

Trinity Consultants, Inc. (including its subsidiaries and affiliates, “Trinity” or the “Company”) is committed to conducting business in an ethical, legal, sustainable, and socially responsible manner. We expect all suppliers, subcontractors, consultants, and other vendors (“Suppliers”) to meet these same standards as a condition of doing business with Trinity.

This Supplier Code of Business Conduct (the “Code”) sets out Trinity’s minimum expectations for Suppliers and, where applicable, their employees, agents, and subcontractors providing goods or services to Trinity. Suppliers are expected to maintain appropriate policies, training, and controls to comply with this Code and applicable law.

**Supplier requirements.** Suppliers must comply with the requirements below (and are encouraged to exceed them). If local law and this Code address the same topic, Suppliers should follow the higher standard. If local law conflicts with this Code, Suppliers must follow local law and promptly notify Trinity of the conflict.

## 1. Legal Compliance & Ethical Business Conduct

- Comply with all applicable laws, rules, and regulations, including those related to labor, health and safety, environmental protection, competition/antitrust, anti-corruption, and personal data protection.
- Conduct business with honesty, integrity, and fairness; do not engage in fraud, misrepresentation, or unfair or deceptive practices.
- Do not offer, promise, authorize, give, request, or accept bribes, kickbacks, facilitation payments, or anything of value intended to improperly influence a business decision (including interactions with government officials).
- Gifts, meals, travel, entertainment, or favors must be modest, infrequent, lawful, and never intended (or perceived) to influence decisions; cash or cash equivalents are prohibited.
- Avoid conflicts of interest. Disclose any actual or potential conflict related to Trinity business (including family, financial, or other close relationships with Trinity Associates).
- Compete fairly and comply with competition/antitrust laws; do not engage in bid rigging, price fixing, market allocation, or improper information exchanges with competitors.
- Maintain accurate books and records related to work performed for Trinity; do not create false, misleading, or incomplete records.

## 2. Human Rights & Labor Practices

- Prohibit forced, bonded, indentured, or involuntary prison labor, modern slavery, and human trafficking. Work must be voluntary, and workers must be free to leave employment with reasonable notice.
- Do not retain or destroy workers’ identity papers (e.g., passports), charge recruitment fees that are prohibited by law, or use deceptive recruitment practices.
- Comply with child labor laws. Do not employ workers below the legal minimum working age. Young workers (where legally permitted) must not perform hazardous work or work hours that interfere with schooling.
- Provide wages, benefits, and working hours that meet or exceed legal requirements, including overtime pay, rest periods, and paid leave where required.
- Provide a workplace free from harassment, abuse, inhumane treatment, and unlawful discrimination; treat all workers with dignity and respect.
- Respect lawful rights to freedom of association, collective bargaining, and peaceful assembly, consistent with applicable law.

### **3. Health & Safety**

- Provide a safe and healthy workplace and comply with applicable occupational health and safety laws and standards.
- Identify hazards, assess risks, and implement appropriate controls (including training, safe work procedures, and personal protective equipment where needed).
- Maintain emergency preparedness and response plans appropriate to the Supplier's operations (e.g., fire safety, evacuation procedures, incident response).
- Promptly report serious incidents that could impact Trinity work or reputation (including fatalities, major injuries, significant releases, or material regulatory actions) and cooperate in investigations and corrective actions.

### **4. Environmental Responsibility & Sustainability**

- Comply with applicable environmental laws and permits, including requirements related to air emissions, wastewater, waste disposal, and hazardous materials management.
- Work to prevent pollution and reduce environmental impacts through appropriate controls, maintenance, and incident prevention.
- Seek continuous improvement in resource efficiency (e.g., energy, water, materials) and, where relevant, track and reduce greenhouse gas emissions associated with operations supporting Trinity.
- Manage waste responsibly, including segregation, recycling where feasible, and lawful handling and disposal of hazardous waste.

### **5. Confidentiality, Data Privacy & Information Security**

- Protect Trinity's (and Trinity clients') confidential and proprietary information. Use it only for the purpose it was provided and do not disclose it to third parties without authorization.
- Respect intellectual property rights and confidential business information. Do not use or share third-party confidential information in a way that violates legal or contractual obligations.
- Comply with applicable personal data protection and privacy laws. Where Suppliers process personal data for Trinity, they must implement appropriate administrative, technical, and physical safeguards.
- Promptly notify Trinity of any actual or suspected security incident or data breach that could affect Trinity or Trinity clients, and cooperate with containment, investigation, and remediation.

### **6. Authorized Engagement, Invoicing & Records**

- Engage with Trinity on commercial matters only through authorized Trinity personnel. Begin work only upon receipt of an appropriate written authorization (e.g., order, subcontract, statement of work, or comparable written confirmation).
- Invoices submitted to Trinity must accurately describe goods/services provided and reference the applicable order or subcontract number (or, if none, include sufficient details to substantiate the transaction, including the Trinity requestor/initiator where appropriate).
- Maintain records to support invoicing and performance of work for Trinity and retain them consistent with applicable law and contract requirements.

### **7. Subcontractors & Supply Chain Responsibility**

- Suppliers are responsible for ensuring that subcontractors and sub-tier suppliers supporting Trinity meet standards consistent with this Code.

- Suppliers should conduct reasonable due diligence and monitoring appropriate to their risk profile and the goods/services provided.

## **8. Reporting Concerns & Non-Retaliation**

- Promptly report suspected or actual violations of this Code related to work performed for Trinity, including bribery/corruption, conflicts of interest, unsafe conditions, significant environmental incidents, or misuse of confidential information.
- Cooperate with Trinity in reviewing concerns, investigations, and corrective actions.
- Suppliers must not retaliate against any person who, in good faith, raises a concern, reports misconduct, or participates in an investigation.

## **Compliance**

Trinity reserves the right, in its sole discretion, to assess adherence to this Code. Suppliers are expected to maintain records that reasonably demonstrate compliance and, upon request, provide access to relevant information and documentation (subject to applicable law and legitimate confidentiality obligations). If non-compliance is identified, Suppliers are expected to promptly implement corrective actions. Trinity may suspend or terminate the business relationship for failure to cooperate or to remediate issues in a timely manner.