



Code of Conduct



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VISION

We strive to build safer and more sustainable communities in which we live and work.

MISSION

We look to drive value for our customers through service and innovation, for more reliable power and communication throughout the world.

CORE VALUES

Quality - We stand behind our products and put quality at the forefront of every business decision we make.

Integrity - In all aspects of our business we operate with the highest ethical standards; in working with our supply base, our customers, and our internal stakeholders, we build trust through honoring commitments and keeping our word.

Safety - We take seriously the responsibility to keep our most valuable assets safe, our employees, and enable our customers to do so as well with lightweight composite solutions.



A photograph of large, dark, wet pipes stacked outdoors. The pipes are covered in water droplets, suggesting they have been recently washed or are in a wet environment. They are supported by wooden blocks. In the background, more pipes and some industrial equipment are visible under an overcast sky.

Code of Conduct

Guidelines for Business Conduct

We take pride in doing business with integrity. Our Code of Conduct (the “Code”) expresses our values and aids us in making decisions that are not always obvious or easy. The Code cannot address every situation. When you need more detailed guidance than you find here, please reach out to your manager or HR representative.

Who the Code Applies To

Our Code of Conduct applies to every single person at Trident Industries, regardless of position, title, or location. In addition, we expect that our supplier partners conduct business in a manner that is consistent with our Code.

We Rely on our Values

Our corporate values provide the framework under which we are all expected to operate. We never compromise **quality** at the expense of profit, we act with **integrity** when it comes to any business decision, helping to build trust and partnerships, and we put the **safety** of all Trident stakeholders and the forefront of our actions.



Open Reporting of Concerns is Welcome

This Code is a great reference guide for handling situations as they come up, but may not address all circumstances. We preserve and build a culture of trust by taking action when we are aware of misconduct. If you see or suspect wrongdoing you are encouraged to promptly report any such incident to your supervisor. You may choose to report a concern anonymously, and where permitted by law, we will do our best to maintain confidentiality.

Policy Against Retaliation

Trident will not tolerate retaliation against any individual who, in good faith, seeks advice, raises a concern, reports misconduct, or provides information in an investigation related to a suspected Code of Conduct violation.

Expectations for Supervisors and Managers

As a leader within our organization it is expected that you set an example for those you serve, and make sure that all employees understand this Code. Create an open environment where concerns can be voiced, and promptly escalate any concerns or violations via the appropriate channels.

We Conduct Our Business With Respect and Transparency

We celebrate our diverse backgrounds and understand that each individual brings a unique skill set and perspective. We are at our best when we appreciate and leverage our differences.

Diversity & Inclusion

Conflicts of Interest

Non-Discrimination & Preventing Harassment

Physical Security and Workplace Violence

Political Contributions

External Communication

Diversity & Inclusion

At Trident we understand that a workplace which fosters and appreciates contributions from all associates regardless of culture, race, religion, gender, sexual orientation, and other dimensions of diversity is a competitive advantage. These differing perspectives and talents lead to better business decisions and drive innovation for our stakeholders and customers who operate in diverse end markets.

In support of this, we stress equal opportunity for all associates in accordance with local laws. Decisions on hiring, development, compensation or advancement are based solely on a person's qualifications, abilities, experience and performance.

Our Diversity and Inclusion Goals

- Ensure equity in pay
- Build and support diverse workforces and leadership teams
- Retain diverse employees
- Promote from within



Non-Discrimination & Preventing Harassment

As we depend on each other's contributions, it is especially important that we treat each other with respect and dignity. Whether it occurs at our offices or off-site, we have no tolerance for discrimination or harassment of any kind at Trident.

We all have the right to work in a harassment free environment, regardless of the form it takes.

- **Verbal:** Threats, slurs, derogatory comments, negative stereotyping, or unwelcome jokes
- **Non-verbal:** Gestures that ridicule, insult, belittle, or show hostility
- **Visual:** Degrading or derogatory posters, photographs, cartoons, or drawings
- **Physical:** Unwelcome touching or physical contact

These expectations apply to all of our interactions including between employees, with customers, vendors, and applicants for employment.

Reporting Harassment

If you have encountered harassment in the workplace, whether you were a target or not, you should report it immediately to your manager or the HR department. Allegations of discrimination or harassment will be promptly investigated, and violators of this ethical standard will be disciplined. There will be no retribution against anyone making a good faith complaint or report of discrimination or harassment at work.

Physical Security and Workplace Violence

Trident has a zero tolerance policy when it comes to threatened and actual workplace violence. This includes any behavior that creates fear of injury or distress, including threatening or intimidating behavior and verbal abuse.

Unless otherwise specifically permitted by law, Trident bans all weapons on our premises or while on company business. Please report any concerns for your personal safety or a suspected violation of this standard to your manager, HR, or security immediately. In the event of an emergency, follow local reporting procedures or contact the authorities.

Conflicts of Interest

As a term of employment we expect all associates to avoid putting personal interests ahead of those of the company. Avoid any appearance of a conflict by promptly disclosing any existing relationships or situations that you are unsure about to your manager or to the HR department.

Common Conflicts to Avoid

Close Personal Relationships

- It is against Trident's policy to have a supervisory relationship with a family member, close friend, or someone with whom you have or have had a romantic relationship.

Outside Employment and Activities

You may not:

- Secure outside employment that affects the quality or value of your work performance or availability to Trident.
- Use company resources to advance conflicting interests.
- Work for or receiving payments from a Trident competitor, customers, supplier or vendor.

Business Opportunities

- Any opportunity that you learned about as a result of your position with Trident that would personally benefit you.
- A job that you start that would compete with Trident.

Family Members

- A family member receives an undue advantage or improper benefit as a result of your position with Trident.

For more information on conflict of interest please refer to your Employee Handbook.



Political Contributions

Trident encourages that you stay informed about important issues, vote, and take part in the political process. However, no company funds or resources may be used to solicit or provide contributions to political candidates or parties. In addition, no political campaign donation may be solicited from any Trident associate in such a way that the associate feels obligated or expected to contribute.

The company may choose to make charitable contributions to non-profit organizations, and if in our stakeholders best interest, may take a position on certain public policy.

External Communications

In order to maintain trust with our external stakeholders, image in the community, and a unified voice we prohibit public statements about Trident unless you have permission to do so, which includes social media posts related to the company. Forward any external media requests to your manager.

For more information on use of social media please refer to your Employee Handbook



We Conduct Our Business With High Integrity

We work hard to build trust and credibility with all of our stakeholders, and are committed to always conducting business ethically, honestly, in full compliance with the law, and expect our partners to do the same.

Fair Competition

Anti-Corruption

Anti-Money Laundering

Gifts and Entertainment

Trade Restrictions and Import/Export Controls

Records Management

Financial Reporting

Fair Competition

We believe in winning business based on our merits, and that fair competition and an even playing field are best for our customers and the industry. Our value proposition will position us well to succeed, and we will always do so in accordance with applicable competition laws (or "anti-trust laws").

When engaging with our competition we should avoid:

- Making any agreement that would restrict trade.
- Coordination that could violate competition law, regardless of how informal.
- Discussing or dividing territories and customers.
- Discussing prices we charge for certain products.
- Manufacturing capacity or capability conversations.
- Disclosing our terms and conditions of sale.
- Disclosing our supply base.



Anti-Corruption

Conducting business with integrity means that we abide by all applicable anti-corruption laws where we do business including but not limited to the U.S. Foreign Corrupt Practices Act (FCPA). We will never make a corrupt payment as a means to further our business goals, and will never offer payments to public officials. This includes employees of government-owned enterprises, candidates for political office, and any government staff.

Bribery and Kickbacks

- We never offer anything of value (including charitable contributions, cash, excessive gifts, travel, or entertainment) to win or retain business, or gain any other improper advantage.
- We do not accept improper payment (or return) intended to result in preferential treatment.

Facilitating Payments

- We do not allow facilitating payments at Trident, which are intended to expedite routine government actions.
- If anyone requests an improper payment from you report the incident to your manager.

Anti-Money Laundering

Money laundering is a means by which criminals use to make money earned from illegal activities appear legitimate by passing it through a business. We must use our best judgment and pay close attention when working with any customer, supplier, or third party, especially in the transaction involves cash payment.

When Working with Customers

- Always verify their identity and understand the nature of their business.
- Verify sources of funds and look for any signs of illegitimacy.

When Working with Suppliers

- Leverage references supplied or conduct other third-party due diligence to ensure our payments will be used for legitimate business purposes.

Gifts and Entertainment

Building relationships throughout our value chain is an important part of doing business. However, we must do so in an appropriate manner.

Gifts

Gifts are appropriate when they:

- Are modest and do not compromise our ability or our customer's ability to make objective business decisions.
- Are occasional.

Entertainment

Like gift giving, offering or accepting entertainment which is proportionate to the business relationship is appropriate when:

- Activities take place in an appropriate setting.
- Activities are not excessive or too regular.

Trade Compliance / Import and Export Controls

As a growing organization it is expected that our customer base will become more diverse in time and geographies in which we operate will expand. It is important that we understand and abide by all sanctions imposed by multi-national organizations such as the United Nations and European Union. These sanctions often prohibit transactions with certain countries or individuals including import, export, financial transactions, or travel.

Likewise, as our customer and supply base expands it is important that we all follow any applicable import and export laws and regulations. Be aware of and comply with international trade laws and policies.

Records and Contract Management

Daily business decisions rely on complete, accurate, and timely record keeping. Each of us has a responsibility to maintain accurate information and complete records, both physical and digital (email, voicemail). You must ensure that any report you prepare does not contain any false, misleading, or inaccurate data or information. Likewise, no undisclosed or unrecorded funds, assets or liabilities are permitted, and no false or improper entries can be made in Trident accounting records for any purpose.

Similarly, Trident builds trust and a reputation in honoring our commitments. When entering any sort of agreement or contract with a customer, supplier, or other third-party we must follow the appropriate channels for approval and signature. Once executed, it is all of our responsibilities to ensure we are abiding by the agreements we've made. If you ever have any doubts or questions please raise these concerns to your manager.

Financial Reporting

Like record keeping, it is imperative that we keep accurate books for the integrity of our financial reporting and business decision making. All financial records must be kept and reported honestly, accurately, and timely. Internal accounting protocols must never be circumvented. Any evidence or suspicion of inaccurate, incomplete, or fraudulent entries must be reported and rectified immediately.

For more information on record keeping and financial reporting please refer to your Employee Handbook.



We Conduct Our Business in a Socially Responsible Manner

The products we manufacture at Trident offer the industries we serve a safer, more environmentally friendly, and sustainable solution. We conduct our business with the same principles in mind.

Health and Safety The Environment
Sustainability Human Rights

Health and Safety

We are committed to always maintaining a safe and healthy work environment. It is not only critical to our associates but to the health of our business. This applies not only to manufacturing, but also associates working in our offices, from home, and when traveling. Each of us is responsible for following all health and safety rules, regulations, laws, and procedures.

Creating a culture of safety requires all of our support and attention. We believe:

- All accidents are preventable
- Safety is everyone's responsibility
- Working safely is a condition of employment

With safety always in mind we should:

- Promptly report any work-related injury, near-miss, first-aid, illness, or unsafe condition.
- Bring suggestions for safety improvements to your manager as often as possible.

Pay attention to your surroundings at all times to help prevent accidents.

Drugs and Alcohol

Trident is committed to maintaining a drug and alcohol-free workplace. Being under the influence of alcohol, illegal drugs (as classified under federal, state, or local laws) or other impairing substances while on the job may pose a serious health and safety risk to yourself and others and will not be tolerated.

For more information please refer to the Trident Safety Plan and your Employee Handbook.

The Environment

At Trident, we intend to build and maintain a culture that protects the environment and improves the communities in which we work and live. We pursue environmentally sound business practices and strive to continuously improve our EHS performance. We comply with all applicable laws, regulations, standards and guidelines, and ensure our products enable our customers to do the same. We are transparent in the information needed to understand the safety and environmental impacts of our operations and products. Ultimately, we believe in the products we produce and that they are a more environmentally friendly option to the traditional alternative materials on the market.

Sustainability

We understand that our operations and products have an impact on our local communities and the world at large. Business decisions are made under the pretense of meeting the needs of the present without compromising future generations to do the same.

Trident is focused on continuous improvement in our operations, and in the work we conduct with our customers and suppliers, in order to minimize the environmental impact and maximize efficiencies and the benefit to our communities. Pursuing sustainable solutions is not only the right thing to do for business, but also for our associates, partners, and neighbors.

Human Rights

As a global citizen, our commitment to human rights not only applies to Trident, but throughout our value chain including suppliers. We uphold that basic human rights are a core value and forbid the use of child labor, forced labor, or human trafficking in any operation associated with Trident business. We subscribe to the United Nations Guiding Principles on Business and Human Rights, and ensure our third-party partners do as well.



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