

SUPPLIER CODE OF CONDUCT

Founded in 1997, TRIGO is a multinational company providing operational Quality Management and Supply Chain solutions for the manufacturing sector, especially in the transportation industries. Our services aim to guarantee maximum responsiveness, flexibility, visibility and traceability based on the expertise of our operational teams and a know-how that is recognized by our customers in the most demanding sectors (automotive, aerospace, etc.).

The TRIGO Group has become a globally renowned company, with thousands of employees across Europe, Africa, Asia, and the Americas. We have built our brand and solid reputation worldwide by delivering outstanding services, thanks to a solid risks based approach including quality, safety, information security and environmental issues and by meeting our high ethical standards.

As a TRIGO supplier, you contribute to achieving our objectives and protecting our brand. This is the reason why our Code of Conduct, here declined for our suppliers, 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' and we expect all of our suppliers, including subcontractors, to :

- comply with applicable laws, rules and regulations in the countries where they operate,
- adhere to this Supplier Code of Conduct which reflects TRIGO's values and sets the minimum standards for doing business with any TRIGO company. This includes the following topics :
 - **Business integrity** (Anti-corruption measures, fair business practices, information security).
 - **Human rights and labour rights** (child labor laws, anti-discrimination practices, working conditions, health and safety standards, etc.).
 - **Environment** (protection, climate action strategy).

TRIGO VALUES



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

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

GLOBAL TEAM SPIRIT We value individual and collective commitment, loyalty and honesty with full respect for local cultures and people.

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

BUSINESS INTEGRITY

TRIGO expects its suppliers to conduct business in compliance with internationally agreed standards on business ethics and adhere to all applicable anti-corruption laws and regulations.

INTEGRITY

Integrity is a key prerequisite for TRIGO and ensures we show respect to each other. It implies that each of us can rely on and trust each other.

RESPECT AND FAIRNESS

The supplier is required to act and interact with respect and in good faith with employees of TRIGO.

Each of us has to 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.
- Fairness and honesty in all that we do. To build solid relationships, we must communicate with one another in a fair, honest and open manner.

FIGHTING CORRUPTION

The supplier shall not :

- engage in or tolerate any form of corruption, bribery or influence peddling. Resources and goods must never be used for corruption purposes.
- request, offer or accept any benefits in order to obtain any undue or improper advantage. It can be any type of benefit, promised or given inappropriately.

Increased vigilance must be shown in case of behaviors and situations that could lead to bribery matters, such as gifting, conflict of interest, sponsorship and call for intermediaries.

Gifting

At TRIGO, 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 its 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, our employees shall not accept, 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

The supplier shall avoid conflicts of interest that may compromise the supplier's credibility or third parties' confidence in TRIGO.

At TRIGO, we forbid choosing or having a supplier where employees, or close relatives, have significant interests.

Sponsorship

At TRIGO, the financial or material support brought via the sponsoring with the purpose to support general interest or sportive activities is 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

Intermediaries are persons or companies that facilitate a business relationship between a TRIGO company, and a customer or provider. They may be sales agents, business introducers, traders, or consultants.

At TRIGO, 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.

COMPETITION LAW

The supplier shall respect and comply with applicable competition laws and regulations, including an obligation not to exchange commercially sensitive and strategic information with competitors or to enter into anti-competitive agreements with any business partner.

INFORMATION SECURITY

The supplier shall protect the confidentiality, integrity and availability of information shared and/or necessary for business purposes. This includes information about TRIGO companies, their employees and customers and other third parties. It implies that the supplier shall :

- adhere to applicable data protection laws, including security of personal data, as well as to respective regulation.
- respect and protect the confidential information trusted to it by TRIGO and take appropriate measures to prevent accidental disclosure.
- not disclose nor discuss any sensitive information regarding TRIGO's financial performance, investment, strategies, plans and/or partners.
- respect a duty of discretion whatever the sensitivity of the information.
- be prepared for any disruptions of its business to mitigate the risks for TRIGO and its customers from the effects of possible serious disruptions that may arise within the domain of operations.

This obligation continues after the end of the business relationship.

HUMAN RIGHTS AND LABOR RIGHTS

TRIGO expects its suppliers to respect internationally recognised human rights, as set out in the Universal Declaration of Human Rights. This Code shall apply to all of the suppliers' workers, including direct permanent employees but also temporary workers, students, etc.

FORCED LABOR AND CHILD LABOUR

The supplier must not engage in, and will require its suppliers to not engage in, directly or indirectly, child or forced labor practices, including bonded labour, involuntary prison labour, slavery, servitude or work performed under the menace of a penalty or coercion.

The supplier shall ensure, everywhere it operates, compliance with the legal working age set by local legislation and the absence of employment of children under the age of 18.

All work should be voluntary on the part of the employees.

The supplier should not retain any form of official employee identification (passports or work permits), nor destroy or deny access to such documentation, as a condition of employment unless required by applicable law.

The supplier shall ensure that employees do not pay fees or make any payment connected to obtaining employment throughout the hiring process and the employment period.

The supplier must respect the right of workers to enter into and terminate after reasonable notice their employment freely and to receive all owed salary.

The supplier must respect the right of workers to leave the workplace after their shift.

EQUITY AND NON-DISCRIMINATION

The supplier shall not practice any form of discrimination in hiring, promotion, development, remuneration, and termination practices. Illegitimate grounds for discrimination include but are not limited to race, colour, gender, age, language, property, nationality or national origin, religion, ethnic or social origin, caste, economic grounds, health status, disability, pregnancy, belonging to an indigenous people, trade union affiliation, political opinion, sexual orientation.

At TRIGO, we are committed to fostering a workplace environment that is inclusive, respectful, and free of gender sexism. We believe in the equality of all individuals, regardless of gender, and we are dedicated to creating a culture where every employee feels valued, safe, and supported.

The supplier is encouraged to promote equality, diversity and inclusion within its organization.

FIGHTING HARASSMENT

The supplier is required to not impugn TRIGO employees' dignity and integrity by any form of abuse, harassment (moral or sexual), bullying, hostile conduct, verbal comments or actions.

The supplier is also expected to ensure that its employees are afforded an employment environment that is free from physical, psychological, sexual, and verbal harassment, intimidation or other abusive conduct.

COMPENSATION AND WORKING HOURS

The supplier shall pay a fair wage, including benefits and leave, to all workers in accordance with local minimum wage legislation and terms of applicable collective bargaining agreements.

The supplier shall comply with all applicable laws regarding working hours, including overtime, rest breaks and paid vacation. Workers shall be compensated for overtime.

The supplier must not permit deduction from wages as a disciplinary measure nor permit any other deductions, if not legally permitted.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

The employees of the supplier must be free to join or not to join a union/employee representation of their choice and communicate openly with management regarding working conditions without fear of harassment, threat or intimidation.

The supplier recognizes and respects the right to collective bargaining in accordance with applicable local laws.

FOREIGN WORKERS

The term “foreign workers” refers to a person who is to be engaged, is engaged or has been engaged in a remunerated activity in a State of which he or she is not a national.

The supplier must ensure that “foreign workers” are employed in full compliance with the immigration laws and labour laws of the host country.

HEALTH AND SAFETY

The supplier shall comply with applicable occupational health and safety regulations and provide, everywhere it operates, a work environment that is safe, including the provision of appropriate Personal Protective Equipment (PPE), and conducive to good health, in order to preserve the safety and health of employees, safeguard third parties and prevent accidents, injuries and work-related illnesses.

ENVIRONMENT

The supplier shall comply with all applicable environmental laws.

In addition, TRIGO expects its suppliers to manage their operations responsibly in relation to the environment – including climate change, and actively work with reducing environmental risks and impacts associated with their supply chains.

As a minimum and in line with TRIGO Environmental policy :

- The supplier whose activities have an environmental impact, should have a structured and systematic approach to working with their environmental aspects.
- The use of resources such as energy, water, land and raw materials, should be used in an efficient and sustainable manner.
- The supplier should avoid or minimize any waste as a result of its business activities or increase the share of waste recovered by recycling processes.
- The supplier should strive to reduce its greenhouse gas emissions.

The supplier is informed that environmental protection actions and climate strategy actions are one of the criteria used to differentiate suppliers.

COMPLIANCE AND IRREGULARITIES

TRIGO reserves the right to check compliance with the requirements of this Supplier Code of Conduct, for example through self-assessments, assessments or audits either by TRIGO or a third party.

The terms and conditions set forth in this Supplier Code of Conduct reflect TRIGO's values and commitments. Therefore, any deviation and disrespect of these terms and conditions must be corrected. Without prejudice to any other contractual remedies TRIGO may be entitled to, any failure to correct such a deviation will cause TRIGO to consider ending the commercial relationship.

If the supplier, its employees or any other stakeholder believes that the terms of the Supplier Code of Conduct are not adhered to, or that TRIGO is not acting in accordance with its own Code of Conduct, TRIGO encourages such concerns to be raised via the whistleblowing channel. See <https://www.trigo-group.com> > Whistleblower procedure.

ACCEPTANCE

The supplier acknowledges that it has read, and is in compliance with, the TRIGO's supplier code of conduct.

Company name: Contact name: Title:	SIGNATURE
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REFERENCES

TRIGO Code of conduct,
TRIGO Sustainable Purchasing policy,
TRIGO Environmental policy,
TRIGO Information Security policy,

General Data Protection Regulation (EU) 2016/679

<https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1532348683434&uri=CELEX:02016R0679-20160504>

Universal Declaration of Human Rights (UDHR)

<https://www.un.org/en/aboutus/universal-declaration-of-human-rights>

United Nations Global Compact

www.unglobalcompact.com

UN Guiding Principles on Business and Human Rights

https://www.ohchr.org/documents/publication s/guidingprinciplesbusinesshr_en.pdf

UN National Human Rights Action plans

https://www.ohchr.org/Documents/Issues/Business/UNWG_NAPGuidance.pdf

UN Sustainable Development Goals

<http://www.un.org/sustainabledevelopment/>

United Nations Convention against Corruption

<https://www.unodc.org/unodc/en/treaties/CAC/index.html>

International Labour Organization, specifically the documents listed below:

<http://www.ilo.org>

- Declaration on Fundamental Principles and Rights at Work from 1998
- Forced Labour Convention (C.29-1930)
- Abolition of Forced Labour Convention (C.105-1957)
- Minimum Age Convention (C.138-1973)
- Prohibition and Immediate Elimination of the Worst Forms of Child Labour Convention (C.182-1999)
- Discrimination (Employment and Occupation) Convention (C.111-1958)
- Equal Remuneration Convention (C.100- 1951)
- Hours of Work (Industry) Convention (C.1-1919)
- Hours of Work (Commerce and offices) Convention (C.30-1930)
- Freedom of Association and Protection of the Right to Organise Convention (C. 87- 1948)
- Right to Organise and Collective Bargaining Convention (C. 98-1949)
- Occupational Safety and Health Convention (C.155-1981)

International Organization for Standardization, specifically the standards:

<https://www.iso.org/>

- ISO14001 Environmental management systems
- ISO 45001 Occupational health and safety management systems
- ISO 27001 Information Security management systems