

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 strong reputation worldwide by delivering outstanding services, supported by a robust risk-based approach covering quality, safety, information security and environmental issues, and by upholding high ethical standards.

As a TRIGO employee, permanent or temporary, you contribute to achieving our objectives and protecting our brand. 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 act as 'One TRIGO' and we expect all employees, regardless of location or position, to :

- Act in line with this Code of Conduct and in compliance with all applicable laws and regulations,
- Act in a way that reflects our values whenever facing an ethical situation,
- Speak up when they observe any behaviour that does not align with this Code of Conduct or our values, with no retaliation for raising a concern in good faith.

Version #	Applicability date (mm/dd/yy)	Page(s)	Description of change(s)
-	04/18/19	All	Initial version
-	07/05/24	5	Addition of a "Gender Equity" chapter
A	07/15/26	All	Comprehensive update, with enhanced coverage of Human Rights, Working Conditions and Business Integrity. Addition of a reference to the document.

Note : The Code of Conduct is reviewed at least every two years to ensure its continued relevance and alignment with applicable regulations and best practices. This review is led by the Group ESG Leader, with the support of the Group Legal function.

TRIGO VALUES**GLOBAL TEAM SPIRIT**

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

How this value translates into action:

TRIGO 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 TRIG, 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 Management 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 does this value translate 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 who take responsibility for their actions.

How does this value translate 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.

RESPECT FOR PEOPLE

We believe that strong and sustainable working relationships are built on mutual respect, fairness and open communication. Each of us is expected to respect the rights of others, treat everyone with dignity and be mindful of cultural differences, recognizing that diversity of perspectives and backgrounds is a source of value for the Group.

We are also committed to acting with honesty and fairness in all our interactions, promoting a work environment where dialogue is open, transparent and constructive, and where every employee feels valued, safe and supported.

RESPECTFUL CONDUCT IN PROFESSIONAL INTERACTIONS

In all professional interactions, whether internal or external, including during missions or projects at customer sites, employees are expected to demonstrate the highest standards of professionalism, respect and neutrality. This applies to all situations, including inspections, resident activities, trainings, audits, etc. In all circumstances, employees represent the Group and must ensure that their behaviour reflects TRIGO's values and preserves the quality of our relationships with customers and partners.

Employees are expected to:

- **Maintain respectful**, objective and constructive exchanges at all times.
- Focus discussions strictly on professional topics relevant to the mission.
- Refrain from any personal, intrusive or non-business-related questions or comments, including those related to personal characteristics, beliefs or political views.
- Avoid any form of sarcasm, condescension or behaviour that could be perceived as dismissive or inappropriate.
- **Show cultural sensitivity and respect** for individual backgrounds and differences.
- Ensure their conduct contributes to a climate of trust, enabling open and professional dialogue.

NON-DISCRIMINATION AND EQUITY

At TRIGO, we are committed to fostering a workplace that is fair, respectful, free from discrimination and gender-based bias, and that ensures equal opportunities for all employees. TRIGO does not tolerate any form of discrimination based on, but not limited to, gender, age, nationality, ethnic or social origin, race, colour, religion or belief, caste, language, disability, health status, pregnancy, marital status, sexual orientation, political opinion, trade union affiliation or any other personal characteristic unrelated to professional performance.

All employment-related decisions, including recruitment, assignment, remuneration, promotion, training, discipline and termination, are based solely on objective criteria such as role requirements, qualifications, experience, performance and competencies.

The Group promotes equal treatment and expects all employees to contribute to a workplace where diversity is respected and every employee feels valued, safe and supported. It places particular emphasis on preventing behaviors in the workplace that may create a hostile, intimidating or degrading work environment, including any form of sexism.

Employees are expected to:

- **Promote respectful interactions** at all times and ensure that their words and actions do not undermine the dignity of others.
- **Avoid any form of sexist behavior**, whether explicit or implicit, including inappropriate remarks, stereotypes or attitudes that reinforce gender bias.
- **Refrain from inappropriate jokes or comments**, including jokes related to gender, appearance or roles, which may be perceived as offensive or exclusionary.
- **Ensure fairness in daily interactions**, including the allocation of tasks, speaking opportunities, feedback and recognition.

Managers play a key role in promoting non-discrimination, especially gender equality, and are expected to:

- Lead by example and foster a positive and respectful environment.
- Challenge inappropriate behaviors when they arise.

FIGHTING HARASSMENT

TRIGO is committed to providing a work environment that is free from all forms of harassment, intimidation and abusive conduct. Harassment includes any unwanted verbal, physical or visual behavior that creates a hostile, intimidating or degrading work environment, or that undermines an individual's dignity. It may be of a psychological, physical or sexual nature.

Employees are expected to behave in a respectful and professional manner at all times. Any form of harassment, including bullying, hostile conduct, inappropriate comments or actions, and unwanted physical contact, is strictly prohibited.

HEALTH AND SAFETY

TRIGO is committed to providing a safe and healthy working environment for all employees, contractors and third parties, in order to prevent accidents, injuries and work-related illnesses.

Employees are expected to comply with applicable health and safety laws and regulations, as well as with TRIGO internal rules and customer safety requirements. This implies that employees:

- **Follow all safety rules and procedures** applicable to their activities and workplace.
- **Use appropriate personal protective equipment** and ensure it is used correctly.
- **Identify and report unsafe situations or behaviors** that may pose a risk to themselves or others.
- **Act responsibly and remain vigilant** to protect their own safety and that of others.

Managers are also expected to:

- Lead by example and promote a strong safety culture.
- Provide appropriate personal protective equipment and ensure that safety requirements are consistently applied in daily operations.
- Ensure that employees are adequately trained and aware of safety risks.
- Take appropriate action to address unsafe behaviors or conditions.

WORKING CONDITIONS

TRIGO is committed to promoting fair working conditions across all its operations, in compliance with applicable labour laws and regulations in the countries where it operates. The Group recognizes that certain activities may require specific working arrangements, including shift work or extended working hours, depending on customer requirements and operational constraints. These situations may have an impact on employees' work-life balance and overall well-being. Therefore, the Group promotes organizational and managerial practices aimed at preventing excessive workloads and limiting their impact on employees' well-being. This includes:

- Ensuring **compliance with applicable labour laws**, particularly with regard to working hours and rest periods.
- Promoting fair and **equitable workloads** and clear allocation of responsibilities.
- Supporting **sustainable ways of working**.
- Ensuring that working conditions are appropriate to the nature of the local activities (including equipment, ergonomics, and consideration of weather conditions).

Employees are expected to comply with applicable working rules, respect the workplace and equipment provided, and use them appropriately and responsibly.

Managers are also expected to:

- Ensure compliance with applicable labour laws and internal policies within their scope of responsibility.
- Pay attention to working arrangements and workload distribution.
- Contribute to employee engagement by creating conditions that support motivation, well-being and performance in daily operations.

CHILD AND FORCED LABOUR

TRIGO is committed to preventing child labour and prohibiting any form of forced or compulsory labour in its operations and business relationships.

The Group complies with applicable laws and regulations regarding minimum working age in each country where it operates and adheres to internationally recognized standards. TRIGO does not employ workers below the legal minimum working age and pays particular attention to ensuring that young workers, where permitted by law, are not exposed to inappropriate or hazardous working conditions.

All work must be voluntary. Employees must be free to enter into and leave their employment in accordance with applicable laws. TRIGO promotes fair and transparent recruitment and employment practices, including the prohibition of document retention, recruitment-related fees, and any form of coercion, pressure or constraint.

INTEGRITY AND ETHICAL BUSINESS CONDUCT

FIGHTING CORRUPTION AND BRIBERY

TRIGO is committed to conducting its business with integrity and transparency. The Group prohibits all forms of corruption, bribery and influence peddling in both public and private sectors.

Corruption consists of offering, promising, giving, soliciting or accepting an **undue advantage** in order to influence a decision or obtain an improper benefit. This may involve money, gifts, hospitality, services or any other advantage, whether provided directly or through a third party. Such practices are strictly prohibited, regardless of:

- whether they involve public officials or private parties
- whether the advantage is offered, promised or actually given
- whether the action takes place directly or through intermediaries

What are the consequences?

- Corruption exposes both employees and the Group to severe legal, financial and reputational risks, including criminal sanctions.
- Any breach of these principles may result in disciplinary action, legal proceedings and sanctions.

What does this mean in practice?

Employees must never use TRIGO's resources or position to obtain an undue advantage and are expected to:

- **Act with integrity** in all business relationships, including with customers, suppliers and partners.
- **Refuse any benefit that could influence** or give the appearance of influencing a decision.
- **Ensure transparency in dealings**, particularly in contractual negotiations or procurement processes.
- **Remain vigilant in situations involving third parties**, intermediaries or public officials.

You must not:

- Offer or accept **cash, gifts, invitations or any benefit** when you are in a position to influence a business decision that could benefit yourself, the giver or any third party, or that could reasonably be perceived as influencing your judgment.
- Provide preferential treatment in exchange for a personal or third-party benefit.
- Use intermediaries, agents or consultants to perform actions that would be prohibited if done directly.
- Offer any advantage (even after a decision is made) as a reward for a favorable outcome.
- Make any payment, even small or unofficial, to accelerate an administrative process (“facilitation payments”).

Gifts and invitations

Gifts, meals or invitations may be offered or received only if they are occasional, low-value promotional items or customary business courtesies, provided they are reasonable, transparent, without any expectation of something in return, and do not influence, or appear to influence, a decision.

Any gift or benefit that could influence, or be perceived as influencing, a decision must be refused. Cash payments or benefits equivalent to cash are strictly prohibited.

Conflicts of interest?

A conflict of interest arises when an employee’s personal interests, or those of a close relative or associate, may interfere, or appear to interfere, with the interests of TRIGO and the impartial performance of their duties.

Conflicts of interest are not necessarily unlawful, but they may compromise objectivity, create risks of unethical decisions, and damage the Group’s reputation if not properly managed.

Employees are expected to:

- Avoid situations that could compromise their objectivity or independence.
- Disclose any actual, potential or perceived conflict of interest to their management.
- Refrain from participating in decisions or processes where such a conflict exists.

Conflicts of interest may arise in particular when:

- Participating in the **recruitment, evaluation or promotion** of a relative, partner or close acquaintance.
- Being involved in the **selection of a supplier, subcontractor or temporary employment agency** with whom you or a close relative have a personal, financial or professional relationship.
- Holding a **direct or indirect financial interest** in a company that is a customer, supplier or competitor of TRIGO.
- Accepting a role, activity or external engagement that may **interfere with your duties or create a competing interest**.
- Using or having access to **confidential information** that could be used for personal benefit.

Transparency and early disclosure are essential to prevent and properly manage any potential conflict of interest.

Third parties and intermediaries

Particular attention must be paid when working with intermediaries (agents, consultants, partners), as they may expose the Group to corruption risks.

Employees must ensure that:

- Services are legitimate and clearly defined.
- Compensation is appropriate and transparent.
- The third party complies with TRIGO's Code of Conduct.

Dealings with public officials

Public officials are subject to strict regulations. They include any government or public authority representatives, employees of state-owned or state-controlled entities, and candidates or representatives of political organizations.

Employees must:

- Avoid any situation that could be perceived as an attempt to influence a public decision.
- Never offer gifts, payments or advantages to public officials.

Sponsorship, Donations and Patronage

TRIGO may engage in sponsorship, donations or patronage activities to support social, cultural, charitable or sporting initiatives that are consistent with its values and ethical standards.

Such contributions must be made in good faith, for legitimate purposes, and must not be used to obtain an undue advantage or influence a business decision. Indeed, sponsorship, donations or patronage may present corruption risks, particularly when:

- They are used to indirectly benefit a business partner, a decision-maker or a public official.
- They are linked to an ongoing or potential business relationship.
- They lack transparency or proper documentation.

Employees involved in such initiatives are expected to:

- Ensure that the supported organization is legitimate and aligned with TRIGO's values.
- Verify that no direct or indirect personal interest exists for themselves or any related party.
- Ensure that contributions are reasonable, transparent and properly documented.
- Follow internal approval processes before committing any resources (to be approved by the EVP).
- Pay attention to any potential link with public officials or politically exposed persons.

FIGHTING FRAUD

TRIGO is committed to preventing and detecting any form of fraud in its operations and business activities. Fraud refers to any intentional act or omission designed to deceive, mislead or obtain an undue advantage, whether financial or non-financial, to the detriment of the Group, its customers, partners or employees.

What are the consequences?

- Fraud exposes both employees and the Group to significant legal, financial and reputational risks.
- Any breach of these principles may result in disciplinary action, legal proceedings and sanctions.

What does this mean in practice?

Employees are expected to act honestly and with integrity in all professional activities and to:

- Ensure that information, records and reports are accurate, complete and reliable.
- Use company resources responsibly and only for legitimate purposes.
- Follow internal controls and procedures, particularly in financial and operational processes.

You must not:

- Falsify reports, timesheets, expenses or any company records.
- Misuse company funds, equipment or assets for personal purposes.
- Conceal errors or irregularities.
- Manipulate data or information to achieve personal or business objectives.
- Approve or participate in transactions that you know to be inaccurate or misleading.

ANTI-MONEY LAUNDERING AND FINANCIAL INTEGRITY

TRIGO is committed to preventing the use of its operations for money laundering or any form of financial misconduct. Money laundering involves concealing the origin of funds derived from illegal activities in order to make them appear legitimate.

Employees must remain vigilant in their business activities and avoid any situation that could involve or facilitate such practices. This implies that employees:

- Ensure that business relationships are legitimate and transparent.
- Pay attention to unusual or suspicious transactions, including unclear payment methods or requests.
- Ensure that payments are justified, properly documented and made through approved channels.

FAIR COMPETITION

TRIGO is committed to conducting its business in a fair and transparent manner and to complying with applicable competition laws and regulations. Competition laws aim to ensure fair business practices and prohibit any conduct that could restrict free competition, such as exchanging sensitive information with competitors or entering into anti-competitive agreements.

Employees are expected to:

- Compete fairly and independently in all business activities.
- Protect confidential and commercially sensitive information.
- Ensure that all commercial decisions are made independently and in the best interest of the Group.

CONFIDENTIALITY AND INFORMATION PROTECTION

TRIGO is committed to protecting the confidential information, relating to TRIGO, its employees, candidates, customers, suppliers, partners, and any third parties in the course of

business. This includes the protection of personal data in accordance with the General Data Protection Regulation (GDPR).

Employees are expected to:

- **Read, understand and comply** with the Information Security and IT policy.
- **Protect non-public information** in accordance with applicable internal rules.
- **Remain vigilant** in view of increased cybersecurity risks and the growing threats of fraud, phishing and data breaches, and act responsibly when handling information and digital tools.

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

COMMUNICATION

TRIGO promotes responsible, transparent and professional communication in all its interactions, whether internal or external.

Employees are expected to act with discretion, ensure their communications reflect TRIGO's values and do not create confusion or risk for the organization. This implies that employees:

- Avoid speaking or writing on behalf of the Group without expressed authorization.
- Avoid speaking or writing about subjects outside our field of expertise.
- Ensure no confusion between personal opinions and those of the Group, particularly in external communications or on social media.
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ENVIRONMENT

TRIGO is committed to conducting its activities in an environmentally responsible manner and to minimizing the impact of its operations on the environment.

The Group promotes sustainable practices in its daily activities and expects all employees to contribute to the preservation of natural resources and the reduction of environmental impacts.

Employees are expected to:

- Comply with applicable environmental laws and internal policies in their activities.
- Use resources responsibly, including energy, water and materials.
- Limit waste generation and promote reuse and recycling where possible.
- Adopt environmentally responsible practices in their daily work (e.g. travel, use of equipment, consumption of resources).

COMPLIANCE AND REPORTING IRREGULARITIES

TRIGO is committed to ensuring compliance with this Code of Conduct and encourages a culture of integrity, transparency and accountability.

Employees are expected to comply with the principles set out in this Code of Conduct and to contribute to their effective implementation in daily activities.

When in doubt, employees are expected to seek guidance and consult their management. If they think that the information received is incomplete or unsatisfactory, they may also contact TRIGO Group's legal team.

VIGILANCE AND RESPONSIBILITY

Employees are expected to remain vigilant and to raise any concerns when they become aware of:

- Situations that may be inconsistent with this Code of Conduct.
- Potential misconduct, unethical behavior or irregular practices.
- Actions that may expose the Group to legal, financial or reputational risks.

SPEAK-UP

TRIGO encourages employees to report any concerns or suspicions in good faith via the whistleblowing channel. See <https://www.trigo-group.com> > Whistleblower procedure.

All concerns will be treated seriously and handled in a confidential and appropriate manner, in accordance with applicable laws and internal procedures. Employees who report concerns in good faith are protected from retaliation.

ACCEPTANCE

By signing this document, I acknowledge that I have read and understood the TRIGO Code of Conduct and agree to comply with its principles.

Company name: Employee name: Position:	SIGNATURE
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REFERENCES

TRIGO Social policy,
TRIGO Business Integrity policy
TRIGO Information Security policy,
IT and Information Security charter,
TRIGO Environmental policy,
TRIGO Sustainable Purchasing 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)
- 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