



TriMark USA
Code of Business Ethics and Conduct

Always on the Mark

CONTENTS

✓ A Message from the Chief Compliance Officer

✓ Our Foundation

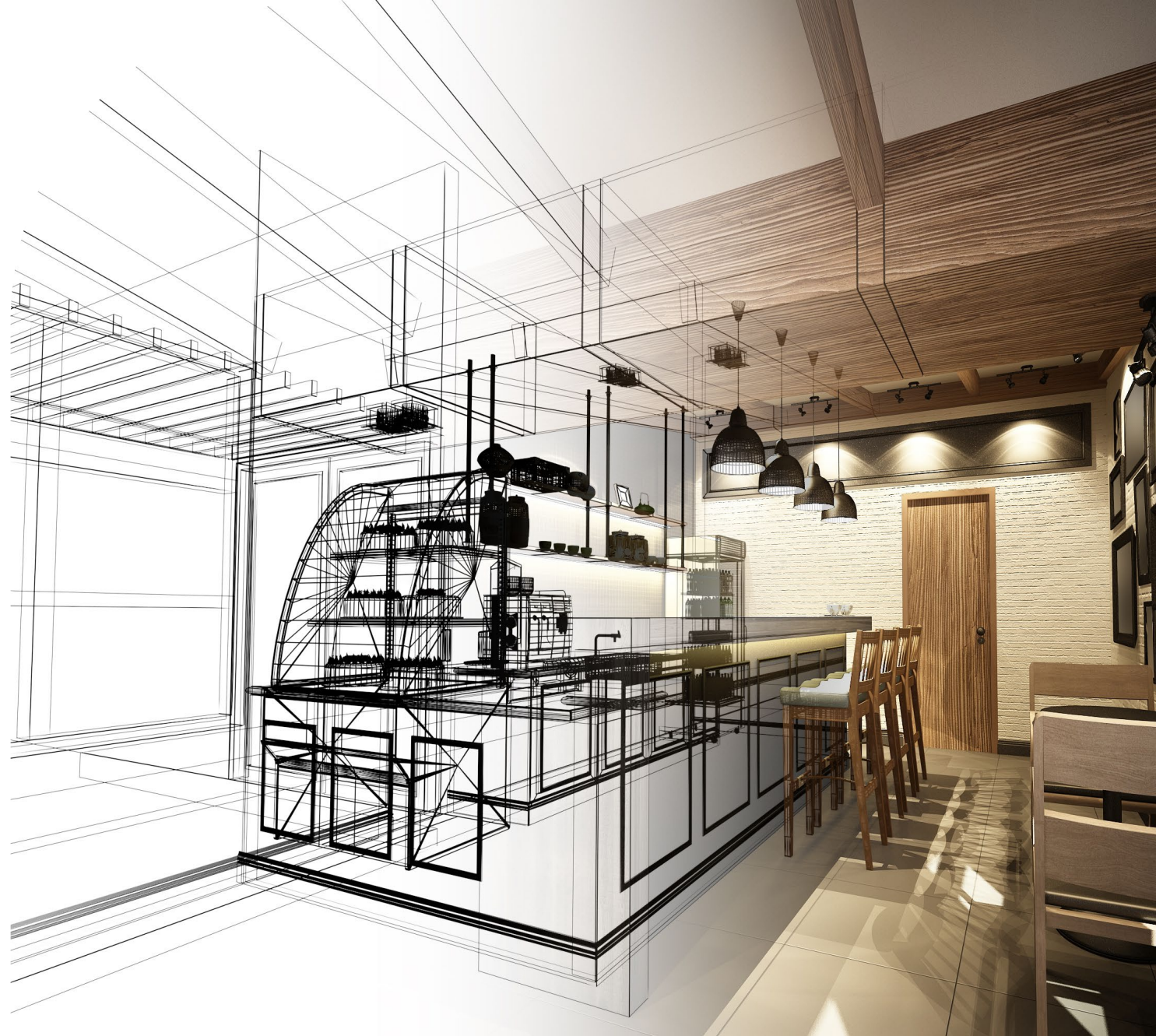
✓ Purpose and Values

- Our Purpose
- Our Core Values

✓ Do The Right Thing

01. Committing to Compliance
02. Respecting, Upholding, and Protecting
03. Leading by Example
04. Holding Each Other Accountable
05. Being Loyal and Responsible
06. Communicating Honestly and Accurately
07. Building Trust and Credibility

✓ Resources



A MESSAGE FROM THE CHIEF COMPLIANCE OFFICER

At TriMark, ***Always on the Mark*** is more than a slogan. It means moving fast, staying on target, and delivering results the right way—every time.

Our **Code of Business Ethics & Conduct** sets the standard for how we operate—across every team, every location, and every decision.

Guided by our core values, we are expected to do the right thing. This means making sound, responsible decisions—especially when it's not easy—and speaking up when something doesn't feel right.

Integrity isn't a box we check. It drives how we work, how we treat others, and how we build trust. When we act with purpose and transparency, we earn confidence and deliver results the right way.

Every decision matters. Each of us is responsible for understanding and following this Code. By doing so, we strengthen our reputation and drive continued success.

If you have a question or concern, speak up. That's how we protect our culture and each other.

Thank you for your commitment to doing the right thing and for helping keep TriMark ***Always on the Mark***.



Jacob Beier | Chief Compliance Officer

OUR FOUNDATION

Who We Are

We are an entrepreneurial, people-first company grounded in strong values and a shared commitment to doing things the right way—every time.

With more than a century of experience, we focus on safety, adaptability, and building a high-performing, positive culture.

We are better together as **One TriMark**.

What We Do

We provide foodservice equipment, supplies, and design solutions across industries.

Beyond our products, we deliver value to our colleagues, customers, and communities. Our work helps businesses operate, supports jobs, and creates the environments where people gather, connect, and share experiences.





PURPOSE AND VALUES

TriMark is built on five core values that guide how we operate, work together, and deliver results the right way—every day.

OUR PURPOSE

Our mission is to be our customers' essential partner—delivering foodservice equipment, supplies, and design solutions that help them succeed.



Our Code sets the standard for how we work, make decisions, and hold ourselves accountable.

TriMark is built on five core values:

Integrity

Customer Service

Accountability

Respect

Excellence

These values guide how we do business, how we treat others, and how we deliver results together—the right way.



OUR CORE VALUES



INTEGRITY

We do the right thing—every time, even under pressure.

KEY TRAITS:

- Honest and transparent
- Fair and consistent
- Exercises good judgment



CUSTOMER SERVICE

We put our customers first and respond quickly with solutions that help them succeed.

KEY TRAITS:

- Responsive and reliable
- Communicates clearly
- Solution-oriented



ACCOUNTABILITY

We act with urgency, solve problems, and deliver results. We own outcomes.

KEY TRAITS:

- Takes ownership
- Acts with urgency
- Delivers results



RESPECT

We treat people with respect and work well with others. We listen, collaborate, and act professionally.

KEY TRAITS:

- Respectful and professional
- Listens and values others
- Works well with others



EXCELLENCE

We set high standards and deliver quality work. We move quickly without cutting corners.

KEY TRAITS:

- High standards
- Attention to detail
- Continuous improvement



DO THE RIGHT THING

Every action matters. How we show up every day reflects our values and defines our reputation.



DO THE RIGHT THING

TriMark's core values guide how we make decisions every day—for ourselves, our teams, and the company.

Doing the right thing means acting with integrity, treating others with respect, and making decisions we can stand behind. Each of us is responsible for understanding and following this Code.

How we act matters. Our leaders, employees, and business partners are expected to live these values every day.

We emphasize:

- 01. Committing to Compliance**
- 02. Respecting, Upholding, and Protecting**
- 03. Leading by Example**
- 04. Holding Each Other Accountable**
- 05. Being Loyal and Responsible**
- 06. Communicating Honestly and Accurately**
- 07. Building Trust and Credibility**

DO THE RIGHT THING

01. COMMITTING TO COMPLIANCE

We follow the law and our policies everywhere we do business. Each of us is responsible for understanding the rules and making the right choices every day.

How we act matters. TriMark expects all colleagues and business partners—including vendors, suppliers, consultants, and other third parties—to act with integrity.

Bribery and Corruption

We do not offer, promise, give, or accept bribes. This includes money, gifts, favors, or anything of value to influence a decision or gain an unfair advantage.

This applies to everyone we deal with—especially government officials—anywhere we operate.

We are responsible for third parties acting on our behalf. We conduct appropriate due diligence and monitor third parties to ensure they meet our standards. We do not allow anyone to do something for TriMark that is improper or illegal, and we do not ignore red flags.

Reasonable, occasional business gifts or hospitality may be allowed if they are modest and permitted by policy. If you are unsure, stock and check with [Compliance](#).

Additional rules apply when working with government customers. See the [Government Contract Compliance Manual](#) for more details.



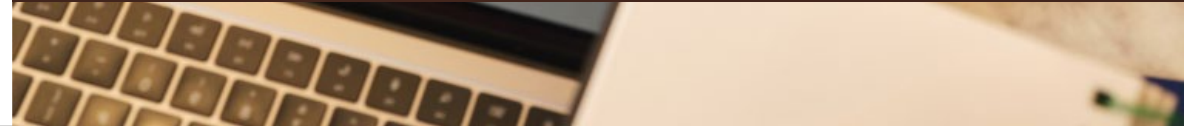
Competition

We compete the right way—fair, honest, and based on what we do best. We win business because of our quality, service, and competitive pricing. Not because of unfair practices

We never offer or accept bribes, kickbacks, or improper gifts when buying or selling products or services for TriMark.

We do not work with competitors or others to gain an unfair advantage. This means we never fix or control prices, rig bids or quotes, divide customers or territories, support or participate in unlawful boycotts, or agree with competitors about hiring, pay, or other terms of employment (including “no-poach” agreements).

See TriMark’s [Antitrust and Competition Policy](#) for more details.



DO THE RIGHT THING

Recognizing and Avoiding Conflicts of Interest

We avoid conflicts of interest that could affect our judgment or decision-making. If a potential conflict exists, you must disclose it.

Examples of situations that may create a conflict of interest include:

- Being employed by or consulting for a competitor
- Hiring or supervising family members or close relationships
- Serving on a board or in an advisory role for an organization that competes or does business with or could influence your decisions at TriMark
- Having a personal or financial interest in any TriMark transaction
- Accepting gifts, discounts, or favors that could influence a business decision

* In limited cases, gifts or other items of value may be allowed with prior approval and if equally available to all TriMark employees.



Conflicts aren't always obvious.

If something feels off, stop and ask before acting.

Disclose potential conflicts and get guidance from your manager, HR, or Compliance.

We are responsible for speaking up and protecting TriMark.



DO THE RIGHT THING

02. RESPECTING, UPHOLDING, AND PROTECTING

We treat people with dignity and respect—every day.

Everyone at TriMark deserves a safe, high-performing workplace where they can speak up, be heard, and do their best work.

We do not tolerate harassment, discrimination, or retaliation. If something isn't right, say something.

We are committed to safe, responsible, and sustainable operations—for our people, customers, and communities.

We put these principles in to practice by:

- **Respecting People**
- **Upholding Human Rights**
- **Protecting our Environment**





DO THE RIGHT THING

Respecting People:

We treat people with dignity and respect—every day.

We are committed to equal employment opportunity and comply with applicable laws.

We do not tolerate discrimination, harassment, retaliation, or violence. Period.

Speak up if something isn't right. We take concerns seriously, investigate them promptly, and act when needed.

TriMark strictly prohibits retaliation against anyone who raises a concern in good faith.

See the Anti-Harassment Policy and Ethics Reporting Policy and Procedure for more information.

Workplace behavior:

- ✓ Treat others with dignity and respect
- ✓ Speak up and report inappropriate behavior
- ✓ Work as a team and support one another
- ✓ Communicate clearly and professionally
- ✓ Listen to others and consider different perspectives
- ✓ Be accountable for your actions and how you show up

DO THE RIGHT THING

Upholding Human Rights:

We uphold human rights in all our operations and in every location where we conduct business.

We do not use child labor or forced labor. We do not tolerate abuse, exploitation, human trafficking, or unsafe or inhuman working conditions—anywhere in our business.

We expect our suppliers and contractors to meet these same standards. We will not work with partners who violate them.

For more information, please refer to TriMark's Supplier Code of Conduct.





DO THE RIGHT THING

Protecting the Environment:

We operate responsibly and work to reduce our environmental impact across our operations.

We focus on practical actions that improve efficiency, reduce resource use, and support resilient operations.

We stay informed on evolving environmental expectations, maintain readiness, and adjust our practices as needed.

We put this into action by:

- ✓ Reducing fuel use through route optimization
- ✓ Recycling materials such as cardboard, plastic wrap, and stainless steel at our largest warehouse
- ✓ Reducing landfill waste by returning or repurposing unused materials
- ✓ Continuously identifying opportunities to improve efficiency

For more information, see resources in the TriMark [Compliance Hub](#).

DO THE RIGHT THING

03. Leading by Example



TriMark leaders and managers set the tone. They model our values, drive results, and ensure we follow the Code.

Managers create clear expectations and a workplace where people speak up, take ownership, and do their best work.

Managers are expected to:

- ✓ Lead with integrity and accountability
- ✓ Set clear expectations and follow through
- ✓ Own results and deliver outcomes
- ✓ Act with urgency and a bias for action
- ✓ Build strong teams that work together and win
- ✓ Develop people and bring out their best
- ✓ Treat others with respect and fairness
- ✓ Support speaking up and never tolerate retaliation





DO THE RIGHT THING

04. HOLDING EACH OTHER ACCOUNTABLE

TriMark is committed to doing the right thing—even when it’s difficult.

Each of us is responsible for understanding and following this Code, asking questions when unsure, and speaking up when something doesn’t feel right.

We hold ourselves and each other accountable for meeting our standards. If you see or suspect a violation, raise it.

We don’t look the other way. We act.

Violations of this Code may result in disciplinary action, up to and including termination.

Concerns can be reported through multiple channels, including the [Ethics Line](#).

DO THE RIGHT THING

05. BEING LOYAL AND RESPONSIBLE

Protecting TriMark's confidential information is a core responsibility of all colleagues and partners.

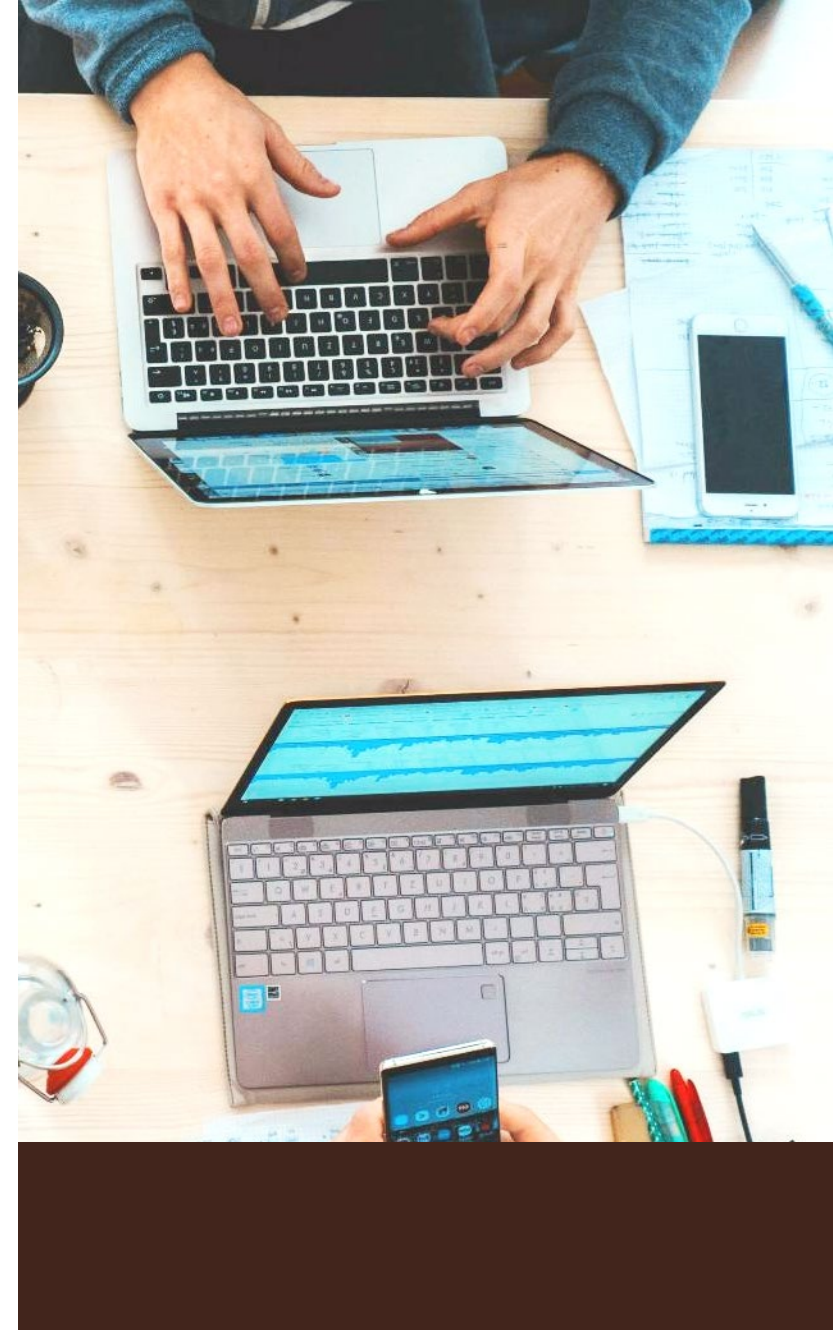
Confidential information includes:

- Pricing and financial data
- Customer names and contact information
- Non-public information about other companies
- Personal employee information

We use company resources—including time, systems, and information—responsibly and for legitimate business purposes. Do not use company resources to create, access, or share content that is inappropriate, offensive, or inconsistent with our standards.

TriMark may monitor the use of company systems and devices to protect the business and ensure compliance.

Business communications must be conducted through approved TriMark channels. Do not move business discussions to personal devices or unapproved messaging platforms. The use of applications that delete or obscure business communications is not permitted. When in doubt, keep it on company systems and ask before you act.





DO THE RIGHT THING

Protect privacy, secure information, and safeguard trade secrets—every time. When in doubt, protect the information and ask before you act.

Intellectual Property

We respect intellectual property rights—our own and those of others. Do not use, copy, distribute, or access proprietary information without authorization. Do not seek or use a competitor's confidential or trade secret information.

Data Privacy and Security

We protect the confidentiality and security of colleague and customer information. Handle sensitive information carefully and use it only for legitimate business purposes. Follow TriMark policies and applicable laws when collecting, using, storing, or sharing data.

Workplace Recording

Do not record coworkers, customers, or business activities without appropriate authorization and consent. This applies to audio, video, and photographs, except where legally permitted.

Use of AI and Technology

Use company-approved technology and AI tools responsibly. Do not input confidential, sensitive, or proprietary information into unauthorized systems. Follow TriMark's [policies](#) governing the use of AI and other technologies.

DO THE RIGHT THING

06. COMMUNICATING HONESTLY AND ACCURATELY

We communicate honestly, accurately, and in compliance with the law—every time. No business goal justifies misrepresenting facts or falsifying records.

Representations and Disclosures:

We ensure that all representations, certifications, and disclosures are accurate, timely, and complete. Speak up immediately if you believe any communication is inaccurate, misleading, or incomplete

Corporate Recordkeeping:

We create, retain, and dispose of company records in accordance with TriMark policies and legal requirements. Do not alter, conceal, or destroy records inappropriately. We prohibit improper influence, manipulation, or interference with audits or internal reviews.

Media Inquiries:

Direct all media inquiries to TriMark’s Marketing and Legal teams. Do not speak on behalf of TriMark or issue public statements without authorization.





DO THE RIGHT THING

07. BUILDING TRUST AND CREDIBILITY

TriMark's success depends on the trust we earn—every day—with our colleagues, customers, and partners.

We build trust through our actions: doing what we say, acting with integrity, and delivering results.

When making decisions, ask yourself:

- ✓ **Is this the right thing to do, and would I be comfortable explaining it?**
- ✓ **Does this build trust with our customers and colleagues?**
- ✓ **Can I deliver on this commitment—on time and with quality?**
- ✓ **Would I be comfortable if this decision were made public?**

RESOURCES



EMAIL

compliance@trimarkusa.com

REPORT A CONCERN

Reports may be made through multiple channels.

- Manager
- HR Business Partner
- Chief People Officer
- General Counsel
- Chief Compliance Officer
- Ethics Line

GUIDANCE & TOOLS

- Anti-Harassment Policy
- Antitrust and Competition Policy
- Code of Business Ethics and Conduct
- Ethics Reporting Policy
- Government Contract Compliance Manual
- Records Retention Guidelines
- Reports and Investigations Procedure
- Supplier Code of Conduct
- TriMark Compliance Hub

