



Code of Business Conduct



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MESSAGE FROM THE CEO

At Trifast we are committed to conduct our business in a fair and ethical manner and comply with all relevant laws and regulations.

I would ask that all of our employees, wherever they are, take the time to read and understand this Code of Business Conduct. The Code contains our Purpose, Vision and Mission, our Culture Pillars and Values, together with policies ensuring ethical business practice.

We also recognise that our business activities can have an impact on the communities in which we operate and we remain committed to act responsibly with those communities.

As a global business we bring together people from a variety of backgrounds, origins, experiences and cultures. It is our responsibility to respect and value others and maintain high ethical standards.

Our reputation is critical to our success and I therefore ask that all employees adhere to our Corporate Values and follow this Code. I would also ask that a responsible business approach is fulfilled throughout our supply chain. We expect our customers, suppliers, distributors and contractors all around the globe to observe all relevant laws and regulations as well as the conditions of our Code of Business Conduct.

Iain Percival
Chief Executive Officer
Trifast plc



COMPANY OVERVIEW

TR Fastenings (TR) is part of Trifast plc and is a leading international specialist in the design, engineering, manufacture, and distribution of high-quality industrial fastenings and Category 'C' components principally to major global assembly industries.

The Group supplies to customers in c.70 countries across a wide range of industries, including light vehicle, heavy vehicle, health & home, energy, tech & infrastructure (ET&I), general industrial and distributors. As a full service provider to multinational OEMs and Tier 1 companies spanning several sectors, we deliver comprehensive support to our customers across every requirement, from concept design through to technical engineering consultancy, manufacturing, supply management and global logistics.

As an international business we are able to provide 24/7 customer support from across key regions in the UK, Asia, Europe and North America. In addition to our service locations we operate a number of manufacturing facilities focused on high volume cold forged fasteners and special parts. We have also established technical & innovation centres to support R&D and customer collaboration across the world.

UK

Trifast plc & Group Services head office – Uckfield

Belfast
Birmingham
East Grinstead
East Kilbride
Lancaster
Manchester
Newton Aycliffe

Europe

Germany – Verl
Holland – Oldenzaal
Hungary – Szigetszentmiklos
Ireland – Mallow
Italy – Fossato di Vico
Norway – Skytta
Poland – Warsaw
Spain – Barcelona
Sweden – Nacka, Tidaholm & Gothenburg

Asia

TR Asia headquarters – Singapore
China – Shanghai & Beijing
India – Bangalore, Chennai & Pune
Malaysia – Kuala Lumpur
Philippines – Manila
Taiwan – Kaohsiung
Thailand – Bangkok

North America

Charlotte
Greenville
Houston
Louisville

OUR PURPOSE, VISION AND MISSION

OUR PURPOSE

To provide Trusted Reliability at every turn to our customers, suppliers and our people, empowering them to deliver sustainable products and solutions that add value to society and our planet.

OUR VISION

Securing a sustainable future

Supporting a sustainable economy using our technical expertise to empower customers, suppliers and our people to innovate sustainable solutions that will improve the environment and people's lives.

OUR MISSION

- To promote an environment that is safe and fair, which motivates, develops and maximises the contribution and potential of all employees
- To be acknowledged commercially as the market leader in industrial fastenings in terms of service, quality, design, engineering support, ESG (environmental, social and governance), together with brand reputation
- To continue to grow profitability, improve stakeholder returns through organic and acquisitive growth, and by driving continual efficiencies throughout the organisation



part of the Trifast plc Group

OUR CULTURE PILLARS



Being inclusive but pragmatic and empowering



A 'Can Do' attitude, working in an agile manner to deliver practical results



Engaging with employees regularly and meaningfully



Providing development opportunities



Listening



Working together as a professional global team



Communicating openly, positively and regularly



Investing in the future - people/product/property



Saying thank you, being thoughtful and kind to each other



Celebrating success

OUR VALUES



Trusted

The organisation and its employees need to trust each other – colleagues need to trust each other – the organisation needs to instil trust in its stakeholders



Reliable

We do what we say we will do when we say we will do it – both inside and outside of our organisation



Inclusive

We work together as a team and respect each other



Fair

We are thoughtful of every individual and consistent in how we interact



Ethical

We are mindful of our impact on others and the environment and demonstrate integrity in all our actions



Excellent

We add value and quality to everything we do for our customers and other stakeholders





INTRODUCTION TO THE CODE

This Code is a summary of the principles and standards of business conduct that we expect from our employees. In addition the Company has a [Business Ethics and Responsible Behaviour Policy](#) which should also be referred to.

The Code should be read by all employees and should be used as the basis for dealing with colleagues, customers, suppliers, contractors and other stakeholders. When appropriate this Code can be provided to outside organisations to ask that they comply with our standards and principles.

Trifast is committed to complying with the laws and regulations of all the countries in which we operate, and each employee is responsible for understanding and following the applicable laws.

EMPLOYEES HAVE A RESPONSIBILITY TO:

- Conduct business fairly, honestly and with respect and integrity
- Prevent compliance violations and protect the Company's reputation by acting in an ethical manner
- Commit to eradicating unethical business practices including bribery, fraud, corruption and human rights abuses, such as slavery and human trafficking and child labour
- Continually enhance knowledge and compliance with laws, regulations and policies applicable under the Code and in the locations where we operate
- Actively support and promote our Environmental, Social and Governance principles and sustainability Initiatives
- Report any violations or potential violations of the Code without fear of retaliation



COMPLIANCE WITH LAWS AND REGULATIONS

As an international company with relationships in many countries around the world, Trifast is committed to maintaining high standards of business conduct.

We expect our employees to conduct our business in an ethical manner and within applicable laws, rules and regulations. You must respect and abide by the laws of the cities, states and countries in which we operate. Failure to abide by the laws can result in substantial fines, imprisonment and restrictions on the Company's ability to carry out its business.

EXPORT CONTROLS AND TRADE SANCTIONS

Trifast complies with laws and regulations concerning embargoes and sanctions and does not conduct transactions with individuals, entities or countries that are subject of restricted party or embargoed country lists (also known as interdiction lists).

Our suppliers should also ensure they conduct their business in compliance with all lawful international sanctions regimes, and that they do not engage with any sanctioned parties. As such, suppliers must:

- Be aware of, and fully comply with, all lawful sanctions regimes affecting their business; and
- Carry out regular checks on their business partners to ensure that they are not designated, blocked or otherwise targeted by applicable economic or trade sanctions in order to avoid doing business with sanctioned parties

For further information see [Our Sanctions Policy](#)

Trifast will ensure that all of its employees work in compliance with all applicable laws and industry standards with regard to working hours, rest breaks, holidays and statutory leave.

CHILD LABOUR

Trifast prohibits the use of child labour and all minimum age regulations in all of the countries in which we operate. This will be strictly observed.

FORCED LABOUR

Trifast will only employ workers who are legally authorised to work within their operations. All work is voluntary and all employees are free to leave work or terminate their employment upon reasonable notice.

For further information please see:

[Working Conditions and Human Rights Policy](#)

[Freedom of Association Policy](#)

INTEGRITY

Trifast plc does not tolerate any form of bribery.

Anyone associated with the Company must not offer, give or receive bribes or any form of corrupt payments.

All of Trifast's operating Companies are expected to understand the rules within their own jurisdiction.

They are also expected to abide by the Company's [Anti-Bribery Policy](#) and to complete an annual declaration to confirm that no such activity takes place within their location.

For further information please see:

[The Companies Charitable and Political Donations policy](#)

[Fair competition and Antitrust Policy](#)



SLAVERY AND HUMAN TRAFFICKING

Trifast plc is committed to eradicating all forms of slavery or human trafficking. We aim to eliminate the risk of modern slavery within our supply chain and to trade both ethically and with integrity.

Our continuing approach to preventing slavery and trafficking activities within the supply chain is through supplier engagement and oversight, conducting risk-based audits and working collaboratively with suppliers to raise awareness and ensure compliance.

It is now mandatory for all new employees to complete our eLearning modern slavery training as part of their induction. This training explains how to assess the risk of slavery and human trafficking, how employees can identify the signs of slavery and human trafficking and what to do if this activity is suspected.

Trifast's slavery and human trafficking statement is reviewed annually and published on our website.

[Slavery and human trafficking statement](#)



ENVIRONMENT

Trifast is committed to good environmental management across our operations and supply chain, and in the way we design products. Employees and business partners are expected to comply with all requirements and to report any incidents or conditions that might result in a violation of a law or Company policy.

All employees have a personal and collective responsibility to use resources efficiently and to minimise the impact of our operations on the environment. All employees should be aware of and understand the Company's [Environmental Policy](#).

On a monthly basis we compile the Group Carbon Footprint data, based on energy, fuel and fleet usage. This data allows us to effectively manage and reduce our emissions, and in turn reduce our environmental impact.

The Company complies with and is certified to ISO 14001.

Trifast is committed to providing innovative products, compliant with all applicable environmental legislation, we work closely with our customers and supply chain to determine requirements, and conduct due diligence.






HEALTH AND SAFETY


The Company is committed to providing a safe and healthy working environment.

The well being of employees is paramount. This includes not only their physical health but also their mental health. We operate an effective health and safety management system across our operations, with a focus on risk management and prevention. We manage health and safety issues alongside environmental issues within an integrated environment, health and safety (EHS) system.

Every employee has responsibility for maintaining a safe and healthy workplace for all employees by following health and safety rules and practices and reporting accidents, injuries and unsafe equipment, practices or conditions as stated in the Company's [Health and Safety Policy](#).



For further information email hr@trifast.com



DIVERSITY, EQUAL OPPORTUNITIES AND RESPECT

In accordance with our Equal Opportunities Policy the Company is committed to providing and maintaining a working environment that is fair, tolerant and respectful.

These values help to create a strong, diverse team all working together in a mutually beneficial environment.

The Company is firmly committed to providing equal opportunities in all aspects of employment and will not tolerate any discrimination or harassment of any kind, as stated in the [Harassment Policy](#), the [Equal Pay Policy](#) and the [Dignity at Work Policy](#).



REPORTING CONCERNS

Employees have an obligation to report any potential or suspected violation of this Code.

The Code cannot cover every situation that may occur but there are a number of ways that you can seek advice and support including:

- Your manager
- An alternative manager
- The Human Resources Department
- The Whistleblowing Service - Safecall

The Company does not tolerate any sort of retaliation against any employee who reports a complaint in good faith.

The Company's [Whistleblowing Policy](#) should be referred to in order to understand the procedures and processes that are available. Each of our sites has details of the relevant method to contact Safecall. The service is fully confidential and information can be reported anonymously.



For further information email hr@trifast.com



APPENDIX A

POLICIES

ANTI-BRIBERY POLICY

INTRODUCTION

The Company is committed to the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. This policy outlines the Company's position on preventing and prohibiting bribery, in accordance with the Bribery Act 2010. The Company will not tolerate any form of bribery by, or of, its employees, agents or consultants or any person or body acting on its behalf. Senior management is committed to implementing effective measures to prevent, monitor and eliminate bribery.

SCOPE OF THIS POLICY

The policy applies to all employees and officers of the Company, and to temporary workers, consultants, contractors, agents and subsidiaries acting for, or on behalf of, the Company ('associated persons') within the UK and overseas. Every employee and associated person acting for, or on behalf of the Company is responsible for maintaining the highest standards of business conduct. Any breach of this policy is likely to constitute a serious disciplinary, contractual and criminal matter for the individual concerned and may cause serious damage to the reputation and standing of the Company.

The Company may also face criminal liability for unlawful actions taken by its employees or associated persons under the Bribery Act 2010. All employees and associated persons are required to familiarise themselves and comply with this policy, including any future updates that may be issued from time to time by the Company.

- The Bribery Act is in force from 1 July 2010. This policy covers:
- The main areas of liability under the Bribery Act 2010
- The responsibilities of employees and associated persons acting for, or on behalf of the Company
- The consequences of any breaches of this policy

BRIBERY ACT 2010

Under the Bribery Act 2010, a bribe is a financial or other type of advantage that is offered or requested with the:

- Intention of inducing or rewarding improper performance of a function or activity
- Knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity

A relevant function or activity includes public, state or business activities or any activity performed in the course of a person's employment, or on behalf of another company or individual, where the person performing that activity is expected to perform it in good faith, impartially, or in accordance with a position of trust.

A criminal offence will be committed under the Bribery Act 2010 if:

- An employee or associated person acting for, or on behalf of, the Company, offers, promises, gives, requests, receives or agrees to receive bribes
- An employee or associated person acting for, or on behalf of, the Company offers, promises or gives a bribe to a foreign public official with the intention of influencing that official in the performance of his/her duties (where local law does not permit or require such influence)
- The Company does not have the defence that it has adequate procedures in place to prevent bribery by its employees or associated persons All employees and associated persons are required to comply with this policy, in accordance with the Bribery Act 2010

ANTI-BRIBERY POLICY

WHAT IS PROHIBITED

The Company prohibits employees or associated persons from offering, promising, giving, soliciting or accepting any bribe. The bribe might be cash, a gift or other inducement to, or from, any person or company, whether a public or government official, official of a state-controlled industry, political party or a private person or company, regardless of whether the employee or associated person is situated in the UK or overseas. The bribe might be made to ensure that a person or company improperly performs duties or functions to gain any commercial, contractual or regulatory advantage for the Company in either obtaining or maintaining Company business, or to gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

This prohibition also applies to indirect contributions, payments or gifts made in any manner as an inducement or reward for improper performance, for example, through consultants, contractors or sub-contractors, agents or sub-agents, sponsors or sub-sponsors, joint-venture partners, advisors, customers, suppliers or third parties.

RECORDS

Employees and, where applicable, associated persons, are required to take particular care to ensure that all company records are accurately maintained in relation to any contracts or business activities, including financial invoices and all payment transactions with clients, suppliers and public officials.

Due diligence should be undertaken by employees and associated persons prior to entering into any contract, arrangement or relationship with a potential supplier of services, agent, consultant or representative.

Employees and associated persons are required to keep accurate, detailed and up-to-date records of all corporate hospitality, entertainment or gifts accepted or offered.

WORKING OVERSEAS

Employees and associated persons owe a duty to the Company to be extra vigilant when conducting international business.

PROCEDURE

Employees and associated persons are required to cooperate with the Company's risk management procedures and to report suspicions of bribery to a Company Director. While any suspicious circumstances should be reported, employees and associated persons are required particularly to report:

- Close family, personal or business ties that a prospective agent, representative or joint-venture partner may have with government or corporate officials, directors or employees
- A history of corruption in the country in which the business is being undertaken
- Requests for cash payments
- Requests for unusual payment arrangements, for example, through a third party
- Requests for reimbursements of unsubstantiated or unusual expenses
- A lack of standard invoices and proper financial practices

If an employee or associated person is in any doubt as to whether or not a potential act constitutes bribery, the matter should be referred to a Company Director.

ANTI-BRIBERY POLICY

FACILITATION PAYMENTS

The Company prohibits its employees or associated persons from making or accepting any facilitation payments. These are payments made to government officials for carrying out or speeding up routine procedures. They are more common overseas. Facilitation payments are distinct from an official, publicly available fast-track process. Facilitation payments, or offers of such payments, will constitute a criminal offence by both the individual concerned and the Company under the Bribery Act 2010, even where such payments are made or requested overseas. Employees and associated persons are required to act with greater vigilance when dealing with government procedures overseas.

PROCEDURE

Where a public official has requested payment, employees or associated persons should ask for further details of the purpose and nature of the payment in writing. If the public official refuses to give these, this should be reported immediately to a Company Director.

If the public official provides written details, a Company Director will consider the nature of the payment. Local legal advice may be sought by the Company.

If it is concluded that the payment is a legitimate fee or is permitted locally, the Company will authorise the employee to make the payment.

Where the Company Director considers that the request is for a facilitation payment, the employee or associated person will be instructed to refuse to make the payment and notify the public official that the employee or associated person is required to report the matter to the Company and the UK embassy.

The Company will seek the assistance of the relevant employee in its investigation and may determine that the matter should be referred to the prosecution authorities.

If an employee or associated person has any other concerns about the nature of a request for payment, he/she should report it to a Company Director using the reporting procedure set out in this policy, and in accordance with the Company's whistle-blowing policy.

Corporate Entertainment, Gifts, Hospitality and Promotional Expenditure

The Company permits corporate entertainment, gifts, hospitality and promotional expenditure that is undertaken:

For the purpose of establishing or maintaining good business relationships

- To improve the image and reputation of the Company
- To present the Company's services effectively
- Provided that it is:
- Arranged in good faith
- Not offered, promised or accepted to secure an advantage for the Company or any of its employees or associated persons or to influence the impartiality of the recipient

The Company will authorise only reasonable, appropriate and proportionate entertainment and promotional expenditure. This principle applies to employees and associated persons, whether based in the UK or overseas.

ANTI-BRIBERY POLICY

PROCEDURE

Employees and, where relevant, associated persons should submit requests for proposed hospitality and promotional expenditure well in advance of proposed dates to a Company Director.

Employees are required to set out in writing:

- The objective of the proposed client entertainment or expenditure
- The identity of those who will be attending
- The organisation that they represent
- Details and rationale of the proposed activity

The Company will approve business entertainment proposals only if they demonstrate a clear business objective and are appropriate for the nature of the business relationship. The Company will not approve business entertainment where it considers that a conflict of interest may arise or where it could be perceived that undue influence or a particular business benefit was being sought.

Any gifts, rewards or entertainment received or offered from clients, public officials, suppliers or other business contacts should be reported immediately to a Company Director. In certain circumstances, it may not be appropriate to retain such gifts or be provided with the entertainment and employees and associated persons may be asked to return the gifts to the sender or refuse the entertainment, for example, where there could be a real or perceived conflict of interest. As a general rule, small tokens of appreciation, such as flowers or a bottle of wine, may be retained by employees.

If an employee or associated person wishes to provide gifts to suppliers, clients or other business contacts, prior written approval from a Company Director is required, together with details of the intended recipients, reasons for the gift and business objective.

Employees and, where applicable, associated persons must supply records and receipts, in accordance with the Company's expenses policy.

CHARITABLE AND POLITICAL DONATIONS

The Company considers that charitable giving can form part of its wider commitment and responsibility to the community. The Company supports a number of charities that are selected in accordance with objective criteria, following a risk assessment. The Company may also support fundraising events involving employees.

RISK MANAGEMENT

The Company has established detailed risk management procedures to prevent, detect and prohibit bribery. The Company will conduct risk assessments for each of its key business activities on a regular basis and, where relevant, will identify employees or officers of the Company who are in positions where they may be exposed to bribery.



ANTI-BRIBERY POLICY

PROCEDURE

The Company will identify high-risk areas, for example projects undertaken in high-risk countries, tenders for work and those working on high-value projects.

The Company will:

- Regularly monitor 'at risk' employees and associated persons
- Regularly communicate with 'at risk' employees and associated persons
- Undertake extensive due diligence of third parties and associated persons
- Communicate its zero-tolerance approach to bribery to third parties, including actual and prospective customers, suppliers and joint-venture partners

REPORTING SUSPECTED BRIBERY

The Company depends on its employees and associated persons to ensure that the highest standards of ethical conduct are maintained in all its business dealings. Employees and associated persons are requested to assist the Company and to remain vigilant in preventing, detecting and reporting bribery.

Employees and associated persons are encouraged to report any concerns that they may have to a Director as soon as possible. Issues that should be reported include:

- Any suspected or actual attempts at bribery
- Concerns that the other employees or associated persons may be being bribed
- Concerns that other employees or associated persons may be bribing third parties, such as clients or government officials

Employees or associated persons who report instances of bribery in good faith will be supported by the Company. The Company will ensure that the individual is not subjected to detrimental treatment as a consequence of his/her report. Any instances of detrimental treatment by a fellow employee because an employee has made a report will be treated as a disciplinary offence. An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, employees and associated persons should not agree to remain silent. They should report the matter to a Director.

ACTION BY THE COMPANY

The Company will fully investigate any instances of alleged or suspected bribery. Employees suspected of bribery may be suspended from their duties while the investigation is being carried out. The Company will invoke its disciplinary procedures where any employee is suspected of bribery, and proven allegations may result in a finding of gross misconduct and immediate dismissal. The Company may terminate the contracts of any associated persons, including consultants or other workers who act for, or on behalf of, the Company who are found to have breached this policy.



ANTI-BRIBERY POLICY

The Company may also report any matter to the relevant authorities, including the Director of Public Prosecutions, Serious Fraud Office, Revenue and Customs Prosecutions Office and the Police. The Company will provide all necessary assistance to the relevant authorities in any subsequent prosecution.

The Company reserves the right to amend and update this policy as required.



Revision Level	Date	Change Summary
0	08.01.2021	Initial release of policy with rev details (Previously stored in HR Handbook)
1	18.07.2022	Full review of policy



BUSINESS ETHICS AND RESPONSIBLE BEHAVIOUR POLICY

Trifast plc, ('the Company'), is a business founded on mutual trust and confidence. These attributes have to be earned and sustained over a long period by the successive generation of people who work in the business and can be lost overnight by irresponsible or unethical behaviour. The purpose of this code is to set out in some detail the principles, which must be observed throughout the Company. They fall under three general principles – integrity, loyalty and self-respect – basic qualities that we expect from every employee from the Board to the newest employee. They also include certain corporate values to which we subscribe and which must govern our business ethics. We all must take responsibility to ensure that these behaviours and ethics are upheld, deliberate failure to do so may result in disciplinary action and the result of which, in serious circumstances, may lead to the dismissal of an employee. It is therefore important that everybody reads and understands this Policy.

INTEGRITY

Integrity implies being fully worthy of the trust placed in us by our customers, suppliers and employer by being honest, impartial and truthful. This means:

- Acting at all times in an honest and upright manner both in our corporate and personal dealings, recognising that our personal conduct may reflect on the Company
- Scrupulously refraining from illegal, fraudulent, dishonest or unethical behaviour, particularly in relation to business dealings
- Never using confidential information for personal gain or abusing the trust placed in us by the Company
- Avoiding conflict between self-interest and the interest of the employer, and being ready and willing to disclose any potentially compromising or conflicting business relationships or shareholding
- Where husbands, wives, partners or other relatives are employed in the same or related areas; never allowing personal and/or domestic circumstances to impinge upon or affect either working relationships or the breaching of the Company's employment regulations regarding confidentiality and fidelity
- Avoiding gifts, services or hospitality on a scale, which could be interpreted as affecting integrity or the ability to exercise independent judgement. Further information can be found in the anti-bribery policy

FIDELITY

Fidelity embraces duties of loyalty, confidentiality and citizenship in relation to the affairs of our Company. This means:

- Promoting the good standing and name of the Company and defending it against unwarranted criticism
- Ensuring that any undertakings given are within our personal capacity and fully honoured
- Safeguarding information in relation to the Company's affairs and restricting access to any confidential or sensitive documents
- Taking care over our communications – oral, written or electronic – to prevent others acquiring confidential information
- Not knowingly engaging in business that might in any way be associated with, or regarded as supportive of, illegal or criminal activities, construed as bribery or corruption or, which would be contrary to the national interest of respective countries

BUSINESS ETHICS AND RESPONSIBLE BEHAVIOUR POLICY

- To not knowingly deal with companies that do not adhere to international human rights and environmental laws and practices. This also refers to the Company's slavery and human trafficking statement published in this Handbook and also on the Company's website

SELF-RESPECT

Self-respect is enhanced by professionalism, good citizenship and conscientiousness. This means:

- Acquiring the necessary skills, knowledge and experience to conduct business dealings or tasks in a professional manner and keeping abreast of current developments
- Acting with the utmost courtesy at all times
- Seeking help and advice from colleagues where difficulties arise in matters of professional judgement or conduct and adopting an approach of openness and teamwork
- Maintaining your dignity and promoting that of fellow employees, by not bullying or victimising colleagues for any reason and by promoting equal opportunities

CORPORATE VALUES (IN RELATION TO PERSONAL CONDUCT)

- **Trusted** - the organisation and its employees need to trust each other - colleagues need to trust each other - the organisation needs to instil trust in its stakeholders
- **Reliable** - we do what we say we will do when we say we will do it - both inside and outside of our organisation
- **Inclusive** - we work together as a team and respect each other
- **Fair** - we are thoughtful of every individual and consistent in how we interact
- **Ethical** - we are mindful of our impact on others and the environment and demonstrate integrity in all our values
- **Excellent** - we add value and quality to everything we do for our customers and other stakeholders

Revision Level	Date	Change Summary
0	08.01.2021	Initial release with rev details (previously part of HR handbook)
1	18.07.2022	Policy reviewed



CHARITABLE AND POLITICAL DONATIONS POLICY

INTRODUCTION

The Company runs its business with integrity. All employees must work together to ensure our businesses remain untainted by bribery and corruption. This policy is integral to that effort and all employees are bound by it.

Trifast takes pride in its support of charities and good causes and is committed to conduct itself with the highest standards of probity in continuing to offer such support.

This policy covers political and charitable donations made by the Company or on its behalf. This is to ensure that any legitimate contribution is recorded and does not improperly affect this organisation.

CHARITABLE DONATIONS

A charitable donation is a gift made by an individual or Company to a non-profit organisation or charity.

A charity means anybody of persons or trust established for charitable purposes only.

Charitable donations are commonly in the form of cash or other assets.

Bribes may be disguised as charitable donations. For that reason, any donations Trifast makes requires prior approval.

While individuals may of course make personal donations to charity, they must not do so on behalf of the organisation without prior approval.

POLITICAL DONATIONS

Political donations are contributions made to a politician, a political campaign or a political party.

All employees should be aware that such contributions can be seen as bribes in disguise.

We do not make donations to political parties.

No individual is to make a donation stated to be, or which could be taken to be, on behalf of Trifast.

Individuals may, of course, make political donations in a personal capacity, but employees need to be sensitive to how such contributions could be perceived, especially by those who are aware of a connection with our Company.

PERSONAL POLITICAL DONATIONS

This policy is not intended to interfere with an employee's individual personal political donations.

Employees may make personal political donations and be involved in political activity in their own time.

However, employees must not make personal political donations where:

- They could be connected, or be seen to be connected, with a decision by a public sector body in relation to Trifast's business
- They could be mistaken to be for the activities of Trifast
- Company time, property or equipment is needed to carry out or support personal political activities

Trifast is completely independent of any personal political donations and will never pay, reimburse or organise these types of donation.

Employees must always make clear that their views and actions are their own and not those of Trifast.

CHARITABLE AND POLITICAL DONATIONS POLICY

APPROVAL PROCEDURE

Trifast forbids any employee directly or indirectly from making an offer of, or making a donation to, any charitable, non-profit or political organisation in the course of their employment as a way to obtain an advantage in a business transaction or other business matter.

Trifast may exercise its discretion to permit charitable donations through this approval process.

To seek approval, employees must submit their request to an OEB Director.

Trifast will undertake an initial screening exercise on all approval requests. This will include considering:

- The intention behind the donation
- The perception
- The legal and regulatory environment

Should any concern emerge from the initial screening, or should the proposed donation be a 'major donation', we will carry out a more detail and thorough due diligence process before deciding whether or not to approve the donation request.

As with all due diligence, the level of enquiry depends on the circumstances, and will be reasonable and proportionate.

Trifast will record on a central register details of all charitable donations made.

DUE DILIGENCE

Trifast will conduct due diligence on requests for approval of 'major donations' (over £1,000 or equivalent) or those that raise concerns during the initial screening process to:

- Ascertain whether there is any connection between the political party or charity and any business transactions, organisations or individuals with which Trifast's name is involved, or likely to be involved
- Ensure no foreign public official (FPO) is associated with the body gaining an advantage through the donation
- Confirm the donation is appropriate and consistent with the needs of the recipient
- Confirm the donation will not be diverted inappropriately
- Determine whether the donation is consistent with any local laws

Should the due diligence process identify any cause for concern in relation to a donation, we will consider whether it is necessary to engage third parties to assist with further checks and enquiries or whether there is sufficient reason to refuse a request to make the donation.

OTHER CONTROLS

The Company will employ the following further safeguards:

- We will always ask for any requests for donations to be put in writing
- We will always require receipts from recipients
- We will make donations to purchase equipment or services directly to the vendors
- We will avoid cash payments and make deposit funds into an authorised bank account
- We will always require the recipient to sign a confirmation that the donation does not violate anti-bribery and corruption laws and that they will only use the money for the specified purpose



CHARITABLE AND POLITICAL DONATIONS POLICY

RECORDING DONATIONS

Trifast will ensure all charitable are accurately recorded.

REPORTING CONCERNS

Every member of staff has a responsibility to speak out if they suspect bribery or corruption or are concerned about a charitable or political donation. Any such concern must be reported to a Director or through the [Whistleblowing procedure](#). This can be done anonymously.

The Company will investigate all allegations immediately and thoroughly and end any ongoing charitable or political donation arrangements if appropriate.

COMPLIANCE WITH THIS POLICY

The Chief Financial Officer (CFO) is responsible for this policy.

Compliance with this policy is a condition of each employee's employment contract. Every employee is responsible for reading and understanding the contents of this policy.

Trifast will provide training on the requirements of the policy, but if any employee has any questions they should contact the Group Finance team.

Employees may be liable to disciplinary action if they fail to comply with the provisions of this policy.



Revision Level	Date	Change Summary
0	18.07.2022	Initial Release

DIGNITY AT WORK POLICY

The Company aims to ensure that all its employees have dignity at work. That means that there are some types of behaviour that are unacceptable which will include the following:

- Being offensive, abusive, malicious, insulting or intimidating to a fellow employee
- Engaging in unjustifiable criticism towards a fellow employee
- Imposing a punishment upon a fellow employee without reasonable justification

Changing an employee's duties or responsibilities to his or her detriment without reasonable justification

This policy applies to all employees, regardless of their rank or seniority. Breach of this policy will be treated as misconduct.

If you feel that your dignity at work has been compromised, you should raise the matter through the Company's grievance procedure.



Revision Level	Date	Change Summary
0	08.01.2021	Initial release of policy with rev details (Previously stored in HR Handbook)
1	18.07.2022	Full review of policy



ENVIRONMENTAL POLICY

Trifast is a leading international specialist in the design, engineering, manufacture and distribution of high quality industrial fastenings and Category 'C' components, principally to major global assembly industries.

It is the intention of the business that its environmental management system (EMS) will assess and control the environmental impacts of its activities, products, and services, and will also serve to implement the environmental policy throughout the business. The system will be implemented, maintained, and continually improved throughout the business.

THE COMPANY COMMITS TO:

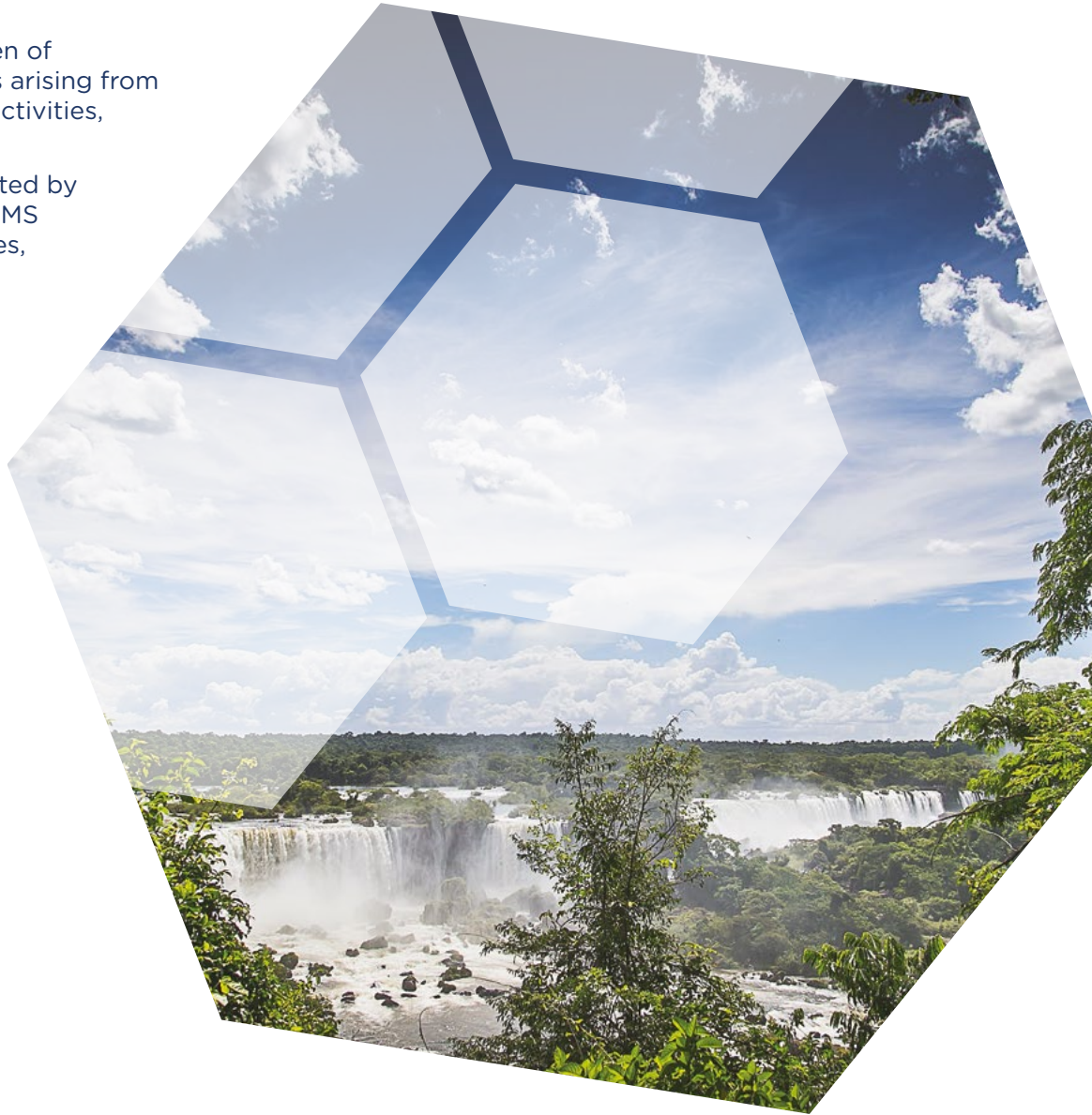
- Monitor and reduce energy consumption in line with intensity factors
- Monitor and aim to reduce our Carbon Footprint per turnover
- Prevent pollution as far as is reasonably practicable
- Reduce the production of waste and develop effective waste management and recycling procedures, as well as disposing of unavoidable waste in such a way as to minimise its environmental impact
- Monitor and reduce water consumption
- Prevent emissions with potential to impact water quality
- Minimise emissions when defined as having a significant impact
- Periodically review its environmental arrangements, and performance against objectives to ensure that it remains relevant and appropriate
- Encourage awareness of internal and external environmental issues, and this Environmental Policy
- Reduce, control and where applicable prevent the use of restricted substances
- Conduct its activities in full knowledge of, and compliance with, the requirements of applicable environmental legislation, Approved Codes of Practice and other environmental requirements agreed by top management
- Report environmental metrics in line with GRI (Global Reporting Initiative) standards

ENVIRONMENTAL POLICY

The Company will establish environmental KPI's through Group management review, and measure performance utilising an agreed framework.

Consideration is taken of environmental issues arising from business decisions, activities, and processes.

This Policy is supported by associated internal EMS documents, processes, and policies.



Revision Level	Date	Change Summary
4	14.10.2016	Total re-write of policy - previous revisions stored
5	20.10.2017	Amended to cover Trifast Plc
6	18.07.2022	Document review conducted. Water and GRI commitments added. Trifast description paragraph amended to tie in with publications.



EQUAL OPPORTUNITIES POLICY

The Company is an equal opportunity employer. We have a respectful culture and want to encourage an inclusive environment where everyone feels comfortable to be themselves. We work and grow together and view laughing together as a sign of enjoyment of our roles and of a lively, busy environment. However, at all times, we need to be mindful of how our humour and comments can affect others.

We are committed to ensuring within the framework of the law that our workplaces are free from unlawful or unfair discrimination because of Protected Characteristics as defined by the Equality Act 2010. We have adopted this policy as a means of helping to achieve these aims.

THE PROTECTED CHARACTERISES ARE:

- Age
- Disability
- Gender
- Gender reassignment
- Marriage and civil partnership status
- Pregnancy and maternity
- Race
- Religion or belief
- Sexual orientation

We aim to ensure that our employees achieve their full potential and that all employment decisions are taken without reference to irrelevant or discriminatory criteria.

WHAT IS DISCRIMINATION?

Direct Discrimination: When someone is treated less favourably than another person because of a protected characteristic.

Associative Discrimination or Discrimination by Association: Direct discrimination against someone because they associate with another person who possesses a Protected Characteristic.

Discrimination by Perception: Direct discrimination against someone because it is thought that they possess a particular Protected Characteristic even if they do not actually possess it.

Indirect Discrimination: The application of a provision, criterion, or practice in relation to a protected characteristic that is disadvantageous to a particular group because a considerably smaller proportion of that group is able to comply with it.

Harassment: Unwanted conduct related to a relevant protected characteristic which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual. Employees may complain of such offensive behaviour even if it is not directed towards them personally.

Harassment by a Third Party: Harassment of employees by third parties such as customers or clients.

Victimisation: When an employee is treated less favourably because they have made or supported a complaint or raised a grievance under the Equality Act 2010 or are suspected of doing so.

EQUAL OPPORTUNITIES POLICY

COMMITMENT

- We are committed to ensuring that all of our employees and applicants for employment are protected from unlawful discrimination in employment, recruitment and employment decisions will be made on the basis of fair and objective criteria
- Person and job specifications shall be limited to requirements which are necessary for the effective performance of the job
- Interviews will be conducted on an objective basis and personal or home commitments will not form the basis of employment decisions except where necessary and relevant
- All employees have a right to equality of opportunity and a duty to implement this policy. Discrimination is a serious disciplinary matter which will normally be treated as gross misconduct
- Anyone who believes that he or she may have been disadvantaged on discriminatory grounds should raise the matter through the Company's grievance procedure



Revision Level	Date	Change Summary
0	08.01.2021	First release with rev details (previously held in HR Handbook)
1	18.07.2022	Policy Reviewed

EQUAL PAY POLICY

The Company is committed to equal pay for men and women. In this context “pay” includes not only remuneration but also other benefits of employment such as promotion and training opportunities and access to facilities provided within the employment package from time to time. We are committed to introducing and maintaining pay systems which are transparent, based on objective criteria and free from sex bias. In line with the Gender Pay reporting legislation, we publish an annual statement, this can be viewed in [our Annual Report](#).

Women and men employed by us are entitled to equal pay if they are undertaking work which is substantially similar or is of equal value to the organisation unless there are specific and clear reasons unconnected with their sex which explain and justify any differential in pay. In some cases individuals carrying out similar work may receive different salaries because of seniority, incremental points, qualifications and other such factors.

You should raise any query or grievance concerning your pay and its evaluation in accordance with the Company’s grievance procedure.



Revision Level	Date	Change Summary
0	08.01.2021	Initial release of policy with rev details (Previously stored in HR Handbook)
1	18.07.2022	Policy Reviewed

FAIR COMPETITION AND ANTITRUST POLICY

Trifast plc carries out its business by promoting fair competition. Fair competition is a key element of the development of the Group and the market in which it operates. This policy has been created to support the Group's [core cultural values](#), to ensure fair, transparent, and honest business practices, sustainable development and growth and to comply with the global fair competition principles.

The jurisdictions where the Group operates may impose additional legal requirements related to fair competition. It is the responsibility of all Group Companies to ensure compliance with relevant country laws and governmental regulations and regulatory guidance which relate to competition and antitrust.

Investigations by competition authorities can result in significant fines and costs, compensation claims for customers and competitors and damage to reputations and commercial relationships. Criminal sanctions for individuals can also apply.

COMPETITION LAWS PROHIBIT:

Anticompetitive agreements

Sharing of commercially sensitive information between competitors, unless approved through legal channels

Certain restrictions imposed or agreed with distributors and other customers,

Abuses of dominant market positions

This policy which forms part of the Group Code of Conduct sets out what employees must do to ensure that Trifast plc upholds fair competition.

This policy applies to directors, employees, advisers and all persons who operate for the benefit of the Trifast Group.

EMPLOYEES MUST:

- Comply with competition law for all markets in which they operate and undertake appropriate training
- Object immediately if inappropriate topics are raised during any contact with competitors
- Report any incidents of inappropriate discussions immediately with the Global Commercial and Sales Director or Chief Executive Officer (CEO) who may seek legal advice if that is deemed necessary
- Seek advice from the Global Commercial and Sales Director or Chief Executive Officer (CEO) if advice is needed with regard to any specific business situation and in any cases of doubt or in situations which may involve the exchange of information with a competitor
- Seek advice from the Global Commercial and Sales Director or Chief Executive Officer (CEO) before discussing joint purchasing arrangements or production, research and development and standardisation agreements with any competitors, or when contemplating restrictions on the commercial activity of a customer or a distributor
- Clearly record sources of competitor information in all communications and documents so their legitimacy is understood



FAIR COMPETITION AND ANTITRUST POLICY

EMPLOYEES MUST NOT:

- Participate in cartels
- Discuss, agree or exchange information about any of the following, directly or indirectly, with competitors:
 - The price or terms of sale for products and/or services
 - The price or terms to be demanded from suppliers
 - The co-ordination or allocation of bids or quotes
 - Limitations on production or sales,
 - The division or allocation of geographic markets, customers or product lines
- Impose restrictions on the commercial activity of a customer or a distributor without first seeking advice from the Global Commercial and Sales Director, including control of the resale price, the territory or channels in which they may resell Trifast products and the extent to which they may sell competing products.

Revision Level	Date	Change Summary
0	18.07.2022	Initial Release



FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING POLICY

Trifast plc respects the dignity of all its employees and recognises fundamental principles of human rights. The Company will uphold fundamental human rights in all of our corporate activities. We are committed to taking steps to identify and prevent interference with those fundamental rights.

Trifast recognises that the ideal of free human beings enjoying civil and political freedom and freedom from fear can only be achieved if conditions are created where everyone can enjoy their civil and political rights, as well as their economic, social and cultural rights. We also recognise that the challenge of maintaining these standards is unique in different parts of the world and as such due regard is given to the law of the jurisdiction where the policy is applied.

It is also recognised that many people and groups have different views on human, civil and political rights and whilst we welcome discussion and debate on these issues, we do not believe that it is appropriate to attempt to impose our views on others. We do, however, believe that we can, and do, influence others through leading by example.

All employees and contractors will be extended the following workplace rights, without distinction of any kind, such as race, colour, sex, sexual orientation, language, religion, political or other opinion, national or social origin or other status.

WORKPLACE RIGHTS:

1. Everyone shall have the right to freedom of association with others, including the right to form and join trade unions
2. When consistent with local law, everyone shall have the right to vote for representatives in genuine elections which shall be held by secret ballot, guaranteeing the free expression of the will of the electors
3. Everyone shall have the right to freedom of expression. This right shall include freedom to seek, receive and impart information and ideas of all kinds, either orally or in writing, or through any other media of their choice, and the freedom to hold opinions without interference
4. Everyone shall have the right to protection against interference with their privacy, family, home or correspondence, or attacks on their reputation
5. Everyone shall have the right to their property. No one shall be deprived of their property, or the right to exercise control of their property

RESPONSIBILITIES:

The exercise of the rights provided for in this policy carry duties and responsibilities by those claiming such rights and are therefore subject to recognising that the workplace is for work and that these rights must be exercised in a manner that does not interfere with the safe and efficient performance of work. The Company will not tolerate conduct by any person or organisation that seeks to intimidate, harass, or coerce employees in the exercise of these rights.

Revision Level	Date	Change Summary
0	18.07.2022	Initial release

HARASSMENT POLICY

Harassment pollutes the working environment and can have a devastating effect on the health, confidence, morale and performance of those affected by it. It may also have a damaging effect on other employees not themselves the object of unwanted behaviour who are witness to it or who have knowledge of the behaviour. All employees are entitled to a working environment which respects their personal dignity and which is free from such objectionable conduct. Harassment is a disciplinary offence and it will normally be treated as gross misconduct. A single incident can amount to harassment if sufficiently grave.

HARASSMENT IS EITHER:

- Unwanted conduct related to a relevant protected characteristic which affects the dignity of men or women at work
- Bullying of colleagues by intimidating behaviour
- Unfavourable conduct at work, whether verbal or non-verbal, towards someone based on a protected characteristic which could affect his/her dignity at work

EXAMPLES OF HARASSMENT INCLUDE:

- Insensitive jokes and pranks
- Lewd comments about appearance
- Unnecessary body contact
- Displays of sexually offensive material, e.g. Pin-ups
- Repeated instances of minor harassment acts
- Requests for sexual favours
- Speculation about a person's private life and or sexual activities
- Threatened or actual violence
- Threat of dismissal, loss of promotion, etc. for refusal of sexual favours
- Jokes about a person being either too old or too young to do a job properly
- Age related jokes

Bullying is defined as any form of physical or verbal attack and/or threat of such, or the abuse of position, in order to attack or undermine the confidence or ability of another, or to place another employee under unreasonable pressure or subjecting another to detrimental treatment, by either act or omission.

Employees may complain of behaviour that they find offensive even if it is not directed at them personally and they do not personally possess the relevant protected characteristic.

Employees are also protected from harassment related to Discrimination by Perception and Associative Discrimination.

Where harassment arises from people not directly employed by the Company e.g. customers or clients, such complaints will be taken seriously and will be pursued with the third party concerned, exercising whatever sanctions are available.

Anyone who believes that he or she may have been the victim of harassment should raise the matter through the Company's grievance procedure.

Revision Level	Date	Change Summary
0	08.01.2021	Initial release with rev details
1	18.07.2022	Policy Reviewed





HEALTH AND SAFETY AT WORK POLICY

Trifast is a leading international specialist in the design, engineering, manufacture and distribution of high-quality industrial fastenings and Category 'C' components principally, to major global assembly industries.

It is the intention of the business that its Occupational Health and Safety Management System will assess and control the occupational health and safety impacts of its activities, products and services, and will also serve to implement the occupational health and safety policy throughout the business. The system will be implemented, maintained, and continually improved throughout the business.

THE COMPANY COMMITS TO:

- Provide safe and healthy working conditions which aim for the prevention of work-related injury or ill health
- Provide relevant and effective safety training
- To eliminate hazards, so far as is reasonably practicable, and reduce occupational health and safety risks
- Conduct its activities in full knowledge of, and compliance with, the requirements of applicable legislation, Approved Codes of Practice and other requirements agreed by top management

The Company will establish occupational health and safety objectives and targets through Group management review, and measure performance against these targets utilising an agreed framework.

Consultation and participation with our workforce, and any applicable representatives will form the foundation of our occupational health and safety management.

Consideration is taken of occupation health and safety aspects arising from business decisions, activities and processes.

Revision Level	Date	Change Summary
4	27.07.2017	Re-write of policy – previous revisions stored
5	18.07.2022	Update to scope of company / policy review



TRADE COMPLIANCE AND SANCTIONS POLICY

INTRODUCTION

This Policy has been developed to help employees and contractors understand where issues related to sanctions regulations may arise and to support them in making the right decisions, ensuring that the Company fully complies with all sanctions applicable to its business activities and appropriately manages associated risks.

The Company is committed to the highest standards of ethical conduct and integrity in its business activities, both in the UK and overseas. The jurisdictions where the Group operates may impose additional legal requirements related to sanctions and it is the responsibility of all Group Companies to ensure compliance with relevant country laws and regulations relating to sanctions.

SCOPE OF POLICY

The policy applies to all employees and officers of the Company, and to temporary workers, consultants, contractors, agents, intermediaries and subsidiaries acting for, or on behalf of, the Company ('associated persons') within the UK and overseas.

Every non-wholly-owned subsidiary and joint venture which the Company controls must adopt a similar sanctions policy.

Every employee and associated person acting for, or on behalf of the Company is responsible for maintaining the highest standards of business conduct. Any breach of this policy is likely to constitute a serious disciplinary, contractual and criminal matter for the individual concerned and may cause serious damage to the reputation and standing of the Company. The Company may also face criminal liability and substantial financial penalties for unlawful actions taken by its employees or associated persons.

All employees and associated persons are required to familiarise themselves and comply with this policy, including any future updates that may be issued from time to time by the Company.

DEFINITION AND EXAMPLES

Financial sanctions are restrictions put in place by governments to bring about a change in the activities or policies by another country or individual, particularly where breaches of international law or human rights have occurred, or where democracy is under threat.

There are different types of sanctions, which can be country specific and may include bans on financial transactions and trade or they can be targeted at specific entities and or individuals.

Where financial sanctions are imposed on a particular individual or entity (usually referred to as a "designated person"), it is generally prohibited to:

- Deal with the frozen funds or economic resources, belonging to or owned, held or controlled by a designated person
- Make funds or economic resources available, directly or indirectly, to, or for the benefit of, a designated person
- Engage in actions that, directly or indirectly, circumvent the financial sanctions prohibitions
- Provide certain financial services and credit
- Sanctions can also be applied to a wide variety of markets and services: these can apply to named states individuals and entities, specified groups, or entire sectors.



TRADE COMPLIANCE AND SANCTIONS POLICY

Trade Sanctions are export control laws that regulate the export and re-export of goods, software, and technology to specified destinations and end-users for specified purposes and applications. These laws apply to intra-company transfers as well as to dealings with third parties.

Breaches of financial sanctions and trade sanctions are criminal offences punishable by imprisonment. In addition, monetary penalties may be enforced against a person or company that is found to have breached their sanctions obligations, whether deliberately or inadvertently.

COMPLIANCE WITH SANCTIONS

UK sanctions apply to all persons within the territory of the UK and to all UK persons, wherever they are in the world. This means that all individuals and legal entities who are within or undertake activities within the UK's territory must comply with UK sanctions that are in force. In addition, all UK nationals and legal entities established under UK law must also comply with UK sanctions that are in force, irrespective of where their activities take place.

US Persons must not participate in any transaction involving an Embargoed Country or other US Sanctions Target unless OFAC has licensed or authorized the involvement of US Persons in that transaction. "US Persons" include anyone while in the United States; any US citizen or green card holder, wherever located (including dual nationals of the US and another country); any US incorporated entity, or anyone employed by a US entity, as well as US-owned or controlled non-US entities under certain US Sanctions.

All other entities in the European Union and in Asia must comply with the sanctions associated with their particular jurisdiction.

WORKING OVERSEAS

Employees and associated persons owe a duty to the Company to be extra vigilant when conducting international business.

RECORDS

Due diligence should be undertaken by employees and associated persons prior to entering into any contract, arrangement or relationship with a potential supplier or customer.

Employees and associated persons, are required to take particular care to ensure that all company records are accurately maintained in relation to contracts for any business activities.

Employees and associated persons should not engage in any conduct designed to evade Sanctions or the requirements of this Policy. No information in payment instructions, transaction documents and/or counterparty data should be altered, deleted or concealed in order to evade Sanctions or impede the identification of a Sanctions issue. Employees should reject and report to the Company Secretary any request from a counterparty to omit or conceal names, addresses or other information relating to a Sanctions Target in transaction records or other commercial documents.

REPORTING CONCERNS

The Company depends on its employees and associated persons to ensure that the highest standards of ethical conduct are maintained in all its business dealings. Employees and associated persons are requested to assist the Company and to remain vigilant in preventing, detecting and reporting suspected breaches of sanctions.



TRADE COMPLIANCE AND SANCTIONS POLICY

If you suspect that the Company or one of its subsidiaries has become involved in any business contrary to applicable Sanctions, you should notify the Company Secretary as soon as possible for further guidance.

If you are ever unsure of how to react to a situation or whether certain conduct may be improper or contrary to the Policy, you should always seek guidance from the Company Secretary before you take action.

Staff are reminded of their ethical obligations under the Business Ethics and Responsible Behaviour Policy and their ability to raise any concerns under the Whistleblowing Policy.

NON-COMPLIANCE

You may be subject to disciplinary action if you have been found to be in breach of this Policy. This could lead to dismissal or termination of your contract.

Accordingly, you must read this policy and comply with the spirit and the strict letter of its regulations and related procedures.

GOVERNANCE

The responsibility for the Sanctions Policy and the management of sanctions risk sits ultimately with the Board of Directors of the Company. Compliance of the Sanctions Policy is monitored by management and the Company Secretary. The Board of Directors and the Company Secretary review this Sanctions Policy on at least an annual basis to ensure that it remains relevant, both internally, with regards to all those parties defined as being in scope, and externally regarding changing legal and regulatory requirements and business best practice.

The latest version of this Policy can be obtained upon request from the Company Secretary and is available on the Company's Intranet and website.

Revision Level	Date	Change Summary
0	18.07.2022	Initial Release



WHISTLEBLOWING POLICY

INTRODUCTION

All of us at one time or another have concerns about what is happening at work. Usually these concerns are easily resolved. However, when they are about unlawful conduct, financial malpractice, or dangers to the public or the environment or any other matter of a serious nature, it can be difficult to know what to do.

You may be worried about raising such issues or may want to keep the concerns to yourself, perhaps feeling it's none of your business or that it's only a suspicion. You may feel that raising the matter would be disloyal to colleagues, managers or to the organisation. You may decide to say something but find that you have spoken to the wrong person or raised the issue in the wrong way and are not sure what to do next.

The Company has introduced this policy to enable you to raise your concerns about such possible malpractice at an early stage and in the right way. We would rather that you raised the matter when it is just a concern rather than wait for proof.

If something is troubling you which you think we should know about or look into, please use this policy. If, however, you are aggrieved about your personal position, please use the Grievance Procedure - which you can get from your Manager or the HR Department. This Whistle-blowing Policy is primarily for concerns where the interests of others or of the organisation itself are at risk and includes reporting any concerns about activities in our supply chain that would contravene the Modern Slavery Act 2015. A separate Company statement on slavery and human trafficking is published in this document and also on the Company's website.

If in doubt - raise it!

OUR ASSURANCES TO YOU:

YOUR SAFETY

The Board and Chief Executive of the Company are committed to this policy. If you raise a genuine concern under this policy, you will not be at risk of losing your job or suffering any form of retribution as a result. Provided you are acting in good faith, it does not matter if you are mistaken. Of course, we do not extend this assurance to someone who maliciously raises a matter they know is untrue.

YOUR CONFIDENCE

We will not tolerate the harassment or victimisation of anyone raising a genuine concern. However, we recognise that you may nonetheless want to raise a concern in confidence under this policy. If you ask us to protect your identity by keeping your confidence, we will not disclose it without your consent. If the situation arises where we are not able to resolve the concern without revealing your identity (for instance because your evidence is needed in court), we will discuss with you whether and how we can proceed.

Remember that if you do not tell us who you are, it will be much more difficult for us to look into the matter or to protect your position or to give you feedback. Accordingly, while we will consider anonymous reports, this policy is not well suited to concerns raised anonymously.

WHISTLEBLOWING POLICY

WHAT IS PROTECTED?

- A 'qualifying disclosure' is one of information that in the reasonable belief of the disclosing worker shows wrongdoing of one or more of the following kinds:
- A criminal offence was committed or is being or is likely to be committed
- A person has or is or is likely to fail to comply with a legal obligation
- A miscarriage of justice has occurred or is likely to occur
- The health and safety of any individual has been, or is being, or is likely to be endangered
- The environment has been, is being, or is likely to be damaged
- That information tending to show any matter falling within any one of the above categories has been, is being, or is likely to be deliberately concealed

HOW WE WILL HANDLE THE MATTER

Once you have told us of your concern, we will look into it to assess initially what action should be taken. This may involve an internal inquiry or a more formal investigation. We will tell you who is handling the matter, how you can contact them and whether your further assistance may be needed. If you request it, we will write to you summarising your concern and setting out how we propose to handle it.

When you raise the concern, you may be asked how you think the matter might best be resolved. If you do have any personal interest in the matter, we do ask that you tell us at the outset. If your concern falls more properly within the Grievance Procedure, we will tell you.

While the purpose of this policy is to enable us to investigate possible malpractice and take appropriate steps to deal with it, we will give you as much feedback as we properly can. If requested, we will confirm our response to you in writing. Please note, however, that we may not be able to tell you the precise action we take where this would infringe a duty of confidence owed by us to someone else.

HOW TO RAISE A CONCERN INTERNALLY

STAGE 1

If you have a concern about malpractice, we hope you will feel able to raise it first with your Manager. This may be done orally or in writing.

STAGE 2

If you feel unable to raise the matter with your Manager, for whatever reason, please raise the matter in the first instance with your HR Representative thereafter either the Company Secretary or another Senior Manager / Director.

Please say if you want to raise the matter in confidence so that they can make appropriate arrangements.

STAGE 3

If these channels have been followed and you still have concerns, or if you feel that the matter is so serious that you cannot discuss it with any of the above, please contact Safecall. Safecall are an independent whistle-blowing hotline provider engaged by TR. Further information can be seen on the Safecall website.

WHISTLEBLOWING POLICY

INDEPENDENT ADVICE

If you are unsure whether to use this policy or if you want independent advice at any stage, you may contact Safecall at any time. Each location has a telephone number to get through to the Safecall team and these are publicised in each location and can also be found as an appendix to this policy.

EXTERNAL CONTACTS

While we hope this policy gives you the reassurance you need to raise such matters internally, we recognise that there may be circumstances where you can properly report matters to outside bodies, such as regulators or the police. Public Concern at Work will be able to advise you on such an option and on the circumstances in which you may be able to contact an outside body safely.

IF YOU ARE DISSATISFIED

If you are unhappy with our response, remember you can go to the other levels and bodies detailed in this policy.

While we cannot guarantee that we will respond to all matters in the way that you might wish, we will try to handle the matter fairly and properly. By using this policy, you will help us to achieve this.

Country	Telephone Number
UK	0800 9151571
USA	1 866 901 3295
Europe	
Netherlands	00 800 72332255
Hungary	00 800 72332255
Ireland	1800 812740
Norway	00 800 7233 2255
Poland	00 800 72332255
Sweden	0850 252 122
Spain	00 800 72332255
Italy	00 800 72332255
Germany	00 800 72332255
Asia	
China	China Unicom/Netcom 10800 7440605
China	China Telecom 10800 4400682
India	000 800 4401256
Malaysia	1800 220 054
Singapore	800 4481773
Thailand	001 800 72332255
Taiwan	00 800 72332255

Revision Level	Date	Change Summary
0	08.01.2021	Initial release with rev details (previously part of HR handbook)
1	18.07.2022	Full review of policy
2	23.09.2022	Addition of Trifast international phone numbers

For further information email hr@trifast.com



WORKING CONDITIONS AND HUMAN RIGHTS POLICY

Responsible, sustainable and lawful conduct forms an integral part of Trifast plc's values and is embedded in its strategy.

Trifast plc is committed to respecting internationally recognised human rights. Human rights are basic standards aimed at securing dignity and equality for all. We respect the human rights of all our employees and aim to provide working conditions that exceed the minimum standards.

This policy applies to employees, contractors and suppliers. The policy is to be implemented in accordance with current legislation in the various locations in which we operate and with due regard for their respective cultures.

The following sections set out the key points in order to respect human rights and ensure favourable conditions of work.

NO CHILD LABOUR

The Trifast plc Group does not tolerate child labour of any kind. A child's development must not be hindered by undertaking any kind of work that keeps them from receiving an education. Their dignity must be respected and their health and safety ensured.

NO FORCED LABOUR

The Trifast plc Group does not tolerate forced or compulsory labour of any kind and opposes the use of forced or unlawful compulsory labour of any kind in its business activities.

FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING

Trifast plc respects the dignity of all its employees and recognises fundamental principles of human rights. The Company will uphold fundamental human rights in all of our corporate activities. We are committed to taking steps to identify and prevent interference with those fundamental rights.

Trifast recognises that the ideal of free human beings enjoying civil and political freedom and freedom from fear can only be achieved if conditions are created where everyone can enjoy their civil and political rights, as well as their economic, social and cultural rights. We also recognise that the challenge of maintaining these standards is unique in different parts of the world and as such due regard is given to the law of the jurisdiction where the policy is applied.

It is also recognised that many people and groups have different views on human, civil and political rights and whilst we welcome discussion and debate on these issues, we do not believe that it is appropriate to attempt to impose our views on others. We do, however, believe that we can, and do, influence others through leading by example.

All employees and contractors will be extended the following workplace rights, without distinction of any kind, such as race, colour, sex, sexual orientation, language, religion, political or other opinion, national or social origin or other status.

WORKING CONDITIONS AND HUMAN RIGHTS POLICY

WORKPLACE RIGHTS:

1. Everyone shall have the right to freedom of association with others, including the right to form and join trade unions
2. When consistent with local law, everyone shall have the right to vote for representatives in genuine elections which shall be held by secret ballot, guaranteeing the free expression of the will of the electors
3. Everyone shall have the right to freedom of expression. This right shall include freedom to seek, receive and impart information and ideas of all kinds, either orally or in writing, or through any other media of their choice, and the freedom to hold opinions without interference
4. Everyone shall have the right to protection against interference with their privacy, family, home or correspondence, or attacks on their reputation
5. Everyone shall have the right to their property. No one shall be deprived of their property, or the right to exercise control of their property

PROTECTION FROM DISCRIMINATION

Equal treatment of all employees is a fundamental principle of our corporate policy. The Trifast Group does not tolerate discrimination against its employees. Employees must not be disadvantaged, favoured or harassed on the grounds of characteristics such as gender, age, skin colour, religion, nationality, political or other beliefs, ethnic origin, disability or sexual orientation or any other characteristics protected by local laws. For further information please see the Company's [Equal Opportunities](#) and [Equal Pay policies](#).

It is the responsibility of all managers to ensure that this policy is implemented and integrated into all working practices. Every manager has the duty to inform his or her employees of the content of this policy and those within the Corporate Code of Conduct and to advise and support them in implementing its principles in their day-to-day activities. At the same time, managers must comply with this policy themselves in their everyday managerial work, for example in their dealings with employees and as a basis for decision-making. Any indications that human rights may have been breached must be followed up and investigated immediately.

If necessary, corrective actions will be initiated to help resolve problems and prevent future occurrences.

Revision Level	Date	Change Summary
0	18.07.2022	Initial release



Code of Business Conduct

