

TRENCH GROUP

Business Partner Code Of Conduct

Release Date: August 1st 2025

TRENCH
Sense the Power

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Sustainable Business Practices

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Sustainability and integrity are core to our business.

At Trench Group, our commitment to ethical business practices and integrity extends to every relationship we build, including those with our Business Partners. We believe that sustainable, transparent, and ethical partnerships are essential to our mutual success and to maintaining the trust of our customers, employees, and communities.

Trench Group expects all Business Partners to demonstrate the same commitment to fairness, honesty, responsibility, and dedication to sustainability and integrity across every area of their business.

This Business Partner Code of Conduct outlines the standards and expectations we hold for all our partners, including suppliers, contractors, consultants, and all other entities that collaborate with us.

Legal Compliance and Management System

Ensuring compliance with relevant legal requirements is the baseline for complying with the Business Partner Code of Conduct.

We encourage our Business Partners to pursue continuous improvement by establishing, implementing, and maintaining recognized compliance management systems and standards in line with the principles outlined in the Business Partner Code of Conduct. A solid foundation for successfully implementing this Code includes thorough risk assessment, well-defined policies, processes, and routines, clearly communicated roles and responsibilities, relevant training and guidance, the establishment and evaluation of measurable goals, and effective control systems.

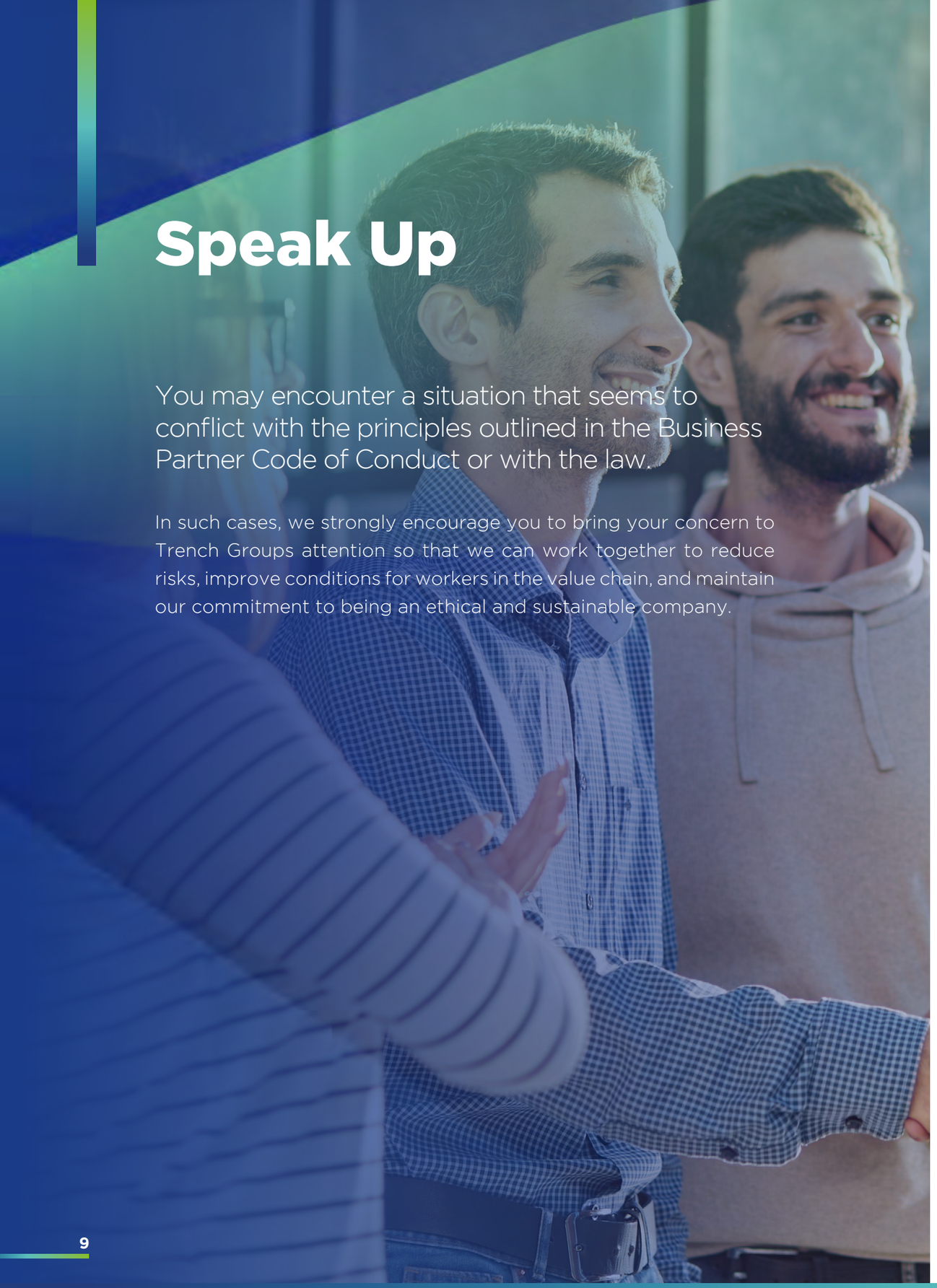
Monitoring

All business relationships between Trench Group and our Business Partners must be grounded in honesty, trust, and collaboration.

By agreeing to the Business Partner Code, the Business Partner commits to upholding these standards within its own operations and supply chain. When assessing a Business Partner's adherence to the Business Partner Code, Trench Group will consider the scope and relevance of the requirements in relation to the nature of the Business Partner's operations and the associated risks. Additional sustainability requirements and targets specific to the Business Partner may also be outlined in commercial agreements.

If a Business Partner fails to grant Trench Group the right to verify compliance with the Business Partner Code of Conduct or does not address identified non-compliances within a reasonable timeframe, this will be deemed a material breach of the Code. Consequently, Trench Group reserves the right to terminate the contractual relationship with the Business Partner.

Speak Up



You may encounter a situation that seems to conflict with the principles outlined in the Business Partner Code of Conduct or with the law.

In such cases, we strongly encourage you to bring your concern to Trench Groups attention so that we can work together to reduce risks, improve conditions for workers in the value chain, and maintain our commitment to being an ethical and sustainable company.

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HOW TO SPEAK UP

Speak Up is accessible through the Trench Group internet portal via the Whistleblowing platform, available in all languages where Trench operates. In addition to reporting incidents, the system can be used to ask questions related to the Business Partner Code of Conduct.

All reports received will be carefully evaluated, and an internal investigation will be conducted if necessary. The relevant details you provide will be recorded in a case management database, and an investigator may contact you for additional information. The information you share is kept confidential. While you have the option to remain anonymous where local laws permit, we strongly encourage you to identify yourself to facilitate a thorough investigation.

Speak Up
Trench Group

https://trench-group.ethicspoint.com

NON-RETALIATION POLICY

Your privacy and integrity are of the utmost importance to us. This is particularly relevant when you or one of your colleagues steps forward to report a concern or suspected violation of our policies or the law. We will not retaliate against an employee or business partner who, in good faith, voices their concern.



Health and Safety

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All Business Partners must prioritize health and safety as fundamental values in all operations and activities.

Business partners are required to comply with all applicable local, regional, and national health and safety laws, regulations, and standards. This includes but is not limited to occupational health and safety laws, environmental regulations, and building codes.

Business partners must proactively identify, assess, and manage risks associated with their operations. This includes implementing effective hazard prevention measures to minimize the risk of accidents, injuries, and illnesses in the workplace.

Human Rights

We believe the protection of human rights is fundamental to sustainable business practices and is a shared responsibility.

We expect all Business Partners to respect the principles established in international human rights frameworks, such as the core labor standards established by the International Labor Organization (ILO) and the UN Guiding Principles on Business and Human Rights (UN Global Compact). Compliance with these principles, as well as relevant national and regional human rights legislation, is essential in all collaborative efforts.

LABOR RIGHTS

We expect all Business Partners to prohibit forced labor and any form of exploitation or abuse. It is essential that all workers are treated with respect and provided with fair employment opportunities and safe working conditions.

CHILD LABOR

We require our Business Partners to actively prevent child labor within their operations and supply chains. Employees must be at least 15 years of age (or 14 where permitted by national law) or older, as required by local legislation.

Young workers under the age of 18 must not engage in work that is mentally, physically, socially, or morally harmful or that interferes with their education. Additionally, young workers are prohibited from working night shifts.

MODERN SLAVERY

Modern slavery in any form—including forced, compulsory labor, servitude, deceptive recruitment, and human trafficking—is completely unacceptable to Trench. This encompasses not only all work performed under duress but also any situation involving coercion, mental or physical threats or abuse, misuse of power, or deception.

DISCRIMINATION AND EQUAL TREATMENT

Workplace discrimination is unacceptable to Trench Group. Inclusive and diverse teams promote enhanced performance and results for the company.

Business Partners must ensure equal treatment of employees, irrespective of skin color, race, nationality, ethnicity, social background, health status, disabilities, gender, sexual identity and orientation, marital status, political opinion, ideological or religious conviction, belief, or age, and promote their equal opportunities.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Business partners must recognize and respect the right of employees to freely associate, organize, and engage in collective bargaining, in accordance with the laws of the countries where they are employed.

WORKING HOURS AND WAGES

Reasonable working hours and fair remuneration are central to providing decent working conditions. At a minimum, Business Partners are expected to adhere to all applicable working hours and fair pay policies or regulations. Employees should be informed of their employment conditions, including rights and obligations. Business Partners are encouraged to maintain transparency and accountability in tracking working hours and wages.



Prohibition of corruption

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Business Partners must adhere to local laws and international anti-corruption conventions and must not engage in any form of corrupt practices.

This policy establishes the ethical and legal responsibilities of our business partners to prevent corruption, bribery, and unethical practices in compliance with international laws, including the United Nations Convention Against Corruption (UNCAC), the OECD Anti-Bribery Convention, the U.S. Foreign Corrupt Practices Act (FCPA), and the UK Bribery Act. Business partners—including suppliers, vendors, contractors, agents, consultants, distributors, and joint ventures—must not offer, solicit, or accept bribes, facilitation payments, or improper benefits. Compliance with all applicable anti-corruption laws, proper record-keeping, and transparency in transactions are mandatory. Due diligence and risk assessments are required before engagement and periodically thereafter, with any red flags reported for investigation. Business partners must also provide anti-corruption training to employees and adhere to contractually binding compliance standards.

Violations may result in contract termination, legal action, and reporting to regulatory authorities. Partners are required to report any suspected violations to our compliance officer or through an anonymous whistleblower channel, with protection against retaliation. Regular audits and corrective actions may be enforced if non-compliance is detected. This policy is reviewed periodically to align with evolving legal and regulatory standards, and all business partners must acknowledge and commit to its principles as part of their contractual obligations.

Business Ethics

Trench Group prioritizes ethics and sustainable business practices in everything we do, and we expect the same from our Business Partners.

ANTITRUST AND FAIR COMPETITION

Business partners are expected to fully comply with all applicable antitrust and competition laws. They must conduct business fairly and honestly and must not enter into agreements or take part in actions that limit competition or distort market conditions. This includes avoiding practices such as price fixing, bid rigging, dividing markets or customers, or any similar anti-competitive behavior. Business partners should also not share confidential business information such as prices, production volumes, or sales terms with competitors. Any suspected violations of antitrust or competition laws must be reported immediately.

INFORMATION SECURITY

Business Partners must follow all applicable principles for personal data protection and use personal data only when lawful and necessary to fulfill legitimate business purposes. An adequate Cybersecurity management framework should be established based on good industry practices, to ensure confidentiality, authenticity, integrity, and availability of data, processes, products, systems, and services.

Business Ethics

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EXPORT AND TRADE COMPLIANCE

Business partners must comply with all applicable export control, customs, and trade laws in the countries where they operate and conduct business with us. This includes understanding and following any restrictions on the transfer or shipment of goods, services, software, and technology across borders. Business Partners must not engage in business with any countries, individuals, or entities that are subject to government sanctions or trade restrictions. They are responsible for securing any required licenses or approvals for controlled exports or re-exports and must ensure that all customs and export documentation is complete, accurate, and truthful.

CONFLICTS OF INTEREST

Employees are expected to act in the best interests of the company, ensuring that personal interests and considerations do not influence business decisions. Both Trench Group and its Business Partners must avoid any activities or situations that could create a conflict between an employee's private interests and the business interests of Trench Group. All conflicts of interest should be reported promptly to Trench Group.

Environment

Trench Group is committed to minimizing environmental impact, addressing climate change, and promoting circularity in all operations.

We focus on reducing emissions, waste, and energy consumption while protecting biodiversity, using resources sustainably, and managing land responsibly.

Business Partners are expected to continuously improve their environmental performance and comply with relevant regulations.

Responsible Sourcing of Minerals

Business Partners must comply with all applicable laws concerning responsible sourcing and conflict minerals, avoiding the use of raw materials originating from Conflict-Affected and High-Risk Areas.

Supply chains that either directly or indirectly contribute to conflicts or to serious human rights violations are unacceptable to Trench Group.

Supply Chain

Business Partners must take reasonable measures to ensure all suppliers comply with the principles of this Business Partner Code of Conduct and to verify this using a risk-based approach.

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Business Partner Acceptance

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I/We the undersigned authorized representative/s, hereby certify on behalf of itself and its affiliates* that the business partner and its affiliates* accept and comply with the Trench Group Business Partner Code of Conduct.

Full company name _____

Place _____

Date _____

Name _____

Position _____

Signature

_____

*Affiliate(s) means any entity which is controlled by a party, which controls a party hereto, or which is under common control with a party hereto. For purposes of this Business Partner Code of Conduct, "control" of an entity means the direct or indirect ownership of more than fifty percent (50%) of the shares or interests entitled to vote for the directors of such entity or equivalent power over the management of such entity, for so long as such entitlement or power exists.