policy to notify all of our clients, including the U.S. Government, if we become aware of any inappropriate conduct or violation of laws that impact our clients. Failure to timely notify the U.S. Government of such violations may result in having our existing contract terminated and/or Stanley Consultants being ineligible to receive future U.S. Government contracts.
- **Protection for Whistle-Blowers:** Many U.S. Government regulations provide special protections to U.S. Government contractors' employees, as well as ordinary citizens, who report violations of FAR or any other laws or regulations that govern U.S. Government work. If you have concerns on how Stanley Consultants uses U.S. Government resources on any of our U.S. Government contracts, you should contact [EthicsPoint](#) to report your concerns confidentially or anonymously.

## *Excellence: Excelling in our Business*

**Through systematic and disciplined management of our operations, we are able to pursue complex and challenging projects, deliver exceptional service and drive value and in all that we do, while upholding all of the rules and standards we set for our company.**

### » *WE SAFEGUARD CONFIDENTIAL INFORMATION*

Protecting confidential information is critical to our reputation for integrity and our relationship with clients. Much of Stanley Consultants' information is confidential information. Confidential information is information that Members create, receive, use, learn or have access to by virtue of our employment with Stanley Consultants that is not generally known by the public and that is of sufficient sensitivity that loss or unauthorized disclosure or access could result in legal, regulatory or reputational harm to Stanley Consultants or our clients and Business Partners.

We must protect confidential information, regardless of its format, from the time of its creation or receipt until its authorized disposal. In particular, you must:

- Access only the confidential information that you need and are authorized to access.
- Transmit confidential information only to Members and our agents that have a legitimate business reason to know such information.
- Take reasonable measures to prevent any unauthorized persons from accessing or otherwise obtaining all confidential information in your possession.

### » *WE ENGAGE RESPONSIBLY WITH SOCIAL MEDIA*

While we do not direct how you use social media on your personal time, exercise good judgment and carefully consider the impact when posting to social sites, internet chat rooms and blogs. When identifying yourself as a Stanley Consultants Member on social media sites always adhere to our values, and take care not to offend our clients, our industry or your fellow Members. Never use social media to circulate knowingly false or misleading information regarding Stanley Consultants, other Members, our clients or Business Partners. Confidential information about Stanley Consultants business relationships, performance, financial condition or legal issues should never be discussed in social media, as doing so may damage the company and violate laws. If you become aware of a negative posting about Stanley Consultants, bring it to management's attention so we can protect our brand, thus protecting our client relationships and your job.

## » *WE FOLLOW INTERNAL RULES ABOUT ENGAGING WITH THE MEDIA*

Our Corporate Marketing Department is responsible for all media contact, requests and activities. In the event of a media request that is in any way associated with Stanley Consultants, you should immediately refer the media inquiry to the Corporate Marketing Department.

## » *WE PROTECT OURS AND OTHERS' INTELLECTUAL PROPERTY AND INFORMATION*

Intellectual Property (IP) and innovation are critical to our business success. Stanley Consultant's IP includes ideas, processes, trade secrets, technology, software, proprietary know-how, inventions, designs, marketing materials, pricing methods and other creations protected by law. We make significant investments in the development and acquisition of IP and will enforce our rights and prosecute infringers to the fullest extent of the law. Unless otherwise provided by law, all IP created by Members during their employment with the company is Stanley Consultants' property. Our proprietary information is a very valuable asset. Always safeguard confidential and proprietary information that you help develop, or have access to, as part of your job. Never use or disclose Stanley Consultant's IP or confidential proprietary information without authorization and make sure that proper non-disclosure arrangements are in place before IP and proprietary information are disclosed.

We respect third-party IP rights in our daily business activities. We must never knowingly infringe on the valid copyrights, trademarks or patents of others, such as practicing a patented process or using protected material (i.e., by downloading unlicensed software onto company computers or by duplicating, publishing or distributing copyrighted works of authorship from published documents. Likewise, it is illegal to download songs, photographs, images, videos or any other work of authorship from the Internet or to play or otherwise exhibit such works without the written consent of the rightful owner of the IP.

## » *WE FOLLOW STANLEY CONSULTANTS' REQUIREMENTS FOR RETENTION OF DOCUMENTS*

Our records retention and destruction practices reflect legal requirements and our internal control procedures. If you are notified that documents in your possession are relevant to litigation, investigation or audit, follow the guidelines set forth in the notification.

For information about records retention and destruction procedures specific to project-related documents or other non-project-specific documents please contact the Legal Department.

## » *WE PROTECT COMPANY ASSETS*

Members have access to valuable company assets (technology, equipment, cash and other property). We must use these assets only for legitimate business purposes. Never sell, loan, gift, take for personal use, or otherwise dispose of company assets without proper authorization. If you suspect theft or misuse of Stanley Consultants property, report the situation immediately.

## » *WE UNDERSTAND AND ABIDE BY COMPETITION LAWS*

Stanley Consultants competes ethically on our own merits, and in doing so deals honestly and fairly with our clients, competitors and suppliers. We always follow procurement rules and procedures established by our clients. Antitrust and competition laws generally prohibit agreements between competitors such as bid rigging, inappropriate information sharing, price fixing, as well as customer, market or territory allocations. Casual and informal information exchanges are also illegal if the intent is to corrupt the procurement process. If you find yourself in discussions with representatives of a competitor, that appear to be about how you can work in concert to set prices, divide markets or manipulate business opportunities, stop and seek immediate guidance from your manager or from the Legal Department. Teaming or joint venturing with competitors in pursuit of project opportunities or markets generally is not a violation of antitrust or competition laws.

## » *WE DO NOT ENGAGE IN INAPPROPRIATE SECURITIES TRADING DECISIONS*

As part of our work, we may come across information about Stanley Consultants, our clients or our business partners that is not available to the public at large (or, in the case of Stanley Consultants, to other Members). It is illegal to buy or sell stock if you have material, non-public information. At Stanley Consultants, we do not permit Members to buy or sell directly held shares during two Blackout Periods, each year as set forth in the SC Companies, Inc. Stock Policy, while independent valuations are occurring. Carefully consider every transaction you make regarding Stanley Consultants shares, as well as in the public securities market, to ensure that you are not making your trading decisions on material, non-public information.

Because of the unique nature of the Stanley Consultants Stock Ownership Program, we take care to share relevant and material information about our projects and important developments with all of our Members. Most Members can participate in the stock program without the concern that they have 'inside' information that is not otherwise available to all other Members. On occasion, you may find that you are in possession of material, non-public information (e.g., a pending acquisition or a major project win) that could prevent you from participating in the Stanley Consultants Stock Ownership Program until such information becomes public. Stanley Consultants' Legal Department will notify you of such situations in advance. If you have any concerns, please consult our [SC Companies, Inc. Stock Policy](#) or notify our Legal Department.

## *Social Responsibility: A Duty to Act*

**Without exception, responsible choices are central to the way we work and run our operations.**

### » *WE MAINTAIN A SAFE AND HEALTHY WORKPLACE*

At Stanley Consultants, our members' safety is our priority. Each member has a role to play to ensure a safe workplace. Stay current on best practices in safety by completing periodic safety training relevant to the job; and always comply with safety procedures and practices taught in injury prevention training. Ensure that anyone entering our premises observes all posted warning and follows our safety standards.

### » *WE EXPECT A DRUG- AND ALCOHOL-FREE ENVIRONMENT*

Stanley Consultants has a drug- and alcohol-free workplace policy. Intoxication adversely affects judgment and impacts the safety and security of our employees and visitors. Being in possession of or impaired by any intoxicant (alcohol, drugs or improperly used prescription medication) while conducting company business (on our premises or elsewhere) will lead to termination. If you attend a business function where alcohol is served, exercise good judgment, know your limits and arrange for transportation. See [Substance Abuse Policy](#).

### » *WE HAVE ZERO TOLERANCE FOR VIOLENCE IN THE WORKPLACE*

Threats, violence and intimidation are not tolerated at Stanley Consultants. We will take immediate steps against violence in the workplace. Report all safety concerns and threats of violence immediately.

### » *WE DO NOT ALLOW WEAPONS AT WORK*

Firearms and/or weapons of any kind are strictly prohibited in the workplace, in Stanley Consultants' vehicles or in a Member's possession while on Stanley Consultants' premises or at a company-sponsored event or activity. If you or your coworkers are in immediate danger, contact law enforcement and the Stanley Consultants Health, Safety and Environmental Manager immediately.



**Stanley Consultants**

[www.stanleyconsultants.com](http://www.stanleyconsultants.com) | 800.553.9694