TRICON

CODE OF CONDUCT

ISSUED

OCTOBER 2026

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"How we do business matters just as much as the results we deliver"

Ignacio Torras
Chief Executive Officer

Introduction to Our Code of Conduct

LEADERSHIP MESSAGE

At Tricon, we believe that strong results start with strong principles. How we do business matters just as much as the results we deliver.

Our Code of Conduct sets clear expectations for how we act with each other, with our partners, and in the markets where we operate. It reflects our values, our responsibility as a global company, and our belief that trust is earned through consistent, ethical behavior.

This Code is not meant to cover every situation or replace good judgment. Instead, it provides a shared framework to guide decisions, encourage transparency, and promote a safe and healthy environment no matter where we work or who we work with.

I expect every employee, officer, and manager to understand and follow this Code. Just as importantly, I expect us to speak up if something doesn't feel right. Doing the right thing is not always the easiest path, but it is always the right one.

Our reputation is built over time through our actions, our integrity, and our accountability. This Code helps protect that reputation so we can continue to operate with the freedom to grow, innovate, and compete responsibly.

Ignacio
Ignacio Torras, CEO

WHO THIS CODE APPLIES TO

This Code applies to:

- All employees, officers and directors of Tricon and its affiliates
- Contractors, consultants, agents, and other third parties when acting on Tricon's behalf

Everyone covered by this Code is expected to understand it, follow it, and seek guidance when needed.

OUR SHARED RESPONSIBILITY

We are all responsible for:

- Acting with integrity
- Complying with applicable laws, regulations, and company policies
- Seeking guidance and speaking up if something feels wrong

Managers and leaders have an added responsibility to:

- Lead by example
- Promote a culture of openness and accountability
- Respond appropriately to questions and concerns

If local laws or regulations are stricter than this Code, the stricter standard applies. If local laws are below the Code, Tricon upholds the Code as the higher standard.

THE RULE

How we do business matters as much as what we achieve

Snapshot

- ✓ Act responsibly
- ✓ Follow the law
- ✓ Use good judgement
- ✓ Speak up



Who We Are & How We Work

Our purpose is to sustainably and efficiently connect the world with essential goods. Everything we do should align with this purpose.

SUSTAINABLY

In a way that will be doable today and 100 years from today, enriching lives and improving impacts to environment and society.

ESSENTIAL GOODS

The raw materials that help make our life the way it is today or better.

EFFICIENTLY

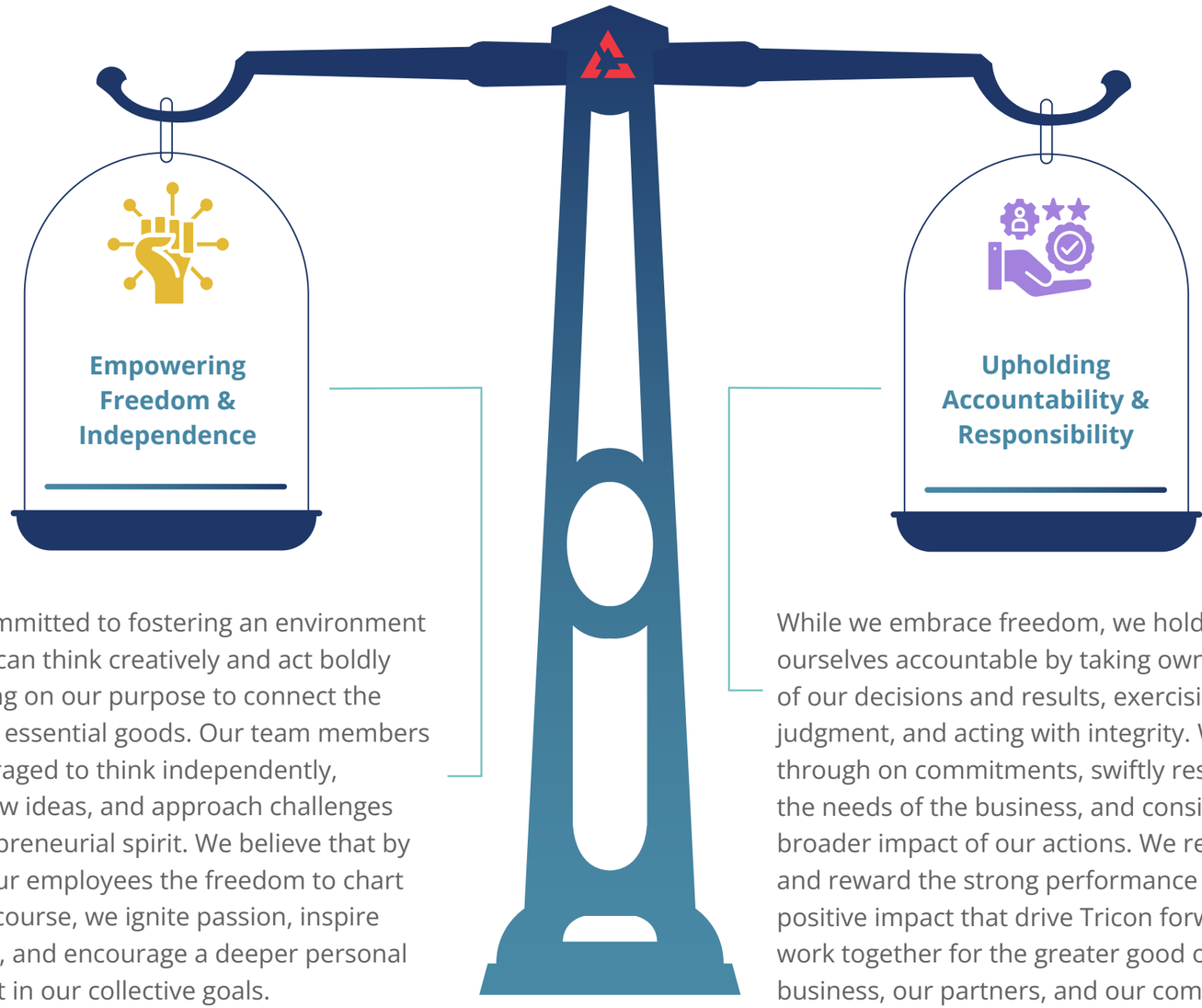
In cost, value, time, quality, or any other measure relevant to the industry.

CONNECT

Move the products from the producer, wherever competitive advantage locates them, to the consumer in any part of the world.

LIVING OUR CULTURE

At Tricon, our culture is built on empowering freedom with responsibility. It drives the way we show up every day, a balance that allows us to operate effectively in complex, fast-moving global markets while maintaining high standards of integrity and professionalism.



We are committed to fostering an environment where we can think creatively and act boldly in delivering on our purpose to connect the world with essential goods. Our team members are encouraged to think independently, explore new ideas, and approach challenges with entrepreneurial spirit. We believe that by granting our employees the freedom to chart their own course, we ignite passion, inspire innovation, and encourage a deeper personal investment in our collective goals.

While we embrace freedom, we hold ourselves accountable by taking ownership of our decisions and results, exercising sound judgment, and acting with integrity. We follow through on commitments, swiftly respond to the needs of the business, and consider the broader impact of our actions. We recognize and reward the strong performance and positive impact that drive Tricon forward and work together for the greater good of our business, our partners, and our communities.

What This Means in Practice:

Empowering freedom with responsibility means:

- **Making informed decisions within your role and authority**
- **Understanding the risks associated with your work**
- **Following laws, regulations, and company policies**
- **Knowing when to escalate issues or ask for guidance**
- **Taking ownership of outcomes, not passing accountability**



GOVERNANCE (HOW WE DO IT)

Tricon operates within a governance framework designed to support ethical decision-making and appropriate risk management. We expect everyone representing Tricon to:

ACT WITH INTEGRITY:

- Don't lie, cheat or steal.
- Uphold high standards of honesty and ethical business, making decisions that are transparent, responsible, and aligned with our company's values.
- Do what is right even when it is difficult, avoiding any actions, relationships, or practices that could compromise our integrity or the trust placed in us.

TREAT OTHERS RESPECTFULLY:

- No harassment, discrimination, or retaliation - ever.
- No condescending, hostile, or derogatory behavior.
- Remember that different perspectives make us stronger.

CONDUCT BUSINESS RESPONSIBLY:

- Understand and comply with applicable laws and regulations.
- Follow all safety guidelines and support a safe and healthy workplace.
- Take appropriate measures to protect the environment.
- Respect the communities and cultures in which we operate.

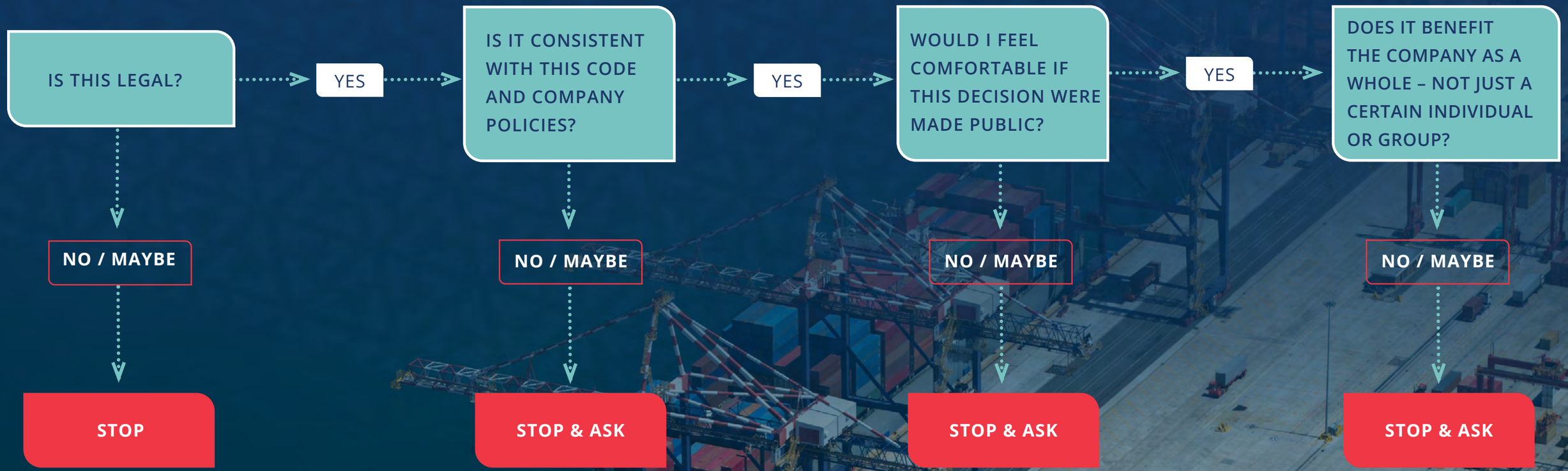
USE COMPANY RESOURCES AND DATA RESPONSIBLY:

- Be a good steward of our systems, assets, and reputation.
- Keep company, employee, and business partner data confidential and secure.



MAKING GOOD DECISIONS

We may not always have clear answers or specific rules for every situation. When that happens, ask yourself:



It is better to ask before you act when you are not sure.
Speak with either:

- Your Manager
- The Compliance Team
- Your Local Compliance Ambassador
- The Tricon Listens Helpline

Speaking Up and Accountability

SPEAKING UP

Maybe you sense that something is not right at work. Maybe you saw something or heard about an act that may violate our Code, our policies, or the law. You have a responsibility to share your concerns – even if you are not sure that a Code violation has occurred.

When you report concerns, you help us handle issues properly, fix problems before they occur, and remedy situations that have already happened.

Reporting Misconduct:
Employees are required to report concerns — from safety issues to fraud. Reports can be made confidentially through Tricon Listens.

Investigations & Grievances:
The Internal Investigations & Grievance Process mandates handling all concerns fairly. Employees must cooperate fully.

No Retaliation:
Tricon prohibits retaliation against whistleblowers in good faith.

Snapshot

- ✓ You don't need proof to raise a concern
- ✓ Reports made in good faith are protected
- ✓ Retaliation is not tolerated

IRL

If an employee reported misconduct and was later excluded from team projects, this would be considered retaliation and is not tolerated.

THE RULE

If something doesn't feel right, speak up. Asking questions is expected.

THE POLICIES

Reporting Misconduct Policy; Internal investigations & Grievance Management

Reporting Concerns:

Speak with either:
- Your manager
- Your local Human Resources or Compliance Ambassador
- A Compliance team member

Email the Compliance team
- Compliance@triconenergy.com

Call the Tricon Listens Helpline
- Using the access code for your country, which can be found on Tricon Listens website

Submit a concern
- Submit a concern to the Tricon Listens Helpline
- at triconlistens.integrityline.com

- The Tricon Listens Helpline is available 24/7 and is run by an independent third party. It offers anonymity where permitted by law, along with translation services.

Acting with Integrity in Our Business

This section explains how we apply our values and standards in day-to-day business activities. Because our work spans global markets, regulations, and counterparties, acting with integrity is critical to protecting Tricon's reputation and maintaining trust.

ANTI-CORRUPTION & BRIBERY

Tricon has **zero tolerance** for corruption, bribery, and improper influence in any form. We comply with global anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA) and U.K. Bribery Act.

NO BRIBES

RULES

Do not offer, promise, or accept anything to improperly influence decisions.

Facilitation payments are prohibited unless there is an immediate risk to personal safety.

EXPECTATIONS

Decline and report any request for a bribe or "facilitation" fee.

GIFTS & HOSPITALITY

RULES

Allowed only if modest, transparent, and approved per thresholds to comply with Anti-Corruption Policy and applicable local laws and regulations.

EXPECTATIONS

Log gifts and hospitality transparently; seek pre-approval for anything above thresholds.

POLITICAL & CHARITABLE CONTRIBUTIONS

RULES

Never use Tricon funds for political purposes, including contributions or lobbying without CEO approval.

Sponsorship and charitable contributions require prior approval and must follow the Social Investment Process. Trade shows and similar sponsorships follow the Communications process for approval.

EXPECTATIONS

Use official channels for charitable contributions; never commit company funds directly without any internal procedures and approvals.

THIRD PARTIES

RULES

Agents, brokers, service providers and intermediaries must undergo due diligence and cannot be used to circumvent anti-corruption rules.

EXPECTATIONS

Third Parties working on our behalf must comply with anti-corruption and bribery laws.

THE RULE

Never offer or accept anything intended to improperly influence a business decision.

THE POLICIES

Anti-Corruption Policy; Travel & Expense Policy; Social Investment Process

Snapshot

- ✓ Bribes and facilitation payments are prohibited
- ✓ Never use Tricon funds for political purposes
- ✓ Third-party misconduct may still be our responsibility
- ✓ When in doubt, stop and ask

GIFTS, MEALS, & ENTERTAINMENT

Tricon never wants to create even the impression that the recipient of gifts or hospitality made a decision based on receipt of same.

Giving or receiving gifts or hospitality:

✓ Allowed only if modest, transparent, and for legitimate business purposes.

✗ Not allowed if it is meant to or could be perceived to improperly influence a business decision.

Gifts or entertainment involving government officials are subject to stricter regulations and require prior approval.

Follow internal policies and procedures, in line with local laws and regulations, customary practice, as well as recipient's internal rules.

Gifts of significant value or cash equivalent (e.g., voucher, expensive items) are prohibited. If a gift could raise concerns or be perceived as a bribe, it should not be offered, given, or accepted.

Hospitality limits: if above certain threshold, it requires higher authorization as per the Anti-Corruption Policy.

When it comes to gifts and hospitality:

✗ Do not offer, provide or intend to offer or provide anything of value with any attempt to improperly influence business decisions.

✗ Be extra cautious when the recipient is a public official or government employee.

? If unsure whether a gift or expense is acceptable, ask Compliance.

✓ Obtain proper approvals if it exceeds the thresholds listed in the Gifts & Entertainment Policy.

If you are unsure about the value or appropriateness of a gift or hospitality offered to you, report it and seek guidance.



CONFLICTS OF INTEREST

Conflicts of interest arise when personal interests interfere – or appear to interfere – with Tricon's best interests.

Tricon operates within a defined governance framework designed to support ethical decision-making and appropriate risk management.

IS IT A CONFLICT OF INTEREST?

- **Owning or having a financial interest in a competitor, supplier, or customer, or any other third party partners**
  - YES → Disclose / Seek Guidance
  - NO
- **Participating in business activities that compete with the company's interests**
  - YES → Disclose / Seek Guidance
  - NO
- **Having a close personal relationship with someone who influences business decisions or contracts**
  - YES → Disclose / Seek Guidance
  - NO

THE RULE

Never use your role at Tricon for personal financial gain. Disclose conflicts early – don't try and manage them alone.

Snapshot

- ✓ Conflicts can be real or perceived
- ✓ Disclosure and transparency protect both you and the company
- ✓ Silence creates risk

IRL

An employee is involved in selecting an IT software provider for the company. The employee proposes engaging a company owned by their brother. To avoid a conflict of interest, the employee should not participate in the evaluation, selection, or approval process to ensure a fair, independent, and transparent procurement decision.

When it comes to actual or potential conflicts of interest:

- If you are unsure about a situation, talk to your manager or the Compliance Department.
- If you perceive someone else may have a conflict, discuss it with your manager or the Compliance Department.
- Failure to disclose a conflict of interest could result in disciplinary action.

Once a conflict is reported, it will be reviewed to assess the potential risk to the Company, and the necessary steps will be taken to resolve or manage the conflict.

FAIR COMPETITION & ANTITRUST

Everyone benefits from a competitive marketplace, so we follow antitrust and fair competition laws in all locations where we operate. We avoid even the appearance of unfairly restricting another company's ability to compete against us. Employees must not enter into agreements with competitors regarding prices, customers, markets, or output. Even informal conversations can create violations. Do not discuss competitively sensitive information with competitors or involve in any bid-rigging related activities.



IRL

At an industry event, if a competitor suggests aligning prices 'to stabilize the market,' the conversation should be ended immediately and reported.

TRADE COMPLIANCE & SANCTIONS

International trade laws, — including economic sanctions, import and export laws and anti-boycott laws — generally prohibit or restrict dealings with certain countries, entities, individuals, or items.

We follow all applicable import and export laws and regulations associated with the countries where we operate. We do not conduct unauthorized business with countries or third parties that are subject to trade embargoes or economic sanctions. And, as a United States-based company, we cannot participate in boycotts that the United States does not support.

We expect those in our Company to know and understand and follow the requirements that apply to our business.

IRL

If a customer asks that shipping documents omit the final destination to avoid scrutiny, this is a red flag and should be reported.

THE RULE

If a transaction doesn't make sense, pause and escalate.

THE POLICIES

Antitrust Policy; Third Party Payment Process

ANTI-MONEY LAUNDERING

Money laundering is engaging in transactions that are unlawful, involve property derived from illegal conduct, or that support crime or terrorism.

Transactions must be transparent and legitimate. Suspicious behavior — such as unusual payment structures — must be flagged.

We take the time to know our suppliers and other business partners and the reputations they have for following the law, by performing appropriate due diligence and screenings.

Be proactive when it comes to spotting financial transactions that might signal a problem, and report your concern if you see or suspect an activity or transaction that is outside of normal process.

Red Flags:

- Unusual payment methods
- Requests for third-party payments without justification
- Transactions lacking a clear business purpose

Snapshot

- ✓ Know your counterparty
- ✓ Watch for red flags
- ✓ Escalate concerns early

COMMODITY TRADING & INSIDER INFORMATION

Tricon personnel cannot trade Tricon commodities personally or on behalf of others, outside of their company responsibilities. Traders are prohibited from trading on behalf of Tricon, while in possession of material non-public information, if doing so would violate applicable law. If you receive access to third party confidential information as part of your role, you may not use that to purchase or sell shares or equity or to disclose this to others.

THE RULE

Don't trade on or share material non-public information. Approval thresholds and delegation limits must be followed at all times.

THE POLICIES

Risk Management Policy; FX Management Policy; Contract Review & Approval Matrix; Signature Authority Policy; New Product Evaluation Policy

Snapshot

- ✓ Do not engage in price- or bid-rigging activities
- ✓ Never sign a contract unless you are explicitly authorized

IRL

If a friend /customer/supplier/contractor/etc. asked for inside tips on Tricon's upcoming market moves, sharing would constitute insider trading. In this situation, you should decline to comment and report the request.

Trading:

- All transactions and trading exposures (including all physical, financial and hedge activity) must stay within risk limits for Tricon overall and each business which are defined in the Risk Management Policy (RMP) and Trade Authorization Forms (TAF). Any exceedances or adjustments to limits must be approved by the Risk Committee. Approvals to change or exceed a risk limit must be requested by the commercial team prior to a limit exceedance. While all risk limits are reviewed annually, the Risk Committee can modify risk limits or request exposures to be reduced at any time.
- Traders are required to follow the deal capture and entry reporting requirements as defined in the RMP. It is the responsibility of traders to ensure the operators/deal entry team has all the correct and necessary information required to fully capture deals in Tricon's systems. As soon as a deal is concluded, once Tricon is obligated to perform, the transaction must be recorded the same day. Any subsequent changes to the deal must be entered the same day.
- Traders are only allowed to trade pre-approved products. Requests to trade new products require approval in advance.
- Only designated traders may execute derivative trades. Option trading requires specific approval in advance from Risk on a case-by-case basis.

FX:

- Tricon's functional currency is the USD and all the Company's business activities, transactional or non transactional, denominated in other currencies shall be immediately identified and have their exposure mapped through Tricon's applicable systems and controls.
- All transactional and corporate FX exposures shall be hedged in accordance with the Company's FX Risk Management Policy.
- Any exception to this rule needs prior Risk Committee approval.

CONTRACTS & SIGNATURE AUTHORITY

Contracts must follow the Contract Review and Approval Matrix. Only authorized individuals may sign agreements. This means:

- Follow the Contracts Review and Approval Matrix before executing any contract.
- Ensure all required internal stakeholders (e.g., Legal, Risk, Finance) have reviewed and approved, as applicable.
- Do not sign any contract without proper authority or outside your approved limits.
- Do not bypass required reviews or approvals, even for urgent transactions.
- Do not modify contract templates without appropriate review and approval.
- Do not execute agreements that exceed approved financial or risk thresholds.

Respecting People, Communities, & the Environment

Tricon is committed to conducting business responsibly in a way that respects people, communities, and the environment. These commitments apply across our global operations.

RESPONSIBLE SOURCING AND PRODUCT STEWARDSHIP

Responsible sourcing and product stewardship help ensure that the products we trade and distribute are safe, compliant, transparent, and aligned with our sustainability goals.

Tricon is committed to respecting internationally recognized human rights across our operations and value chain. We expect our people and our business partners to uphold the UN Guiding Principles on Business & Human Rights and ILO Core Conventions.

Responsible Sourcing

We evaluate and monitor our supply chain to help ensure materials, services, and logistics partners meet Tricon's standards for ethics, labor, environment, and governance.

SCREENING

We use KYCs and due diligence forms to screen counterparties.

CONTRACTUAL SAFEGUARDS:

Agreements must include human rights and relevant sustainability clauses.

ASSESSMENTS AND AUDITS:

Based on risk, suppliers may be asked to complete assessments, provide third-party evidence, or undergo on-site audits.



PRODUCT STEWARDSHIP

We trade legal products for legitimate purposes and expect our partners to respect people and communities in production, processing, transport, and use.

THE RULE

Our responsibility for products can extend beyond direct control to situations where we contribute to or are directly linked to impacts through business relationships.

THE POLICIES

Sustainability Policy; Responsible Sourcing and Product Stewardship Standard; Sustainability Risk Management & Due Diligence Process; ISCC Management Process; Environmental Checklists; KYC & DDQ forms

SAFETY AND COMPLIANCE

All products must meet applicable laws and industry standards for quality, labeling, packaging, and transport. This includes TSCA, REACH, and other regulatory standards.

PRODUCT KNOWLEDGE AND DATA

Product safety data sheets (SDS), regulatory certifications, and other documentation must be maintained and made available to customers. No product may be traded, transported, or stored without necessary documentation.

CLIMATE TRANSPARENCY

We encourage suppliers to calculate and disclose their **Product Carbon Footprints (PCF)** and proactively provide customers PCF reports for their purchases, improving transparency across the chemical value chain.

POLLUTION PREVENTION

We promote the use of Operation Clean Sweep® standards to prevent accidental releases during loading, transport, or transfer of materials at storage and packaging sites.

TRACEABILITY AND CERTIFICATION

We support ISCC PLUS certification for renewable and recycled feedstocks and expect suppliers and customers who are certified to follow recognized chain-of-custody systems. Employees must verify certification status where applicable and escalate uncertainties to the relevant departments.

SUSTAINABLE PRODUCTS

The Sustainable Products line aims to increase the sale of circular, renewable, and low-carbon products.

PRODUCT RISK

All new products and suppliers must undergo ESG, quality, compliance, and risk evaluation before trading approval.

Snapshot

- ✓ Choose partners carefully
- ✓ Watch for human rights and safety risks
- ✓ Raise concerns early

When it comes to responsible sourcing and product stewardship:

- ✓ Confirm that all business partners have passed Tricon's KYC and due diligence checks before contracting. Do not bypass due diligence or omit contract clauses.
- ✓ Follow the new product process before entering into an agreement to buy or sell a new product.
- ✗ Never trade or ship materials that lack verified safety data, chain-of-custody, or legal documentation.
- ✓ Be aware of red flags around ethical, environmental, human rights, labor, or product-safety risks.
- ✓ If you see or suspect an issue, report it to Sustainability or Compliance Teams or the Tricon Listens Helpline.
- ✓ Ensure transport, storage, and packaging partners meet Tricon's safety and environmental standards.
- ✓ Share sustainability data, such as PCFs or certifications, with customers to support informed decision-making.

Summary Table: Responsible Sourcing and Product Stewardship in Action

FOCUS AREA	WHAT YOU DO	WHY IT MATTERS
Supplier Due Diligence	Verify ESG and sanctions screening; track RSPS sign-on and escalate concerns before engagement	Ensures ethical, transparent partnerships
Product Approval	Submit New Product form to newproduct@triconenergy.com and complete required documentation	Prevents legal, safety, and reputational risk
Traceability & Certification	Verify documents (ISCC PLUS, REACH, etc.) and follow chain-of-custody rules when handling certified products	Builds trust and circular market credibility
PCF Data & Transparency	Request PCF data from suppliers and share PCF results with customers	Supports decarbonization and accountability
Logistics & Pollution Prevention	Apply Operation Clean Sweep®, follow spill-prevention controls, and request Sea Cargo Charter data from liquid tankers	Reduces environmental impact and microplastic loss

IRL

In this example, a vessel under consideration is flagged for labor abuses, including non-payment of wages and denial of leave. A trader shifts Incoterms to make marine transport the customer's responsibility.

What's the problem? Tricon does not tolerate forced labor, including in its value chain. The trader shifted financial responsibility but our responsibility to respecting human rights remains, even if not under our direct contractual control.

What should be done? Notify the customer of the human rights issue and work with the sustainability team to verify there is no forced labor occurring before loading products on the vessel. If there is push back, escalate the concern to the Sustainability Committee.

Why: Changing contractual terms doesn't remove Tricon's ethical responsibility. We will not contribute to or ignore forced labor risks. All high-risk vessels must undergo due diligence and escalation, even when contracted by a third party.

PEOPLE & WORKER WELFARE

Our policies and practices aim to create workplaces and partnerships that protect health and well-being, respect human rights, and promote fair and inclusive conditions for all.

Tricon prohibits forced labor, child labor, discrimination, harassment, and abuse, and requires the same standards from our contractors, logistics providers, and suppliers.

We provide safe work environments, respect cultural diversity, and promote mental health and flexibility. The Worker Welfare Guidelines define these expectations across our business and value chain and require applying whichever standard (local law or Tricon's guidelines) offers greater protection for workers.

THE RULE

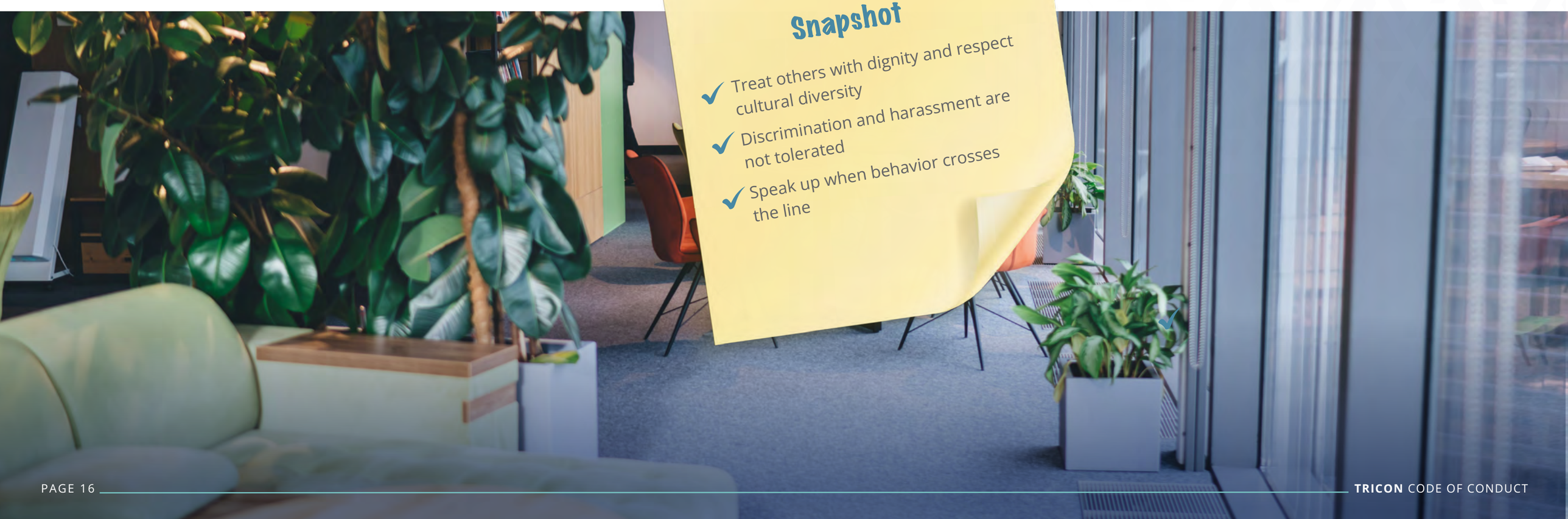
Complying with worker welfare standards is not optional.

THE POLICIES

Employee Handbooks locally; Worker Welfare Guidelines

Snapshot

- ✓ Treat others with dignity and respect cultural diversity
- ✓ Discrimination and harassment are not tolerated
- ✓ Speak up when behavior crosses the line





Tricon is committed to fair, transparent, and inclusive recruitment practices. We attract and select talent based on merit, skills, and alignment with our values.

IRL

In this example, a hiring manager favors a candidate referred by a close friend, despite another applicant being better qualified.

The hiring manager should follow HR's structured recruitment process and select the candidate objectively based on skills and qualifications.

IRL

If, for example, you are in team chat and someone sends a joke that targets a colleague's nationality, you should stop the chat, document what you saw, and report it via your manager, local Human Resources, or Tricon Listens.

If you feel safe doing so, address the behavior in the moment and explain that the comment is inappropriate. This helps signal to others that it's not acceptable or tolerated among Tricon teams. Either way, you should also report the incident to Tricon Listens or other appropriate channels.

Tricon is committed to ensuring employees understand their responsibilities and have the knowledge and skills needed to act safely, ethically, and effectively. Training and development support individual growth, strong decision-making, and compliance with our Code, policies, and applicable laws.

WORKPLACE HEALTH, SAFETY, AND SECURITY

Safety is our top priority and everyone's responsibility. We proactively prevent incidents, stop unsafe work, report hazards and near-misses, and follow incident and emergency protocols.

Stop-work authority: If you see unsafe conditions or behaviors, stop the work, alert others, and escalate immediately.

Report and respond: Report all incidents, near misses and unsafe conditions immediately. Cooperate fully in investigations and corrective actions.

Product safety and handling: Follow SDS and regulatory requirements for storage, transport, and delivery; and do not handle products without appropriate training.

Logistics and terminals: Verify that Tricon's standards for spill prevention, emissions control, and worker protection are followed.

Emergency readiness: Know your role during drills and follow evacuation, shelter-in-place, or business continuity procedures.

Follow site safety rules: Use PPE as required and complete required HS&S training.

Well-being and security: Maintain a safe workspace, protect access credentials, and support mental and physical wellness programs by making use of available resources and looking out for colleagues' wellbeing.

THE RULE

No task is more important than safety.

THE POLICIES

Environmental, Health, Safety & Security Policy; Safety & Health Guidelines; Worker Welfare Guidelines; Emergency & Business Continuity Plan; Environmental Guidelines

Snapshot

- ✓ Safety comes first, always
- ✓ Stop work if conditions are unsafe
- ✓ Report incidents and near misses

IRL

You see a person performing an unsafe behavior, such as standing on a chair instead of using a ladder, carrying multiple boxes down the stairs, bypassing PPE requirements, or lifting incorrectly.

Right response: Approach someone respectfully, ask to stop the unsafe behavior immediately, and provide feedback on the potential risks. Reinforce the correct safe practice before work continues and report to supervisor.

Why: Unsafe behavior is an unnecessary risk for injury. Stopping unsafe behavior may prevent harm to that person and keep others from being exposed to the same risk.



COMMUNITY INVESTMENT

We are committed to respecting human rights in communities, in alignment with the **UN Guiding Principles** on **Business and Human Rights**. We believe that healthy, safe, and inclusive communities strengthen our business and reflect our values.

As part of this focus, we support community investment programs designed to create lasting social and environmental value, support the **UN Sustainable Development Goals (SDGs)**, and align with **Tricon's Sustainability Policy**.

Creating Impact

Project Zero is Tricon's flagship social investment initiative, focused on advancing zero waste, zero emissions, and zero inequality, with particular emphasis on schools and community-based programs. Through Project Zero, Tricon supports projects that promote environmental protection, social inclusion, education, and community resilience. All social investments are made responsibly and transparently, following defined governance, approval, and due diligence processes, and must never create or appear to create a conflict of interest or influence a business decision.

TRICON CARES

Tricon Cares is our global employee volunteering and community engagement program. It enables employees to give back locally while strengthening our culture of sustainability, inclusion, and collaboration. Each full-time employee is entitled to one paid volunteer day per year to participate in approved activities aligned with Tricon's values.

Volunteering may include:

- Project Zero or Tricon Cares signature events.
- Local cleanup or education activities aligned with Tricon's sustainability goals.
- Joining community resilience, inclusion, or environmental restoration projects.
- Inclusion programs like GENUINE CUP HOUSTON 2026

Where community engagement efforts are involved, employees must ensure that:

- Community and charitable activities align with Tricon's sustainability priorities
- Required approvals are obtained from the Compliance and Sustainability teams
- Contributions are lawful and transparent

THE RULE

Community engagement must be responsible and approved.

THE POLICIES

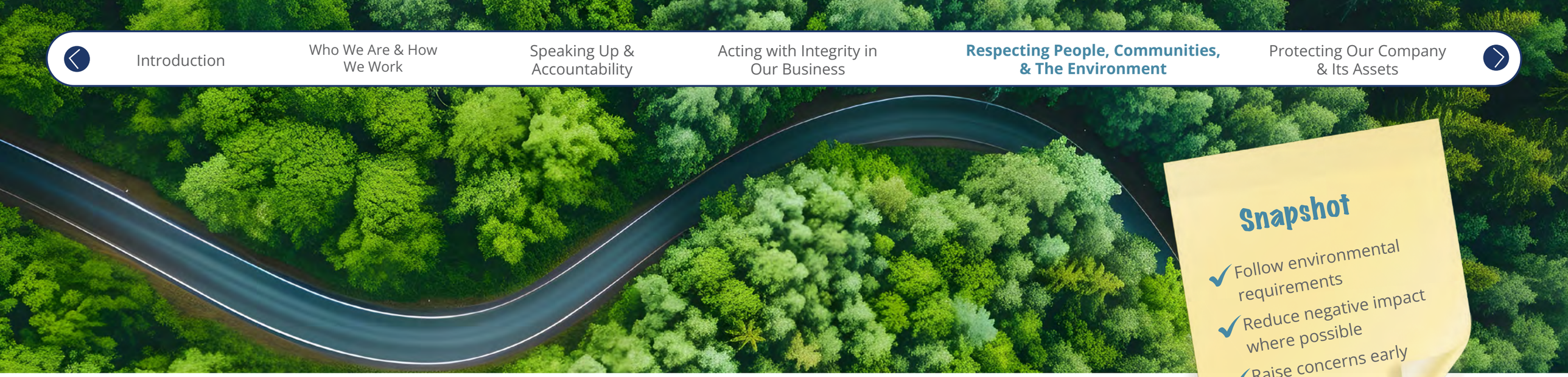
Sustainability Policy; Social Investment Process; Office Guide to Sustainability; Sustainability Reporting Methodology

IRL

If an office wanted to sponsor a local baseball tournament that promotes youth inclusion and community recycling awareness, the team would need to check that the project aligns with sustainability goals and examine the business case (e.g. employee engagement, reputation, marketing).
Depending on the amount of the investment and purpose, this might be considered a marketing expense or a social investment.
Contact the sustainability team to discuss.

Snapshot

- ✓ Follow approval processes
- ✓ Ensure transparency
- ✓ Align activities with company values



SAFEGUARDING THE ENVIRONMENT

We are committed to reducing our environmental impact and complying with applicable environmental laws and regulations. Our environmental commitments extend beyond compliance to reflect continuous improvement, transparency, and accountability in how we operate in offices and how we source, transport, and manage products globally.

This includes:

- Complying with all applicable laws, international conventions, and Tricon's Environmental Guidelines
- Managing waste responsibly
- Using resources efficiently
- Partnering with customers and suppliers to improve environmental performance

Environmental responsibility is part of protecting our business and the communities in which we operate.

That means we:

- Track and report environmental performance such as waste intensity, emissions, and energy consumption
- Follow all environmental regulations and site-specific permits
- Conduct risk assessments using the site checklists
- Promote recycling, waste minimization, and resource conservation in all facilities
- Use the Environmental Incident Flowchart for reporting and escalation
- Implement operational efficiency and green leasing standards
- Follow responsible sourcing & product stewardship good practices

Snapshot

- ✓ Follow environmental requirements
- ✓ Reduce negative impact where possible
- ✓ Raise concerns early

THE RULE

Environmental responsibility is part of how we do business.

THE POLICIES

Environmental Guidelines; Sustainability Reporting Methodology; Environmental Incident Report

Protecting Our Company and Its Assets

Protecting Tricon's assets, information, and financial integrity is a shared responsibility. Each of us plays a role in safeguarding company resources, ensuring financial integrity, and communicating responsibly on behalf of the company.

USE OF COMPANY RESOURCES

Company resources – including travel, expense, and office administration activities – must be used for legitimate business purposes and in accordance with company policies.

This includes:

- Physical property and equipment
- Office resources and supplies
- Travel and expense spending and reporting
- Company time and services

Employees are expected to use company resources responsibly, avoid misuse, and ensure expenses are accurate, properly documented, and approved.

All business travel must follow the Travel & Expense Policy, including required pre-approvals and use of approved booking tools where applicable. Expense reports must be complete, submitted properly, and supported by appropriate documentation. Falsification, personal use of company funds, or circumvention of approval processes is prohibited.

Office-related commitments – including leases, new office setups, or vendor engagements – must follow established evaluation and approval procedures. Employees may only negotiate or commit within their delegated authority.

Personal use of company resources should be limited and must not interfere with business operations or violate company policies.

THE RULE

Use company resources responsibly and transparently.

THE POLICIES

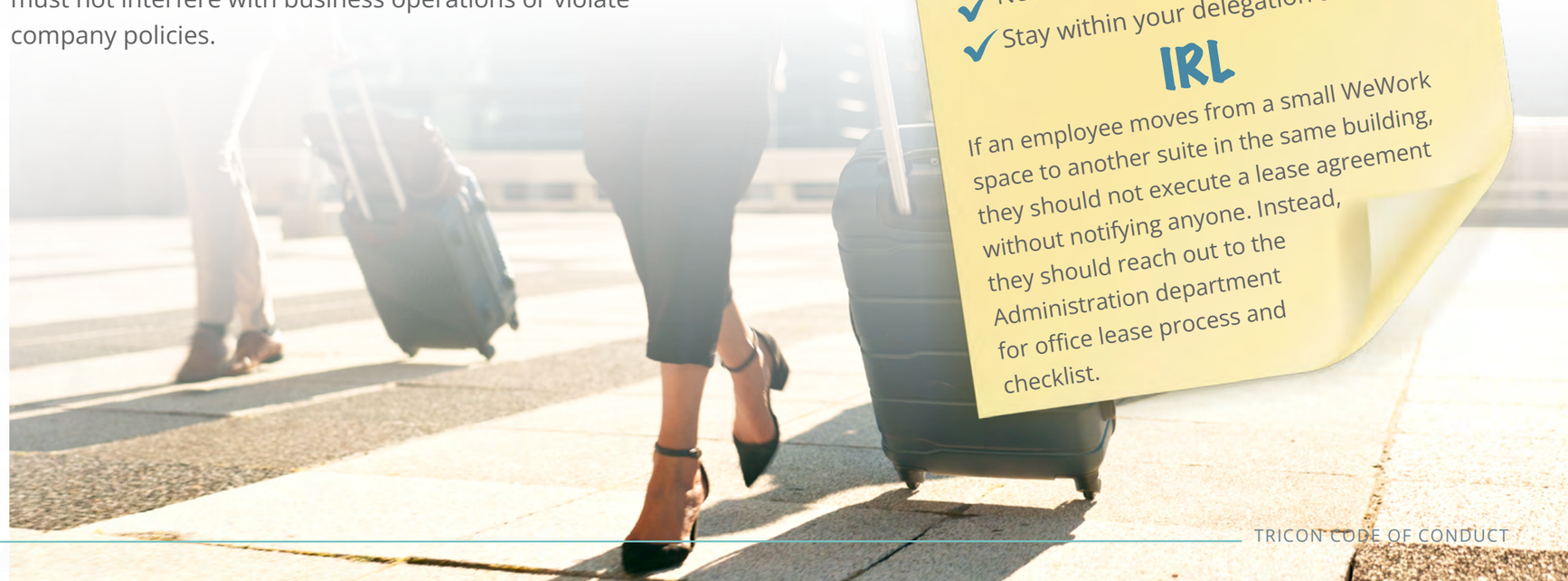
Travel & Expense Policy; New Office Checklist; Contract Review & Approval Matrix

Snapshot

- ✓ Use resources for business purposes
- ✓ Follow travel and expense approval processes
- ✓ Never falsify or misuse company funds
- ✓ Stay within your delegation authority

IRL

If an employee moves from a small WeWork space to another suite in the same building, they should not execute a lease agreement without notifying anyone. Instead, they should reach out to the Administration department for office lease process and checklist.



PROTECTING INFORMATION & TECHNOLOGY

Privacy & Data Protection

We are responsible for protecting confidential, proprietary, and personal data belonging to Tricon, our employees, and our business partners.

This includes:

- Commercial and contractual information
- Customer and supplier data
- Financial and operational records
- Personal employee information

Tricon complies with global privacy laws and protects personal and business data through appropriate safeguards.

Personal data must be:



Collected only for legitimate purposes



Stored securely



Shared only when necessary



Protected through technical and physical controls

Information must only be accessed, used, or shared for legitimate business purposes and in accordance with applicable privacy and data protection laws.

Technology Use

Employees must use IT systems, devices, and networks responsibly and in accordance with policy.

Employees must:

- ✓ Protect company devices and systems from unauthorized access
- ✓ Follow cybersecurity and IT policies
- ✓ Report lost devices promptly
- ✓ Use approved systems for business communications
- ✓ Report suspected phishing, malware, or breaches immediately
- ✓ Limit personal use only where permitted

Confidential and proprietary information must not be shared without authorization.

THE RULE

Protect company systems and data at all times.

THE POLICIES

Global Privacy Policy; Tricon Fair Processing Statement; Mobile & Enterprise-Owned Device Policy

Snapshot

- ✓ Keep data and systems secure
- ✓ Don't share credentials
- ✓ Report suspicious activity and lost devices immediately

IRL

Say an employee receives a suspicious email requesting login credentials. Instead of responding or clicking any links, they should report it to IT for review.

FINANCIAL INTEGRITY & CONTROLS

Accurate financial reporting and strong internal controls are essential to Tricon's operations and regulatory compliance.

Accounting & Reporting

All financial records must be accurate and compliant with accounting standards.

Employees must never falsify records or misrepresent financial performance.

Treasury & Payments

Payment processes must follow approval structures and controls.

Employees must:

- Follow Accounts Payable procedures
- Avoid circumvention of payment controls
- Escalate irregular payment requests

Credit & FX Risks

Credit currency exposure must be managed in line with company risk frameworks.

This includes:

- Counterparty credit management
- Exposure monitoring
- FX hedging requirements

THE RULE

Financial records must always reflect the truth.

THE POLICIES

Revenue Recognition Policy; Inventory Valuation; Loss Reporting

Snapshot

- ✓ Record transactions accurately
- ✓ Follow payment controls
- ✓ Escalate irregular requests

IRL

If a vendor were to request early payment outside normal terms, unless approved by Treasury, you must decline and escalate the request.

MEMBERSHIPS & ASSOCIATIONS

Tricon participates in trade, sustainability, and industry associations that advance responsible business practices. Participation must always reflect Tricon's values and must not create conflicts of interest or antitrust risks.

All memberships and sponsorships must be approved through appropriate business and compliance channels. Employees representing Tricon in industry groups must act professionally and avoid sharing confidential or competitively sensitive information.

Employees must also:

- Obtain approval before committing Tricon to any association membership
- Avoid discussions on pricing, markets, customers, or other sensitive topics
- Escalate questions to Compliance before agreeing to position that may create risk

THE RULE

Participate in industry groups responsibly and never share sensitive information.

THE POLICIES

Antitrust Policy; Communications & Marketing Guidelines

Snapshot

- ✓ Get approval before joining associations
- ✓ Avoid discussing pricing or markets
- ✓ Escalate risky discussions

IRL

If an employee was attending an industry meeting and was asked to share views on pricing trends, they should decline and reinforce that discussing pricing could violate antitrust laws.

COMMUNICATIONS

We communicate accurately, responsibly, and consistently, protecting confidential information, personal data, and Tricon's reputation. Every communication, whether internal or external, reflects on the company and must support trust, transparency, and compliance.

Internal Communications & Awareness

Our internal communications help ensure employees are informed, aligned, and able to act on Tricon's values and strategy.

Employees must:

- Use respectful and professional language across email, chat, and collaboration platforms
- Protect confidential and sensitive information and share only on a need-to-know basis
- Follow the Acceptable Use Policy and Device Policies when using company systems

External Communications & Social Media

External communications – including media engagement, marketing, conference speaking, customer materials, and social media – shape Tricon's reputation and must be accurate, coordinated, and approved where required.

Snapshot

- ✓ Keep internal and third party comms professional
- ✓ Don't post confidential information
- ✓ Route media inquiries to Communications department

Employees must:

- Not speak on behalf of Tricon without authorization
- Route media and investor inquiries to Marketing & Communications
- Obtain approval before public speaking engagements when appearing as a representative of Tricon
- Use Tricon's brand, logo, and messaging only as permitted and within guidelines
- Avoid sharing confidential, proprietary, or inside information in any communications
- Keep personal opinions clearly separate from company positions
- Report impersonation, brand misuse, or suspicious online activity

THE RULE

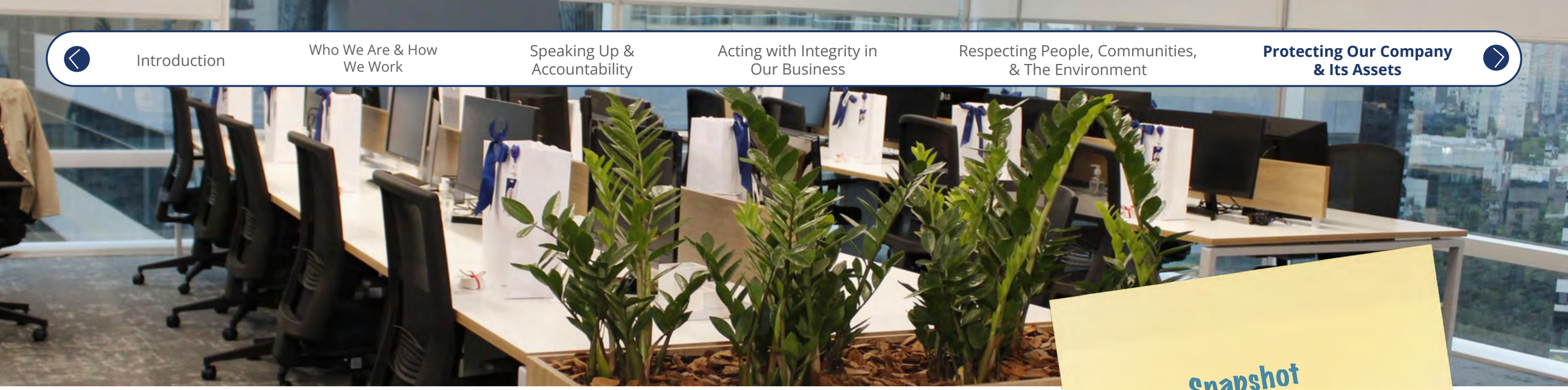
Only authorized voices speak for Tricon.

THE POLICIES

Acceptable Use Policy; Mobile & Enterprise-Owned Device Policy; Worker Welfare Guidelines

IRL

In this example, following an internal company update, an employee posts a screenshot of a slide from the meeting that contains non-public information. Employees who see the post should notify the Communications department, and the employee who posted it should remove it. Any inquiries that happen as a result of the post should also be directed to the Communications department.



QUESTIONS, RESOURCES, & COMMITMENT

WHEN IN DOUBT, ASK.

This Code is designed to guide decisions, but it cannot cover every situation. If you are unsure how to apply it, or if something does not feel right, seek guidance before acting.

Raising questions early protects you, your colleagues, and the company.

Questions or Concerns: Relevant Contacts

- **Global Compliance Director**
- **Chief Sustainability Officer**
- **Global Travel & Administration Manager**
- **Communications & Marketing Manager**
- **Your manager**
- **Your local HR**
- **Tricon Listens Helpline**

Policies & Resources

All the policies and guidelines linked in this document can be found in the Policies & Best Practices folder on Tricon's SharePoint

Your Responsibility

All employees and applicable third parties are required to:

- ✓ Review and understand this Code of Conduct
- ✓ Complete required training
- ✓ Comply with the standards outlined in this Code
- ✓ Acknowledge their commitment to follow it

Our Shared Commitment

Our reputation is built on how we act – every day, in every room, and in every market. Each of us is responsible for protecting that reputation through integrity and accountability.

Snapshot

- ✓ You are expected to use good judgement
- ✓ You are encouraged to speak up
- ✓ Seeking guidance is a sign of responsibility

THE RULE

If you're unsure, ask before you act.

TRICON

THANK YOU