



SUPPLY CHAIN CODE OF CONDUCT POLICY

Procedure: OP-990

Revision: 1.00

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Title: Supply Chain Code of Conduct

Purpose

Trilliant's Supply Chain Code of Conduct Policy defines acceptable standards of behaviour to be followed by employees and contractors involved with all activities concerning the supply chain. This includes planning, manufacturing, purchasing, contracting, logistics, payments, and other areas. This policy applies to all Trilliant employees and to participants in the Trilliant supply chain, including without limitation, suppliers, contract manufacturers, and shippers and logistics specialists ("Business Partners").

This Policy will be published on Trilliantinc.com where it will be publicly available. Trilliant purchase orders shall reference this policy, provide a link to the policy on Trilliantinc.com, and state as a requirement that all Business Partners comply with it.

Code of Conduct Statements

Business Ethics and Integrity

All Trilliant employees and Business Partners involved with purchasing, manufacturing, and other supply chain functions must act, and be seen to act, with professionalism and integrity. Due diligence and care are integral to the supply chain and operations function within Trilliant. All business transactions shall be fully transparent and reflected appropriately in financial records. All employees and Business Partners are to have a zero-tolerance policy for any form of corruption, bribery, and extortion. No Business Partner may offer anything of value to a Trilliant employee unless of inconsequential value such as mugs with business logos, pens, t-shirts and the like. Trilliant employees shall decline any such offers and report them to the SVP for SCM who will remind business partners of this policy.

Intellectual Property Rights

All intellectual property rights must be respected by all parties. Sharing and transfer of technology-related know how including specific designs of sub level components and/or finished goods shall be done in a manner that fully protects intellectual property rights and customer information.

Responsible Sourcing of Minerals

All Business Partners shall have in place and comply with policies designed to avoid the sourcing of "Conflict Minerals," tantalum, tin, tungsten and gold for incorporation into the products they manufacture where such sourcing might directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. Business Partners shall exercise due diligence on the source and chain of custody of these minerals and shall respond to requests from Trilliant for information on their due diligence measures

Labor

Trilliant is committed to protecting and upholding the human rights of workers within the supply chain and adheres to the United Nations Guiding Principles on Business and Human Rights. All workers shall be treated with utmost respect and dignity. This basic standard applies to all workers including contract / temporary, migrant, student, and any other type of labor.

Forced or indentured labor, involuntary prison labor, slavery or trafficking of persons shall not be utilized within the supply chain. This includes transporting, harbouring, recruiting, transferring or receiving persons

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by means of threat, force, coercion, abduction or fraud for labor or services.

Young Workers

Trilliant requires that its Business Partners not permit child labor in any stage of manufacturing or supply chain. The term “child” refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Workers under the age of 18 shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime.

Health & Safety

Trilliant strives to provide a safe and productive workplace to its employees, and expects all Business Partners to prioritize the occupational health and safety of its labor force. As a basic requirement, all Business Partners must adhere to all applicable health and safety laws, standards, and regulations. In addition, Trilliant encourages its Business Partners to:

- i. maintain policies, procedures and a management system aimed at preventing occupational and work-related incidents;
- ii. maintain OHSAS 18001 or equivalent certification; and
- iii. continuously evaluate and report safety performance through audits

Environmental

Trilliant places the utmost importance on protecting our natural resources and the environment. It is Trilliant’s policy to work with Electronic Manufacturing Services companies who are ISO 14001 Environment certified, and who are audited on a regular basis by third-party institutions.

Environmental responsibility is integral to producing Trilliant’s products. In manufacturing, adverse effects on the environment and natural resources are to be minimized while safeguarding the health and safety of the public.

All required environmental permits, approvals and registrations are to be obtained and kept current and their operational and reporting requirements are to be followed in participation with leading global and local legislation.

Hazardous substances and other materials posing a hazard if released to the natural environment are to be identified and managed appropriately to ensure their handling, movement, storage, recycling and disposal.

Document Control

Rev 1.00

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