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# Code of ethics



Living our values &  
maintaining the highest  
ethical standards

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# 01.

## A message from our CEO



**Scott Martin**  
Group CEO, Glacier Energy

### Our Values

A strong set of values at Glacier Energy is key to the ongoing success and growth of our Group. In particular, they will increase our customers' confidence that they will encounter the same standards of excellence in all our businesses. I strongly believe that our values below are central to us delivering our objective of growing each of our business units and achieving this faster than the competition.

#### **Safety conscious**

Safety is engrained in our culture, and we shall relentlessly and without compromise safeguard the health and safety of our employees and those affected by our decisions and actions.

#### **Customer focused**

We shall continually strive to understand our customers' requirements and to build lasting partnerships with them to achieve mutual success.

#### **Integrity**

We do what is right, ethically and lawfully, and we deliver on our promises and commitments in accordance with our values.

#### **Commercially orientated**

We shall be commercially orientated at all times, cognisant of our responsibilities to our business partners, employees and stakeholders.

#### **Best people**

Our people are core to our success, and we shall create an environment for them that is empowering and that allows them to develop continuously.

### Glacier Energy's reputation is entrusted to each of us

Each of us make decisions every day that may have financial, human, community or ethical implications. As a member of the Glacier Energy family, it is important that you read, understand and fully comply with our Code of Ethics. The Code emphasizes the personal responsibility each of us has to act with integrity and maintain the highest ethical standards. As a Company employee and Company representative, you must ensure the Company's reputation is not tarnished by dishonest, disloyal or corrupt behaviour. Nothing is harder to win, or easier to lose, than a company's reputation for integrity.

Our Code cannot cover every possible ethical issue that may arise. But it does describe the basic principles that should guide our conduct. As a general rule, applying common sense, good judgement and integrity to the business issues you face will help ensure that your decisions are consistent with our values and our Code.

But knowing about our Code of Ethics is not enough. As Glacier Energy employees, we promote ethical behaviour through our actions and our words. We take responsibility for our actions and decisions and speak up to challenge behaviour that conflicts with our Code of Ethics, as well as other Glacier Energy policies.

If you have concerns about any action that may seem to violate our commitment to the highest ethical standards, I urge you in the strongest possible terms to take personal responsibility and communicate your concerns. There are several ways to do this, and the names and numbers of those to contact are included in this Guide.

Thank you in advance for your ongoing commitment to our shared values and ethical leadership, which are vital to our continued business success.

# 02.

## Doing the right thing

Great companies are built on a foundation of integrity and respect. At Glacier Energy we are committed to doing the right thing for our customers, colleagues, investors, suppliers, the environment and our local communities. Our Code of Ethics outlines the behaviours that Glacier Energy upholds as a Company and expects from you to make sure we conduct our business with the highest standards of honesty and integrity. The Code describes the key Company policies and procedures and reminds us of behaviours that are unacceptable. Finally, it sets out how you can raise your concerns.

### The purpose of this code

- Describes the principles by which Glacier Energy expects to conduct its business
- Provides employees with guidance on the standards expected when conducting business on behalf of Glacier Energy

We all have a responsibility to protect the Company's reputation in everything we do and say. This includes:

- Complying with the law in the UK and all other countries in which we operate
- Following Company policies and procedures

- Acting in a professional manner with honesty and integrity at all times
- If in doubt...do the right thing!

Glacier Energy recognises that observing a local custom or practice may have a different effect to that envisaged by this Code. Local management's advice should be sought in such cases to resolve the dilemma where individuals do not feel able to resolve it themselves.

### The scope of this Code

This Code applies to all Glacier Energy employees, temporary personnel, agents and contractors.

We expect our suppliers to adhere to this Code or adopt similar ethical standards.

### Keeping you informed

Glacier Energy requires that all employees read, understand and comply with the Code. However, compliance does not just happen. It requires a commitment from each of us. To reinforce this commitment, Code training and certification are offered to Glacier Energy employees around the globe on an annual basis. In addition, certain employees, including Company directors, will re-certify annually in writing that they have re-read the Code, know of no violations of the Code, and have no conflicts of interest to disclose, or they will report exceptions or violations of the Code.

### Breach of this Code

While mistakes may be forgiven, violation of our ethical code will never be tolerated. Any breach of this Code may be considered to be a disciplinary matter and could result in disciplinary action up to and including dismissal. It is therefore of critical importance that you read and understand this Code.

# 03.

## Guidance

### Your responsibilities – seek guidance & report concerns

Many business decisions may involve ethical dilemmas and this Code cannot address every possible situation. For that we must ultimately rely on each person's good sense of what is required to adhere to the Company's high standards, including a sense of when it is proper to seek guidance on the appropriate course of conduct.

The principles of this Code are intended to help guide you in the normal course of your work but they are no substitute for common sense and proper internal consultation.

If you find yourself in a situation where you are unsure of the right course of actions to take, you may find it useful to ask yourself the following questions:

- Am I authorised to do this?
- Is it legal?
- Am I setting the example?
- Is it consistent with Glacier Energy policies and this Code of Ethics?

- Would I be proud to report this action to someone that I respect?
- Will the action further enhance Glacier Energy's reputation as an ethical Company?
- Am I demonstrating the highest ethical standards?

In most instances, you should bring questions concerning the guidelines described in the code to the attention of your direct manager, who may in turn refer such matters to his or her supervisor or the Human Resources Department.

You may also contact the Human Resources Department with any questions or concerns relating to this Code using the confidential email address: [ethics@glacierenergy.com](mailto:ethics@glacierenergy.com)

### Reporting concerns

If you know of, or have good reason to suspect, a violation of the Code or other Company guidelines, you are required to immediately report that information to your manager or the Human Resources Department.

Alternatively, you should feel free to go to the higher levels of management without fear of reprisal. Glacier Energy will not retaliate against any individual who reports information concerning potential violations in good faith, or who participates in any investigation or proceeding by the Company or the government, unless the information provided is found to be intentionally false.

The Company will also take all necessary steps to keep an individual's identity and the information he or she submits confidential, and will only disclose information on a need to know basis when that disclosure is:

- Unavoidable in order to conduct an effective investigation and take appropriate action or
- Otherwise required by applicable law

# 04.

## Maintaining successful working relationships

At Glacier Energy, we take pride in the strong personal commitment of our people and the excellent achievements that result from that commitment. But this level of commitment can only be achieved in a climate of trust, open and honest communication, and respect. All of your dealings with your peers, your direct reports and your supervisors should be conducted as a partnership, in which each individual's behaviour is governed by an overriding commitment to maintaining the highest ethical standards.

Your relationship with those you work with should be as a member of a winning team. People working in harmony and focused on as a set of mutual objectives are the driving momentum behind our business. For this dynamic team relationship to work, each individual must fulfil his or her responsibilities and feel assured that others will do the same. This means providing the necessary support to others, at every level, to get the job done. No individual or business unit can place its own priorities before those of the Company's.

Your relationship with those you work with or supervise should promote ethics and compliance by setting an example of decency, fairness and integrity. As a leader, you are responsible for clearly defining standards of performance and creating an environment that promotes teamwork and ethical behaviour.

Therefore, it is inappropriate for an employee to have an intimate personal relationship beyond simple friendship with an employee who is subject to their supervision or with whom they have a reporting relationship. This is also the case with any outside party with whom you have dealings with as representatives of Glacier Energy (including customers, contractors and suppliers). If such a relationship develops, you should promptly report it to an appropriate person within the Company so that we can determine whether a reasonable accommodation can be made to resolve the situation.

# 05.

## Harassment-free & substance-free workplace

### Promoting Teamwork

Promoting teamwork and excellence demands a working environment that is free from discrimination, harassment or other intimidating personal behaviours. All Glacier Energy facilities worldwide maintain a professional and harassment-free working environment – they are workplaces where employees act with respect for one another and for those with whom we do business.

Abusive, harassing or offensive conduct, whether verbal, physical or visual, is unacceptable.

Examples include:

- Derogatory comments based on racial, ethnic or physical characteristics, religious beliefs, age, gender identity or sexual orientation
- Deprecating remarks concerning a person's disability, and
- Unwelcome sexual advances

Threats or acts of violence or physical intimidation are absolutely prohibited, as is retaliatory treatment in response to any

complaint of harassment made in good faith. You are strongly encouraged to speak out if a co-worker's conduct makes you or others uncomfortable and to report harassment or threatening behaviour.

### Substance Abuse

Substance abuse - whether alcohol or drug abuse - poses a serious threat to the safety, health and productivity of our organisation, employees and customers. Glacier Energy has a drug-free and alcohol-free workplace policy that extends to locations worldwide and that applies to employees, vendors, customers and guests.

Our substance-free workplace policy prohibits:

- The use or possession of alcohol, illegal drugs and other controlled substances in the workplace. Their presence will not be tolerated under any circumstances (with the exception of possession of prescription medication for medical treatment); and
- Being under the influence of alcohol, illegal drugs or any other controlled substance on the job.



### Functions Involving Alcohol

There may be Company-sponsored events where management approves the serving of alcoholic beverages. In these cases, all appropriate licencing laws must be followed, including laws regarding the serving of alcohol to those under the legal drinking age. Consistent with our policy, intoxication and excessive drinking at these events is prohibited.

# 06.

## Health, Safety & environment

We are all responsible for maintaining a safe workplace by establishing and following health and safety rules and policies, and by exercising good judgement and common sense.

Being safety conscious is one of Glacier Energy's core values and having a safe workplace is one of the most important benefits we offer to our employees and their families. We do this by following strict safety and health rules and practices, including:

- Reporting near misses so that they can be investigated and corrected before anyone is injured
- Wearing the appropriate personal protective equipment
- Requiring every Glacier Energy business to have an active safety program that is strongly supported by its management team
- Rigorously adhering to the established safety procedures, avoiding shortcuts and keeping the work areas clean and safe

- Not tolerating any threats of harm – either direct or indirect – or any conduct that harasses, disrupts or interferes with another employee's work or performance or that creates an intimidating, hostile work environment.

It is our goal to avoid all injuries and to be recognised as an industry leader in safety.

Glacier Energy conducts its operations in a manner that both conserves and protects natural resources and the environment. All Glacier Energy entities conduct their operations in compliance with applicable environmental laws and regulations in the jurisdictions where we do business.

If you become aware of any actual or potential safety or environmental hazard, or if you have a safety concern, immediately notify your supervisor, manager or QHSE Division Representative.

# 07.

## Personal data privacy

Glacier Energy respects the privacy of its employees, customers, business partners and other individuals who have entrusted their personal information to us. We are committed to handling Personal Information, as defined below, responsibly and in compliance with applicable privacy and data protection laws.

Key principles of Glacier Energy's policy and practices related to the collection, use, management, storage and protection of Personal Information are that information:

- Is obtained and processed lawfully and fairly.
- Is obtained for specified and lawful purposes.
- Is adequate, relevant and not excessive for the purpose for which it is processed.
- Should be accurate and current.
- Should not be retained for longer than is necessary.
- Must not be processed in a way that violates the individual's rights under applicable Data Protection Laws.
- Must be kept secure

- May only be transferred between companies subject to suitable contractual or other sufficient safeguards.

### What is Personal Information?

Personal Information is information that either directly or indirectly and clearly identifies an individual (e.g., name, employee number, personal identification number such as tax ID number or National Insurance number in the UK, etc.) or information that indirectly, through the combination or various pieces of information in Glacier Energy's possession, identifies an individual.

This includes Personal Information held in electronic or manual records such as paper files.

### What is Sensitive Personal Information?

The law applies additional rules to 'Sensitive Personal Information' which is Personal Information relating to racial or ethnic origin, political opinions, religious or other similar beliefs, trade union membership, physical or mental health,

sexual orientation or criminal convictions. As a matter of practice, Glacier Energy maintains only that Sensitive Personal Information which has a business purpose and is necessary or incidental to the operation of our business or management of our employees.

### How is Personal Information collected?

Glacier Energy collects Personal Information that is needed for customary and legitimate business purposes, such as reaching decisions about hiring, placement and promotion; providing compensation and benefits; offering training and career development; supporting other Human Resources programs and services; meeting legal, audit and insurance requirements; and ensuring compliance with Company policies.

There are several sources of Personal Information, including forms completed by employees during the job application, hiring and induction process, annual Human Resources and employee benefit processes and routine intercompany email communications. The collection

and tracking of employee data begins with the recruitment and hiring process and continues throughout your relationship with the Company. In most cases, Personal Information is collected directly from you, but sometimes it may be collected from other parties, such as a former employer.

Glacier Energy allows individuals to have reasonable access to their own Personal Information and, within reasonable limits, to have any inaccurate or incomplete Personal Information corrected, amended or deleted. Employees who want to access their Personal Information should contact the Human Resources Department.

Employees with questions or concerns about the handling of Personal Information, either their own or that of others, should contact the Human Resources Department.

# 08.

## Conflicts of interest

Your judgement is one of your most valuable assets. You should avoid any activity, interest or association that conflicts with or appears to compromise your exercise of independent judgement in the Company's best interests. Conflicts can arise in many situations. It is impossible to cover them all here, and it may not always be easy to distinguish between proper and improper activity. When in doubt, consult your manager or Human Resources department before taking any action. The following guidelines apply to the most common conflict situations.

### **Investments**

Do not make any investment that might affect your business decisions. Company policy prohibits Glacier Energy employees from owning shares or having a proprietary interest in a company competing with or doing business with Glacier Energy. This prohibition does not apply to owning small amounts (generally less than 1%) of shares of a publicly listed company, provided that the investment is not financially substantial that it creates the appearance of a conflict of interest. If you have made potentially prohibited

investments before joining Glacier Energy, report the facts to Scott Martin, CEO, Glacier Energy.

### **Family**

Notify your manager and obtain approval from your Divisional Managing Director before doing business on Glacier Energy's behalf with any company in which you or a close family member has an interest such that they may in any way benefit from your or their actions.

### **Other Work**

Do not work for a competitor of Glacier Energy's while working for Glacier Energy or do any work for or provide assistance for any third party (customer, distributor or supplier) that may adversely affect your performance or judgement on the job. Do not use Company time, facilities, brands or logos for outside work that is not related to your job at Glacier Energy without authorisation from your Divisional Managing Director.

### **Personal**

While we recognise and respect the rights of Glacier Energy people to freely associate with those they encounter in the work environment, we must also use good judgement to ensure that those relationships do not negatively impact job performance, the ability to supervise others or the work environment.

Any workplace conduct arising from a romantic relationship or friendship between employees may be improper if the conduct creates an uncomfortable work environment for others. Favouritism or making business decisions based on emotions, allegiances or friendships rather than the best interests of the Company is prohibited. Individuals who find themselves in a personal relationship or friendship should use tact, good judgement and sensitivity.

Be conscious of the fact that another member of your household might be employed in a capacity that could create or appear to create a conflict of interest. If this situation arises, consult your manager or Human Resources department.

### **Board**

Obtain approval from your Divisional Managing Director before agreeing to serve on a Board of Directors or a similar body for an outside business. Serving on the Board of Directors for a professional or work-related non-profit organisation must also be approved in advance by your Divisional Managing Director.

# 09.

## Bribery & corruption

Glacier Energy considers the definition of bribery to be the practice of offering something (usually money gifts, but also favours or other advantages) in order to influence, or seek to influence, someone to gain an illicit commercial advantage.

We at Glacier Energy have a clear position on bribery: employees do not offer or accept bribes and the direct or indirect offer, payment, soliciting or acceptance of bribes in any form by employees is unacceptable.

The Company strictly prohibits the offering of giving of any bribe or inducement, whether in cash or some other form, to any person, company, public official, public body or other entity, wherever situated, by any employee or other person or body acting on the Company's behalf in order to gain any commercial, contractual or regulatory advantage for the Company in a way that is unethical. Equally, employees are prohibited from accepting any bribe or inducement to act unethically.

This does not prohibit expenditure of reasonable amounts for meals and legitimate client entertainment which are ordinary and customary business expenses and are incurred in accordance with the provisions set out on page 11, Gifts & Hospitality.

### **UK Bribery Act 2010**

The Bribery Act 2010 applies not only to companies within the UK, but also to persons associated with UK based companies, to the operations of UK based companies abroad and to foreign companies operating within the UK.

The Bribery Act 2010 set out four main offences:

- Bribing another person
- Being bribed
- Bribing foreign public officials; and
- Failure of commercial organisations to prevent bribery

Bribery under the Bribery Act 2010 is a criminal offence and may result in criminal penalties. Where a company is convicted of an offence under the Bribery Act 2010, the person who made or accepted the bribe, senior officers (if the provided consent to make or accept the bribe or connived with the person who made or accepted the bribe), and the company can all be punished. For an individual, such punishment can be up to 10 years' imprisonment and an unlimited fine and for a company, this can be an unlimited fine.

### **Facilitation Payments**

Facilitation payments are payments used by businesses or individuals to secure or expedite the performance of a routine or necessary action to which the payer has a legal or other entitlement (e.g. to expedite a visa application). In many countries, it is customary business practice to make payments or gifts of small value to government officials in order to speed up or facilitate a routine action or process.

These payments are considered bribes under the UK Bribery Act 2010 and are prohibited by the Company.

For further information, please refer to the Company's Anti-Corruption and Bribery Policy.

# 10.

## Gifts & hospitality

The Company acknowledges that the giving of gifts and entertainment may be a useful tool in building and maintaining business and client relationships. However, in some circumstances, the giving or receiving of gifts and entertainment may give rise to a conflict of interest between an individual's personal enjoyment and professional responsibility. The Company seeks to ensure that the business conduct of all employees is appropriate to the nature of the Company's business and the environment in which it operates and to avoid the potential for any perceived or real conflict of interest or allegation of compromise, bribery or corruption.

Gifts and entertainment apply to anything given or received as a result of an actual or potential business relationship for which the recipient does not pay fair market value. This includes such things as meals, beverages, travel and accommodations for business or vacation purposes, tickets to sporting or cultural events, discounts not available to the general public, cash, art objects and any other merchandise or services.

Gifts and entertainment of nominal value (less than £30 (or equivalent) face value) such as pens, lunches, items or clothing etc. may be accepted. Gifts and entertainment of more than a nominal value of £30 (or equivalent), require the approval of your manager. Gifts and entertainment in excess of £100 (or equivalent) require approval from your Business Unit Director or Regional Head. Regardless of value, any gift or entertainment accepted must be regarded as 'reasonable and customary' for the situation and in accordance with Company policy.

There are some cases where refusal of an inappropriate gift would cause embarrassment and hurt to the person offering it. This is particularly true when you are a guest in another country, and the gift is something from that country offered as part of a public occasion. In these cases, the best practice is to accept the gift on behalf of the Company, report it to your manager and hand it over to the Company.

Invitations to business related meetings, conventions and conferences, where some of all of the expenses are to be borne by the host or sponsor, may be accepted only if all of the following apply:

- Other (non-Company) guests have also been invited at the expense of the host of sponsor
- The expense is reasonable, given the nature of the event
- There is a benefit to the Company derived from attendance which relates to your job responsibilities; and
- The invitation is approved in advance by your supervisor or a director in accordance with these guidelines.

Invitations to activities such as sporting events or golf outings, which are partially or fully paid for by a party other than the Company may be accepted only if all of the following apply:

- The expense and frequency of the activity are reasonable and in accord with the above policy
- The event either advances Company business relationships or accomplishes a legitimate business purpose; and
- The invitation is approved in advance by your supervisor or a director in accordance with these guidelines.

# 11.

## Proprietary & confidential information

Glacier Energy business information is very valuable and must be protected. Therefore, you are expected to respect the Company's proprietary and confidential information by:

- Maintaining strict confidentiality of information safeguarded to you; and
- Not sharing that information with anyone – even a co-worker – who does not need to know about it.

Some examples of confidential and proprietary information include:

- Written and oral agreements between the Company and employees, agents, strategic partners and/or other third parties
- Intellectual property – such as trademarks, patents and copyrights
- Company financial information, including actual results, budget or forecast projections
- Proprietary software of Company-owned software modifications, templates, worksheets or other programs

- Financial and other information about potential acquisitions
- Drawings for current or potential new products
- Information about new product development
- Customer lists or agreements, market share data, supplier agreements and other files
- Information that the Company makes an effort to protect and that would harm the Company if competitors learned of it;
- Information relating to or knowledge of an internal investigation with any one than the investigator
- Information relating to any employee's compensation, employment status, performance, etc.

In addition, information provided to Glacier Energy in good faith by our customers and suppliers must be treated with the same degree of confidentiality.

# 12.

## Fraud

### Ownership of Intellectual Property

Any technical innovations, discoveries, system designs or technical enhancements that an employee designs or conceives while at Glacier Energy are the sole property of Glacier Energy. The employee must disclose such discoveries and innovations to the Company.

Your obligations to maintain confidentiality extend beyond your tenure at Glacier Energy. Even after you leave the Company, you may not disclose or release confidential information. Similarly, you may not disclose confidential information that you obtained at a previous employer, including, but not limited to, trade secrets.

Fraud - or the act or intent to cheat, trick, steal, deceive or lie – is both dishonest and, in most cases, criminal. Intentional acts of fraud are subject to strict disciplinary action, including dismissal and possible civil and/or criminal action.

It is important to understand what fraud can entail, so you can recognise it and avoid mistakes. Some examples include:

- Submitting false expense reports
- Forging or altering cheques
- Misappropriating assets or misusing Company property
- Unauthorised handling or reporting of transactions
- Inflating sales numbers by shipping inventory known to be defective or nonconforming; and
- Intentionally making any entry on Company records of financial statements that is not accurate and in accordance with proper accounting standards.

# 13.

## Record keeping & financial controls

Accurate, timely financial records provide the core information that is necessary to manage our business.

The Company's books and records must accurately reflect all Company funds, assets and transactions. Entries into Company records must be made promptly without false or misleading information. The integrity of our accounting practices requires that supporting documents are accurate and complete.

All business transactions must be properly authorised as well as completely and accurately recorded on the Company's books. Procedures for doing so must comply with Glacier Energy financial policies and follow the appropriate delegation of authority, as well as follow generally accepted accounting practices.

In all interactions and communications – whether with customers, suppliers, government agencies or others inside or outside the Company – you are expected to be truthful and forthright. This includes making accurate statements, not

misrepresentations or statements intended to mislead or misinform.

### **Record-Keeping & Records Management**

To help maintain the integrity of your business unit's record-keeping and reporting systems, you must know your area's records retention procedures, including how data is stored and retrieved. It is your responsibility to know how to document and transact any entries or records for which you are responsible.

All employees are expected to comply fully and accurately with all audits, including responding in a timely fashion to requests for documents or other materials from or on behalf of Glacier Energy auditors (both external and internal), Human Resources Department or management.

### **Error Reconciliation**

It is Glacier Energy policy to advise customers and suppliers of any clerical or accounting errors – and to promptly correct such errors through credits, refunds or other mutually acceptable means.

# 14.

## Antitrust & global competition laws

Glacier Energy supports vigorous, lawful and ethical competition and complies with all competition and antitrust laws wherever it does business. Employees working in marketing, sales, purchasing or acquisitions need to be especially aware of competition laws and antitrust requirements.

Competition or antitrust law is designed to ensure that competition remains vigorous and free from collusion. Because antitrust issues are very complex, determining what actions are improper often depends on the structure of the market and a number of other factors.

To avoid even the perception of unlawful conduct, employees should avoid:

- Discussing with a competitor prices, costs, production, products and services, bidding practices, other non-public business matters, sales territories, distribution channels or customers; and
- Restricting the right of a customer to sell or lease a product or service at or above a certain price, except as otherwise permitted by law.

# 15.

## Trade compliance

As a global exporter, Glacier Energy must fully comply with all applicable trade laws and programs.

Specific trade rules vary greatly in each country's jurisdiction, and, therefore moving goods internationally is complex. The penalties for noncompliance are severe and can include damage to Glacier Energy reputation, fines, restrictions on the Company's ability to import or export, and even criminal penalties.

Additionally, the ports of entry that Glacier Energy products are imported through can be high risk areas for public corruption and bribery. Glacier Energy can only use properly vetted and reputable service providers to assist in the import and export process.

Employee vigilance and commitment to support strong trade controls is essential compliance with all trade laws.

Key principles of Glacier Energy policy and practices related to compliance with trade controls include:

- Declaring accurate and timely information to the customs authorities, including declaring values that approximate the fair market value and accurate description of the items imported
- Maintaining the appropriate documentation required for cross-border transactions
- Conducting export screening to ensure compliance with export laws, including applicable international trade sanctions; and
- Obtaining proper export authorisation from the government when required.

# 16.

## Email, internet & use of company property

All communications data and information sent or received using Company property while you are employed at Glacier Energy are Company property and are not private communications. Glacier Energy owns and/or controls access to all communication equipment, including computers, software, email, voicemail, conferencing equipment and office supplies. Glacier Energy reserves the right to monitor all communications, including internet usage. So, unless protected by applicable law, you should not have an expectation of privacy with regard to the information stored or transmitted on this Company property.

Glacier Energy Company property – its buildings, vehicles, equipment and supplies – is in place to enable employees to perform the business-related duties that their positions require. Company property is provided for the purpose of conducting business-related tasks.

### Incidental Personal Use

The Company recognises that, from time to time, you may need to use Company equipment and/or communications for

personal use. In general, this is allowed, provided such use:

- Is limited in duration or extent
- Does not adversely affect your attention to or completion of your job responsibilities
- Does not result in any significant incremental cost to the Company
- Does not contain pornographic or offensive material, discriminatory or harassing language or derogatory references to age, colour, disability, ethnicity, marital or family status, national origin, race, religion, sex, sexual orientation, gender identity or any other characteristic protected by law.

### Software

In general, the only software that should be loaded on your computer is that which the Company has approved and purchased. In many cases, it is illegal to copy, download or distribute software or other materials or files that are protected by copyright.

# 19. Certification

All new hires shall read and certify compliance or disclose exceptions to the Code. In addition, certain employees, including Company directors, will re-certify annually in writing that they have re-read the Code, know of no violations of the Code, and have no conflicts of interest to disclose, or they will report exceptions or violations of the Code.

**Please read (or re-read) the Code of Ethics policy prior to completing this certification.**

Any questions concerning this Certification of the Code should be directed to the Human Resources Department.

*I have read and understand the Code of Ethics policy. I agree to abide by its terms and have not violated the Code and do not know of any violations. I have not engaged in any activity and I do not have any interest that would create a conflict of interest or an appearance of conflict that violates the letter or spirit of the Code. Any exceptions to these statements are noted below.*

*I acknowledge that in the event that I commit a violation of the Code of Ethics through my actions or failure to act, I will be subject to disciplinary measures, up to and including termination of my employment. If a change in circumstances occurs which should be reported as a potential exception to the Policy, I will promptly bring the matter to the attention of my manager or the Human Resources Department.*

### Exceptions

Identify exceptions here:

Name: (Please Print)

.....

Signature:

.....

Job Title:

.....

Date:

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