

# CODE OF CONDUCT

Over the past 20 years, the TRIGO Group has become a globally renowned company, serving the automotive, aerospace, and heavy transportation industries with thousands of employees across Europe, Africa, Asia, and the Americas.

Our mission is to provide global quality which optimize the performance of manufacturing supply chains.

\*\*\*\*\*

The TRIGO name and brand has become one of our greatest assets, along with each employee of the company. We have built our brand and solid reputation worldwide by delivering outstanding services and by meeting our high ethical standards. Now, each one of us shares the responsibility to protect our brand in our daily activities.

This is the reason why our Code of Conduct is so critically important. The actions we take and the decisions we make every day tell the world who we are.

We are and we act as 'One TRIGO'.

### **THIS CODE OF CONDUCT DEFINES:**

- Our values
- Our ethical principles
- Our compliance principles

It applies to each of us, permanent or temporary, regardless of our country or level of position.

Whenever we encounter an ethical issue, each of us has the responsibility to respond in a way that reflects our Code of Conduct. We have the responsibility to speak up when we see any behavior that we believe does not live up to our values, with no retaliation for raising a concern or making a report in good faith. With this regards the relevant speak-up procedure shall be applied.

Thank you for taking the time to read this Code of Conduct, which is part of the foundation of our success.

Should you have any questions do not hesitate to speak with your manager.

## OUR VALUES

### GLOBAL TEAM SPIRIT

We value individual and collective commitment, loyalty and honesty in full respect of local cultures and people.

#### How this value translates into action:

TRIGO Group is committed to developing mutual support and trust at every level in the company.

As a global team, we respect one another and value the contribution of each employee to TRIGO's development.

- We encourage employees to express themselves freely to enable them to enhance their work activities.
- We foster communication across all functions and at every level (locally, nationally and globally) and encourage you to share your experience, knowledge, successes and insights to support our growth.
- We expect everyone to play as a team and to support their colleagues for the benefit of our customers and for the collective success of the Group.

### EXCELLENCE

We deliver outstanding results building on continuous creativity, reliability and efficiency.

#### How this value translates into action:

For TRIGO Group, Excellence is not just a value, it is our daily objective. We deliver performance and respond quickly.

- We strive to use the resources made available for professional activities in the best interests of the company.
- We hold ourselves accountable to the highest performance standards and continuously strive to use the most efficient practices for the benefit of our customers.
- We seek out and suggest ways of improving our individual activities and the organization, as well as, alerting management accordingly.

This translates into the TRIGO Quality System, which ensures the consistency, the quality and the continuous improvement of our services to our customers.

### CUSTOMER FOCUS

We strive for our customers' success by delivering tailor-made solutions for their most critical quality challenges.

#### How this value translates into action:

We use our extensive experience in quality and our quest for excellence to provide high-end tailor-made quality services in the field and build long-lasting partnerships with our customers.

- We attentively listen to and analyze our customers' requests and search for the most suitable solution to address their needs.
- We are reliable partners that strive to meet our commitments on deadlines, costs, quality and performance.
- We show professionalism and impeccable behavior, allowing us to guarantee the quality of our services and to earn the trust of our customers, including complex situations which involve third-parties.

### INITIATIVE

We trust in courageous and innovative people, leaders and trustworthy professionals that take responsibility for their actions.

#### How this value translates into action:

We want our employees to embody the initiative spirit by:

- Encouraging and proposing new ideas to improve current processes to their managers.
- Creating the right conditions for them to proactively provide innovative and value added Solutions.

We are convinced that each one of us can bring added value.

TRIGO Group operational excellence program is a key mechanism to enable this initiative.

## ETHICAL PRINCIPLES

Our ethical principles are designed to help our people to understand what we believe in and which behaviors are appropriate.

### INTEGRITY

Integrity is a key prerequisite for our company and ensures we show respect for our colleagues, suppliers and customers. It implies that each of us can rely on and trust each other.

### FAIRNESS

We show fairness and honesty in all that we do. To build solid relationships with our customers, suppliers, and partners we communicate with one another in a fair, honest and open manner.

### RESPECT

We show respect for others. This means respecting the rights of individuals, treating them with dignity and being mindful of cultural differences. Building on a variety of cultures and points of views can bring more value. It also implies that we strongly reprehend discrimination.

\*\*\*\*\*

We prohibit any form of harassment and corruption. The Code of Conduct helps to define and explain the type of behaviors which are unacceptable and may be punished.

### FIGHTING HARASSMENT

Moral or sexual harassment is characterized by repeated, hostile conduct, verbal comments and actions that impugn the employee's dignity and integrity. Any form of abuse, harassment, or bullying is strongly prohibited. Therefore, any misconduct could cause disciplinary actions leading to a sanction.

### FIGHTING CORRUPTION

We ban any form of bribery or influence peddling. On this basis, we make sure that TRIGO Group's resources and goods are never used for corruption purposes. We do not request or accept any advantage, of any third party, with the goal of directly or indirectly promoting its activities. It can be any type of benefit, promised or given in an appropriate manner. Increased vigilance must be shown in case of behaviors and situations that could lead to bribery matters, as follows:

- Gifting
- Conflict of Interest
- Sponsorship
- Call for Intermediaries

#### Gifting

We refuse, and we do not solicit any gifts, favors, invitations or any benefit, from individuals or organizations with which an employee has had business relations with, and which might influence the impartiality with which the employee performs their work, or which might constitute a reward related to the employee's activities. This also includes any gift in cash or with a value exchangeable for cash. In business dealings, employees shall not provide or offer to provide any gratuity, favor or other benefit or engage in any other activity which could improperly influence or be reasonably interpreted as improperly influencing their decision or activities.

#### Conflict of Interest

We forbid choosing or having a partner where employees, or close relatives, have significant interests.

In this type of situation, it is forbidden to make use of privileged information (launches, results etc.) to provide any type of personal advantage or to have any close third party provide personal advantage, by the selling or purchasing of shares.

#### Sponsorship

The financial or material support brought via the sponsoring with the purpose to support general interest or sportive activities shall be strictly supervised. We ensure that the entity supported has an activity which is compliant with our ethical principles. TRIGO Group refrains to lead actions of sponsoring in which our employees or a third party with whom the Group has business connections with, has, directly or indirectly a financial or material personal interest.

### Call for Intermediaries

Within the scope of our relations with our intermediaries, and more generally with our commercial intermediaries, we strictly ensure contractual compliance specifying in particular:

- Type of services,
- Goals to be achieved,
- Level and terms and conditions of payment and,
- Comprehensive and strict compliance with our Code of Conduct.

\*\*\*\*\*

### CONFIDENTIALITY

Our Group respects and protects the confidential information trusted to us by candidates, customers and any third parties in the course of business and takes appropriate measures to prevent accidental disclosure. Each of us shall maintain the confidentiality of TRIGO Group information and the personal data of colleagues, suppliers and customers\*. Each of us shall therefore not disclose nor discuss any sensitive information regarding TRIGO Group's financial performance, investment, strategies, plans and/or partners.

This obligation continues after the end of the employment relationship. Any disclosure of confidential information likely to prejudice the development of the TRIGO Group, constitutes serious professional misconduct and will be subject to the appropriate sanctions. The TRIGO Group reserves the right to take legal action against anyone contravening this provision.

*\*In compliance with applicable internal rules and the General Data Protection Regulation (GDPR).*

### LEGISLATION AND REGULATIONS

We act in compliance with legislation and regulations and observe in all circumstances the national and international laws and regulations as well as the rules of professional conduct related to our activities.

TRIGO Group is committed to promoting and enforcing the labor standards established by the International Labour Organization in its various conventions and declarations.

#### **In particular, it implies:**

- Making a positive contribution in countries and communities where we operate.
- Striving for the abolition of child and forced labor.

- Pledging to respect human and labor rights in all countries where we operate, thus including countries where these rights are insufficiently protected.

**This also means that we act as a good corporate citizen wherever we operate:**

- Abiding by tax legislation and paying local & national taxes that may be due.
- Making sure that all accounts are fully and correctly completed, with all the supporting documentation.

### SAFETY

Each one of us shall abide by the local TRIGO internal rules & guidelines in terms of safety as well as by the customer's safety rules.

### ENVIRONMENT AND SOCIAL

Each one of us shall comply with the local and Group policies in terms of environmental protection, as we all are responsible for the reduction of negative impacts of our activities on the environment.

Appropriate optimization of working conditions for all employees of TRIGO Group is also key in our day to day work.

### USE OF IT RESOURCES

When using the company's information, IT and telecommunication systems as part of our professional activities, functions and assignments, we abide by the internal regulations.

### COMMUNICATION

We respect TRIGO basic communication principles in all our communications, as an individual (TRIGO employee) or as a company as a whole.

- Avoid speaking or writing on behalf of the Group without expressed authorization.
- Avoid speaking or writing about subjects outside our field of expertise.
- Ensuring no confusion between personal opinions and those of the Group.

### USEFUL CONTACTS

Employees shall address any questions regarding the application of the principles defined in this Code of Conduct to their direct managers. If they think that the information received is incomplete or unsatisfactory, they may also contact TRIGO Group's legal team.