

TEW - Code Of Conduct

Guidelines | Expectations | Rules

By Marc-Anthony Decaria | Director of Operations



As the President of The Electrical Works Ltd., I am writing to you today to emphasize the importance of our Code of Conduct. At TEW, we are committed to maintaining a culture of respect, integrity, and excellence. Our Code of Conduct reflects these values and is designed to guide our behaviour in the workplace and beyond.

Our Code of Conduct is more than just a document - it is a promise we make to each other and to our customers. It is a promise to uphold the highest standards of ethical behavior, to act with integrity, and to treat each other with respect and professionalism.

We take our Code of Conduct seriously, and I expect all employees to adhere to its principles. This means being honest, ethical, and respectful in all of our interactions with each other, our customers, and the wider community. It means acting with integrity, even in the face of difficult decisions, and taking responsibility for our actions.

As President, I am committed to creating a safe and inclusive workplace for all employees. This means promoting a culture of openness and transparency, where all employees feel comfortable sharing their thoughts and ideas, and where we can work together to address any issues that may arise. I encourage all employees to familiarize themselves with our Code of Conduct and to ask any questions they may have. Let us all work together to create a workplace that is built on a foundation of respect, integrity, and excellence.

Thank you for your commitment to TEW and to our Code of Conduct.

Sincerely,

X Joseph DeCaria President Joe DeCaria











1.0 Code Of Conduct

1.1 Responsibility

The responsibility of the development of this policy and any procedures contained within have been accepted by the President of The Electrical Works Ltd (TEW).

1.2 Commitment

The Electrical Works Ltd. is committed to fostering a safe and healthy work environment where all rights and grounds as prescribed by the Ontario Human Rights Council, Government of Ontario and the Government of Canada are protected and valued. TEW is committed to conducting business with integrity in a fair, just, honest, and respectful manner.

1.3 Purpose

This code provides a formal statement of the policies and framework of principles and expectations of ethical behaviour and business conduct of TEW and its employees and contractors.

1.4 Scope

This policy applies to:

- 1. All employees of TEW including full-time, part-time, temporary, student, co-op, intern, casual or term employees; and
- 2. Any persons who perform work at an Electrical Works Ltd., workplace* including but not limited to, contractors, consultants, unpaid interns or co-op students, and an individual that is paid by a third party and uses The Electrical Works Ltd. assets (e.g., computers, testing equipment, material) and performs work for The Electrical Works Ltd.

*Note: "workplace" includes all locations where The Electrical Works Ltd. services are provided or where business or social activities of The Company are conducted, including all land, facilities, mobile equipment, and vehicles owned, leased, or otherwise directly controlled by The Company for the purpose of conducting Company business.



2.0 Terms

- This Code shall govern and guide employees and contractors in the performance of their duties and responsibilities and daily business decision making and interaction(s) with others.
- All contractors will be advised of the applicable provisions of this Code and will be expected to
 enforce these requirements for their employees, sub-contractors, and agents.
- This Code is not designed to anticipate or foresee every possible event or situation that may arise.
 Employees and contractors are expected to use their best judgement in the spirit of this Code.
 Employees and contractors are encouraged to ask for guidance before acting.
- Any violation of this Code by an employee may result in discipline, up to and including dismissal. Consultation amongst management and employees will take place before any actions are taken.
- Any violation of this Code by a contractor may result in the termination of their contract.

3.0 General Principles

- This Code provides a framework of principles for conducting business and dealing with employees, customers, contractors, and other stakeholders which are:
- To act with personal integrity, ethics, honesty, diligence, and professionalism and in the best interests of TEW
- To be scrupulous in the proper use and protection of Company information, funds, equipment, facilities, employee benefits available under our current health plan, and other assets
- To comply with all laws and by-laws, regulations, codes, standards, and Company policies governing ethical behaviour and conduct
- To exercise fairness, equity, courtesy, and sensitivity in dealing with employees, customers, contractors, and other stakeholders
- To respect the dignity and rights of others and without discrimination
- To avoid conflicts of interest or the appearance of a conflict of interest
- And to promote a safe and secure work environment



4.0 Employee & Contractor Responsibilities

All employees and contractors are required to:

- Adhere to the standards described in this Code.
- Comply with all applicable legislation and municipal by-laws, including but not limited to the
 responsibilities and obligations as set out in the Ontario Human Rights Code. Employees and
 contractors are expected to be sufficiently familiar with any legislation that applies to their work
 and to recognize potential liabilities and know when to seek advice. If in doubt, employees and
 contractors are expected to ask for clarification.
- Perform their duties and responsibilities with integrity, impartiality, professionalism, skill, honesty, objectivity, care and diligence, using their job-related authority in a fair and equitable manner.
- Be accountable and transparent and apply good judgment and discretion while making business decisions.
- Avoid all real or perceived conflicts of interest.
- Not engage in inappropriate and unprofessional conduct in the workplace, examples include:
 profanity, or swearing; excessive noise; insulting or negative comments that can affect the
 workplace; offensive pictures or jokes; and demonstrating little to no respect for others and/or their
 personal belongings. Employees are expected to be reasonable and fair in their expectations of
 each other and resolve any conflict in a mature and professional manner.
- Ensure property or assets in the workplace are not threatened or damaged.
- Always reflect a professional image, employees and contractors are requested to be mindful of their attire and dress appropriately for their job.
- Abide by TEW policy and procedures, instructions and lawful directions that relate to their employment, duties, and responsibilities.
- Refrain from committing or condoning any unethical or illegal act or instructing another employee or contractor to do so. Company employees and contactors should take the approach that every act should withstand the scrutiny that would be applied if it were committed in public view.
- Maintain a safe and secure work environment.
- Refrain from making comments that slander, defame and/or disparage the reputation of TEW or an employee of TEW.
- Work in accordance with TEW's policies and controls established to prevent fraudulent misconduct.
- Promptly report violations of this Code as set out in Section 7 of this Code.



5.0 Management Responsibilities

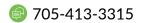
In addition to the requirements as set out in section 4.0 above, Company managers and supervisors are required to:

- Commit to being a leader, and model the appropriate behaviours outlined in this Code.
- Ensure that their employees and contractors are aware of, and act in compliance with, this Code and its related policies.
- Create a work environment reflecting the content and spirit of this Code and Company values.
- Must make every reasonable effort to establish and maintain adequate systems, procedures, and controls to prevent and detect fraud, theft, breach of trust, conflict of interest, bias and any other form of wrongdoing and criminal activity.
- Upon receiving disclosure of an actual or potential breach of this Code, the supervisor or manager shall either determine that no breach exists or take reasonable steps to ensure that the matter is addressed in the appropriate manner.
- Ensure that each incident of suspected wrongdoing is investigated. If a breach of this Code or any other related policy is proven, The Company will deal firmly and fairly with the employee or contractor, as applicable, in addressing the breach of this Code or any other related policy.

6.0 Complying with laws, by-laws, regulations, codes, standards and policies

All employees and contractors subject to this policy are expected to be aware of and comply with all applicable laws, by-laws, regulations, codes, standards and TEW policies, rules, standard operating procedures, practices and/or instructions which may be amended from time to time at TEW's sole discretion.

Every person, across various disciplines, is also expected to uphold the practices and principles related to his/her/their respective professional regulatory body.









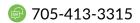
7.0 Reporting Allegations

The rules and obligations set out in this Code, form the foundation of the morals, attitude, and behaviour TEW expects of all its employees and business partners. Failure to adhere to this Code and the procedures contained within it are of the gravest concern, the following is to provide assistance in reporting of such infractions.

- A breach of this Code requires immediate attention, and employees and contractors (as applicable), have an obligation to report any known or suspected breaches, including unethical or illegal conduct as soon as they occur or become aware of them.
- Any allegation of a breach of this Code should be made to the employee's immediate supervisor or, if the allegations are being reported by a contractor to the applicable Company representative or contract administrator.
- Employees and contractors should provide as much information as possible about the possible breach they are reporting.
- When reporting an alleged violation of this Code, employees or contractors are encouraged to
 provide their name and contact information. This information will assist in the investigation of
 the matter, including any follow-up discussions that may be needed. In some cases, it may not be
 possible to initiate or properly investigate without this information.
- Employees and contractors are able to report infractions of this code anonymously by sending an email to info@electrical-works.ca ensuring they take care to hide their identity.
- Employees and contractors must co-operate fully during an investigation relating to a suspected breach of this Code or any other related policy.
- Acts of retaliation or consequence targeted at any employee who reports a suspected breach of this Code, is a potential witness, or is involved in an investigation will not be tolerated. Such acts will result in disciplinary action up to and including dismissal.
- Any employee under investigation for an alleged breach of this Code may, among other things, be suspended with or without pay or be re-assigned to other duties pending the completion of the investigation, depending on the particulars of the case and the best interests of TEW.
- When in doubt about the interpretation or application of this Code, clarification should be sought from an employee's immediate supervisor.

8.0 Whistle Blower Protection

The Company will provide protection from retaliation towards employees and contractors who, in good faith, make a complaint or disclosure about an alleged breach of this Code, using the available reporting channels, and will also ensure that these employees will not be disadvantaged or prejudiced in the making of such complaint or disclosure.





9.0 Criminal Misconduct

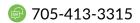
An employee that has engaged in criminal activity that directly or indirectly impacts the employee's employment shall be subject to disciplinary action up to and including dismissal and/or legal action. Any violations found to be made against TEW or its interests will be subject to disciplinary action up to and including dismissal and/or legal action.

10.0 Conflict of Interest

Employees are required to report any conflict of interest or perceived conflict of interest to management immediately. If the conflict proves to impact the employee, project, or TEW negatively the employee may be recused from the job and the site. If the conflict or interest or perceived conflict of interest is found to have negatively impacted TEW or its interests after a investigation is conducted by executive management, the employee may be subject to disciplinary action up to and including dismissal.

11.0 Outside Work/Business Activity (Moonlighting)

An employee must ensure that moonlighting at an external job or business does not negatively impact on the employee's performance at TEW, nor contravene any of its related policies and procedures. An employee shall not be permitted to moonlight at an external job or business during the employee's normal working hours at TEW. If there is a potential conflict, employees must advise their immediate supervisor of all external work situations including being self-employed, during off-duty hours, vacation periods or while on leaves of absence, to ensure compliance with this Code. This includes full details of work (i.e., type/nature of work, name of employer/business, days/hours of work, etc.).





12.0 Safe & Respectful Work Environment

TEW is committed to providing a work environment and service that respects dignity, self-worth, and human rights of every individual, and is free of discrimination or harassment. TEW will not tolerate any act of discrimination or harassment perpetrated against or by any employee, contractor, or customer. All employees and contractors are expected to act respectfully towards other and not conduct themselves in a manner that will embarrass and/or jeopardize the integrity, business interests, image and/or reputation of TEW.

All employees and contractors are encouraged to report all incidents of discrimination and/ or harassment experienced, witnessed, or having knowledge of to a supervisor or member of management.

TEW is committed to providing a safe work environment and service that is free from violence or the threat of violence. TEW will not tolerate any actual, attempted or threatened violence against or by any employee, contractor, or customer.

13.0 Resources

For further information please refer to the Occupational Health and Safety Management System.

Occupational Health and Safety Act - https://www.ontario.ca/laws/statute/90001
TEW Company SharePoint Library - TEW Company - Field Library - All Documents (sharepoint.com)
Ontario Human Rights Council - https://www.ohrc.on.ca/en/ontario-human-rights-code
Government of Ontario - https://www.ontario.ca/page/government-ontario
Government of Canada - https://www.canada.ca/en.html

