

## **PERMA-PIPE INTERNATIONAL HOLDINGS INC.**

### **SUPPLIER CODE OF CONDUCT**

#### **OBJECTIVES**

This Supplier Code of Conduct (“Code”) sets out the minimum ethical expectations of suppliers, contractors and sub-suppliers who work with Perma-Pipe International Holdings Inc. (along with its subsidiaries and joint venture partners) (hereinafter as “Perma-Pipe”).

#### **SCOPE AND APPLICABILITY**

Perma-Pipe has a long history of conducting its businesses in a manner consistent with high standards of social responsibility. In order to continue promoting this goal in the future, Perma-Pipe is requiring that each contractor, supplier, and sub-supplier (individually a “Supplier” and collectively “Suppliers”) comply with the Code, and each Supplier will be asked to acknowledge its compliance with the Code. The principles and values expressed by the Code reflect Perma-Pipe’s ongoing commitment to social responsibility and human dignity. This commitment is integral to Perma-Pipe’s continued success, and Perma-Pipe believes it positively impacts its diverse and worldwide suppliers, contractors, clients, employees, investors, and the communities where we do business.

Perma-Pipe Suppliers are expected to do what is necessary to understand and comply with these expectations and, in turn, require their suppliers and subcontractors to conform as well. This Code does not cover every situation. Perma-Pipe expects its Suppliers to follow the law and to use good judgment and ethical standards to guide their actions in all circumstances.



## **REQUIREMENTS**

### **Protecting Health, Safety & Environmental (HSE)**

The health and safety of all personnel associated with Perma-Pipe’s work is Perma-Pipe’s highest priority. Perma-Pipe’s Suppliers are expected to provide a safe and healthy work environment that supports accident prevention, minimizes exposure to health risks, is in compliance with applicable workers’ health and safety laws, and apply safe work practices (including regulatory and contract-specific requirements) to all their activities and instill safety in every aspect of their work processes.

Suppliers are also expected to conduct their operations in an environmentally responsible manner and in accordance with applicable environmental laws.

### **Respect Human Rights**

The welfare of the workers of Perma-Pipe Suppliers is critical to Perma-Pipe successfully performing its work. As a minimum, Perma-Pipe expects the following from its Suppliers:

- i. Suppliers must not utilize involuntary labor of any type. This shall include, but not be limited to, forced, trafficked, bonded or child labor.
- ii. Suppliers must treat each of their employees with respect and dignity. As such, Suppliers shall not subject any employee to physical, sexual, verbal, or other forms of harassment, discrimination, coercion, or abuse.
- iii. Suppliers must pay each of their employees at least the minimum wage, and supply the minimum benefits, required by applicable local laws. In the absence of applicable local laws, Suppliers shall provide minimum wages and benefits consistent with industry practice in such location.
- iv. Suppliers shall comply with all applicable health, safety, and welfare laws, rules, and regulations, and shall provide a safe working place for their employees.

### **Conflict Minerals**

No Supplier shall supply goods to Perma-Pipe containing columbite-tantalite (coltan), cassiterite, wolframite, tin, tungsten, tantalum, or gold (the “Conflict Minerals”) obtained from sources that finance or benefit armed groups in any “Covered Country” as defined by Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. All



Suppliers shall inform Perma-Pipe at the time any orders or contracts are entered for the sale of goods to Perma-Pipe whether any such goods contain Conflicts Minerals. Such notification shall identify the specific Conflict Mineral and its country of origin. If the Conflict Mineral originates from a Covered Country, Supplier must affirm that the purchase of such Conflict Mineral did not directly or indirectly finance or benefit armed groups in the Covered Countries, and state the basis for such affirmation. Perma-Pipe, in its sole discretion, reserves the right to terminate and cancel any orders or contracts for goods containing Conflict Minerals.

### **Trade and Export Controls**

Suppliers are expected to know and comply with the export controls, economic sanctions, import customs, and anti-boycott laws applicable to their work with and for Perma-Pipe. Suppliers agree to never participate in boycotts or other restrictive trade practices prohibited or penalized under United States of America or applicable local laws.

Suppliers should provide accurate commodity jurisdiction and classification information for supplier-provided materials, equipment, technology, and technical data; and to disclose to Perma-Pipe supply chain representative any apparent conflict between U.S.A. and applicable local law requirements.

### **Anti-Bribery and Corruption**

Perma-Pipe maintains zero tolerance for bribery and expects our Suppliers to do the same. Bribery is directly or indirectly giving or promising to give anything of value to improperly influence actions of a third party. Bribes may include money, gifts, travel or other expenses, hospitality, below-market loans, discounts, favors, business opportunities, political or charitable contributions, or any direct or indirect benefit or consideration. Perma-Pipe expect Suppliers to remain in compliance with all relevant anti-corruption laws in addition to Perma-Pipe purchase terms and conditions.

### **Compete Fairly**

Perma-Pipe is committed to promoting fair competition, where quality, fair pricing, merit, and other objective factors determine success. Perma-Pipe expects Suppliers to follow



antitrust and competition laws and not to engage in or support unfair or predatory business practices or activities that improperly restrain trade.

### **Keep Accurate Books and Records**

Perma-Pipe expect Suppliers to keep honest, accurate, timely, complete, and understandable financial, operational, timekeeping and billing records.

### **Money Laundering Prevention**

Perma-Pipe Suppliers are expected to follow applicable laws that prohibit money laundering and require the reporting of cash and other suspicious transactions related to Perma-Pipe contracts to their Perma-Pipe supply chain representative.

### **Avoid Conflicts of Interest, Gifts, Entertainment, and Business Courtesies**

Perma-Pipe Suppliers, their employees, and their family members must not receive improper benefits through their relationship with Perma-Pipe or allow other activities to conflict with acting in the best interests of Perma-Pipe.

Perma-Pipe Suppliers are expected to limit promotional items and entertainment involving Perma-Pipe employees to reasonable business courtesies, within accepted business practices and never with the intent to improperly influence a business decision or create a potential conflict of interest or the appearance of impropriety.

It is expected from Suppliers to disclose any potential conflict of interest or contractual business relationship with Perma-Pipe employees and family members to their Perma-Pipe supply chain representative for review prior to entering any business transaction.

### **Company Resources**

Perma-Pipe's resources include property, assets, intellectual property, and confidential and/or private information. Perma-Pipe Suppliers are expected to safeguard Perma-Pipe resources utilized while performing work and use such resources solely for legitimate business purposes to advance the interest of Perma-Pipe; honor the intellectual property rights of Perma-Pipe, Perma-Pipe clients, and partners at all times; maintain, handle, and



process any confidential information on a need-to-know basis, with appropriate technical and organizational controls and in accordance with applicable law.

### **Sub-suppliers and Sub-contractors**

Suppliers are expected to adopt similar minimum standards to these in dealing with sub-suppliers and sub-contractors; and to conduct due diligence across Suppliers supply chain to ensure the intent of this Code is met, including (but not limited to) providing for timely payment, prevention of forced, trafficked, bonded or child labor, bribery and corruption, and promotion of human rights.

### **Media**

Suppliers must ensure any broad communication, including but not limited to marketing materials, press releases, social media posts or media interviews, regarding Suppliers business relationship with Perma-Pipe is formally approved by Permapipe's CEO or CCO prior to publication or broadcast by Suppliers.

### **Reporting Concerns**

Perma-Pipe Suppliers and their employees should promptly report any business conduct and ethics concern involving or affecting Perma-Pipe, whether or not the concern involves the Supplier, by contacting one of the following:

- Supplier supply chain representative; or
- Call the confidential hotline (877-226-2558).

Supplier may also be requested to take such steps as Perma-Pipe may reasonably request to assist Perma-Pipe in the investigation of any ethics concern involving Perma-Pipe and the Supplier.

### **Legal Compliance**

Wherever Perma-Pipe is conducting business, Suppliers must know and follow all applicable laws and regulations. Suppliers must maintain documentation reasonably necessary to evidence compliance with this Code. Such documentation must be made



available to Perma-Pipe upon reasonable advance written request. Failure to comply with this Code may subject a Supplier to possible termination of its business relationship with Perma-Pipe.

### **No Retaliation**

Perma-Pipe does not tolerate retaliation against anyone who makes a good faith report of a possible problem or who participates in an investigation of possible wrongdoing. Suppliers have the right to raise compliance, safety, and quality concerns to Perma-Pipe, and to engage in any other protected activity without being subject to retaliation.