

# **ICT**

***INTERNATIONAL  
COOLING TOWER***

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**Code of Ethics**

***Canada & USA 2021***



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## Introduction

### Message from the Chief Executive Officer

At **International Cooling Tower (ICT)**, ethical behavior is paramount to the way we conduct business. Over the past 60 years, we have built a foundation based on integrity and honesty. We are committed to ethical practices, safe practices, quality work and environmental sustainability.

In order to maintain that commitment as our company continues to grow, we must all protect the reputation of **ICT** by always doing the right thing, by always conducting ourselves with the highest level of ethical standards. It is our duty.

### Vision

Lead the industries we serve with exceptional quality, value, and service while providing the highest degree of professionalism and integrity.

### Core Values

#### *People*

Everything we do depends on the well-being and safety of our people. Our work can be dangerous. We want all of you to return home safely to your families each and every day.

#### *Respect*

We respect each other and all of those we come into contact with. It is the right thing to do. We depend on the relationships we have with others. We value diversity of people and thought.

#### *Integrity*

The integrity of our people is what defines us to the outside world. We operate on the qualities of being honest and having strong moral principles.



## **Excellence**

We are in a hazardous business. We are committed to excellence through ethical and responsible actions, the ability to think critically and problem solve, the ability to take initiative and be accountable and above all, strive for excellence in everything we do.

## **Our Culture**

- Ensure all of our business partners act honestly, fairly and responsibly
- Ensure the safety of our work force through our commitment to training, research and development of world-class best practices, policies and procedures, employee engagement and training and development programs
- Ensure customer trust through continual improvement based on our expertise, experience and customer feedback
- Ensure environmental sustainability through high compliance standards improving efficiency and greening our supply chain

### **Expectations for Employees**

- Understand and follow the laws and regulations that apply to your job
- Read, understand and follow our Code
- Participate in any compliance training required by ICT
- Report any suspected violations of the Code (see below)
- Cooperate with any investigations into potential misconduct
- Understand that any violation of our Code of Ethics can result in disciplinary action up to and including termination

### **Expectations for Managers**

- Understand and follow the laws and regulations that apply to your job
- Read, understand and follow our Code
- Participate in any compliance training required by ICT
- Report any suspected violations of the Code (see below)
- Cooperate with any investigations into potential misconduct
- Lead by example by promoting a culture of integrity, compliance and a positive work culture where people are treated with dignity and respect
- Understand that any violation of our Code of Ethics can result in disciplinary action up to and including termination



## Leadership Commitment

ICT is committed to providing all employees with a supportive and respectful work environment. We hold ourselves and our leaders, from department managers to lead hands, accountable for providing a safe, fair, and equitable work environment at all times.

## Confidential Compliance Reporting

We encourage you to discuss any and all questions, concerns, ideas, and suggestions related to ICT and its business with your direct supervisor. Should any employee witness any unethical behavior, it must be reported immediately. You can report it to your direct supervisor. You may also make an anonymous report by going to our Confidential Compliance Reporting site at [ccr.ictower.com](http://ccr.ictower.com) and completing and submitting the form.

This form will allow you to report, at any time, any ICT employee in violation of the ICT Code of Ethics. It will allow you to send a message to a Confidential Compliance Reporting email without requiring you to provide a contact email address. This form is 100% anonymous and cannot be traced to a computer. However, you may provide contact details if you would like to be contacted. There are legal protections in place in the US and Canada to protect you from retaliation for reporting a potential violation of the Code of Ethics in good faith. Reports of a violation will be investigated promptly and the matter will be treated as confidential.

Thank you for taking the time to read our Code of Ethics and practicing our Core Values each and every day.

A handwritten signature in blue ink, appearing to read "B. Middleton".

Brent Middleton  
Chief Executive Officer

## Workplace Conduct

### Commitment to Safety

International Cooling Tower's (ICT) talented and dedicated workforce is our greatest asset. Our operations complete over 1,000,000 man hours annually, and our safety programs are the underlying factor in our organization's success. ICT Management is committed to providing the resources and leadership required to ensure that HSE goals and objectives are set, and continuous improvement in reaching these goals is pursued by means of assigning roles and responsibilities to all management, workers, subcontractors and employees while performing work for ICT. We are committed to complying with all applicable government legislations and our own health and safety standards and include the costs for providing the appropriate safety into all of our bids for potential projects.

#### ICT Targeted Goal Zero Safety Program

- ICT's targeted goal for safety is zero incidents and/or injuries
- We measure health and safety performance by tracking:
  - Incidents and near misses
  - First Aids
  - Inspections and Audits completed
  - Corrective actions
  - Employee training
  - Worker participation
  - Areas where remedial action is needed

We foster a positive safety culture. Loss prevention and early intervention are the pillars of our program. Our most valuable assets are our people and we are engaged every day to ensure that those assets are protected. We are committed to training, researching and developing world-class best practices, policies and procedures.

#### No Weapons or Workplace Violence

- Personal weapons are not permitted in our workplace
- Any acts of violence including threatening remarks or gestures are not permitted

#### Drug Free Workplace

- No employee shall report to work or work while the employee's ability to safely perform his or her duties is adversely affected because of the use of alcohol and/or drugs, whether prescription drugs or nonprescription drugs, lawful or unlawful.

## **Commitment to Quality**

International Cooling Tower is dedicated to establishing superior quality management standards and procedures. We do the job right the first time. Change orders, rework, and warranty repairs can all be avoided by effective quality control.

We are an ISO 9001:2008 certified organization. The Chief Executive Officer ensures that we consistently meet all applicable standards and that our Quality policy is appropriate to our business needs, organizational goals, and customer expectations.

Our management team is committed to distributing product that meets customer specifications and industry standards, and to continually improving the effectiveness of our Quality Assurance system.

The Quality Assurance department is responsible for the continued development, documentation, and improvement of the QA system and for providing a framework for establishing and reviewing Quality objectives. The QA Manager is responsible for enforcing the system and has the authority to stop work and/or shipments and initiate any necessary corrective action.

Quality management will be reflected in all employee performance reviews.

## **Commitment to Environmental Sustainability**

ICT is committed to conducting its operations in accordance with environmental best practices. We encourage you to assist in reducing the environmental impact of our work. It's the right thing to do.

We are committed to:

- Identifying environmental risks and specific environmental needs
- Evaluating environmental performance
- Considering the impact of products on the environment
- Reducing impact on the environment by limiting the amount of materials used, transported or left over as waste
- Cleaning up any spills or releases immediately and continuously improving and reducing the number of spills and releases
- Water Management
- Energy conservation
- Considering impacts on local plant and animal habitats
- Continuously improving environmental performance



## Employment and Employees

### Equal Opportunity

ICT is an equal opportunity employer and expects that all of its suppliers, subcontractors, and vendors shall not discriminate against any employee, applicant for employment, or service provider of any kind based on race, national or ethnic origin, color, religion, age, sex, sexual orientation, marital status, family status, disability or conviction for an offence for which a pardon has been granted or in respect of which a record suspension has been ordered. All suppliers, subcontractors, and vendors shall comply with all anti-discrimination laws of any other national or international jurisdiction that applies to their relationship with ICT.

### Diversity and Inclusion

All employees are expected to demonstrate dignity and respect for one another by valuing the diverse backgrounds, experiences and ideas present amongst your colleagues and in the locations where we work. You are expected to promote an inclusive work environment by practicing fair behaviors toward all fellow employees, clients and individuals in our communities.

### Fair Employment Practices

All employment decisions such as hiring, promotion, pay, termination, training opportunities and job assignments will be based on merit, not a person's legally protected status. Such characteristics may include gender, race, color, religion, national origin, marital status, age, disability, pregnancy, veteran status, sexual orientation or any other characteristics protected by law.

### Privacy of Employee Information

We respect the privacy of our employees, partners and clients and are committed to ensuring such information remains secure and protected.

We will protect the security of your personal information regardless of the format in which it is held, against loss or theft, as well as unauthorized access, disclosure, copying, use or modification.

## **Certifications**

Any statement or certification you make on behalf of ICT must be accurate and truthful. Knowingly making a false or misleading statement is cause for termination.

## **Outside Inquiries and Presentations**

Throughout the course of your employment, you may become aware or have access to financial or proprietary information that is not available to the public. It is your duty to exercise caution not to reveal this information when responding to outside inquiries or when giving presentations to outside groups, as this information is to be held in the strictest of confidence.

## **Outside Jobs and Activities**

Outside jobs and activities may affect your ability to do your work for ICT. You are to refrain from inappropriate activities which may include:

- Working for or providing services to an actual or potential ICT competitor, client, supplier, subcontractor or agent while employed by ICT
- Using company assets, contacts or other resources to start or support another business
- Taking advantage of any business opportunity that competes with ICT

## **Cyber Security and Digital Devices**

### **Internet Usage**

ICT'S corporate internet connection is primarily for business, however, occasionally employees may use ICT's connection for personal purposes as long as they do not interfere with job responsibilities.

Employees must not use the ICT internet connection to:

- Download or upload obscene, offensive or illegal material
- Send confidential information to unauthorized recipients
- Invade another person's privacy and gain access to sensitive information
- Download or upload pirated movies, music, material or software
- Visit potentially dangerous websites that can compromise our network and computers' safety
- Perform unauthorized or illegal actions, like hacking, fraud or buying/selling illegal goods.

### **Cell Phone**

ICT allows the use of cell phones at work, however, employees must ensure that devices do not distract from work activities or disrupt the workplace. We ask you to follow a few simple rules:

- Use your cell phone in a manner that benefits your work (business calls, productivity apps, calendars)
- Keep personal calls brief
- Avoid playing games on your phone or texting excessively

- Do not download or upload inappropriate, illegal or obscene material using our corporate internet connection.
- Do not use your phone to record confidential information

### **Corporate email**

Email is essential to our work. You should use your company email primarily for work, but we allow some uses of your company email for personal reasons.

- **Work-related use.** You can use your corporate email for work-related purposes without limitations. For example, you can sign up for newsletters and online services that will help you in your job or professional growth.
- **Personal use.** You can use your email for personal reasons as long as you keep it safe, and avoid spamming and disclosing confidential information.

### **General Expectations**

No matter how you use your corporate email, we expect you to avoid:

- Signing up for illegal, unreliable, disreputable or suspect websites and services
- Sending unauthorized marketing content or emails
- Registering for a competitor's services, unless authorized
- Sending insulting or discriminatory messages and content
- Spamming other people's emails, including your coworkers

## Employment and Employer

### Privacy of Employer Information

We have an expectation that you, as an ICT employee, will lock or secure confidential information at all times, shred confidential documents when they're no longer needed, view confidential information on secure devices only, only disclose information to other employees when it's necessary and authorized and keep confidential documents inside our company's premises.

We also have an expectation that you will not use confidential information for your personal benefit or profit, not disclose confidential information to anyone outside of our company and not replicate confidential documents and files nor store them on insecure devices.

This policy is important for our company's legality and future success.

### Harassment-Free Workplace

Harassment is simply not tolerated at ICT. Harassment can be in many forms including verbal remarks, physical advances or visual displays. Harassment may be sexual or nonsexual in nature. Sexual harassment may include unwanted advances, inappropriate sexual jokes, sexually suggestive comments, touch, requests for sexual favors and/or inappropriate comments about appearance. It may come from coworkers, supervisors, suppliers, contractors or clients.

### No Child Labor, Forced Labor or Slave Labor or Human Trafficking

ICT does not tolerate the use of child labor, forced labor or slave labor nor trafficking in persons nor does it tolerate any supplier, contractor or other business partners who do so.

## Business Relationships

### Antitrust and Competition

It is the policy of ICT that our directors, officers and employees are expected to comply with the antitrust and competition laws of any country or group of companies which are applicable to our business.

We expect compliance with our standard of integrity throughout the organization and will not tolerate employees who achieve results at the cost of violation of laws or who deal unscrupulously. Our officers, and directors are held to the same ethical standards as each of you.

Our system of management will not work without honesty, including honest bookkeeping, honest budget proposals and honest economic evaluation of projects.

### Disadvantaged Business Enterprises

We are committed to complying with all Disadvantaged Business Enterprise programs in the countries in which we work. We endeavor to identify and form mutually beneficial working relationships with DBE subcontractors and suppliers whenever possible.

### Small Business Enterprises

We fully support providing small business subcontractors with maximum opportunities to participate in our construction projects.

### Bribery and Anti-Corruption

Any ICT employee who attempts to bribe or provide an unlawful gratuity, directly or indirectly, to any person employed by or affiliated with a client, subcontractor, supplier or government entity in order to obtain business, concessions, favorable treatment or government ruling may be at risk of termination of employment with ICT. Bribes violate anti-corruption laws. It is your duty to know and follow the local and other applicable anti-corruption laws that apply to your assigned duties.

Gifts and business courtesies are subject to complex laws and regulations. All employees must:

- Ensure that all gifts or entertainment are appropriate, properly approved and accounted for and in full compliance with ICT policy and all applicable laws
- Obtain approval from your direct supervisor before offering any business courtesy with a market value greater than \$100

- In geographic areas where exchanges of business gifts are customary, ensure gifts are limited to the value of gifts of common courtesies
- Offer only business courtesies that the recipient is permitted to accept under the gift acceptance rules of his or her organization

## Internal Controls

### Audit Process

ICT has policies, procedures and internal controls in place to ensure its accounting and financial reporting are accurate and complete and maintained in accordance with regulatory requirements and generally accepted accounting principles.

Audits are reported to ICT's management and Board of Directors.

### Compliance Assessments

ICT monitors and performs compliance assessments at the project level on a quarterly basis.

These are reported to ICT's management and Board of Directors.

## Reporting Violations and Government Requests

### Reporting Violations

If you become aware of a potential violation of this Code of Ethics by any employee whatsoever, you must report this by:

- Speaking with your direct supervisor OR
- Submitting an anonymous report at [ccr.ictower.com](http://ccr.ictower.com) by completing the form.

### Non-Retaliation

ICT will not allow any retaliation against you for reporting a potential violation of the Code in good faith. Reports of a violation will be investigated promptly and the matter will be treated, to the extent possible, as confidential.

### Consequences for Violations

Violating ICT's Code of Ethics is a serious offence that may subject you to disciplinary action up to and including termination of employment. In addition, violations of the law may subject ICT or you to fines, penalties or other legal remedies, including imprisonment.

### Responsibilities to Governments and the Law

All ICT business is to be conducted in full compliance with applicable laws. You are expected to understand and comply with all laws affecting your work.