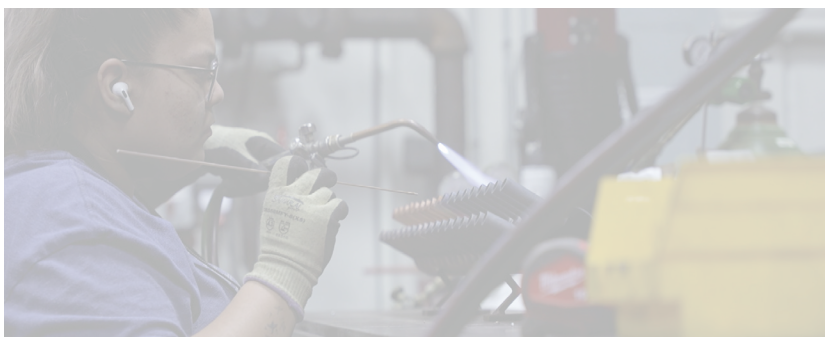
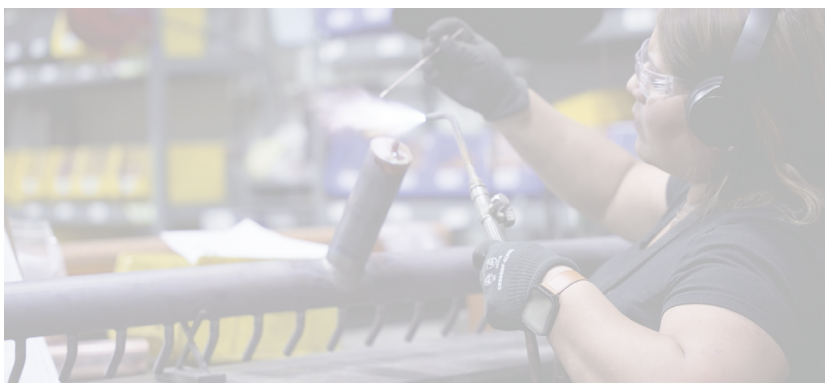


CODE OF ETHICS, VALUES & CONDUCT



Super Radiator Coils

CODE OF ETHICS, VALUES & CONDUCT

This Code of Ethics, Values and Conduct (the Code) is the expression of our expectations that govern us as employees and representatives of Super Radiator Coils (SRC). It explains how we, through our actions, personify our Purpose, Mission, and Values and serve our key stakeholders. This Code clarifies how our Values apply in our workplace, establishes policies that flow from these Values, and sets clear expectations for the way each of us must conduct ourselves. Each employee has the responsibility to understand and comply with the letter and spirit of the Code.

SRC holds a very high standard of business ethics and values in all its business relationships and with all stakeholders. SRC seeks to conduct its business operations with the highest level of pride and honesty and to operate lawfully and ethically. SRC Values drive the way in which SRC does business with all stakeholders. The success of our business is dependent on the trust and confidence we earn from our employees, customers, and suppliers – our key stakeholders. We earn credibility by adhering to our commitments, displaying honesty and integrity, and reaching company goals through honorable conduct.

SRC Purpose

Unleashing the power of thermodynamics to improve our world.

SRC Mission

To be leaders and best in the heat transfer industry while caring for our workforce, communities, and environment.

SRC Values

Relationships – We C.A.R.E. (Connect, Appreciate, Respect & Empathize)

Excellence – If it has to be perfect... it has to be SUPER!

Teamwork - We do our best work together.

Problem Solving – We can handle that!

Integrity – We do what we say we do.



Our Employees

Everyone deserves to work in an environment where they are treated with dignity and respect - any instance of disrespectful, offensive or hostile behavior puts our success at risk. All employees should act in a way that will be seen as respectful and responsible from the perspective of the people with whom they interact, and this responsibility applies equally whether the interactions are occurring at an SRC facility or any other location where SRC conducts business. All of us have an obligation to create an environment where everybody feels comfortable, everybody listens to and seeks to understand the views of others, and everybody is aware of the potential impact of our actions on others.



We care about our employees as whole people who have lives outside of work and we value work-life balance. We want employees to bring their best and authentic self to work. When we nurture a safe and respectful workplace where all employees feel valued and can focus on being their best every day, then we set ourselves and our organization up for success.

SRC is an equal employment opportunity employer and is committed to providing a workplace that is free of discrimination of any types and from abusive, offensive, intimidating or harassing behavior. We strive to create an inclusive workplace that supports and encourages all employees and is based on equal opportunity and fair treatment of all employees. Positive and productive relationships with co-workers, customers, suppliers and other stakeholders are the foundations of our success. The SRC Employee Handbook further outlines protocols and procedures and key contacts if there is ever an issue that needs to be addressed. If anybody witnesses or is subjected to unwelcome verbal, visual, physical or other conduct that creates an abusive, intimidating, offensive or hostile work environment, this Code requires you to report it – SRC takes all allegations of harassment seriously.

SRC is also dedicated to the welfare and safety of all employees. We take workplace safety very seriously. We are fully committed to providing a safe work environment and all OSHA regulations. It is essential to create a safe and respectful environment in which relationships can thrive and employees can contribute to their fullest potential.

Legal Obligations

SRC's commitment to integrity begins with complying with laws, rules, and regulations where we do business. Each employee has an understanding of company policies, laws, rules and regulations that apply to their specific roles, including proper handling and retention of business records.

We are dedicated to honest business dealings and ethical, free and fair competition. SRC prohibits anticompetitive activities, including agreements or understandings with competitors that could undermine competition. SRC will not offer or solicit improper payments, gifts or gratuities in connection with the purchase of goods and services for SRC or the sale of its products or services, nor will we engage or assist in unlawful boycotts of particular customers. If an employee is provided with or learns of material nonpublic information through their work at SRC, they must not use that information for personal gain.

Legal Obligations ... continued

SRC values the property rights of others. We will not acquire or seek to acquire by improper means any third party intellectual property (including trade secrets, inventions, discoveries, software programs, artwork and works of authorship) or other proprietary or confidential information. We will not engage in unauthorized use, copying, distribution or alteration of software or other intellectual property. Each employee must sign a confidentiality and development agreement as a condition of employment. We will protect nonpublic information entrusted to us by employees, customers, and other business partners and use nonpublic information only as permitted and to the extent necessary to perform the job. Securing nonpublic information from unauthorized disclosure is required whether using nonpublic information within or outside of a SRC workplace. Each employee must follow SRC's Acceptance Use Policy regarding the company's technology and information assets and computing systems.

Employees are provided access to facilities and physical and electronic assets to perform their jobs, and each employee is responsible for the use and safeguarding of those assets against misuse, theft, carelessness and waste. An employee must report an instance of lost, stolen or damaged company assets.

SRC also fully supports the United Nations Global Compact principles as they pertain to Human Rights, Labour, Environment and Corruption.

Human Rights

SRC is committed to supporting human rights and is strongly against contributing to, participating in, or enabling the use of child, forced, or exploited labor, forced or exploitative conditions, and human trafficking and against assisting our clients in doing so in any way.

Specifically, we are committed to compliance with all laws regulating minimum working age, including any laws pertaining to the employment, apprenticeship, and internship of youths and students. We also strictly prohibit the use of forced labor and exploitative working conditions. "Forced labor" is defined by International Labour Organization as "work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself voluntarily."

We prohibit in any way and in any process participating, enabling, or causing any individual under the legal working age to be employed or engaged by us; contributing to, participating in, or enabling any use of child, forced, or exploited labor or forced or exploitative conditions; and assisting our clients in doing so in any way and in any process.

Belonging

SRC is committed to supporting and building a workplace where everybody is included and has a genuine sense of belonging, where everybody can thrive collectively and as individuals, and where everybody is encouraged to bring their whole self to work every day. This concept of "belonging" emphasizes that we are all on this journey together – and that if we want to go far, we must go together and support each other to make our workplace stronger and to advance our stakeholder's highest ideals. Belonging means that we believe in fair treatment, equal access to opportunities for advancement, giving a variety of people a voice in decision-making authority, and being open-minded and respectful of people's differences.



Labor

We respect our employees' ability to agree to terms and conditions of employment voluntarily without coercion and to end their employment on appropriate notice freely. SRC supports freedom of association and the right to collective bargaining for all employees. Further, we support the elimination of all forms of forced and compulsory labor and the effective abolition of child labor and human trafficking.

SRC is a non-discriminatory work environment in respect to employment and occupation. We provide a safe working environment along with meeting minimum wage standards, living wage and adhering to working hours regulations. Furthermore, we fully support diversity, equity and inclusion through hiring and employment practices.



Safety

SRC is committed to the safety of all employees and recognizes the need to comply with regulations governing injury and accident prevention and employee safety. Maintaining a safe work environment requires the continuous cooperation of all employees and is paramount at SRC. To promote physical security and safety, employees must follow all workplace rules including those related to use of equipment, timely reporting of work-related injuries, building access, and required training.

Employees are expected to work free from the influence of any substance (legal or illegal) that could impair job performance. SRC prohibits the use, possession, purchase, sale, or the offer to sell, transfer, provide or share illegal drugs or medication prescribed for someone other than their own use, during the execution of work on behalf of SRC, or while on SRC property. The use of prescription or over-the-counter medication that may impair the ability to safely or efficiently complete work is also prohibited.

SRC strictly prohibits the carrying or use of firearms or other weapons in the workplace or in any SRC facility, even if the employee possesses a concealed weapons permit or the employee is otherwise allowed by law to carry a weapon. SRC does not tolerate any type of workplace violence committed by or against any employees – if any employee experiences, feels or witnesses any fear of threatening behavior involving a weapon please call 911 immediately.

Environment

SRC works to minimize and mitigate any negative impact from our business operations – whether direct or indirect. We continually work to improve our performance in this regard. We believe that the environment is a key stakeholder and should be considered in our business decisions. We actively pursue technologies and production methods that maximize efficiencies, promote sustainability, reduce waste and minimize environmental harm. Many of our products – and customers – are driving change through lower emissions, greater efficiency and lower energy usage, and decreased packaging/transportation requirements.

Anti-Corruption

SRC maintains a culture of ethical behavior and compliance, rather than achieving the minimum required by law. We fully support anti-corruption efforts and will not tolerate bribery or corruption in the way we conduct business.

Media Relations / Social Media

It is the responsibility of every employee to act carefully when sharing information and communicating publicly about our business. Always direct questions from the media and outside parties to the appropriate person for a response.

All employees are accountable for their actions and words online, and any social media activity must comply with this Code and our policies, as well as with applicable laws and regulations. No employee should ever post anything that would constitute a threat, harassment or bullying. You should not establish social media accounts using SRC trademarks or logos or use “Super Radiator Coils” as part of any individual user profile name, and do not create or alter online content using SRC trademarks or logos without proper authorization. SRC urges all employees to use common sense and understand the implications for your and the company’s reputation before posting any content publicly.

Community Engagement

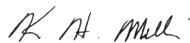
Each employee is encouraged but not required to support personal, political, or charitable causes of their choice, and we recognize that each employee’s cause of choice is entitled to respect. As a company, SRC supports initiatives in the areas of education and workforce development. We welcome the opportunity to support causes that are important to our employees and other stakeholders.

Conclusion

It is the responsibility of each employee to abide by the letter and spirit of this Code and all other SRC policies, protocols, and procedures. It is always better to ask before you act, especially when you are uncertain as to the proper course of action. You should contact any of the leaders below, or your manager or supervisor, for additional guidance if you are uncertain as to the proper course of action in any situation. SRC prohibits retaliation against anyone for the reporting of a perceived violation of this Code or for participation in any investigation. This Code is not a contract, and does not convey any specific employment rights or guarantee employment for any specific period of time.



Rob E. Holt
President & CEO



Kari Holt Mellina
Executive V.P. & CFO

