

# Code of Business Conduct





## Paul Greywall President and CEO

### A Message from Our CEO

Quality, responsiveness, and reliability – these are Trinity Consultants’ founding principles that we demonstrate as we partner with our clients worldwide. We strive to emulate these characteristics at our place of work, in our local communities, where we are committed to perform our services with personal integrity and respect for one another.

As engineers, scientists, and technologists, our passion is to use our expertise to make the world a better place. This includes being good stewards of the resources we’ve been given. It begs our willingness to understand and accept the diverse opinions and lifestyles of the individuals we encounter. And it requires our adherence to the applicable laws, rules, policies, and regulations that govern us and our clients.

Doing the right thing; respecting the convictions and views of others; keeping your commitments; and speaking up if you see something that conflicts with these common values. We expect all employees to adhere to this Code of Conduct and keep each other accountable to represent Trinity Consultants with the highest integrity everywhere we go.

Sincerely,

A handwritten signature in black ink that reads "Paul Greywall". The signature is written in a cursive, flowing style.

Paul Greywall  
President and CEO  
Trinity Consultants

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# Mission, Vision, and Values

At Trinity Consultants, Inc. (including our subsidiaries and affiliates, “Trinity” or the “Company”), we are proud of our ethical business practices and reputation for quality service. The strength of our company lies in maintaining mutual respect between, among, and within the Company and our clients, vendors, community, and the people with whom we come into contact. We are committed to preserving our reputation of integrity that we have earned. Our clients expect us to meet very high standards. This Code of Business Conduct (the “Code”) reflects our commitment to live up to these expectations.

Many of these policies are based on laws and regulations. Others are based on philosophical and ethical principles that enhance our ability to work together cooperatively and conduct our business effectively, ensuring respectful treatment of our employees and all the people with whom we deal. We are all responsible for complying with both the letter and spirit of applicable laws and regulations, as well as with Company policies designed to guide us in maintaining our values.

## Mission

Trinity’s mission is to develop and implement intelligent solutions and to provide high quality consulting services that efficiently achieve our clients’ business objectives, while benefiting our employees and stockholders. All employees are involved in our efforts to continuously improve our ability to meet and exceed client expectations.

## Vision

Trinity will be the premier global provider of intelligent EHS, engineering, and science-related business solutions. We will achieve client satisfaction by delivering unequaled value to our clients. Establishing long-term partnerships with clients will be integral to meeting our business objectives. We will dynamically meet the evolving needs of our clients and employees. Our culture will foster diversity, innovation, and growth. People will be eager and proud to be employed by Trinity.

## Values

**Client** – Our success is measured by the satisfaction and success of the client.

**Employee** – Our culture will foster professional growth and quality of life for our employees.

**Quality** – Pride and ownership, with an attitude of enthusiasm, results in quality products and services.





# Expectations of Employees Globally

Trinity operates business globally. Our business ethics are respectful of local customs, norms, laws, and/or regulations. To support business activities globally, all employees (i.e., workers, officers, and directors covered under this Code) and projects are subject to the laws and regulations of various countries. Although the Code is mainly developed based on U.S. laws and regulations, operations outside of the U.S. may be subject to certain U.S. laws, and inversely, U.S. operations may be subject to laws in other countries.

This Code establishes principles of business conduct for all of Trinity's operations globally, regardless of location. Should differences exist as the result of local customs and requirements, employees must understand their legal obligations and conduct business under the highest standard of conduct. Every employee is expected to act with integrity in all situations and support Trinity's commitment to doing business ethically and within the framework of applicable laws.



## Workplace Behavior

At all times, Trinity employees are expected to conduct themselves in a manner that is appropriate for the work environment and consistent with our values. Our employees are an extension of the Trinity brand and, as such, should represent it well in all interactions with clients, colleagues, and their community.

## Equal Opportunity, Diversity, and the Prohibition of Discrimination

Trinity is an equal opportunity employer and supports this philosophy through all general employment policies and practices. The Company seeks and encourages a diversity of skills, talents, and viewpoints in our workforce. We strive to place the most



appropriately-skilled individuals in every position and make employment decisions based on merit. The Company's senior management is committed to the principles of equal employment opportunity.

All employees are responsible for actively supporting a work environment that provides employees and applicants with equal employment opportunity on a nondiscriminatory basis without regard to race, color, age, national origin, religion, sex, sexual orientation, gender, gender identity, ancestry, marital status, disability, medical condition, veteran status, or any other basis. To ensure that equal employment opportunities are available to qualified individuals, Trinity makes reasonable accommodations for the known physical or mental limitations of an otherwise qualified individual with a disability who is an applicant or an employee, unless undue business hardship would result.

Our equal employment opportunity policies apply to all applicants and employees and to all areas of the organization and employment practices. This includes, but is not limited to, recruitment, hiring, job assignment, opportunities for training and development, pay, benefits, promotion and demotion, dismissal, standards of personal conduct, and all other conditions and privileges of employment.

All employees have an individual obligation to ensure a work environment free of discrimination.

At Trinity, we recognize and appreciate the importance of creating an environment in which all employees feel valued, included, and empowered to do their best work and bring great ideas to the table in service to our business mission. We recognize that each employee's unique experiences, perspectives, and viewpoints add value to the Company's ability to create and deliver the best possible service to our clients and partners.

We are committed to advancing diversity in our workforce across the various dimensions of social and cultural identity and to practicing inclusivity in how we work with one another. Specifically, we seek to:

- ▶ Foster an environment that attracts the best talent, values diversity of life experiences and perspectives, and encourages innovation and integrity in pursuit of our business objectives
- ▶ Be recognized by our employees, clients, and other stakeholders as a model organization with respect to diversity

We will employ the following strategies to advance diversity and inclusion within Trinity:

- ▶ Enhance cultural competence and responsiveness to maximize our effectiveness in recruiting and retaining diverse employees
- ▶ Develop and implement innovative and inclusive policies, programs, and materials which ensure that employees throughout the organization reflect, welcome, and benefit from diversity

## No Harassment

Trinity prohibits sexual harassment and harassment because of race, color, national origin, ancestry, religion, creed, physical or mental disability, marital status, medical condition, veteran status, sex, sexual orientation, gender, gender identity, age, and any other basis protected by federal, state/provincial, or local law. All such harassment is unlawful and will not be tolerated. It is also our policy to prohibit discrimination of any other legally protected characteristic.

## Anti-Retaliation Policy

It is Trinity's policy not to permit any form of retaliation against another individual for reporting a violation of this Code, any other company policy, or the law. Acts of retaliation are considered a violation of the Code and are subject to disciplinary action appropriate to the situation.

## Prohibition on Workplace Violence

We will not tolerate acts or threats of physical violence, including intimidation, harassment, and/or coercion, that involve or affect the Company or that occur on Company property, or while conducting Company business off Company property. This prohibition against threats and acts of violence applies to all persons involved in Company operations, including, but not limited to, Company personnel, contract workers, temporary employees, and anyone else on Company property or conducting Company business off Company property.

The Company prohibits all persons who enter Company property from carrying a handgun, firearm, or prohibited weapon of any kind onto the property regardless of whether the person is licensed to carry the weapon. All employees are also prohibited from carrying a weapon while in the course and scope of performing their job for the Company, whether they are on Company property at the time or not and whether they are licensed to carry a weapon or not.

## Commitment to Health and Safety

Trinity is committed to the health and safety of our employees and all other people with whom we work. Effective health and safety protection in our business is every employee's responsibility for every business activity, whether at Company workplaces or off Company property.

Trinity is committed to:

- ▶ Compliance with all regulations and contractual obligations governing health and safety requirements at our workplaces
- ▶ Expedient action to correct or isolate unsafe conditions or work practices
- ▶ Employee accountability for role-related health and safety requirements
- ▶ Reasonable effort to assure that employees can accomplish assigned tasks safely and with no harm to the environment
- ▶ Enhancing employee awareness of, and compliance with, all applicable health and safety requirements
- ▶ Ongoing monitoring and improvement of the Company's health and safety management system
- ▶ Maintaining a workplace that is free of drug and alcohol abuse

As an employer, Trinity recognizes its responsibility for the health and safety of its employees in the workplace. The Company commits to support every reasonable action to ensure the protection of employees while at the assigned workplace. Similarly, Trinity will make every effort to ensure that all external persons working with Trinity are protected from injury and/or occupational disease. The Company will monitor our workplace and, without exception, will require all persons at our workplace to work in a safe manner and take every action reasonable to eliminate the risk of personal injury or injury to others.

Trinity management expects every employee and agent to be aware of and work in full compliance with all relevant health and safety regulations. The Company will supply and/or provide the resources necessary to attend educational programs as needed to ensure that staff maintain an



understanding of health, regulations, and best practices as applicable to the workplace. In addition, every employee must be aware of and comply with project-specific health and safety requirements as determined from time to time, such as those that may apply at certain industrial sites.

Trinity requires every employee and agent to take ownership of their own health and safety by working in compliance with both the law and according to safe work practices and procedures established by clients. While working at a client's site, all Trinity project team members assigned to the project will comply with the client's health and safety policies and procedures. External contractors retained by Trinity must have a health and safety policy consistent with Trinity's and the client's policies and provide a copy to Trinity prior to start of work. Contractors must work in accordance to the most stringent requirements set out in a policy or program, whether it be the contractor's, the client's, or Trinity's health and safety requirements.

Trinity management is fully committed to the requirements and spirit of this health and safety plan and to continual improvement of our health and safety performance.

## Following Laws and Regulations

Trinity is committed to maintaining the highest ethical standards. It is also the Company's policy to understand and follow all applicable laws and regulations in all locations where we do business. Trinity expects every employee to learn and follow all applicable laws and regulations and to behave in an ethical manner.

## Political Activity and Dealing with Ruling/Governmental Entities

Most contributions to political candidates by corporations are prohibited or restricted in many countries, including the United States. Under applicable law, employees may make political contributions on an individual basis. Employees may not, however, commit Company resources to political candidates or campaigns without prior specific approval from Trinity's Chief Executive Officer or Chief Financial Officer.

Trinity's clients include federal, state/provincial, local, and ruling/governmental entities worldwide. The laws and regulations governing transactions with ruling/governmental entities impose special rules and requirements not usually found in transactions with private parties. Employees must comply with all applicable laws and regulations when dealing with ruling/government entities.

Recruiting and employing former or current ruling/government officials or employees is also subject to special laws and possible restrictions. These rules may also apply to family members of the ruling/government official or employee. Contact the Human Resources Department concerning potential hires of ruling/government officials or employees.





## Anti-Bribery and Anti-Corruption

Trinity prohibits all bribes, kickbacks, and other improper payments, whether to a ruling/government official or to a person who works in the private sector. Employees and others acting on the Company's behalf must not authorize, pay, promise, or offer anything to any individual or entity in order to improperly influence any individual or entity in the conduct of business or to gain a business advantage. Trinity's employees, agents, and representatives must act in an ethical manner at all times and comply with all laws that are applicable to the Company, including laws that prohibit bribery, such as the U.S. Foreign Corrupt Practices Act ("FCPA"), the UK Bribery Act ("UKBA"), state anti-bribery laws, and all applicable anti-bribery and anti-corruption laws of any of the other countries in which Trinity operates.

This prohibition also forbids employees from making any facilitation payments, which are small payments made to ruling/government officials for their personal benefit in order to secure or expedite a routine, non-discretionary ruling/governmental action, such as the issuance of a permit more quickly than if the applicant waited for its turn. However, if there is a reasonable belief that the health or safety of one or more employee may be at imminent risk of physical harm if a payment is not made, a payment can be made, but it must be reported to the Managing Director of Human Resources as soon as possible.

Employees must not use representatives to engage in conduct that the employee would be prohibited from doing, including paying a bribe. Employees are required to conduct appropriate due diligence on potential representatives before engaging them and to monitor the conduct of representatives after their onboarding to ensure their ongoing compliance with this Code and applicable anti-bribery and anti-corruption laws during the life of the Company's relationship with the representative.

## Antitrust Laws

It is imperative and in the best interest of Trinity that our employees engage only in lawful and ethical competitive practices. Generally, competitors may not agree or have an arrangement:

- ▶ On prices they charge, or other terms of sales, for goods or services, regardless of the economic impact
- ▶ On production volumes
- ▶ To avoid competing on bids or projects
- ▶ To refuse to deal or transact with certain clients or suppliers
- ▶ To divide or allocate clients, territories, or markets

If you are ever in a situation where this occurs, leave immediately and promptly contact the Legal Department. If you encounter any other situation that involves these issues, you must contact the Legal Department.

## Global Trade Compliance: Anti-Boycott and Trade Sanctions

With operations throughout the world, Trinity is a global company. For this reason, it is critical that all our activities fully comply with the export control laws and regulations of the United States, the United Kingdom, Canada, and other jurisdictions in which we do business. Employees are responsible for understanding and abiding by laws that prohibit doing business with certain entities, individuals, or countries where trade-restrictions are in place, and in complying with applicable anti-boycott regulations. Employees should be watchful for the intended end-destination of our products and services.

## Insider Trading

Although Trinity is not a publicly traded company, Trinity works for many companies whose securities are publicly traded. In the course of that work, employees may have access to material non-public information about those publicly traded companies, such as unpublished financial data, pending transactions (e.g., acquisitions, divestitures, equity transactions, and financings), litigation



developments, ruling/governmental investigations, and changes to business strategies. Employees should refrain from buying or selling any securities of these companies until two full business days after such information has been publicly disclosed by such company.

## Conflicts of Interest

Employees are expected to conduct themselves in a manner and with such integrity that no conflicts of interest, real or implied, can be construed. All business decisions must be made based on furthering the best interests of Trinity. A conflict of interest may exist in any situation where an employee's personal interests (or that of a family or outside business colleague) might affect actions or decisions adversely impacting the best interests of the Company. Trinity requires all employees to disclose any situation which does or may involve a conflict of interest between their personal interests and the interests of the Company.

Conflicts of interest may include:

- ▶ The use of a position for personal profit
- ▶ Employment of relatives
- ▶ Engaging in an activity that might impair an employee's judgment or conflict with the interests of a client
- ▶ Appropriation of Trinity business opportunities
- ▶ Competition with the Company, whether through personal investments or relationships or outside employment
- ▶ Outside compensation and gifts
- ▶ Misuse or misrepresentation of corporate position
- ▶ Misuse of confidential information

## Protecting Company Assets

### Accounting Information and Records Management

Trinity is committed to maintaining a system of strong internal accounting controls. Accurate business and financial records are critical to the Company's success. These records are essential for internal decision making, as well as reporting to external parties including creditors, ruling/government agencies, and others. Therefore, employees must ensure that the Company makes and keeps books, records, and accounts that accurately and fairly reflect the transactions and dispositions of the assets of the Company in reasonable detail. This requirement also applies to payments to agents or other representatives.

Laws are in place that require accuracy in the recording of all transactions, including sales of property, inventory, or services. Any exchange of Company funds must be recorded within the framework of generally accepted accounting principles. Any transaction "off the record" is strictly prohibited. Destruction of any documents or records, especially of a financial nature, before any required retention period expires is unlawful and subject to penalties. Falsifying records, nondisclosure of transactions, and destroying documents to avoid legal responsibilities are violations of this Code and can lead to civil or criminal liability.

Contact the Finance Department regarding questions or concerns about recordkeeping requirements.



### Expenditure of Company Funds

Company funds must be utilized only in ways that further Trinity's interests. When financial activities of any kind require prior approval, that approval must be received before the action is taken. Approval of invoices, expense reports, and purchase orders by managers





# ESG

ENVIRONMENTAL SOCIAL GOVERNANCE

should be made only with the knowledge that expenditures are proper and that amounts shown are correct. No employee may use Company funds for personal debt or expenses.

## Intellectual Property and Confidential Information

Employees may have access to confidential or proprietary information owned by the Company, its clients, or Trinity's other business partners. Such confidential information must not be disclosed to third parties without appropriate approvals and only as permitted by any confidentiality agreement binding Trinity.

Confidential information includes, without limitation:

- ▶ Information the Company marks or treats as confidential
- ▶ Client lists and information
- ▶ Developmental software, software templates, computer programs (whether source or object code and regardless of the compiler or platform used or available for use at a later date), data files, technical applications data, and the contents of all files stored or maintained on the Company's computer network
- ▶ All employees work output and analysis
- ▶ Financial information about Trinity and its billing rates
- ▶ Trinity's business and marketing plans
- ▶ Current and prospective employee-related information, including salaries and information in personnel files
- ▶ Information which falls under the common law or any statutory definition of trade secrets

## Protecting Others

Trinity is committed to delivering high-quality EHS, engineering, and science consulting, software, and professional education to our clients in a manner that balances the Company's commitment to economic growth with critical environmental, social, and governance programs. We have established environmental, social, and governance objectives and support programs that are meaningful to our stakeholders, including our clients, shareholders, and employees. Trinity strives to achieve optimal performance with minimal adverse environmental and societal impacts.

In addition to extensive programs to promote diversity and inclusion, employee engagement and development, and health and safety as described elsewhere in the Code and Trinity's other policies, Trinity partners with its employees to support social and community issues that are consistent with our values and mission, supports environmental protection, and strives to minimize the Company's carbon footprint.

## Protecting the Environment

We believe that environmental protection is an integral part of doing business, and the Company is committed to minimizing, through a continuous improvement process, the impact that some of its activities, products, or services could have on the environment.

In support of its commitment, Trinity will:

- ▶ Exercise due diligence in its approach to meet or exceed the requirements of all applicable legislation
- ▶ Prevent, control, and reduce releases of hazardous substances into the environment
- ▶ Promote and support cost-effective resource and waste minimization initiatives
- ▶ Prefer to deal with business partners who seek to minimize their environmental impacts
- ▶ As appropriate, participate with ruling/governments, businesses, the public, and relevant interest groups to advance environmental protection
- ▶ Report all environment-related incidents and infractions immediately upon discovery via the incident reporting system implemented under Trinity's Health and Safety Management System

## Slavery and Forced Labor, Child Labor

Trinity is committed to upholding human rights. The Company opposes and prohibits all forms of slavery, forced labor, child labor, or any other form of coerced labor in the Company's operations, its supply chain, and by Trinity's business partners. Every employee is responsible for reporting any conduct or practice that may violate this requirement to their manager and to the Human Resources Department.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor, and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Trinity is committed to acting ethically and with integrity in its business dealings and relationships to ensure modern slavery is not taking place in the Company's own business or in its external business activities.

Trinity is also committed to ensuring there is transparency in its business and in the Company's approach to tackling modern slavery throughout its business activities, consistent with disclosure obligations the Company may have under applicable law. Trinity expects the same standards from its contractors, suppliers, and other business partners, specifically prohibiting the use of forced, compulsory, or trafficked labor, or anyone held in slavery or servitude, whether adults or children.

Trinity does not tolerate the exploitation of children. Trinity does not employ persons under the age of 18. The Company expects its suppliers to prevent the exploitation of children in their operations, which means that they will not employ any person under legal age to work (and in any case, not younger than 14) and that any employment of workers under the age of 18 will not interfere with their schooling or vocational education or expose them to risks that can harm physical, mental, or emotional development. Trinity also strongly encourages its suppliers to participate in industry efforts aimed at the elimination of such practices wherever they exist in the supply chain.

## Client Standards

Trinity has established rules of conduct for a wide variety of matters that it believes set high standards of behavior for our employees. Trinity's clients often have established their own rules of conduct, including health and safety plans and requirements and standards of conduct with regard to ethics and other similar matters. To the extent the Company's clients' policies and rules establish a higher standard of conduct than Trinity's policies and rules, employees are expected to follow the policies and rules established by Trinity's clients when providing services to those clients. However, to the extent Trinity's policies and rules require a higher standard of conduct, employees are required to follow Trinity's rules. In the unlikely event that compliance with the higher standard is not possible without violation of the other standard, employees should consult with their manager, the Human Relations Department, the Quality Officer, the Safety Officer, or the Legal Department to determine how to act.







# Privacy and Media

## Data Protection and Privacy

Trinity is committed to protecting all employee and client data with appropriate safeguards and to complying with all applicable data protection laws. Appropriate technical and organizational measures shall be taken against unauthorized disclosure or processing of personal data and against accidental loss or destruction of, or damage to, personal data. To that end, Trinity has established a robust data privacy protection program (“DPPP”) that provides that Trinity and its employees will:

- ▶ Comply with local data privacy regulations
- ▶ Ensure that employees with regular access to personal data in the Company’s systems are aware of the DPPP and comply with Trinity’s DPPP policies
- ▶ Honor individuals’ rights in relation to their personal data
- ▶ Comply with external contacts’ requests to have their data removed from Trinity’s systems and/or to opt out of receiving direct marketing messages from Trinity
- ▶ Be transparent about Trinity’s uses of personal data and use personal data accordingly
- ▶ Ensure appropriate safeguards for all personal data collected and processed by the Company
- ▶ Ensure Trinity’s internal and external systems have appropriate safeguards to protect data privacy
- ▶ Ensure that adequate protection is in place when personal data is transferred internationally
- ▶ Protect the legitimate interests of individuals when decisions are made by automated means (e.g., data collected on internal or external websites)
- ▶ Regularly assess Trinity’s compliance with the DPPP requirements
- ▶ Efficiently address complaints and questions relating to the DPPP
- ▶ Cooperate with authorities and clients for any inquiries related to Trinity’s DPPP
- ▶ Update the DPPP as required when changes of regulations or changes in Trinity operations affect Trinity’s DPPP
- ▶ Act transparently and in good faith if legislation prevents Trinity from fulfilling our obligations under the DPPP

## Use of Trinity’s Technical Resources

Trinity technical resources, including but not limited to email, voicemail, computers, and documents, are the property of the Company. Those resources are provided for the benefit of the Company and its clients and suppliers. They are made available for use in the pursuit of Company business and are to be reviewed, monitored, and used only in that pursuit, except as otherwise provided in the Company’s policies. Trinity’s technical resources should not be used for personal gain or the advancement of individual views. Sending,



saving, or viewing offensive material is prohibited. Employees have no right of privacy as to any information or file maintained in or on the Company's property or transmitted or stored through the Company's computer, voicemail, email, or telephone systems. Subject to compliance with applicable legal requirements, Trinity reserves the right to monitor employees' use of the Company's technical resources at any time.

## Contact with the Media (including Social Media)

When in contact with the media (including the use of social media) where Trinity will be mentioned, employees must:

- ▶ Be clear that they are not acting on Trinity's behalf unless they have been specifically authorized to do so by their manager or it is obvious from the context
- ▶ Notify their manager, or make sure their manager is aware of, any material involvement with the media where their association with Trinity will be mentioned (including, without limitation, developing a website or writing a blog)
- ▶ Not use the Trinity name or logo without explicit written permission from the Company
- ▶ Not share any information that is confidential or proprietary information of Trinity or our clients
- ▶ Speak respectfully about the Company and our current and potential employees, clients, partners, and competitors
- ▶ Honor the privacy rights of our employees, including seeking their permission before writing about or displaying internal company happenings that might be considered to be a breach of their privacy and confidentiality
- ▶ Refer any contacts from the media about the Company (including those regarding its current and potential products/services, employees, partners, clients, and competitors) to the Marketing Department for coordination and guidance

## Where to Go for Help

Employees are responsible for knowing, understanding, and complying with the Code and Trinity's policies. However, employees are not expected to face troublesome ethical or legal questions on their own. The Company has a number of available resources to guide us through difficult situations.

For more clarity on these topics or answers to compliance questions or situations, or when unsure of "the right thing to do," an employee's first course of action should be to talk with their manager. If an employee cannot effectively communicate their

observation or compliance-related matter by speaking with their manager, or does not feel comfortable doing so, they may contact a member of the Human Resources Department, the Legal Department, or senior management.

## Trinity Ethics Hotline

If reporting or addressing issues via the channels listed above is not feasible, compliance-related issues (including this Code, a Trinity policy, or any law) can be reported or addressed by phone or online via the Trinity Quality and Ethics Hotline (the “Trinity Hotline”). An employee may use the Trinity Hotline, either by phone or online, if the employee feels they cannot effectively communicate their observation or compliance-related matter by speaking with their manager or to the Human Resources Department, the Legal Department, or senior management. However, if an employee can go to their manager or the Human Resources Department, they are encouraged to do so, as this is often the most effective way of making concerns known and getting the help needed.

Reports made in good faith on the Trinity Hotline are made without retaliation. To help the Company fully investigate matters accurately and quickly, employees are encouraged to provide the details of their concerns, but they also have the option to remain anonymous. The important matter is to speak up and report any violation of the Code. Details on how to use the Trinity Hotline are set forth below.

## When to Report

Contact the Hotline at any time to speak up about such issues as:

- ▶ Theft, fraud, or any other form of dishonesty
- ▶ Harassment or discrimination
- ▶ Accounting or financial irregularities
- ▶ Workplace safety
- ▶ On-the-job drug or alcohol abuse
- ▶ Disregard of quality procedures/gross negligence in serving clients
- ▶ Violence or threatening behavior
- ▶ Violations of laws, regulations, policies, or procedures
- ▶ Any other issues relating to a violation of this Code or any Trinity policy



## Where to Report

**Online:** [trinityconsultants.ethicspoint.com](http://trinityconsultants.ethicspoint.com)

Phone numbers for different countries are provided online.

# Compliance with the Code

All employees must uphold Trinity’s high standards of ethical and professional conduct. Instilling trust, honesty, and integrity into our work environment is a collective and continuing responsibility. Trinity’s success has always depended on the committed, combined efforts of us all. Protecting and enhancing the Company’s reputation requires no less of a shared commitment.

## Employees’ Responsibilities

We rely on every employee to act with integrity in all situations and support Trinity’s commitment to doing business in an ethical and transparent manner. Your actions should always be ethical and honest, reflect our values, and comply with applicable laws, this Code, and the Company’s policies.

- ▶ Familiarize yourself with the Code and all of Trinity’s policies and procedures that apply to you, your job function, or your site, and follow them in your work for Trinity
- ▶ Complete training(s) required by the Human Resources Department pertinent to this Code and associated policies

- ▶ Perform your job and conduct Trinity's business affairs ethically, legally, and with the utmost integrity
- ▶ Promptly raise concerns about potential violations of law, the Code, or Trinity's policies using any of the reporting channels available to employees
- ▶ Cooperate fully and honestly with any investigation related to ethics or potential violations of the law, this Code, or Trinity's policies
- ▶ If you manage relationships with the Company's business partners, such as subcontractors, agents, or suppliers, make them aware of our Code and let them know we expect them to comply with the ethical standards in this Code
- ▶ Seek advice or help when faced with a difficult ethical situation
- ▶ Report circumstances where employees or Trinity's business partners are not meeting the standards set out in our Code

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*All employees are required to comply with this Code and follow all Company policies. Breaching the Code or violating any Company policy is serious and could result in disciplinary action, up to and including dismissal. Depending on the circumstances, violations may also result in civil or criminal prosecution.*

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## Managers' Responsibilities

In addition to their individual job responsibilities, employees, officers, directors, and managers have a special duty to uphold Trinity's reputation for integrity, honesty, and ethical conduct. This means:

- ▶ Setting an example by complying with the Code and all of Trinity's policies at all times, even when doing so may seem difficult, time-consuming, or inexpedient
- ▶ Ensuring that all employees have access to the Code and all of Trinity's policies and that they know, understand, and comply with stated provisions
- ▶ Ensuring that all employees review this Code annually and comply with the annual review process
- ▶ Creating and maintaining a work environment that encourages ethical behavior
- ▶ Fostering an environment of open communication in which problems may be raised and discussed without fear of reprisal
- ▶ Immediately reporting, to the appropriate person or department, any apparent violation of this Code or breach of Company policy
- ▶ Taking prompt and decisive disciplinary action when it has been proven that the Code has been violated

## Commitment to Improvement

Trinity is committed to learning from its mistakes and continually improving its compliance with this Code and the Company's policies. If there is a violation of this Code or any Trinity policy, those involved should use their best efforts to learn from the failure and to improve performance in the future.

To that end, the Company has adopted improvement procedures for both individuals and groups, up to and including the entire Company. When an individual or a small group of individuals materially violate this Code or any Trinity policy, in lieu of or in addition to potential immediate disciplinary action, the Company has processes for implementing individual performance improvement plans for those involved. If there is a systemic problem with compliance or training, Trinity has procedures for implementing corrective and preventative action procedures to address that systemic problem. Additionally, Trinity conducts various annual and other periodic review processes to determine risks, identify potential opportunities for improvement, recommend corrective actions and alternatives to control risk, and provide proper monitoring approaches or further assessments regarding the issue.





## Legal Matters

It is your responsibility to know the relevant company policies and procedures. If you are in doubt, please contact your manager, the Human Resources, and/or Legal Departments.

## Discipline for Violations

All of us are expected to follow this Code and the Company's policies. In addition, we must follow policies set by individual subsidiaries, departments, or business units, which may modify, supplement, or complement Company-wide policies. Failure to uphold both the letter and the spirit of the Code and these policies may lead to disciplinary action, up to and including dismissal. Depending on the circumstances, it may also result in civil or criminal prosecution.

Disciplinary action may be taken should an employee, for example:

- ▶ Violate this Code or a Company policy or disregard proper procedures
- ▶ Ask others to violate this Code or a Company policy
- ▶ Deliberately fail to promptly report a violation or withhold relevant information concerning a violation
- ▶ Fail to cooperate in the investigation of a known or suspected violation
- ▶ Take action against an employee who reports a policy violation

## No Rights Created

This Code is a statement of the basic principles and key policies and procedures that govern the conduct of the Company's business. It does not and is not intended to create any obligations to, or rights in, any employee, director, client, supplier, competitor, stockholder, or any other person or entity.

Neither this Code, nor any Trinity policy, constitutes a contract of employment or any agreement, promise, or representation of continued employment. All employment at Trinity is "at-will" unless an employee has a written individual employment contract with the Company for a specific, fixed term of employment that expressly provides otherwise, or the employee is, by law, subject to an implied employment contract under the laws of certain countries outside the United States. This Code and Trinity's policies and practices do not create or imply any contractual obligation or intent on the Company's part that termination will occur only for "just cause." Statements here or in other Company documents are not intended to restrict the Company's right to administer "employment at-will" policies where legally permitted.



## **Compliance with Laws**

We intend for this Code and all of the Company's policies to comply with all applicable federal, state/provincial, local, and ruling/governmental laws and regulations worldwide. If this Code or any Company policies do not comply with such laws and regulations, you must follow such laws and regulations and may consider this Code and such policies to be revised to the extent required to comply with the applicable laws and regulations.

## **Investigations of Suspected Violations**

Trinity will investigate all reported violations of this Code and the Company's policies. It is essential that reporting persons not conduct their own preliminary investigations since such investigations may involve complex legal issues. Acting on your own may compromise the integrity of an investigation and adversely affect both you and the Company.

## **Waivers of the Code**

Trinity may waive application of the policies set forth in this Code or in the Company's policies where circumstances warrant granting a waiver. Only Trinity's Executive Officers and Managing Directors may waive any violation of this Code.

## **Annual Monitoring of the Code**

The Code will be reviewed at least annually by the Company's management to ensure it remains accurate and comprehensively represents the interests of our business and employees.

## **Prior Versions, Modifications, Conflicts with Other Policies**

This Code supersedes all prior versions. Trinity may modify, withdraw, or make exceptions to this Code, or any of the Company's policies, procedures, handbooks, or practices, at any time with or without notice. The policies expressed in this Code are subject, in all cases, to the Company's formal policies and procedures, whether referenced herein or not.

# Appendix A - List of Policies

The following list does not contain all policies that may be applicable in a given situation, but refers to key policies in each area. When in doubt, please confirm with your manager, the Human Resources Department, the Legal Department, or senior management. Individual policies are available in the Human Resources library on the Company's SharePoint site ([Employee Policy Descriptions](#)) or other SharePoint sites.

- 1) WORKPLACE BEHAVIOR
  - i) Equal Opportunity, Diversity, and the Prohibition of Discrimination
    - (a) Equal Employment Opportunity and Affirmative Action
    - (b) Harassment Policy
    - (c) Code of Conduct
    - (d) Diversity and Inclusion Committee Charter
  - ii) No Harassment
    - (a) Harassment Policy
    - (b) Workplace Violence Policy
    - (c) Weapons in the Workplace Policy
    - (d) Code of Conduct
  - iii) Anti-Retaliation Policy
    - (a) Harassment Policy
    - (b) Anti-Bribery and Anti-Corruption Policy
  - iv) Prohibition on Workplace Violence
    - (a) Workplace Violence Policy
    - (b) Weapons in the Workplace Policy
    - (c) Code of Conduct
  - v) Commitment to Health and Safety
    - (a) Health, Safety, and Environmental Manual
    - (b) Safety and Injury Management Policy
    - (c) Drug-Free Workplace Policy
- 2) FOLLOWING LAWS AND REGULATIONS
  - i) Political Activity and Dealing with Ruling/Governmental Entities
    - (a) Conflict of Interest Policy
    - (b) Anti-Bribery and Anti-Corruption Policy
  - ii) Anti-Bribery and Anti-Corruption
    - (a) Anti-Bribery and Anti-Corruption Policy
    - (b) Conflict of Interest Policy
    - (c) Code of Conduct
  - iii) Global Trade Compliance: Anti-Boycott and Trade Sanctions
    - (a) U.S. Export Control Compliance Policy
- 3) CONFLICTS OF INTEREST
  - (a) Conflict of Interest Policy
  - (b) Code of Conduct
- 4) PROTECTING COMPANY ASSETS
  - i) Accounting Information and Records Management
    - (a) Company Expenditures Policy
    - (b) Record Retention Policy
    - (c) Code of Conduct
  - ii) Expenditure of Company Funds
    - (a) Company Expenditures Policy
    - (b) Code of Conduct
  - iii) Intellectual Property and Confidential Information
    - (a) Confidential Information and Non-Disclosure/Trade Secrets Agreement
- 5) PROTECTING OTHERS
  - i) Protecting the Environment
    - (a) Environmental Sustainability Plan
    - (b) Sustainable Procurement Plan
  - ii) Slavery and Forced Labor; Child Labor
    - (a) Labor and Human Rights Policy
    - (b) Code of Conduct
- 6) CLIENT STANDARDS
  - i) Services and Work Products:
    - (a) Quality Policy and Quality Management System (ISO 9001 certified for Trinity Headquarters Office in Dallas, Texas and other offices in Australia, China, Ireland, United Kingdom)
  - ii) Client Required Health and Safety Standards
    - (a) HSE Policy and Manual for Projects
    - (b) Procedures for Safety Requirements
- 7) PRIVACY AND MEDIA
  - i) Data Protection and Privacy
    - (a) Personal Data Protection Program
    - (b) Trinity Commitment to DPPP
    - (c) Conflict of Interest Policy
  - ii) Use of Trinity's Technical Resources
    - (a) Social Media Policy
    - (b) Technology Policy
    - (c) Code of Conduct
  - iii) Contact with the Media (including Social Media)
    - (a) Social Media Policy
    - (b) Trade Secret Agreement



