



ATCOTM

HOW WE DO BUSINESS

LIVING THE ATCO VALUES



ATCOTM

EXCELLENCE

The ATCO Heart and Mind:

“Going far beyond the call of duty. Doing more than others expect. This is what excellence is all about. It comes from striving, maintaining the highest standards, looking after the smallest detail and going the extra mile. Excellence means caring. It means making a special effort to do more.”

R.D. Southern

Founder, ATCO

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Our Navigation



Conducting Business the ATCO Way



Living our Values



Speaking Up

MESSAGE FROM THE CHAIR AND CEO

We have the great and sincere privilege of serving customers in communities all over the world. How we do business in these communities symbolizes what we stand for as a company, and aligns with our core values and our enduring pursuit of excellence. We are each charged with upholding these values and conducting business in a safe, respectful and ethical manner. Together, by consistently implementing and living the ATCO values, we are laying the foundation for a strong and sustainable future.

A critical aspect of our responsibility to ATCO is that we consider the broader implications of our actions, complying with not only the letter of the law but also the spirit in which it was intended. It is our responsibility to exercise good judgment, remain accountable for our actions and request guidance when in doubt. It is imperative that we are safe, honest and transparent in every business situation and ensure that we are acting in a way that reflects both our values and the ATCO Heart & Mind.

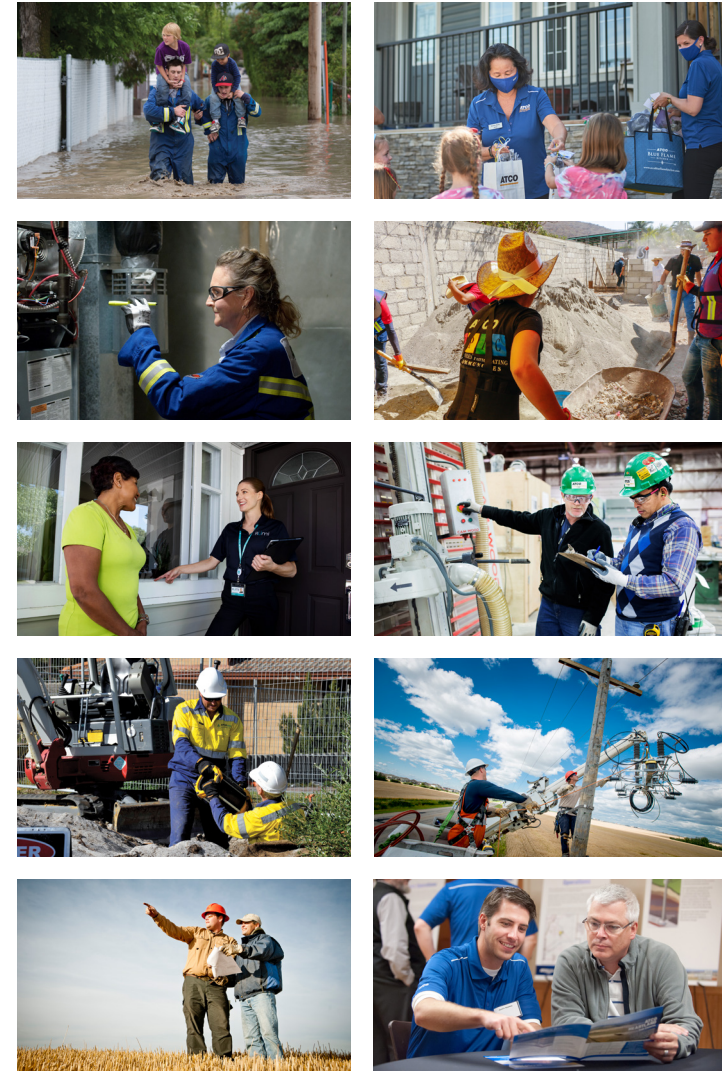
This Code of Ethics is designed to preserve and foster ATCO's values of excellence, help us avoid misconduct, and guide us in protecting and enhancing our company's reputation. This means complying with legal and regulatory requirements as well as our internal policies and practices.

While this Code of Ethics provides a broad range of guidelines for proper business conduct, it cannot address every situation that you may encounter. It is therefore important to use your own judgment and, if you are ever unsure about how to proceed, reflect on the ATCO values, ask questions and consult the resources provided in this Code.

I hope this Code will inspire you, just as it does me, to continue building the ATCO we can all take great pride in. I believe that a company clearly guided by strong values and whose actions reflect the highest standards of ethical behaviour will build a legacy of excellence. Your continued commitment to this legacy will help us fulfil our vision as a company that believes 'how' we achieve our results is just as important as the results themselves.

Sincerely yours,

Nancy Southern
Chair & Chief Executive Officer



CONDUCTING BUSINESS THE ATCO WAY

IN THIS SECTION

[Living the ATCO Values](#)

[Following our Code](#)

[Our Expectations](#)

[How we uphold our Code](#)



1.1 LIVING THE ATCO VALUES

Our history includes a long-standing commitment to business excellence in all areas. Our values portray who we are and include a commitment to integrity and ethical business conduct. In today's business environment, living our values is critical for our continued success.

Our values guide the conduct of all employees, officers and directors. We seek out business partners who share them as well. It is important that all members of our team embrace these values as they are fundamental to how we do business.

We live by the following values:

SAFETY: Safety is the first consideration in everything we do. We hold a shared belief that safety must direct all our day-to-day priorities and decisions, and we are accountable for understanding and following the health and safety requirements for any work we undertake.

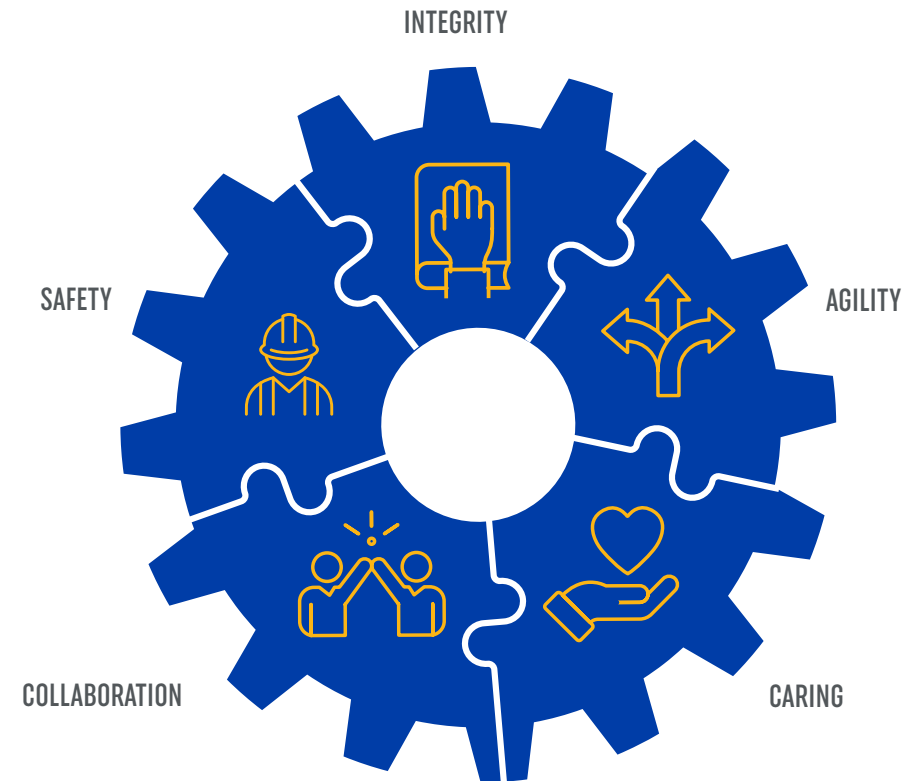
INTEGRITY: We are honest, ethical and treat others with fairness, dignity and respect. We make good decisions, take personal ownership of tasks, are responsible for our actions and deliver on our commitments.

AGILITY: We are creative, innovative and take a measured approach to opportunities and risk, balanced with a long term perspective. We stay relevant, reward action and learn from failure.

CARING: We care about our customers, our employees and their families, our communities and the environment. We seek to understand and care enough to challenge each other.

COLLABORATION: We work together, share ideas, recognize the contribution of others and learn from our failures and successes. We are clear about our intentions and communicate openly especially when problems or issues arise. We value and encourage diversity and different perspectives. We work together to build strong networks.

Our business conduct is guided not only by living our values but by adhering to our company policies and practices. These align with our standards for business conduct and guide us in our work and how we represent our company's interests.



1.2 FOLLOWING OUR CODE

How We Do Business is the Code that sets out the behaviours and standards of conduct we expect of ourselves and each other. It provides an overview of the policies and practices that must be followed by anyone who works for or represents ATCO including:

- Directors, officers, employees, independent consultants and contractors in all countries where we conduct business (from now on we will refer to these individuals as our people);
- Subsidiaries and controlled affiliates (in other words, entities in which ATCO has operating control or more than 50% of the voting rights).

We also encourage non-controlled affiliated companies to adopt and follow this Code and its related policies and practices.

Business partners working with us, including suppliers, joint venture partners and agents are expected to adhere to the same or similar ethical standards as our people.

We expect our people to take action, up to and including the termination of a contract, upon learning that a business partner fails to abide by our Code and our related policies and practices.



ABOUT THIS CODE:

How We Do Business provides an introduction to our company policies and practices and is structured to align with our values.

This Code does not describe every possible scenario you may face. If you are unsure how the Code applies to your situation, please contact a resource listed in the Speaking Up section of this Code.



1.3 OUR EXPECTATIONS

OUR PEOPLE

We expect our people to share a commitment to integrity, regardless of position, location, business unit or level of seniority. As a member of the ATCO family, we have the responsibility to:

- Educate ourselves about the requirements of the Code;
- Acknowledge, on an annual basis, that we have read and agree to abide by the terms of the Code;
- Keep up-to-date on policies and practices relevant to our roles;
- Speak up, ask questions and take action when we encounter acts of wrong-doing; and
- Use good judgment in all business dealings.

OUR LEADERS

We have higher expectations for our leaders who must also:

- Model appropriate behaviours that are consistent with the Code and our values;
- Understand the link between the Code and the policies and practices that apply to the teams they lead;
- Promote open communication and trust in the workplace so that our people feel secure about raising concerns and identifying improvements & opportunities;
- Foster a positive work environment where principled and respectful actions are the norm; and
- Only ask people to do things they would feel comfortable doing themselves.

ETHICAL DECISION MAKING

Ethical decision making starts with good judgment and common sense. When we raise concerns we make our company stronger by protecting each other and our assets from harm. Before taking action in a situation, stop and ask yourself these questions:

1. Is anyone's health, safety or the environment impacted by this action?
2. Is it legal and am I authorized to do it?
3. Is it consistent with our values, policies or practices and do I understand the potential risks?
4. What would my family, friends and coworkers think of my actions?
5. How would I feel if my actions were made public?



1.4 HOW WE UPHOLD OUR CODE

ANNUAL TRAINING AND CERTIFICATION

When you start work with us, and annually thereafter, you are required to complete an acknowledgment confirming you have reviewed *How We Do Business*. Additional training may also be required depending on your job function.

ENFORCEMENT

Failure to comply with this Code and all other policies and practices may result in disciplinary action, up to and including termination of employment.

LEGAL AND REGULATORY COMPLIANCE

We comply with the applicable laws and regulations in all of our operating jurisdictions. We expect our people to have sufficient knowledge of these laws and regulations in order to identify potential risks and to know when to seek advice.

In all cases, if you are unsure how to proceed, contact your supervisor or one of the resources listed in the Speaking Up section of this Code.

In this Code, ATCO means ATCO Ltd., Canadian Utilities Limited and their direct and indirect subsidiary companies.



This symbol, found throughout this Code, indicates that additional information can be found by reviewing applicable ATCO Practices.



This symbol provides added insight on what you should know.



LIVING OUR VALUES

IN THIS SECTION

- [Avoiding Conflicts of Interest](#)
- [Trading Responsibly](#)
- [Protecting Confidential Information](#)
- [Managing Records Responsibly](#)
- [Preventing Improper Payments and Incentives](#)
- [Protecting ATCO's Assets](#)
- [Preparing Accurate Records and Books](#)
- [Preventing Fraud](#)
- [Use of ATCO Information Technology](#)
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- [Exchanging Business Courtesies](#)



2.1 AVOIDING CONFLICTS OF INTEREST

OUR POLICY

We must avoid all situations in which our personal interest conflicts with our professional responsibilities and ensure that all business transactions are conducted with the best interests of our company in mind.

Conflicts of interest may be actual or perceived and often their impact on the business may be unclear or complicated. For this reason, all conflicts of interest must be disclosed promptly to your supervisor and as part of your annual acknowledgement of this Code.

Disclosing all conflicts of interest which may influence your business decisions, whether actual or perceived, allows your management team to mitigate risks.



WHAT TO KNOW

A **CONFLICT OF INTEREST** exists where you are in a position to influence an ATCO business decision that may result in a personal gain for yourself, a relative or someone living in your household.

A **CONFLICT OF INTEREST** is not necessarily a violation of this Code but failing to promptly disclose the conflict is always a violation.

WHAT TO REMEMBER

You have a duty to ensure that nothing interferes with your ability to make all business decisions in the best interest of our company.

YOUR RESPONSIBILITY

Always:

- Disclose any personal or family relationships that might create an actual, perceived or potential conflict of interest.
- Disclose material investments and other financial interests you have in a company or commercial enterprise that is a competitor to, supplier to, or does other business with us.
- Obtain approval from your supervisor before engaging in outside or secondary work that may interfere or conflict with your duties at ATCO, including board or committee work for outside organizations.
- Exclude yourself from the following:
 - Hiring, promoting, direct supervision or evaluation of a family member or close friend;
 - The process of selecting, managing or influencing a relationship with a Contractor, supplier or other business partner if they employ or are controlled by someone with whom you have a personal or family connection.

Do not:

- Accept business courtesies other than of a nominal value from suppliers, customers or competitors—especially if we are seeking requests for proposals for products and/or services offered by that supplier.
- Accept personal discounts or other benefits from suppliers or customers if they are not available to the general public or your colleagues.
- Use ATCO resources, time, intellectual property, or facilities for outside activities unless you have previous approval from your supervisor and their use is permitted by our policies.



For more information, refer to the [Conflicts of Interest Practice](#) and [Exchanging Business Courtesies Practice](#).

2.2 TRADING RESPONSIBLY

OUR POLICY

We are committed to fair and open markets for publicly traded securities. We never purchase or sell securities of any entity on the basis of material non-public information which we acquire through our work.

We do not share non-public information with anyone outside of our company, including spouses, friends and relatives, and we only share non-public information with co-workers on a need-to-know basis.

WHAT TO REMEMBER

We may not use or disclose material non-public information about ATCO or other companies.



For more information, refer to the [Insider Trading Practice](#), [Disclosure Practice](#) and [Confidential Information Practice](#).

YOUR RESPONSIBILITY

Avoid:

- Trading ATCO securities around the time of a significant announcement.
- Discussing confidential ATCO business with family and friends.
- Sharing material, non-public information with anyone outside of ATCO, unless:
 - It is necessary for our business activities; or
 - Proper controls are in place, such as non-disclosure agreements with business partners.

Do not:

- Buy or sell shares of ATCO or any other company while you are aware of material non-public information.
- Recommend or suggest that anyone buy or sell the securities of any company (including ATCO's) based on material non-public information about that company. This is tipping and it is against the law.
- Share material non-public information with colleagues except on a need-to-know basis.



WHAT TO KNOW

NON-PUBLIC INFORMATION is information that has not been disclosed to the public. It is material if a reasonable investor would consider it important in deciding to buy, hold or sell securities, or if its publication would likely affect a company's share price.

2.3 PROTECTING CONFIDENTIAL INFORMATION

OUR POLICY

We must treat confidential information about our business plans, operations and/or other activities as proprietary to the company.

We may not communicate or disclose confidential information unless we have the authority to do so.



WHAT TO KNOW

CONFIDENTIAL INFORMATION includes all knowledge, data and information concerning our business affairs. It can be documented or undocumented, in a digital or physical format, or merely a conversation or statement. It must always be protected.

WHAT TO REMEMBER

Confidential information must always be protected and should only be disclosed when you have the authority to do so. When customers, suppliers and business partners provide us with their confidential information, we treat it with the same respect we give our own.

YOUR RESPONSIBILITY

Always:

- Store business records containing confidential information in a safe place where access is restricted.
- Shred or otherwise destroy all documents containing confidential information when they are no longer necessary.
- Promptly remove confidential information from conference rooms or work areas after meetings have concluded.
- Lock or log off your computer when it is not in use.
- Use extreme caution when copying confidential information onto external hardware devices.
- Speak with your supervisor if you are unsure whether an agreement is required to protect confidential information.

Do not:

- Share confidential information, documents or devices containing confidential information unless required to do so, for example, through a regulatory or legal process.
- Read, display or discuss confidential information in places where the discussion may be overheard or the information viewed (such as in elevators, hallways, restaurants, bathrooms, stairwells, airplanes or taxis).
- Discard confidential information or leave it in an unsecured location where others can easily retrieve or access it.
- Disclose confidential information regarding our customers, suppliers or competitors.



For more information, refer to the [Cybersecurity Practice](#), [Disclosure Practice](#) and [Confidential Information Practice](#).

2.4 MANAGING RECORDS RESPONSIBLY

OUR POLICY

We comply with the legal and regulatory requirements related to the management of business records. This includes following procedures for the creation, storage and retention of records and protecting them against unauthorized access, loss or damage.

We follow procedures that have been developed to ensure each department retains and discards business records appropriately. These procedures detail the length of time a record should be retained and other relevant principles around business records management and storage.

YOUR RESPONSIBILITY

Always:

- Learn and become familiar with the record retention procedures applicable to your department's activities.
- Remember that there are many legal and regulatory guidelines that dictate how we should maintain, store and dispose of employment, tax and other business records.
- Immediately report possible loss or theft of business records, including lost laptops, mobile phones, tablets or other types of data storage equipment.
- Ensure any misuse or improper access to our electronic business records are reported to our Cybersecurity team.

Do not:

- Allow access to our business records by unauthorized individuals.

WHAT TO REMEMBER

Protect our business records against unauthorized access, loss or damage. Report all instances of improper access to your supervisor, Cybersecurity or Corporate Security.



For more information, refer to the [Cybersecurity Practice](#).



WHAT TO KNOW

A **BUSINESS RECORD** includes information that is documented to provide evidence of a business transaction, decision or action. It can exist and be stored in either a paper or electronic format and include emails, text messages and other electronic data transmissions.

2.5 PREVENTING IMPROPER PAYMENTS AND INCENTIVES

OUR POLICY

As a responsible global citizen, we take steps to ensure that corruption does not occur within our operations. We never offer, attempt to offer, promise or accept payments, gifts or anything of value that could influence a business decision. This includes improper payments or other incentives made with a corrupt intent, whether the exchange is made by our people or a business partner.

We ensure that all interactions with public officials comply with the law. We never offer or give small payments to public officials or others to secure or speed up the performance of routine actions to which we are legally entitled. These payments are referred to as facilitation or grease payments and are not allowed.

There may be situations where a bribe is requested and where failure to pay might lead to an imminent threat to the health, safety or security of a person. This is known as extortion and you must protect the person in this situation. If there is an immediate threat, make the payment and report it to your Compliance Officer and Corporate Security. If there is time to react, Corporate Security must be engaged immediately, or as soon as practical to manage the situation.



WHAT TO KNOW

BRIBERY means the giving, offering or promising anything of value to gain an improper business advantage. Bribes are not always in the form of cash or gifts.

ANYTHING OF VALUE can include employment or contracting opportunities, travel benefits, charitable contributions, sponsorships, contracts, favours for family and friends and/or other personal courtesies or improper payments or incentives.

PUBLIC OFFICIAL means any individual acting in an official public capacity and their immediate family members. It includes officers or employees of government departments, government-owned or controlled entities (including crown corporations or state-owned enterprises such as hospitals, banks, airlines or utilities). It also includes candidates for political office, employees or officials of political parties or international organizations such as the United Nations or World Bank.

YOUR RESPONSIBILITY

Always:

- Report all requests for bribes, facilitation and other improper payments or incentives.
- Monitor the activity of all business partners engaged to act on our behalf.
- Take special care when engaging in the following:
 - Interactions with public officials;
 - Business in new geographic locations.
- Ensure that business courtesies offered to public officials comply with our policies and applicable laws and regulations.

Do not:

- Allow an improper payment or incentive in order to influence a business decision.
- Pay a bribe.
- Engage a business partner to act on our behalf without performing thorough due diligence.

WHAT TO REMEMBER

Do not permit or engage in the exchange of any kind of improper payment or incentive. Make sure our business partners adopt this practice when acting on our behalf.



For more information, refer to the [Anti-Corruption Practice](#).

2.6 PROTECTING ATCO'S ASSETS

OUR POLICY

We are responsible for the security of all ATCO assets whether they are physical or intangible. This means we are responsible for protecting them from theft, loss, damage, waste and improper use.

Our people protect the confidentiality associated with intellectual property during their tenure and after their departure from our company.

We value our intellectual property and take steps to protect and enhance the value of our brands, technologies, business processes and information. We understand and leverage the value created through our work and we respect the intellectual property of others. Innovations created during the course of employment or service at our company become ATCO property and remain with the company.

WHAT TO REMEMBER

We all have a responsibility to safeguard ATCO's assets.



For more information, refer to the [Cybersecurity Practice](#) and [Corporate Security Practice](#) and [Intellectual Property Practice](#).

YOUR RESPONSIBILITY

Always:

- Protect ATCO assets from theft, loss, damage, waste and improper use.
- Limit the personal use of ATCO assets and ensure that any personal use has no adverse effect on our company.

Do not:

- Use ATCO assets to support an outside business or other unauthorized activities.
- Remove ATCO assets from our facilities unless you have authority to do so.



WHAT TO KNOW

Examples of ATCO assets include **PHYSICAL ASSETS** such as electronic equipment (computers, tablets and phones), vehicles, tools, office furniture and supplies, real estate, as well as **FINANCIAL ASSETS** such as money, stocks, bonds, credit and debit cards or other financial derivatives and **INTANGIBLES** such as computer software, data, intellectual property and the **ATCO BRAND**, including its reputation.

Examples of **INTELLECTUAL PROPERTY** include inventions, trademarks, patents, copyrights, domain names, discoveries, improvements, research, trade secrets, and ATCO-developed computer software.

2.7 PREPARING ACCURATE BOOKS & RECORDS

OUR POLICY

Our financial records must be accurate, complete and comply with professional accounting and financial reporting standards.

We ensure that an effective system of internal controls exists to protect our assets, transactions and financial reporting practices. Our financial records are supported by adequate documentation. We ensure that we meet our financial reporting and public disclosure obligations by complying with applicable securities laws and regulations.

We never record false, misleading or incomplete information that undermines our ability to correctly disclose a transaction. We never utilize off the book or secret accounts, nor do we issue any documents that do not properly and fairly record the transactions to which they relate. Records are never destroyed in response to or in anticipation of an investigation or audit.

We report all accounting, purchasing, or auditing irregularities and any circumvention or overriding of internal controls in accordance with the Speaking Up section of this Code.



WHAT TO KNOW

Creating **FALSE OR MISLEADING RESULTS** is against the law and is a serious offence. Speak up if you have concerns about how a financial transaction is being recorded.

WHAT TO REMEMBER

Never prepare false or misleading records or take actions to circumvent or override internal controls.

YOUR RESPONSIBILITY

Always:

- Ask questions about incomplete, unusual or misleading information regarding the nature of a business transaction.
- Watch for results that seem inconsistent with performance.
- Record revenues and expenses in the period to which they relate.
- Cooperate with internal and external auditors, investigators, accountants or other financial advisors, especially when allegations of wrong doing are under investigation.

Do not:

- Create or falsify a record with the intention to conceal an improper transaction, misstate financial results or mislead.
- Circumvent an internal control even if asked to do so by your supervisor or a business leader.
- Approve a financial transaction or expenditure that exceeds your approval authority or which you think may be incorrect.



For more information, refer to the [Delegation of Authority Practice](#) and [Accounting Handbook](#).

2.8 PREVENTING FRAUD

OUR POLICY

We are committed to integrity, transparency and accountability in all of our business affairs. We do not tolerate fraud in any form, whether initiated by our people or our business partners.

We are committed to investigating all cases of fraud and, where appropriate, we will take disciplinary action, including referral of the matter to the appropriate authorities for possible prosecution.

Anyone who believes that a fraudulent transaction has occurred or is about to occur should report their concern in accordance with the Speaking Up section of this Code.

WHAT TO REMEMBER

Fraud is an act of deliberate misrepresentation or deception that is intended to harm another person or organization for personal gain. It is unethical and illegal.



For more information, refer to the [Delegation of Authority Practice](#) and [Purchasing Practice](#).

YOUR RESPONSIBILITY

Always:

- Pay attention to circumstances or situations that create the risk of fraud or theft from our company, our shareholders, business partners or others with whom we interact.
- Submit accurate, honest and timely expense claims and time sheets.
- Ensure that you review all invoices, expense reports and supporting documentation prior to approving expenditures for payment or reimbursement.
- Follow our policies, practices and procedures regarding purchasing, supplier selection, contracting, hiring, invoice approvals and other activities associated with the creation, review and/or approval of a business record.

Do not:

- Falsify or misstate a business record.
- Ignore or circumvent an internal control, especially those pertaining to the review and approval of financial transactions and expenses.
- Approve a financial transaction or expenditure that exceeds your approval authority or which causes you concern.



WHAT TO KNOW

FRAUD is defined as the theft, abuse or misuse of funds or resources where the act is made with the intention of obtaining an advantage, avoiding an obligation, or causing loss to another party.

DELIBERATELY FALSIFYING business records such as time sheets, invoices, travel benefits and expense claims is fraud.

2.9 USE OF ATCO INFORMATION TECHNOLOGY

OUR POLICY

We use our information technology systems and assets (such as computers, mobile phones, tablets and IT networks) responsibly and in accordance with our company practices. This includes using them for legitimate business purposes and requires that we take adequate precautionary steps to protect against potential cyber risks. We never use these resources to perform illegal or unethical activities.

You should not have any expectation of privacy when using ATCO's information technology systems or assets. ATCO reserves the right to monitor its systems, including blocking access to inappropriate websites and intercepting any messages or files transmitted by or stored on our systems.

While occasional personal use of ATCO's information technology systems and assets is permissible, use of these assets must not cause significant added cost to ATCO and/or interfere with work-related duties and responsibilities.



WHAT TO KNOW

Be careful when drafting electronic messages, including email and text messages, as these communications are **PERMANENT BUSINESS RECORDS**. Keep in mind these records can be forwarded or altered without your knowledge and can damage our reputation.

WHAT TO REMEMBER

Safeguard our information technology systems and assets and protect them against theft, cyber vulnerability, inappropriate use or other associated risks.

YOUR RESPONSIBILITY

Always:

- Protect your passwords and never share them.
- Limit access to ATCO information technology systems and assets to authorized individuals who need it for legitimate business purposes.
- Use approved networks and tools for data storage, transmission and backup of business information.
- Report any cyber risks or incidents including possible loss, theft, misuse or improper access to your supervisor.
- Review Cybersecurity Bulletins and participate in Cybersecurity Awareness Training.

Do not:

- Engage in conduct that damages the integrity of our company, its reputation or image.
- Engage in illegal, fraudulent, disrespectful, inappropriate or malicious activity when using company information technology systems and assets (including the forwarding or storing of pornographic, offensive, obscene, threatening, harassing or defamatory materials).
- Use personal email or software to conduct company business.
- Open attachments or click on links in emails unless you have confidence in the email source.



For more information, refer to the [Information Technology Practice](#), [Cybersecurity Practice](#) and [Marketing and Communications Practice](#).

2.10 PROMOTING A SAFE AND SECURE WORKPLACE

OUR POLICY

We embrace safety as part of our culture. Our success depends upon maintaining a safe and secure working environment that minimizes harm to those affected by our activities, including our people, business partners and the public. We aspire to achieving the highest safety standards across all our products and services. We comply with all applicable safety and security laws and regulations. We monitor and measure incidents to set objectives, targets and programs that support our continual improvement.

To support a safe work place, each of us is responsible to maintain our fitness for work. We report to work in a condition to safely carry out our duties physically and behaviourally. We consistently promote and follow safe work practices and avoid risk to our colleagues, business and community partners.

We report all safety and security concerns and incidents. Each of us is responsible and has the authority to stop work that we believe is unsafe.

WHAT TO REMEMBER

Always follow safety and security procedures and be alert to hazards and threats in your workplace. We are all accountable for keeping ourselves and each other safe and secure at work and are expected to report all safety and security incidents.



For more information, refer to the [Alcohol & Drug Practice](#), [Business Travel Practice](#) and [Safe and Secure Workplace Practice](#).

YOUR RESPONSIBILITY

Always:

- Understand and comply with the occupational safety and security laws and practices that apply to your work location, position and/or area of responsibility.
- Question unsafe or improper conditions and operating procedures and insist on stopping work if you feel it is necessary.
- Use our designated travel management company for all aspects of business travel.
- Be sure your supervisor is aware of your travel destinations and that you are familiar with all safety and security protocols for that location.
- Ask to see a person's ATCO identification, especially if you think the person's activities look suspicious or unusual.

Do not:

- Enter a work site without wearing the appropriate personal protection equipment.
- Ignore a perceived or actual lapse in safety, security or emergency preparedness measures.
- Take actions that will put you at personal risk even if you believe it to be in ATCO's best interest.
- Allow unauthorized access to our operating locations.
- Show up for work impaired or under the influence of alcohol, medication or drugs.



WHAT TO KNOW

FIT FOR WORK means you are adequately rested and physically able to perform your job duties and are able to respond to emergency situations that may arise in your job. **NEVER** report to work impaired by alcohol, medication or drugs.

2.11 HUMAN RIGHTS

OUR POLICY

We are committed to fostering an environment where internationally proclaimed human rights are respected and protected. We prohibit all forms of slavery, compulsory and forced labour, human trafficking and child labour in our operated business activities.

Our approach to human rights is based on the United Nations (UN) Universal Declaration of Human Rights and we respect human rights in accordance with the UN Guiding Principles on Business and Human Rights. In addition, our relationships with Indigenous peoples are built on respect, transparency, and trust, all in the spirit of Truth and Reconciliation and guided by the UN Declaration on the Rights of Indigenous Peoples.

We seek to work with contractors and suppliers who contribute to sustainable development and are economically, environmentally and socially responsible.



WHAT TO KNOW

In order to conduct business with ATCO, our suppliers must respect and comply with our Vendor Conduct Guidelines.

WHAT TO REMEMBER

If you witness or experience human rights violations at our workplace, or suspect any potential human rights violations relating to our business, speak up and report it.

YOUR RESPONSIBILITY

Always:

- Understand and comply with the employment laws, labour practices, privacy and human rights laws and regulations that apply to your work location, including laws and regulations on freedom of association and collective bargaining.
- Question unethical or improper conditions and operating procedures.
- Use due diligence to identify and prevent human rights risks to people in our business and value chain.
- Speak up if you have a concern.

Do not:

- Tolerate discrimination, harassment or retaliation.
- Tolerate violence or threats of violence.
- Engage with contractors or suppliers that engage in unethical practices.



For more information, refer to the [Safe and Secure Workplace Practice](#) and the [Inclusive and Respectful Workplace Practice](#).

2.12 ADOPTING FAIR COMPETITION PRACTICES

OUR POLICY

We are committed to fair competition and do not engage in anti-competitive practices. We never collude with other companies on prices or terms offered to our customers, agree with competitors to allocate markets or customers, or manipulate bid processes.



WHAT TO REMEMBER

Some of the most serious anti-competition offences occur between competitors. These include bid rigging, collusion, price fixing or agreeing to divide territories or markets. We do not participate in these types of activities.

YOUR RESPONSIBILITY

Always:

- Comply with the fair competition laws of the countries in which we conduct business.
- Communicate honestly in your business relationships.
- Gather competitive information in a way that is ethical, legal and publicly available.
- Avoid contact with competitors that could create the appearance of improper agreements or understandings.
- Seek advice if you believe you have been exposed to anti-competitive or unfair business practices.

Do not:

- Collude with competitors to divide markets, regions or customers, control prices, boycott suppliers or restrict products.
- Engage in misleading advertising or make false claims about competitors' offerings.
- Attempt to gain an unfair advantage through the disclosure of incomplete, inaccurate or misleading information.
- Exchange information about price, market share or other conditions with competitors, customers or other business partners.



WHAT TO KNOW

ANTI-COMPETITIVE PRACTICES can include agreements with competitors to fix or control prices, allocate customers or markets or restrict access to products and services. **COMPETITION LAWS** (also known as **ANTI-TRUST LAWS** in the United States) restrict businesses with a dominant position in a marketplace from using their position in a manner that lessens or prevents competition.

2.13 OPERATING IN REGULATED MARKETS

OUR POLICY

We are committed to operating with integrity in all our commercial dealings including complying with industry standards set out by various regulatory agencies. We ensure that our affiliates operate in accordance with those standards and that our non-regulated entities do not receive preferential treatment because of their affiliations.

We align the interests between affiliates, shareholders and our regulated customers through the establishment of and adherence to restrictions on the sharing of information, services and resources.

These restrictions are intended to:

- Prevent our regulated affiliates from cross-subsidizing non-regulated activities;
- Protect customer information collected in the course of providing regulated services;
- Ensure that unregulated affiliates and their customers do not have preferential access to regulated services; and
- Avoid uncompetitive practices between regulated and non-regulated affiliates which may be detrimental to the interest of our regulated customers.

The regulatory standards prohibiting inappropriate conduct, preferences or advantages by our regulated entities are outlined in our Inter-Affiliate Code of Conduct. They are designed to protect customers of our regulated businesses which could be adversely impacted by the actions of our non-regulated affiliates.



For more information, refer to the [Code of Conduct Regulation](#).

YOUR RESPONSIBILITY

Always:

- Understand the regulatory rules and standards that apply to your role, including what information can be shared between our regulated and non-regulated companies.
- Raise concerns around any actual or potential breaches of regulatory standards.
- Direct any inquiries from regulatory agencies to the appropriate members of our team.
- Conduct regulated services in a non-preferential and non-discriminatory manner.



WHAT TO KNOW

Our compliance with **REGULATORY STANDARDS** and interactions with regulators is a key component of our success. We must ensure that our regulated operations are conducted in a non-preferential and nondiscriminatory manner. When in doubt, seek guidance from your supervisor.

WHAT TO REMEMBER

You must understand the regulatory requirements that apply to your role and ensure compliance with all regulatory commitments.

2.14 COMPLYING WITH INTERNATIONAL TRADE LAWS

OUR POLICY

In the pursuit of our entrepreneurial value we actively seek global business opportunities and partnerships. We comply with all export control, customs, tax, economic and legal sanctions that regulate the cross-border transfer of goods, technology, data and in some cases, individuals, between countries.



WHAT TO KNOW

IMPORT AND EXPORT CONTROL LAWS regulate cross-border transfers of goods, software and/or technology that are used in our ATCO businesses. Some countries also control the transfer of technical data to foreign nationals within their borders. **CUSTOMS LAWS** regulate the movement (import and export) of goods across national borders or customs territories, even in the absence of a commercial transaction or import duties. **TRANSFER PRICING LAWS** regulate cross-border prices that can be charged for property sold or services rendered between related companies. **ECONOMIC SANCTIONS** can restrict or prohibit certain activities such as trade dealings or transfer of funds between certain persons, entities or countries. **BOYCOTTS** are the refusal of a person or group of people to do business with certain other people or countries.

WHAT TO REMEMBER

Always know what you are exporting, its destination, the end user and the end use. Be sure to provide complete and accurate documentation regarding the items being transferred and seek advice from your Compliance Officer if you have concerns about the country or geographic region you will be shipping goods to, ordering from, or in which you are exploring business opportunities.

YOUR RESPONSIBILITY

Regarding Customs:

- Follow all business procedures relating to the import/export of goods.
- Only use customs agents and freight-forwarders who have been pre-approved.
- Report accurate, complete and timely information on import declarations.
- Never hand carry or transport any commercial product across a border.

Regarding Export Controls:

- Follow all of our procedures regarding the export of goods, technology or data.
- Ensure that you know your customers, suppliers and business partners. This includes making sure that the appropriate due diligence procedures have been performed and that we are not doing business with public officials or other individuals on restricted parties' lists.
- Consult management if a restrictive trade practice or boycott appears to be applicable to a region of our operations or business development interest.

Regarding Economic Sanctions and Boycotts:

- Engage senior leadership if you have concerns about a country or region where you will be exploring or undertaking new business opportunities on behalf of our company.

Regarding Transfer Pricing:

- Prior to setting a price for property or services transferred between our companies, ensure the process complies with transfer pricing laws.

2.15 PROMOTING AN INCLUSIVE AND RESPECTFUL WORKPLACE

OUR POLICY

We promote and maintain a workplace culture of inclusion and respect. We value our individual differences, our unique perspectives and backgrounds, and the variety of contributions each of us brings to work. Aligning with our values of caring, collaboration, safety and integrity, we foster constructive relationships and create a positive and professional work environment that is inclusive and respectful.

We do not tolerate behaviour that interferes with our well-being and work such as discrimination, harassment, or violence. We are committed to eliminating exclusion, including those forms of exclusion prohibited by law. Conduct that does not align with our standard is taken seriously; it is investigated and promptly acted upon.



WHAT TO KNOW

To maintain an **INCLUSIVE AND RESPECTFUL CULTURE**, we address behaviours that are inappropriate. **SPEAK UP** if you observe conduct that does not align with our values or is disrespectful or non-inclusive. You will **NOT BE RETALIATED AGAINST** for raising a **CONCERN IN GOOD FAITH**.

WHAT TO REMEMBER

A work environment based on mutual trust and appreciation of others' skills and abilities supports us as engaged and productive members of our team. The diversity of our people makes us stronger, enabling us to serve our communities and customers more effectively.

YOUR RESPONSIBILITY

Always:

- Treat colleagues and business partners in a considerate and professional manner.
- Question any inappropriate behaviour you observe or are a party to. If the behaviour continues, report it to the resources listed in the Speaking Up section.

Do not:

- Engage in or condone discrimination or harassment in the workplace.
- Create an unwelcoming work environment.



For more information, refer to the [Inclusive and Respectful Workplace Practice and Procedures](#).

2.16 PROTECTING PERSONAL PRIVACY

OUR POLICY

We respect the privacy of individuals and act responsibly in respect to the collection, use, retention, disclosure and disposal of their personal information. We are committed to maintaining the accuracy, confidentiality and security of the personal information of our people, our business partners, customers and other parties.

We comply with the privacy laws and regulations within each jurisdiction in which we operate.

WHAT TO REMEMBER

You must treat personal information confidentially. The information should not be shared with anyone, including colleagues or business partners, unless they have a business need to know and you have the authority to share it with them.



For more information, refer to the [Privacy of Personal Information Practice](#) and [Confidential Information Practice](#).

YOUR RESPONSIBILITY

Always:

- Collect, use, retain, disclose or dispose of personal information in accordance with our [Privacy of Personal Information Practice](#).
- Safeguard personal information ensuring that it is only shared for legitimate and authorized purposes.
- Consult with Human Resources or a Privacy Officer before implementing new or modifying processes that use personal information (including new systems or software upgrades).
- If you view personal information that you would not normally have access to, report it to the Privacy Officer for your business unit.

Do not:

- Disclose personal information to a person who does not have a business need to know it, the authority to see it or, where required, the subject's consent to access it.
- Ask employees of our customers, competitors or suppliers to disclose personal information.
- Disclose personal information regarding current or former members of our team.
- Release customer information unless it is for legitimate business purposes and you have the authorization to do so.



WHAT TO KNOW

PERSONAL INFORMATION refers to any information, other than business contact information, that is about an identifiable individual.

2.17 PROTECTING THE ENVIRONMENT

OUR POLICY

We are committed to delivering service excellence and innovative business solutions in a sustainable and environmentally responsible manner. This is an integral part of how we do business. We are committed to minimizing the impacts our operations have on the environment and continuously seek ways to improve our environmental performance.

We do this by meeting or exceeding environmental regulations and operational standards and using resources and energy efficiently. We minimize and mitigate our environmental impact through the systematic and responsible management of our operations globally including preventing pollution, reducing environmental incidents and protecting biodiversity. We set objectives, measure, monitor and regularly report on our environmental performance.



WHAT TO KNOW

REPORT ALL ENVIRONMENTAL INCIDENTS and work processes that have the potential to adversely impact the environment or are not in compliance with environmental regulations.

WHAT TO REMEMBER

Always ensure you understand your environmental responsibilities before starting a project.

YOUR RESPONSIBILITY

Always:

- Comply with all applicable environmental laws, regulations, codes, standards and commitments.
- Use resources and energy efficiently by incorporating environmental considerations into planning, implementation, operations, maintenance and decommissioning activities.
- Follow the appropriate environmental incident reporting procedures or contact resources listed in the Speaking Up section of this Code.

Do not:

- Override any management system that monitors our emissions, wastes or releases to land, air and water.



For more information, refer to the [Environmental Practice](#).

2.18 COMMITMENT TO COMMUNITIES AND INDIGENOUS PEOPLES

OUR POLICY

We are committed to building and maintaining positive and sustainable relationships and partnerships with all the communities we serve. We contribute to and enhance the economic and social development of these communities through business partnerships, procurement and employment opportunities, sponsorships, donations and actively encouraging our people to volunteer and become part of the fabric of the local community. Our relationships with Indigenous peoples are built on respect, transparency, and trust, all in the spirit of Truth and Reconciliation and guided by the UN Declaration on the Rights of Indigenous Peoples.

We recognize the importance of working cooperatively with all Indigenous groups including First Nations, Inuit and Metis communities, and Aboriginal and Torres Strait Islanders. As part of our commitment, we respect the unique historical, cultural and legal status of Indigenous peoples, including related Treaty Rights. We strive to build and maintain meaningful and mutually beneficial partnerships with Indigenous communities wherever possible. This includes providing opportunities to Indigenous people to participate in our operations. We have training initiatives to help Indigenous youth develop marketable and industry recognized skills, leading to enhanced employment opportunities.

We believe that our support of communities helps drive sustainability and economic growth in all of our operating locations.

WHAT TO REMEMBER

Engage with Indigenous communities in a sensitive and respectful manner.


YOUR RESPONSIBILITY

Always:


- Complete Indigenous Awareness Training, especially if your role requires you to work directly with Indigenous communities.
- Coordinate engagement and investment efforts across our businesses when operating within Indigenous communities by involving the Indigenous Relations Committee.
- Look for ways that you or the company can make a difference in our communities.

Do not:

- Offer donations or sponsorships that might be perceived as influencing a business decision or seeking an improper advantage.



For more information, refer to the [Indigenous Relations Practice](#), [Anti-Corruption Practice](#) and [Marketing and Communications Practice](#).



WHAT TO KNOW

We have developed a comprehensive suite of guidelines, training, tools and best practices to assist with Indigenous engagement and community investment efforts.

2.19 ENGAGING WITH OUR BUSINESS PARTNERS

OUR POLICY

We believe in working with business partners who demonstrate high standards of ethical business conduct. We expect them to be guided by the principles outlined in this Code and we will not knowingly work with business partners who operate unethically, unsafely or who violate the law, compete dishonestly or use unfair business practices.

When engaging with business partners, we take steps to retain them on commercially reasonable terms and conditions and are aware of, and contractually bound by, our standards of business conduct as outlined in this Code. We carry out appropriate due diligence prior to engaging with business partners operating in high risk regions of the world and/or who perform high risk services on our behalf. We procure goods and services which offer the best combination of price, quality and level of service.

Business partner conduct that does not align with our standards is taken seriously and may lead to the termination of our contractual relationship. Actual or alleged concerns should be reported to one of the resources listed in the Speaking Up section of this Code. You will not be retaliated against for raising, in good faith, concerns about the practices of our business partners.



WHAT TO KNOW

Business partners working with us include suppliers, joint venture partners and agents. We expect them to adhere to the same or similar ethical standards as our people.

YOUR RESPONSIBILITY

Always:

- Report actual or perceived business partner misconduct.
- Ensure conflicts of interest are avoided between your role and any outside interests you may have with suppliers or other business partners, especially when bid proposals are pending.
- Ensure that an appropriate level of due diligence is performed on new business partners.
- Comply with the requirements of our Exchanging Business Courtesies Practice and remain especially vigilant when exchanging business courtesies with public officials.

Do not:

- Commit our company to contractual obligations which are beyond the scope of your responsibility and/or financial authorization level.
- Engage with business partners until the required due diligence procedures have been completed and reviewed with the appropriate Compliance Officer and/or your supervisor.

WHAT TO REMEMBER

Our reputation for integrity can be significantly affected by those with whom we do business or engage to act on our behalf. It is imperative that we ensure we are associating with business partners that align with our values and commitment to business integrity and our standards for business excellence.



For more information, refer to the [Purchasing Practice](#), [Anti-Corruption Practice](#), [Delegation of Authority Practice](#) and [Exchanging Business Courtesies Practice](#).

2.20 HANDLING EXTERNAL COMMUNICATIONS

OUR POLICY

We are committed to providing clear, factual and timely information to the public that meets our legal and regulatory requirements.

We have authorized specific individuals to communicate to the market through our website, news releases, financial documents, media interviews, social media, presentations and one-on-one meetings.

The reputation of a company is an important asset. We all play a role in ensuring that our reputation is protected and continues to grow in a positive way. We encourage our people to engage with us on social media and share our content in a reasonable and respectful way while keeping our reputation in mind.

YOUR RESPONSIBILITY

Always:

- Forward requests from media, investors, government and regulators to your Marketing & Communications team unless you are authorized to respond.
- Get approval and support from your Marketing & Communications team for speeches, presentations and collateral material.
- Alert your Marketing & Communications team of any event or issue that could garner media attention or impact our reputation.
- Remember that when you post on social media, you represent yourself and the company and both reputations are on the line.

Do not:

- Make public statements or respond to inquiries about ATCO unless you are authorized to do so.
- Allow a business partner to speak on our behalf.



WHAT TO KNOW

Your personal social media activity and your employment are directly connected. Remember that what you say on social media will reflect on you and the company.



For More information, refer to the [Disclosure Practice](#) and [Marketing and Communications Practice](#).

WHAT TO REMEMBER

Never respond to inquiries concerning our company unless you are authorized to speak on the company's behalf.

2.21 INTERACTING WITH PUBLIC OFFICIALS AND POLITICAL ACTIVITIES

OUR POLICY

We comply with all laws, regulations and conventions related to interactions with public officials of domestic and foreign governments. If your role involves working on public contracts, you are responsible for educating yourself on the particular laws or regulations applicable to the government with whom you are working.

We engage in political and lobbying activities that are legal and transparent. In addition, we never use ATCO funds, assets, resources or letterhead to support any political candidate or party unless authorized to do so pursuant to the Political Activities Practice.

We may engage in public policy debate on subjects of legitimate concern to our operations, staff and the communities in which we operate. This can be done in various ways, including through lobbying activities by authorized members of our team who are registered to do so, and are clearly identified as representatives of our company.



WHAT TO KNOW

PUBLIC OFFICIAL means any individual acting in an official public capacity and their immediate family members. It includes officers or employees of government departments, government-owned or controlled entities (including crown corporations or state-owned enterprises such as hospitals, banks, airlines or utilities). It also includes candidates for political office, employees or officials of political parties or international organizations such as the United Nations or World Bank.

LOBBYING is communicating with public office holders with regard to: the making, developing or amending of legislative proposals, bills or resolutions, regulations, policies or programs, the awarding of government grants, contributions or other financial benefits.

Lobbying does not include formal legal or regulatory submissions or communications that are a matter of public record.

YOUR RESPONSIBILITY

Always:

- Unless you are explicitly required to represent ATCO's views as part of your role, be clear that your political views and actions are your own.
- Obtain written approval from your supervisor before committing to political activities which require time away from work.
- Engage our Government Relations team prior to meeting with government representatives.
- Be aware of, and comply with, lobbyist regulations in the jurisdiction you are conducting business in, and report meetings with public officials to your supervisor or our Government Relations team.

Do not:

- Interact with public officials on behalf of our company (including the pursuit of new business opportunities) unless authorized to do so.
- Use ATCO assets or resources to support a political candidate or party in their fundraising efforts.

WHAT TO REMEMBER

You should always discuss your business interactions with your public officials with your supervisor or ATCO Government Relations.



For more information, refer to the [Political Activities Practice](#), [Anti-Corruption Practice](#) and [Conflicts of Interest Practice](#).

2.22 EXCHANGING BUSINESS COURTESIES

OUR POLICY

The exchange of business courtesies may occur between business partners in order to develop goodwill and facilitate strong working relationships. Business courtesies should never be used to influence a decision or action, create a sense of obligation, or put our company in a situation where we appear biased towards a particular outcome.

We never exchange business courtesies that are extravagant, made on a frequent or recurring basis, conducted in inappropriate settings or are of an inappropriate nature. We never exchange cash or cash equivalents.

We must never accept business courtesies from a contractor or supplier during any period when we are in an open bid process. This is especially important when we have a decision-making role in the bid outcome.

Special rules apply when exchanging gifts and entertainment with public officials. If you are involved in these types of exchanges, seek guidance from your Compliance Officer or our Government Relations team.

WHAT TO REMEMBER

Business courtesies should never influence a business decision or call into question the recipient's impartiality, independence or judgment.



For more information, refer to the [Exchanging Business Courtesies Practice](#), [Anti-Corruption Practice](#), and [Political Activities Practice](#).

YOUR RESPONSIBILITY

Always:

- Pay attention to the value and frequency of business courtesy exchanges.
- Make sure that nothing is expected in exchange for the business courtesy.
- Decline offers of cash or cash equivalents.
- Ask yourself if the business courtesy will embarrass ATCO if publicly disclosed.

Do not:

- Allow business courtesies to affect your ability to make objective business decisions or to create the appearance that your objectivity has been compromised.
- Accept or offer a business courtesy of significant value or that appears so to others.
- Solicit business courtesies from an existing or potential business partner (unless it is connected to a previously approved ATCO philanthropic initiative such as ATCO EPIC.)



WHAT TO KNOW

The exchanges of gifts and entertainment to develop a business relationship are referred to as **BUSINESS COURTESIES**.

GIFTS include goods and services but can also be other items of value. They should be exchanged without expectation, advantage or obligation and have no role in business other than to acknowledge or enhance a relationship. When the person offering entertainment is not attending the event, it is considered a gift.

ENTERTAINMENT is where both the persons offering and accepting the event are in attendance and are usually offered with the intention of initiating or developing a business relationship.

SPEAKING UP

IN THIS SECTION

[Why Speak Up](#)

[Integrity Line](#)



3.1 WHY SPEAK UP

OUR POLICY

We are committed to conducting business ethically while promoting a work environment that fosters mutual respect, open communication and integrity. We are expected to speak up, ask questions and raise concerns about business practices or conduct that may violate this Code, or that may indicate illegal or unethical behaviour or create unacceptable risks for ATCO.

We are committed to investigating all good faith concerns raised in accordance with this Code. This includes protecting those who come forward to report such concerns. Retaliation against a person who reports such a concern will not be tolerated and may be subject to disciplinary action. The same applies to any intentional abuse of our reporting process, including the raising of malicious or knowingly false allegations.

We are expected to bring concerns into the open so that problems can be quickly resolved. When in doubt about an issue, *speaking up*.

REPORTING RESOURCES

If you suspect illegal or unethical behaviour, or believe this Code is being violated, you are responsible for raising your concern. You can report your concern to:

- Your supervisor;
- A member of the [Executive leadership team](#);
- The Vice President, Compliance;
- The Senior Vice President, General Counsel & Corporate Secretary;
- The Vice President, Human Resources;
- Director, Corporate Security;
- A [Compliance Officer](#).

You can also *speaking up* by contacting our Integrity Line, which is confidential, anonymous (if you choose) and operated by an independent third party. Reports may be made through the Integrity Line 24 hours a day via [ATCOintegrity.com](https://atcointegrity.com) or by contacting one of the numbers below:

INTEGRITY LINE — CONTACT INFORMATION

Canada and the United States: 1.844.810.2826

Australia: 1.800.238.497

Mexico: 800.062.2116

For all other locations, place a collect call to : 00-1-604-640-7831.

LEGAL AND REGULATORY COMPLIANCE

We must comply with laws and regulations in many different countries and markets that we operate in. In some cases, laws made by one country seek to regulate activities that take place outside of that country. This environment demands that all of our people be committed to compliance with all laws and regulatory requirements. If you are in doubt about something, ask questions and raise your concerns.



WHAT TO KNOW

All concerns must be raised in a timely manner and you should always provide as much and as specific information as possible so that your report can be investigated thoroughly. Details should include: names of persons involved, their roles with ATCO, dates, times, locations, events, the general nature of your concerns, perspectives on the violations that may have occurred, possible witnesses, proposed corrective actions, and/or other pertinent information that may support your report.

Reporting in good faith means you are providing all the information you have, and you believe it to be true.

If you suffer negative consequences after reporting a concern, speak up.



WHAT TO REMEMBER

Speak up if you see something wrong or have concerns. You will not be retaliated against.



For more information, refer to the [Speaking Up Practice](#).

ATCO always there.™
anywhere.

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