



CODE OF CONDUCT

2025

CONTENTS

HOW WE SUCCEED

| | |
|---|---|
| Introduction from the CEO..... | 2 |
| The Trillium Values..... | 3 |
| The Purpose of Our Code of Conduct..... | 4 |
| Applying Our Values..... | 4 |
| Applying Our Code of Conduct..... | 5 |
| Manager Responsibilities..... | 5 |
| Speak Up! How to Raise a Concern or Ask a Question..... | 6 |
| Ethics Hotline Contacts..... | 7 |

PEOPLE

| | |
|--|----|
| Fraud, Deception, and Dishonesty..... | 8 |
| Anti-Bribery and Corruption..... | 10 |
| Gifts and Hospitality..... | 12 |
| Conflicts of Interest and Personal Relationships in the Workplace..... | 14 |
| Equality, Inclusion, and Diversity..... | 16 |
| Harassment, Bullying, and Discrimination..... | 17 |
| Human Rights Principles..... | 18 |

CUSTOMERS

| | |
|--|----|
| Using Integrity When Working with Third Parties..... | 20 |
| Integrity in Dealing with Our Agents and Others | |
| Acting on Our Behalf..... | 21 |
| Competition and Antitrust Laws..... | 22 |
| Import, Export, and Trade Controls..... | 24 |

TECHNOLOGY

| | |
|---|----|
| Use of Company Systems and Information..... | 25 |
| Social Media Guidelines..... | 26 |
| Use of Company Property and Resources..... | 27 |
| Financial Records, Controls, and Reporting..... | 28 |
| Confidential Information..... | 29 |
| Company Communications and Disclosures..... | 30 |
| Personal Information..... | 31 |

PERFORMANCE

| | |
|--|----|
| Environment, Health, and Safety (EHS)..... | 32 |
| Respecting the Environment..... | 33 |
| Respecting Communities..... | 34 |





ETHICAL BUSINESS PRACTICES

Introduction from the CEO



Dear Colleagues,

At Trillium Flow Technologies, integrity and ethical business practices are the foundation of our success. Every decision we make and every action we take shapes our company's reputation and future. While achieving our business goals is essential, how we achieve them is just as important.

Our Code of Conduct serves as a guide for conducting business with honesty, professionalism, and respect. It outlines our commitment to fair business dealings, anti-corruption, workplace safety, diversity and inclusion, and environmental responsibility. As CEO, I expect our leaders to provide the support and resources needed to uphold these standards, and I count on each of you to demonstrate integrity in all that you do. Together, we set the standard for excellence.

Ethical conduct is a shared responsibility. I encourage you to refer to the Code regularly and to speak up if you witness behavior that conflicts with our values. Trillium provides multiple reporting channels, including our Ethics Hotline, and I want to be clear: we do not tolerate retaliation against anyone who raises concerns in good faith.

If you ever face an ethical dilemma or need guidance, the Code outlines who to contact for support. You are not alone; we are all here to help each other do what is right.

Thank you for your commitment to integrity and your contributions to Trillium's success.

Doug Kitani
CEO, Trillium Flow Technologies



Vision

We will become the most relied upon flow control solutions company in the world.

Mission

To sustainably, efficiently, and passionately assist our customers by providing critical products and services to help them meet the needs of today's ever-challenging world.

Position

We develop and deliver advanced flow control technologies, aftermarket services and global expertise by collaborating with our customers to ensure their success.

VALVES – PUMPS – SERVICES

What We Do



MISSION CRITICAL
EQUIPMENT AND
SERVICES



HIGHLY ENGINEERED
SOLUTIONS



PASSIONATE AND
COMPREHENSIVE
CUSTOMER SERVICE



GLOBAL
SUPPORT

How We Succeed

CUSTOMERS

Seamlessly align with customers while continuously improving our customer engagement and service levels

TECHNOLOGY

Develop and apply advanced technologies

EXECUTION

Passionate pursuit of continuous improvement, excellent results and value creation for everyone

TEAM

Attract and develop a diverse, energized and collaborative team focused on our mission

Our Values



PROTECT PEOPLE
AND THE
ENVIRONMENT



INTEGRITY



ALWAYS MEET
CUSTOMERS'
NEEDS



DELIVER QUALITY
IN ALL THAT
WE DO



SOLVE, INNOVATE
AND CREATE



THE PURPOSE OF OUR CODE OF CONDUCT

The Code of Conduct defines our principles and expectations.

It stands to serve three main purposes:

- To clearly set out the behavior we expect.
- To provide guidelines to help you apply our values.
- To enable you to raise a concern or ask a question if you are in any doubt.

APPLYING OUR VALUES

Sometimes you know it's the right thing to do, and sometimes there is doubt.

The Code of Conduct cannot address every situation you may face, so throughout the Code of Conduct we have set out who you can approach for more information or for guidance.

In any situation in which you have some uncertainty as to whether an action is consistent with the Code of Conduct, you should ask yourself these questions:



IS IT LEGAL?



WOULD I BE COMFORTABLE READING ABOUT IT IN THE MEDIA?



WOULD IT SET A GOOD EXAMPLE?



DOES IT FEEL RIGHT?

If you have any trouble answering any of these questions, then you should raise a concern with your manager, HR, Legal, or through the Trillium Ethics Hotline, as appropriate.

APPLYING OUR CODE OF CONDUCT

Our Code of Conduct applies to all of us and to the third parties we work with.

We expect you to comply with this Code of Conduct. If found to be in breach of the Code of Conduct, you may face disciplinary action. Discipline may include termination of employment or cancellation of your contract. There may be additional consequences under applicable laws including personal fines, criminal prosecution, and imprisonment.

Where we use the term “you” in this Code of Conduct, it includes all employees, officers and directors of Trillium Flow Technologies™ (“Trillium Flow Technologies” or “Trillium”) and its subsidiaries and joint ventures in which Trillium holds a controlling interest. It also includes all contractors and consultants working for Trillium, as we expect these contractors and consultants to comply with the Code of Conduct when they undertake work for us.

The Code of Conduct also, to the extent permissible, applies to our suppliers, agents, dealers, and other third parties with whom we work. We expect these third parties to adhere to the requirements and expectations set out in the Code of Conduct.



MANAGER RESPONSIBILITIES

OUR PRINCIPLE

Managers are expected to be good role models that demonstrate the behaviors and principles described in the Code of Conduct and Trillium policies. Managers also have an important role in making sure that their teams understand how the Code of Conduct and Trillium policies apply to their day-to-day work.

Thus, those who manage other employees have additional responsibilities under this Code of Conduct.

THESE INCLUDE:

- Providing copies of the Code of Conduct to employees and helping employees understand the Code of Conduct.
- Speaking with employees about ethical issues.
- Ensuring employees complete training on ethical issues on time.
- Monitoring employee compliance with the Code of Conduct.
- Ensuring that third parties with whom we engage are aware of and comply with these policies and standards as appropriate.
- Ensuring that we support people who raise ethical issues or concerns.

SPEAK UP!

How to raise a concern or ask a question.

REPORTING UNETHICAL BEHAVIOR

If you believe you have experienced or witnessed unethical behavior at Trillium you have a responsibility to do something about it. We want to assure you that you can raise a concern in a secure and confidential way. Such concerns will be properly addressed and investigated.

You should not be concerned that there will be any adverse personal consequences for reporting a genuine concern. You should start by addressing your concerns with your manager or supervisor. If that is not appropriate, or is for some reason unsatisfactory, you can contact your human resources representative or a more senior leader in your work area.

If you do not feel comfortable raising your question or concern through any of the above channels, employees as well as third parties can contact the Trillium Ethics Hotline. Freephone (toll-free) telephone numbers are set out in this Code of Conduct on the following page and are widely publicized in all our companies. You can also access this service via our Global Intranet, www.trilliumflow.com, or directly via www.trilliumflow.ethicspoint.com.

NO RETALIATION

Trillium is fully committed to protecting the rights of those individuals who report issues in good faith and to maintaining the independence, impartiality, and confidentiality of the reporting process. Trillium does not tolerate retaliation of any kind. Retaliation will be met with disciplinary action, up to and including termination.

Can I find out what is happening about my concern?

Yes, regardless of whether you report by phone or online you will be given a reference number so that you can contact the hotline to find out how the case is progressing. You will see updates where possible. You can also see when the issue has been resolved, although it may not be possible to provide you with any details due to privacy regulations or other local legal restrictions.

Do I have to be absolutely sure that there is a problem?

No. So long as you report your real and honest concerns in good faith you will not be penalized in any way, regardless of outcome.

USING THE ETHICS HOTLINE

What will happen when I call the Ethics Hotline?

You will be helped and advised wherever you are. We partner with an independent service provider that specializes in operating confidential telephone reporting systems. When you call, a trained member of their staff will answer your call, listen, and record it into the system.

Do I have to give my name?

In almost all jurisdictions, if you wish to make an anonymous report you may do so. However, in the spirit of an open work culture, we encourage you to give your name because it may make it easier to investigate your concern if we need to talk to you again to obtain further details. If you do give your contact details this information may be recorded in a database. You have the right to access any personal information submitted by you in relation to making your report.

Who at Trillium will know about my hotline report?

The Trillium Legal team owns case management for the Trillium Ethics Hotline. Your details will be known only to those people specifically involved in investigating your concerns and to the case management team to whom the investigators report. Any report that you make will not be sent to anyone that you have indicated may be implicated.

ETHICS HOTLINE CONTACTS

Trillium Ethics Hotline

The Trillium Ethics Hotline, managed by NAVEX Global, is a global service that can be contacted if you wish to speak up or ask questions. The Trillium Ethics Hotline can be accessed online or over the phone 24/7, and you can choose to report anonymously.

www.trilliumflow.ethicspoint.com

INTERNATIONAL DIALING INSTRUCTIONS

Australia

Direct Access

From an outside line, dial the direct access number for your location:

Australia (Optus) 1-800-551-155

Australia (Telstra) 1-800-881-011

At the English prompt dial **(844) 928-0198**

Canada

Toll Free

Dial toll-free within Canada 1-844-928-0198

China

Direct Access

From an outside line, dial the direct access number for your location:

China (Southern) 10-811

China (Northern) 108-888

At the English prompt dial **(844) 928-0198**

France

Direct Access

From an outside line, dial the direct access number for your location:

France (France Telecom) 0-800-99-0011

France (Paris Only) 0-800-99-0111

France 0-800-99-1011

France 0-800-99-1111

France 0-800-99-1211

France (Telecom Development) 0805-701-288

At the English prompt dial **(844) 928-0198**

India

Direct Access

From an outside line, dial the direct access number for your location:

India 000-117

At the English prompt dial **(844) 928-0198**

Italy

International Toll-Free Service (ITFS)

From an outside line dial the ITFS number for your location:

Italy 800-790875

Korea (South)

Direct Access

From an outside line, dial the direct access number for your location:

Korea (South) (Dacom) 00-309-11

Korea (South) (ONSE) 00-369-11

Korea (South) (Korea Telecom) 00-729-11

Korea (South) (U.S. Military Bases - Dacom) 550-2872

Korea (South) (U.S. Military Bases - Korea Telecom) 550-4663

At the English prompt dial **(844) 928-0198**

Malaysia

Direct Access

From an outside line, dial the direct access number for your location:

Malaysia 1-800-80-0011

At the English prompt dial **(844) 928-0198**

Netherlands

Direct Access

From an outside line, dial the direct access number for your location:

Netherlands 0800-022-9111

At the English prompt dial **(844) 928-0198**

Poland

Direct Access

From an outside line, dial the direct access number for your location:

Poland 0-0-800-111-1111

At the English prompt dial **(844) 928-0198**

South Africa

Direct Access

From an outside line, dial the direct access number for your location:

South Africa 0-800-99-0123

At the English prompt dial **(844) 928-0198**

United Arab Emirates

Direct Access

From an outside line, dial the direct access number for your location:

United Arab Emirates 8000-021

United Arab Emirates (du) 8000-555-66

United Arab Emirates (Military-USO and cellular) 8000-061

At the English prompt dial **(844) 928-0198**

United Kingdom

International Toll-Free Service (ITFS)

From an outside line, dial the ITFS number for your location:

United Kingdom **0808-234-6767**

United States

Toll Free

Dial toll-free within the United States **1-844-928-0198**

NOTE

The above numbers are subject to change. You can always get the most current number by visiting the hotline website at www.trilliumflow.ethicspoint.com. Additionally, some countries are not set up to receive reports via the telephone. In those countries please make your reports online.

FRAUD, DECEPTION AND DISHONESTY

Any fraud or dishonesty, irrespective of size, could harm our reputation.

OUR PRINCIPLE


We act with integrity and engage in business honestly. We do our utmost to protect Trillium Flow Technologies from fraud or dishonesty at all times. Fraud typically means deceiving others, acting dishonestly or abusing your position to gain some advantage. Fraud is usually carried out for profit or to wrongfully obtain money, goods or services. It is against the law in most countries and in some, like the UK and the US, fraud is a criminal offense that could lead to imprisonment.

WE NEVER

- Make expense claims that were not incurred for Trillium business.
- Approve expense or charge them to a customer if we believe they are false or not related to Trillium's business.
- Ignore activities that we think might involve fraud, money laundering, or deception.
- Use Trillium's money or resources for something improper or not legitimately connected to our business.

WE ALWAYS

- Act honestly, fairly, and openly.
- Make sure that the company's financial books and records are accurate, truthful, and complete.
- Make sure that other documents, such as invoices, are accurate, complete and comply with contract terms.
- Check or challenge anything that does not look or feel right.



We act with integrity
and engage in business
honestly.

Q & A

A colleague spent most of the afternoon out of the office on personal business but still charged the time to a customer job number on his timesheet. He said that it was okay because he frequently does extra work on jobs which he does not charge on his timesheet. Is this allowed?

No. Timesheets form the basis of the costs we charge the customer, so it is vital that all timesheets give a true and accurate representation of the time spent working on that job. Your colleague has potentially committed a timesheet fraud and the issue must be raised with him and his manager.

I took a customer to dinner, but I also invited a friend and his wife, charging the whole cost to customer entertainment. Is this allowed?

No. It is fraudulent to submit an expense claim when it is not wholly for business purposes.

I need more information, is there anybody I can talk to?

- Your supervisor or manager, or other senior leader of your function
- Your Managing or Finance Director
- Group Financial Controller
- Trillium Legal





ANTI-BRIBERY AND ANTI-CORRUPTION

Bribery/Corruption is always wrong and could damage our business reputation.

OUR PRINCIPLE

Compliance with anti-bribery and anti-corruption laws is critical to protecting Trillium's reputation. Each of us is required to comply with anti-bribery and anti-corruption laws; failure to do so could result in criminal penalties.

Bribery - We must never directly or indirectly (for instance, through third parties) authorize, offer, give or promise anything of value (including cash, gifts, hospitality or entertainment) to anyone to influence them in the performance of their duties, or to persuade them to perform their duties improperly. Likewise, we must not solicit or accept bribes or facilitation payments in any form.

Facilitation Payments - We must never make facilitation payments. Facilitation payments, or "grease payments," are payments made to government officials in order to get them to perform or expedite the performance of their routine, non-discretionary duties. Facilitation payments do not include legitimate, published fees for expedited government services or payments made in the face of a threat to your health and safety. Your health and safety are paramount, and you should always take reasonable steps to keep yourself safe. However, health and safety payments must be immediately reported to your Manager and Trillium Legal so that it can be accurately recorded.

WE NEVER

- Take part in or tolerate any form of corrupt behavior or any violation of anti-corruption laws.
- Hide or fail to properly or accurately record our activities and payments.
- Offer anything of value to a third person if it is for illegitimate purposes or provided to improperly influence action, if it is illegal under local laws, or if it may cause reputational harm to Trillium.
- Make improper payments to any government officials to 'get things to happen or to happen a bit quicker'.
- Pay more than a fair market value for any goods or services.

WE ALWAYS

- Obtain required pre-approvals before i) offering anything of value to any third party, ii) engaging a third party who will interact with others on our behalf, or iii) sponsoring or supporting an event or community project.
- Take great care in selecting the people and parties with whom we work.
- Check that fees paid for services from third parties, including agents, advisors and consultants, are for legitimate business purposes and are appropriate and consistent with the services provided.
- Understand and follow all applicable anti-bribery and anti-corruption laws.
- Promptly report any attempts to bribe us or requests for us to pay bribes and any other suspicions of bribery or corrupt behavior.

Q & A

We are awaiting tenders for a substantial contract and one of the vendors has invited me to an all expenses paid weekend at a five star golf resort. Should I accept?

No. This is unacceptable at any time, and in particular, you must never allow yourself to be unduly influenced, or create a perception of undue influence, during any contract negotiations.

My work sends me to many places around the world. What is common in one country can be seen as a bribe in another. What should I do?

You must not promise or give anything of value to gain an unfair business advantage. Contact the Trillium Legal team for guidance on what actions are allowed.

We submitted a planning application for a site extension overseas. Our local manager advised that a small payment to a local official is required to avoid any delay in obtaining approval. We are told that this is common practice. Is it okay to make the payment?

No, this could be considered a facilitation payment, unless the payment is for a published expediting fee paid to the government that is available to everyone and that has been legally adopted. You must consult with Trillium Legal before making any such payment.

While looking to leave an overseas country a demand for a cash payment is made by a local official who is armed. He is aggressive and threatening and has indicated that I may be detained if I do not make a payment. What should I do?

This is a shakedown. Where you genuinely feel threatened and/or intimidated, you should make the payment and advise your supervisor and a member of Trillium Legal immediately.

I need more information, is there anybody I can talk to?

- Your supervisor or manager, or other senior leader of your function
- Trillium Legal

Check or challenge anything
that does not look or feel
right.

GIFTS AND HOSPITALITY

All gifts or hospitality must be reasonable.

OUR PRINCIPLE

We only give or receive gifts or hospitality for business if it is reasonable. We never offer or accept them if they could influence a business decision improperly. Bribes and 'excessive' hospitality are against the law and our Code of Conduct, no matter what 'local custom' may be. Giving and receiving gifts and hospitality is part of relationship building but common sense and good judgment must always be used. Corporate charitable donations and sponsorships must be pre-approved as these could also give rise to similar issues of exerting improper influence.

You must obtain pre-approval of all gifts and hospitality, subject to the guidelines set out in the Gifts and Hospitality Policy.

HEIGHTENED SCRUTINY FOR GOVERNMENT OFFICIALS

Some countries have very strict limitations on the value and nature of gifts and hospitality their government officials can accept. Gifts and hospitality that are acceptable between private business partners may be unacceptable between a business and an official. Employees of state owned companies are treated as governmental officials for these purposes.

You must have explicit permission to offer gifts and hospitality to government officials, other than for a trivial amount such as a cup of coffee. Equally, you must not offer gifts and hospitality to the spouses, family members or guests of a government official. You must not pay for nonbusiness travel and hospitality for any government official.

In addition, third party behavior can result in liability for you and Trillium if you fail to conduct appropriate due diligence on third parties who deal with government officials on Trillium's behalf, or if you disregard the results of such due diligence.

WE NEVER

- Accept gifts or hospitality that could be perceived to affect our judgment or independence.
- Make or offer any gifts, hospitality, sponsorship, or charitable donation that could affect or appear to affect the judgment or independence of others.
- Make corporate political donations or contributions.
- Accept or offer gifts or hospitality during the process of a competitive bid or tender exercise which could have, or which could be viewed as having, an influence on the outcome of the bid or tender.

WE ALWAYS

- Make sure to understand and follow the Gifts and Hospitality Policy and local laws and rules on gifts and hospitality that apply in the country where we are doing business.
- Report any gift, hospitality, sponsorship, or charitable donation that we are aware of and believe is against the Code of Conduct, either to our local manager or to the Trillium Ethics Hotline or Trillium Legal.
- Talk to our manager, company leaders, or Trillium Legal if we are unsure about any aspects of the Gifts and Hospitality Policy.





Q & A

Q. During a bid process a supplier sent me a very expensive specially bottled 50 year old single malt whisky. Should I accept?

No. The gift must be returned to the supplier with an explanation that to accept it would be contrary to our Code of Conduct.

Q. A Government Minister in a country where Trillium is establishing a new presence suggested that as a community contribution it would be good if Trillium makes a charitable donation to a school for blind children located in his home town that employs his wife as the Director. Is this donation acceptable?

No. This could be construed as benefitting the Minister and his family even though it is described as a charitable donation. Members of the families of government officials are subject to the same restrictions as government officials themselves.

We never accept gifts or hospitality that could be perceived to affect our judgment or independence.

CONFLICTS OF INTEREST AND PERSONAL RELATIONSHIPS IN THE WORKPLACE

Could it put you in an awkward position?

Avoid doing it or seek advice quickly to address or disclose the situation.

OUR PRINCIPLE

We avoid situations that could give rise to actual or perceived conflicts between our personal interests and Trillium's interests. If such situations do occur, we always disclose these in writing to our manager and address openly the consequences of our involvement in order to mitigate any actual conflicts.

Conflicts of interest arise if we, or members of our families, have personal business interests, financial interests, or other jobs which do or might conflict with Trillium's business and we find ourselves compromised.

Relationships – Relationships, including personal relationships with other Trillium employees and employees of suppliers, customers, and competitors, which make it difficult to fulfill our work responsibilities or which give rise to a perceived conflict must be avoided.

Employment outside Trillium Flow Technologies - You may not be employed by another employer if doing so would prevent you from fulfilling your employment duties for Trillium. In addition, employees must not be employed or have any personal business commitments (such as directorships or consultancy roles) in any businesses which are the same as or similar to the businesses operated by Trillium or that do business with Trillium.

Financial Interests - You must not have financial interests that might conflict with the interests of Trillium Flow Technologies, or could appear to others to conflict, unless you have obtained written approval beforehand from the relevant company Managing Director.

WE NEVER

- Have another job or personal commitments in the same sector as a Trillium company while we are employed by Trillium.
- Take advantage of our knowledge, contacts, and position within Trillium to make personal gain beyond our employment rewards and benefits, or to benefit a personal relation, directly or indirectly.
- Allow any familial or close personal relationships (which could give rise to a conflict) in the workplace or related business to go undisclosed.

WE ALWAYS

- Avoid involvement in any contracts or business dealings between Trillium and a family member or friend or a business they own or work in or by not seeking to employ any family member or friend. We inform our manager or supervisor of any such relevant personal relations in writing and we do not take any part in the related decision-making process.
- Obtain written approval from our Managing Director and Trillium Legal to serve as an officer or director of another business. (This will usually be given for service as a director or trustee of a not-for-profit organization, charity or family company, unless it is a potential supplier, customer or competitor of Trillium Flow Technologies).
- Are diligent with our own personal investments or business interests to ensure that there is no conflict or perception of potential conflict with the interests of Trillium or its customers or suppliers. (Generally, investments held in shares of publicly traded entities will not be deemed to give rise to a conflict unless they were acquired on the basis of inside information).
- Disclose and discuss with our manager or Managing or Finance Director if we perceive any possible conflict of interest in our business or in any intimate personal relationship in the workplace.
- Accept and cooperate with agreed solutions to stop or prevent conflicts from occurring.



Q & A

I have been approached by a friend whose son is about to graduate about job opportunities in Trillium. He believes I could use my position in the company to give his son a 'head start' in the recruitment process. Is it okay to do this?

No. You must advise him to apply to the relevant department of the company. You must ensure that you are not involved in the recruitment of that individual as it would be a conflict of interest. You can explain how to apply for the role, but nothing more.

My department just hired the son of another employee. Is this allowed?

Yes, sometimes family members work in the same department. However, when this happens, we put mitigating controls in place. We make sure relatives do not hire, supervise, affect terms and conditions of employment, or influence the management of the employee.

I need more information, is there anybody I can talk to?

- Your HR representative
- Your supervisor or manager, or other senior leader of your function
- Trillium Legal

EQUALITY, INCLUSION AND DIVERSITY

We believe in providing equality of opportunity.



Our Principle

We are committed to recruiting and promoting our employees fairly and without discrimination. We actively recognize diversity by building a culture of equal opportunity, mutual respect, and collaboration.

Fair employment policy: Trillium Flow Technologies does not take any decision and is not influenced by any factors that do not have a direct bearing on the ability of the individual to perform the job.

Workplace diversity: Means having an inclusive, respectful environment that accepts each individual's differences, embraces their strengths, skills, and attributes and provides opportunities for all employees to achieve their full potential.

Inclusion: Everyone has something unique to contribute and we believe that active inclusion promotes lateral and original thinking and is the best way to promote and leverage skills and talents, and to achieve superior organizational performance.

WE NEVER

- Provide development opportunities or promote employees other than on merit and based on work performance and potential.
- Tolerate discrimination, bullying, or harassment in any form.

WE ALWAYS

- Hire the best person for the role.
- Give people opportunities on an equal basis.
- Respect the employment laws in the countries where we operate and comply with any national or local regulations relating to positive discrimination.
- Act and support others to maintain a work environment where all are respected and which is free of discrimination, harassment, and bullying.
- Remain open and flexible to different needs and perspectives in the workplace.

I need more information, is there anybody I can talk to?

- Your HR representative
- Your supervisor or manager, or other senior leader of your function
- Trillium Legal

We employ and promote people based on merit and include people from a diverse range of backgrounds.

HARASSMENT, BULLYING, AND DISCRIMINATION

We do not tolerate harassment, bullying or discrimination in our workspace.

OUR PRINCIPLE

We treat our employees with respect and dignity and ensure that others do the same. We do not allow behavior or actions that make those who work for or with us feel inferior, humiliated, upset, or threatened.

Harassment means behavior or actions towards an individual or group that makes them feel intimidated, humiliated, unwelcome, or threatened.

Bullying means saying or doing something offensive, abusive, intimidating, or threatening that makes another individual feel upset, threatened, humiliated, or vulnerable, or undermines their self-confidence.

Discrimination means treating a certain person or group differently, based on factors such as race, sex, age, gender, religion, caste, color, national origin, disability, actual or perceived sexual orientation, gender identification, employment status, or political affiliation.

WE NEVER

- Harass, bully, or discriminate against others.
- Make unsuitable jokes or comments, or participate in gossip or rumors, which might humiliate or upset someone else.
- Tolerate any physical violence in the workplace.
- Threaten a colleague with physical violence.
- Act in a way which is unacceptable or inappropriate or that could cause offense to others or bring the company into disrepute.

WE ALWAYS

- Speak out against harassment, bullying, and discrimination.
- Support others who challenge or report this kind of behavior.

Q&A

A departmental head is looking to recruit a new deputy. Although the advertisement says nothing about age, he has indicated to me that he is rejecting candidates above a certain age.

I know this is wrong. What should I do?

Discrimination on the grounds of age is not allowed and in some countries is illegal. Seek guidance from your HR representative.



HUMAN RIGHTS PRINCIPLES

We respect human rights.

OUR PRINCIPLE

We respect human rights of all those working for or with us, and of the people in the communities in which we operate. We will not exploit anyone, wherever in the world we are working. We will not do business with companies, organizations, or individuals that we believe are not working to comparable generally accepted human rights standards.

WE NEVER

- Use any form of child labor, modern slavery, servitude, or forced labor nor to the best of our knowledge in our supply chain.
- Tolerate excessive working hours being worked other than on an exceptional or emergency basis.
- Work with other companies that we know or suspect are not respecting our human rights principles.
- Negotiate with or try to persuade our employees to adopt working terms or conditions that do not conform to Trillium's human rights principles.

WE ALWAYS

- Make the health, safety, and well-being of our employees and others a top priority.
- Comply with national laws on wages and working conditions where we operate.
- Comply with the Human Rights Policy, the Modern Slavery Statement, and any Trillium policies covering the rights of those who work for or with us, or are otherwise affected by our actions.

I need more information, is there anybody I can talk to?

- Your supervisor or manager, or other senior leader of your function
- Your HR representative
- Trillium Legal



USING INTEGRITY WHEN WORKING WITH THIRD PARTIES

We must all work to the same high standards.

OUR PRINCIPLE

Relationships with third parties are critical to our success and we will work with all of them to try to ensure that they adopt equivalent standards to this Code of Conduct.

WE NEVER

- Select a new partner without investigating how they carry out their business and being satisfied that they do so in a manner which is consistent with Trillium's ethical standards.
- Ignore behavior that is inconsistent with the requirements of this Code of Conduct.

WE ALWAYS

- Are honest and transparent in our dealings.
- Look to build relationships which will last.
- Treat our stakeholders with respect.

“Look to build relationships which will last.”



INTEGRITY IN DEALING WITH OUR AGENTS AND OTHERS ACTING ON OUR BEHALF

We expect all agents to act ethically in dealing with our customers and competitors on our behalf.

OUR PRINCIPLE

Trillium is an international group with a strong reputation. We will not permit agents appointed by Trillium businesses to risk damage to our ethical reputation by engaging in unethical behavior or corrupt practices. Thus, agents appointed by Trillium must comply with the Trillium Code of Conduct. If agents do not follow our Code we will not work with them.

An agent is anyone or any entity that represents Trillium in any proposed or actual dealing or activity, and can include representing Trillium in front of government agencies or private parties. Agents include sales representatives, lobbyists, freight forwarders, and customs brokers.

WE NEVER

- Appoint an agent without careful due diligence and internal approval.
- Allow agents to pay bribes to win work for Trillium.
- Help agents to avoid paying tax on their remuneration.

WE ALWAYS

- Have a signed agency agreement in place before the agent carries out any work for us.
- Get valid invoices from the agent before paying any commission or compensation.
- Make sure we fully understand what the agent is doing on our behalf.
- Satisfy ourselves that the agent's way of working does not conflict with our ethical standards.
- Tell the agent clearly that bribery and corruption are not tolerated by Trillium.
- Terminate agreements with agents who break our rules.
- Require an agent to confirm in writing that they will act in accordance with the Trillium Code of Conduct.

Q & A

Our agent says he can get me a copy of a competitor's bid so that I can beat the competitor's price.

This is not tolerated – not only is it dishonest but it infringes rules regarding anti-competitive practices.

Our agent has asked me to add some extra commission so he can pay another person to help with our bid.

The commission rate in the agreement cannot be varied without Trillium Legal approval. If the agent has legitimate business expenses, which Trillium has agreed to reimburse, these need to be documented and will be audited in accordance with our normal finance rules. If the agent is proposing to pay another party to do work you need to know exactly who is being paid, and how much; if the person is connected with the customer in any way, or the amount seems excessive, the payment would be inappropriate and possibly illegal.

The agent wants us to pay his commission to a bank account in a tax-free location.

The Trillium Commercial Agent and Distributor Manual has rules about the agent's bank account. Commission can only be paid to an approved bank account.

I have heard rumors from customers or competitors that our agent is behaving unethically.

If you have any suspicion about the way the agent does business you need to report the details to Trillium Legal as soon as possible so that Trillium can investigate the facts immediately. It is better to lose a bid and keep our reputation, than win the job, risk penalties, and be held in disrepute.

I need more information, is there anybody I can talk to?

- Company or Regional Finance Director
- Trillium Legal



COMPETITION AND ANTITRUST LAWS

We always compete fairly in business – it is the only way to act.

OUR PRINCIPLE

We act in a way that ensures open and fair competition and we do not obtain an unfair competitive advantage. Competition and antitrust laws protect free enterprise and prohibits behavior that limits trade or that restricts fair competition. These laws combat illegal practices like price-fixing, market-sharing, or bid-rigging conspiracies, or behaviors that aim to achieve or maintain a monopoly. Anti-competitive practices are unacceptable and will damage Trillium's business and reputation.

Competition/antitrust laws – We make sure that we have knowledge of and respect the relevant competition and antitrust laws in the countries in which we operate. Where no such laws directly apply we nonetheless seek to operate in a manner which is consistent with generally accepted international competition law principles. Competition laws are different in each country. Generally, they restrict anti-competitive market practices such as collusion.

WE NEVER

- Assume that something is right just because our competitors are doing it - we establish the facts for ourselves.
- Get involved in any conversations, meetings, e-mail exchanges, or other communications with competitors that might be or be seen as anti-competitive.
- Do anything that might give the impression that Trillium was taking part in anticompetitive behavior.
- Make any decisions on Trillium's pricing, production, customers, and markets in collaboration with any other party. Any such decisions must be made by Trillium alone.
- Discuss with competitors which suppliers, customers, or contractors with whom Trillium deals or will deal or which markets Trillium intends to sell into or on what terms Trillium will deal.

WE ALWAYS

- Use legitimate means of obtaining competitive information.
- Respect the confidential information and intellectual property rights of our competitors and other third parties.
- Take great care in dealing with competitors: any agreement with them could be anti-competitive, including agreements or behavior that are not written down.
- Leave industry meetings if competitively sensitive issues arise and immediately report the matter to Trillium Legal.
- Tell Trillium Legal if we know of or suspect any potentially anti-competitive practices or if we are uncertain whether practices are legal or not.

AVOIDING SITUATIONS

Expos, trade association meetings, and other business gatherings are useful. However when competitors are together there are chances to break competition laws in seemingly harmless ways. Do not talk about inappropriate topics like marketing or pricing plans with competitors. If a conversation becomes inappropriate, firmly and clearly tell those present that you will not participate and leave. You must report it to Trillium Legal immediately. Violating competition laws can result in severe civil and criminal penalties, including fines, disgorgement of profits, and, for individuals, imprisonment.



IMPORT, EXPORT, AND TRADE CONTROLS

We will always trade both lawfully and appropriately.

OUR PRINCIPLE

We trade in accordance with all valid international sanctions and all trade laws, including all import and export regulations in the countries where we operate. We will not comply with illegal or unofficial trade restrictions or take part in prohibited restrictive trade practices.

Sanctions are trade restrictions against a specific state or actor imposed by international organizations such as the UN or EU, or by individual countries. Compliance with sanctions programs is mandatory and penalties for non-compliance can be severe.

Import and export requirements are established by national laws or the regulations of larger economic entities (such as the EU). There are specific, stricter requirements for exports of certain products (e.g. those for military or nuclear use) and to certain countries or customers.

The United States: Additional restrictions apply both to Trillium operating companies in the US and to US citizens working in any Trillium company anywhere in the world. The punishments for non-compliance can include imprisonment of individuals, heavy fines, and sanctions against Trillium.

WE NEVER

- Make false statements in trade documentation in an effort to get around trade restrictions, import and export regulations, or Trillium screening requirements.

WE ALWAYS

- Make sure we understand and follow the import and export regulations in the countries where we operate and do business.
- Make sure that we get all necessary import and export licenses.
- Comply with all valid regional regimes.
- Take extra care with exports of goods that could be used for military or nuclear use or to military or governmental customers including obtaining counterparty screenings (always check with Trillium Legal).
- Talk to Trillium Legal if we are unsure what to do or whether we might be facing a trade restriction or trade regulation issue and
- Follow all Trillium internal rules regarding international trade.

Q&A

We have signed a contract for which we require an export license. We have not yet applied for the license but believe that there is plenty of time to get it and it will not be a problem. Is this okay?

If you need the license to perform the contract, you should either have it in hand at contract signing or have clear, dependable plans to manage the risk and obtain the license in time to ensure timely performance of the contract. You should work closely with the logistics team and, as necessary, Trillium Legal in order to make sure you are not exposing the company to undue risk.

I need more information, is there anybody I can talk to?

- Your Local Logistics Team
- Managing or Finance Director
- Trillium Legal

USE OF COMPANY SYSTEMS AND INFORMATION

We use company information systems responsibly – this includes any personal use.

OUR PRINCIPLE

Trillium Flow Technologies seeks to maintain secure and effective information systems for its businesses to use. We all have individual responsibilities for ensuring that we use our IT systems and equipment appropriately and maintain the security of the data within them.

We must also remember that e-mails to external parties have the same effect in law as other forms of written communication. We will not send e-mails or other electronic communication which make representations, contractual commitments or any other form of statement concerning Trillium or one of its businesses unless we are authorized to do so.

We may occasionally use Trillium information systems to send e-mail and access the internet for personal purposes, but we may not do so if we are accessing or distributing material which is inappropriate or illegal or if we are putting the security of Trillium IT systems or equipment at risk. This personal usage is not private or confidential, and Trillium may monitor e-mail and internet usage to ensure that it complies with Trillium policies.

Company information systems are software applications, computer and communications equipment provided for the use of Trillium employees.

This includes:

- Access to company business applications and the data stored and processed by them.
- Desktop, laptop and mobile/handheld computers and communication equipment.
- Server computers and network equipment, including internet access.
- Portable storage devices such as USB memory sticks, removable hard-drives, USB drives and CDs/DVDs.
- Video and audio communications equipment including desktop and mobile phones, video-conferencing equipment and personal web-cams.
- Office technology such as printers, scanners and fax machines.
- Data stored within and communicated by these systems including databases, electronic documents, e-mails and voicemails.
- All software applications and systems.

WE NEVER

- Misrepresent Trillium online.
- Visit social networking sites whilst at work unless for legitimate business purposes (e.g. Yammer).
- Make excessive personal use of company telephones or computers.
- Rely on company equipment to maintain the master copy of any personal data.
- Visit inappropriate or illegal websites (e.g. sites containing pornographic, violent or racist material) using company information systems.
- Use Trillium computer systems to access, create, or distribute any material that is offensive or illegal, or has been obtained illegally.
- Install unauthorized or unlicensed software on company computers.
- Use external data storage devices (e.g. USB memory sticks, CD/DVD writers) unless they have been approved by the company IT department and their security is ensured. We must take care not to be careless with or lose these devices.
- Take copies of information stored on Trillium systems for our own personal use or for the use of others.
- Take photographs, videos, or sound recordings in any Trillium facility, or facilities belonging to customers or suppliers, without first obtaining permission to do so.

WE ALWAYS

- Comply with Trillium IT security policies, including the use of passwords, anti-virus software, and making regular back-ups.
- Keep company IT equipment, especially laptops and any external data storage containing company information, as secure as possible.
- Follow the social media guidelines in respect of our personal and, where appropriate, business use of social networking sites.
- Remember that Trillium may, subject to local governing laws, monitor the usage of its computer and communications systems, so privacy cannot be expected if they are used for personal or non-work purposes.
- Regard information as a company asset and treat as confidential all information to which we have access through Trillium systems.
- Use IT equipment safely and in accordance with local laws.
- Endeavor to make sure all information in Trillium systems is up-to-date and accurate for the benefit of the company and or colleagues.
- Report any equipment or data loss, or any suspected security breach, to our IT department as soon as it is known or suspected.

I need more information, is there anybody I can talk to?

- IT Department
- Your HR representative (in relation to social media usage)



SOCIAL MEDIA GUIDELINES

Approach the online world in the same way you do the physical one – using sound judgment and common sense. Be accurate, truthful and, when talking about Trillium or the industries in which we work, disclose your affiliation and state that the views expressed are your own. To avoid confusion between official and personal accounts, your account or username should not include the term 'Trillium' or any of our brand, product or divisional names (e.g. avoid 'twitter.com/SarahFromTrillium').

Whatever you post online can be viewed by anyone, even if it is later deleted or you have privacy controls in place.

- Do not disclose any proprietary information, affiliations, trade secrets, ideas, or intellectual property, or share content which is sensitive, private, or confidential.
- Do not post photos featuring our products which have not yet been publicly released, are damaged, or are in trial form. If you wish to post photos of customers' or suppliers' facilities ensure that you have their approval before doing so. If you are unsure, please email social@trilliumflow.com for guidance.
- Respect your audience. Remember that anything you say or publish gives an impression of how we work—things can be misconceived, particularly across different languages and cultures. Ensure your online contributions are meaningful, purposeful, and professional.

We know you are passionate about Trillium and want to help protect our reputation. However, we carefully manage all official communications online and offline through our communications team. If you see something online which you feel needs an official response, please email social@trilliumflow.com to bring it to our attention.

Finally, follow the law, our Code of Conduct, and the terms and conditions of the social networking site you are using.



USE OF COMPANY PROPERTY AND RESOURCES

Protecting company resources is a company-wide responsibility.

OUR PRINCIPLE

We protect all Trillium's property and resources and take the same care with the assets of our customers and other third parties. We are all responsible for keeping safe and making the best use of company property and resources to which we have access. We make sure that they are not lost, damaged, misused, or wasted. We do not lend, transfer, sell, or give away these assets unless it has been properly approved. We never use them for personal gain.

Company property and resources means both physical assets and intangible assets. Physical assets include, for example, property, equipment, materials, supplies, and cash. Intangible assets include, for example, company information, intellectual property, value of our brands, and employee time and talents.

WE NEVER

- Use company property and resources for non-work use unless it is allowed by our policies.
- Abuse the expense system or claim sums not spent on Trillium business or
- Give away trade information to others.

WE ALWAYS

- Make sure physical assets are properly maintained.
- Use company property and resources only for authorized purposes.
- Ensure company equipment and property are secured or locked when not in use.
- Keep good records of fixed assets and inventory.

Company property and resources means both physical assets and intangible assets.

FINANCIAL RECORDS, CONTROLS, AND REPORTING

Our financial records must record our business activities accurately.

OUR PRINCIPLE

We play our part in making sure that the books, records, and financial information of Trillium Flow Technologies companies are complete, truthful, and accurate. This includes supplying accurate information for sales invoices, ensuring that new employee tax information is submitted promptly, and making sure that our time sheets or expenses forms are correct.

We all have a responsibility for preventing and looking out for possible fraud or money laundering. We are also responsible for following Trillium's system of financial controls, to ensure the integrity of our businesses and financial records. Examples include following individual company procedures for checking and authorizing purchase invoices and counter-signatures on payment instructions.

Finance staff and company management teams must also understand their responsibilities as described in Trillium's relevant finance manuals and must follow the guidelines contained within those manuals.

WE NEVER

- Deliberately record false or misleading information or give wrong financial data to others.
- Conceal or fail to report any business transaction.

WE ALWAYS

- Give accurate information to the Finance function as soon as we can.
- Record and report financial information in line with the laws of the country where we operate.
- Follow Trillium's system of financial controls.
- Respect the limits of our authority (e.g. only approve invoices for payment within our authority limits).
- Look out for possible fraud or money laundering and report any suspicions to senior management.

We all have a responsibility for preventing and looking out for possible fraud or money laundering.



Q&A

I am reviewing a transaction that was approved by senior management, but I cannot find any supporting documents. Is it okay for me to also approve it since the senior managers did?

No. Employees must ensure transactions are documented and supported appropriately.

I need more information, is there anybody I can talk to?

- Your Company Finance team or Finance Director

CONFIDENTIAL INFORMATION

We keep confidential information confidential.

OUR PRINCIPLE

We will keep confidential information belonging to Trillium Flow Technologies or to customers or other third parties safe and only share it on a 'need to know' basis. We will only disclose confidential information to third parties if we are properly authorized to do so and on a confidential basis.

Confidential information means confidential or trade information belonging to Trillium or disclosed to Trillium under obligations of confidentiality.

This includes, for example:

- Financial information, business strategies or plans, business practices, systems and processes, and other similar information which is not in the public domain.
- Product specifications, pricing policies, sales, or marketing information.
- Customer and supplier contracts.
- Employee information.
- Technical information.
- Intellectual property, including inventions, innovations and, trade secrets.

During the normal course of business, employees may gain possession of, or access to, information which is confidential to Trillium. We are careful to deal with confidential information in such a way that we protect Trillium's interests.

NOTE

There are special rules regarding processing and safeguarding customer information and personal information.

WE NEVER

- Discuss confidential information in public or where we could be overheard.
- Leave confidential information in an unsecure or public place.
- Share confidential information from or about a previous employer unless we are permitted to do so by our previous employer.
- Copy documents or materials containing confidential information unless we are authorized to do so.

WE ALWAYS

- Make sure that, if we are legitimately disclosing confidential information outside Trillium, we do so as part of an established confidential business relationship or with a confidentiality agreement in place.
- Make sure that customers, suppliers, and other third parties protect our confidential information.
- Ask Trillium Legal if we are in doubt.



COMPANY COMMUNICATIONS AND DISCLOSURES

How we communicate is very important in building trust.

OUR PRINCIPLE

We communicate any information about Trillium Flow Technologies truthfully and carefully, making sure that our messages are authorized if necessary. Any communications to national media should be sent to askdavid@trilliumflow.com for authorization and approval due to their significance and potential impact for investors. We think carefully when we are communicating about Trillium in electronic form, such as external e-mails, blogs, websites, and social networks.

Company communications mean any external messages from anyone within Trillium or anyone we authorize to communicate on our behalf about Trillium or its business. This includes press releases, communications with journalists or other news media, advertisements, content published on social networks, trade promotional material, and any other public statements.

Disclosures mean factual statements or forecasts communicated to shareholders, regulators, securities exchanges, the media, or other third parties.

Media means newspapers (national and local), trade press, television, radio, websites, and social networks.

WE NEVER

- Respond to journalists, the media, regulators, government agencies, or other external agencies without getting permission to do so.
- Write or say anything in public about Trillium that is untrue, inaccurate, misleading, or could harm its reputation.
- Do anything to harm Trillium's reputation in social networking sites, blogs, chat-rooms, and other electronic communications.
- Communicate our personal views in a way that they could be interpreted as being Trillium views.

WE ALWAYS

- Make sure that all company communications and disclosures have been authorized by the appropriate internal parties.
- Remember, when we are communicating, that any e-mails, texts, tweets or anything else we write might appear in newspapers or have to be explained in court.
- Think carefully before forwarding e-mails either internally or externally. Something intended as a joke between colleagues can look very bad printed in a newspaper.
- Take extra care about what we say at meetings or other public events when we could be thought to be speaking on behalf of Trillium Flow Technologies.

I need more information, is there anybody I can talk to?

- Your manager or supervisor, or other senior leader of your function
- Trillium Legal

PERSONAL INFORMATION

We keep personal information private regardless of its format.

OUR PRINCIPLE

We think carefully about issues relating to personal information, making sure that we protect individual privacy and follow the data protection and data privacy laws in the countries where we operate. We will only allow employees with the correct authorization and valid legal or business reasons to access any personal information. Where such employees access personal information, they will only use it for proper business purposes. We will only hold personal information for the time we need to carry out the specific legal or business task or as required by law. We will not transfer personal information to other employees or countries if it is not allowed by local law.

Personal information means data such as names, addresses, dates of birth, national insurance or social security numbers, job titles, medical data, or photographs of any persons.

Data protection and data privacy laws mean laws which cover the collection, disposal, use, and storage of personal information. These laws vary in different countries in the world, although there are common principles in some regions such as under the General Data Protection Regulation 2016/679 (GDPR) that applies within the EU.

WE NEVER

- Check potential employee references without getting their consent first.
- Use or give personal information to unauthorized people.

WE ALWAYS

- Comply with data protection and data privacy laws.
- Consider the privacy impact when we develop new products and processes.
- Protect personal information, keeping it confidential and secure.
- Obtain any permissions we might need for the use of personal information and record those permissions.
- Use personal information in ways that individuals would reasonably expect.
- Take particular care with sensitive personal information, such as medical information, as explicit consent may be required for processing or disclosing such information.
- Tell our manager if we lose any personal information (e.g. employee details stored on a laptop).

We always protect personal information.

Q & A

I emailed a customer and accidentally attached the wrong report that contained personal information.

I've asked the recipient to delete the email, do I have to do anything else?

Yes, report it to your supervisor, HR representative or Trillium Legal.

I need more information, is there anybody I can talk to?

- Your HR representative
- Trillium Legal

ENVIRONMENT, HEALTH AND SAFETY (EHS)

Our vision is a zero harm workplace for people and the environment.

OUR PRINCIPLE

At Trillium we believe that all injuries and occupational illnesses are preventable. There is no business objective that will take priority over health and safety. There is no task that is so important or urgent that it cannot be done safely. We believe safety is everyone's responsibility and we operate sustainably and minimize our environmental impact.

Trillium prioritizes continuous reinforcement of zero harm to people and the environment; a deeply embedded safety culture where employees act safely at and away from work; and delivery of our safety culture through visible and proactive 'felt leadership' at all levels.

WE NEVER

- Ignore legal and other compliance requirements.

WE ALWAYS

- Pursue the identification of all hazards proactively and eliminate or, if not possible, manage the risk to as low as reasonably practicable.
- Maintain and continuously improve the Trillium EHS management system across the organization.
- Apply Trillium standards consistently and uniformly across the Trillium footprint irrespective of geography or local legislation.
- Lead, train and motivate our people to work in a safe and responsible manner.
- Consult with and promote the active participation of our people in the management of their own and others' health, well-being, and safety.
- Provide the resources and skills necessary to achieve our continuous performance improvement with respect to the environment and the health and safety of our people.
- Place EHS at the heart of a whole life cycle approach to product stewardship.
- Identify performance measures, set improvement targets, and report performance at all levels (recognizing excellent performance appropriately).
- Establish and maintain third party certification to ISOs 14001 and 45001 in Trillium facilities and operations.
- Use resources and energy efficiently, targeting waste, emissions and pollution in our activities, in order to minimize the impact of our activities on our communities.

I need more information, is there anybody I can talk to?

- Your supervisor or manager, or other senior leader of your function
- Your Operations or Manufacturing Director
- Your local EHS Manager

No business objective will take priority over health and safety.



RESPECTING THE ENVIRONMENT

We care about the impact we have on the environment.

OUR PRINCIPLE

We aim to minimize the impact of our actions, operations and our products on the environment. Our global environmental commitment is to minimize our most significant environmental impacts which are:

- Energy use;
- Water use; and
- Production of hazardous and non-hazardous waste.

To achieve this goal, Trillium Flow Technologies is committed to ensuring all our subsidiaries are ISO 14001 accredited and as a result are required to continuously improve their environmental performance and management practices. In addition, all our companies are required to comply with local environmental legislation and regulatory requirements applicable to its business.

Each Trillium company will seek to ensure that it acts as a good and responsible citizen in the communities in which it operates and adopt practices aimed at minimizing the environmental impact of its operations.

WE NEVER

- Ignore our environmental impact.
- Tolerate wastefulness in our offices or operations.

WE ALWAYS

- Focus our improvement efforts on the areas that have the most environmental impact.
- Try to identify opportunities to improve our environmental performance.
- Bring newly acquired businesses into line with best practice and have them ISO 14001 accredited.
- Monitor local and international legislative development and implement these appropriately.
- Collaborate with suppliers to address environmental considerations.
- Invest in research and development to contribute to environmental protection.

I need more information, is there anybody I can talk to?

- Your supervisor or manager, or other senior leader of your function
- Your Operations or Manufacturing Director
- Your local EHS Manager

RESPECTING COMMUNITIES

We will be good and responsible citizens in the communities in which we operate.

OUR PRINCIPLE

Trillium Flow Technologies has a large global presence and the impact we have on local communities and economies is of great importance to us. We respect the communities where we operate and we strive to make a positive impact by responsibly running our operations and investing in local initiatives in a way which benefits the local community.

We believe that any investment in a community should create a meaningful and sustainable impact on that community. It should be relevant to the local needs but at the same time aligned with our business and carried out in partnership with local organizations.

We aim to identify the possibilities for investment through contact with local people and organizations including local non-government bodies and community groups.

Education and health are priorities for communities worldwide. We are therefore particularly committed to focusing on community projects with strong educational and health themes whether it might be mentoring at a local school, helping young engineers with their school projects, setting up scholarship schemes, arranging site visits for local colleges and universities, or sponsoring the education of children.

Trillium does not make any political donations or contributions, nor does it allow any of its operating companies to do so. This includes cash and non-cash items such as services, materials, employee time, or use of corporate facilities.

WE NEVER

- Deliberately or knowingly ignore or show lack of respect to local customs or traditions.
- Use company funds or resources for political purposes.
- Participate in political activities at a corporate level.

WE ALWAYS

- Respect the traditions, cultures, and laws of the countries and the local communities where we operate.
- Try to employ local people in our businesses wherever possible.
- Listen to the concerns of the local communities and try to act in a way that deals with their concerns where we can.

I need more information, is there anybody I can talk to?

- Your supervisor or manager, or other senior leader of your function
- Your Operations or Manufacturing Director
- Your local EHS Manager



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NOTES

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TRILLIUM FLOW TECHNOLOGIES™

www.trilliumflow.com