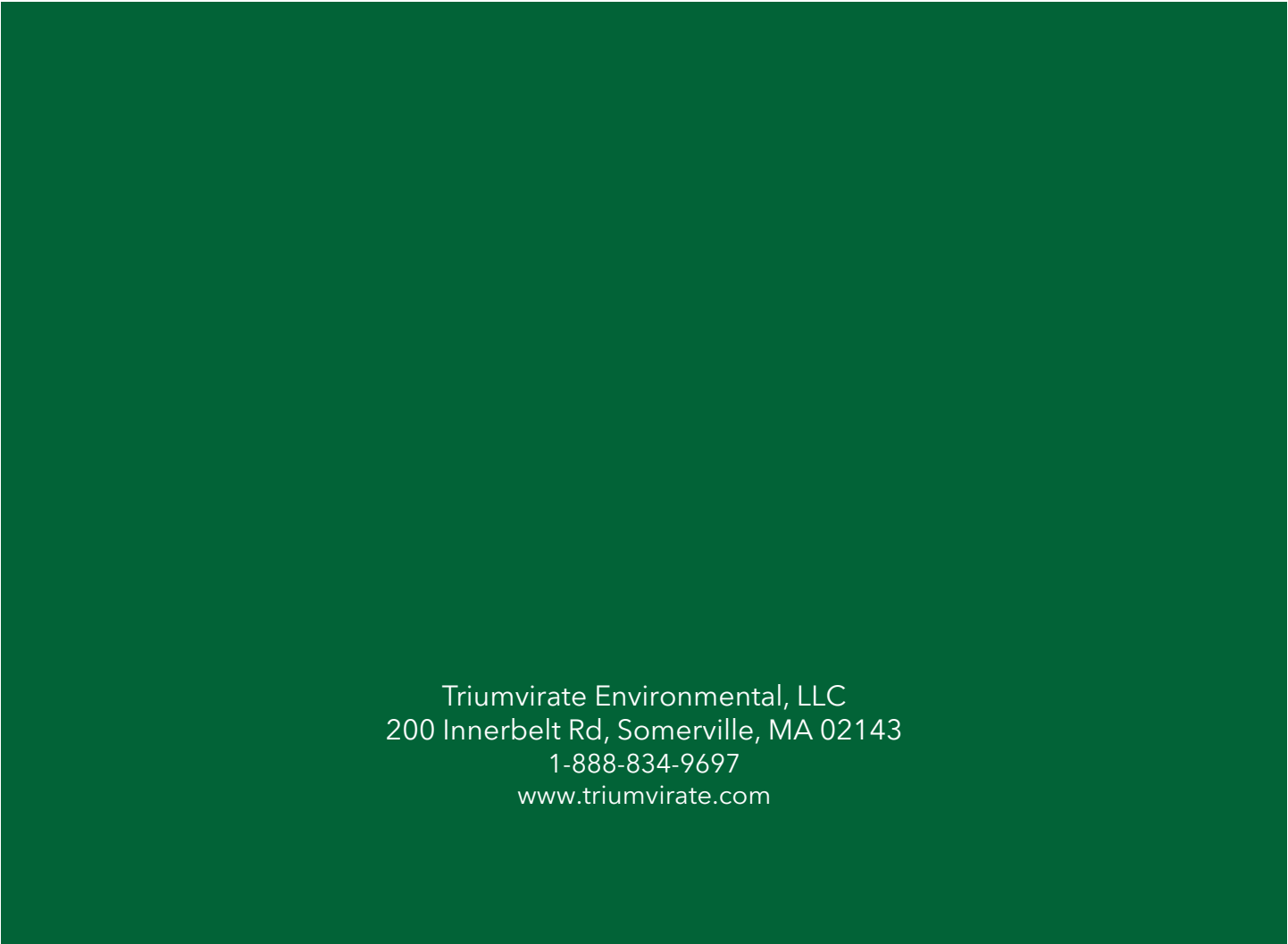




SUPPLIER CODE OF CONDUCT



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Overview

Triumvirate Environmental, LLC (together with its subsidiaries and affiliates, "**Triumvirate**") is committed to ethical, responsible, and high-quality business practices across its supply chain. This Supplier Code of Conduct (the "**Code**") outlines the standards and expectations we require from our Suppliers. Our goal is to ensure that our Suppliers operate in alignment with applicable Laws and Triumvirate's core values.

Please review and use this Code in conducting all your business and interactions with Triumvirate. Please contact Purchasing1@triumvirate.com for more guidance.

Definitions

- **EHS:** Environmental, Health, and Safety
- **Environmental Services:** Those services that pertain to the protection of human health, safety, wildlife, or the environment.
- **Government:** Any federal, state, regional, city, or local government, or any political subdivision of any of the foregoing, or any court, agency, tribunal or other entity, body, organization or group, exercising any executive, legislative, judicial, quasi-judicial, regulatory or administrative function of government.
- **High-Risk:** A designation for Suppliers performing activities that carry a significant potential for safety or environmental impact, such as hazardous waste handling, transportation, fieldwork, or high-risk industrial tasks. Triumvirate categorizes Suppliers into risk tiers based on their scope of work to determine specific safety and compliance requirements.
- **Laws:** All applicable federal, state, provincial, and local laws, statutes, ordinances, regulations, rules or orders, judgments or other requirements of any Government.
- **Supplier:** Any organization or individual, including vendors, suppliers, manufacturers, contractors, service providers, and subcontractors, that provide goods and/or services or engages in transactions with Triumvirate for any other commercial purpose.
- **Supplier Diversity:** A "diverse business" is certified to be a small business per published guideline or is at least 51%-owned -operated, and -controlled by one or more minority, woman, LGBT+ person, persons with disability, veteran, service-disabled veteran, or Aboriginal or Indigenous persons.
- **Transportation Services:** The movement of goods, equipment, or waste (hazardous or non-hazardous) via motor vehicle, rail, or water.

Compliance

Suppliers are expected to meet the standards outlined in the Code, inclusive of establishing and maintaining practices that adhere to this Code. Any violation of this Code may result in corrective actions, including without limitation removal from "Preferred" vendor status and, if necessary, termination of the business relationship. This Code is not intended to replace, supersede, or conflict with any contractual obligations with Triumvirate nor any applicable Laws.

Regulatory and Permit Requirements

1. Suppliers must operate in full compliance with all Laws. Suppliers are required to maintain all applicable Government permits and certifications necessary to perform their services.
2. For Suppliers engaged in Environmental Services this includes, without limitation, those Laws mandated by the United States Environmental Protection Agency (EPA) and its equivalent in every jurisdiction in which Supplier conducts business with, or on behalf of, Triumvirate.
3. For Suppliers engaged in Transportation Services, strict adherence to the United States Department of Transportation (DOT) regulations, and their equivalent in every jurisdiction in which Supplier conducts business with, or on behalf of, Triumvirate, is mandatory.

Standards and Management Systems

1. Certain Suppliers may be required to maintain third-party certifications confirming that their operations align with international quality and environmental standards, such as, but not limited to ISO 14001, ISO 9001 and ISO 45001.
2. Triumvirate expects Suppliers to utilize a "Plan-Do-Check-Act" (PDCA) model to ensure continuous improvement in their environmental and safety performance.

Labor

Triumvirate is an "E-Verify Employer" and follows all regulations under the Department of Labor (DOL), Fair Labor Standards Act (FLSA), National Labor Relations Board (NLRB) and any applicable State mandated labor laws in our operating jurisdictions.

Freely Chosen Labor

1. Suppliers are prohibited from using forced, involuntary, or coerced labor in any form. Triumvirate maintains a zero-tolerance policy toward modern slavery and human trafficking. All employment must be freely chosen, and workers must have the clear and legitimate ability to resign from their employment under reasonable notice and conditions, without fear of penalty or retaliation.

Child Labor

1. Suppliers must strictly comply with all applicable Laws and regulations relating to the employment of children and young workers.
2. Triumvirate prohibits the use of child labor at any stage of its operations or supply chain. Consistent with the International Labour Organization (ILO) Minimum Age Convention, 1973 (C138), no individual under the age of 15 may be employed, or a higher minimum age required by applicable Law, whichever standard is more stringent.

Nondiscrimination/Non-harassment

1. All Supplier workplaces shall maintain an environment free from discrimination and harassment. Suppliers are expected to foster an inclusive culture that actively promotes

equal opportunity and fair treatment for all individuals and/or implement policies to explicitly ban discrimination, bullying, or harassment based on any protected classes.

Wages and Other Employment Conditions

1. Wages must be paid in full, on time, and must meet or exceed local legal requirements and industry benchmarks.
2. Suppliers must allow for all legally mandated breaks, rest periods, and days off. Working overtime shall be voluntary and compensated.
3. Suppliers are responsible for ensuring that all employees receive relevant and effective training appropriate to their job functions, particularly on health, safety, rights, and responsibilities in the workplace.

Human Rights

1. Suppliers must respect and support internationally recognized human rights, including the principles set forth in the Universal Declaration of Human Rights, adopted by the United Nations General Assembly in December 1948, and integrate these principles into their business practices.

Health and Safety

1. Suppliers must comply with all applicable health and safety Laws, including, for Suppliers that conduct business with, or on behalf of, Triumvirate in the United States, Section 5 of the Occupational Safety and Health Act (OSHA), the General Duty Clause, which requires a workplace free from recognized hazards.
2. Suppliers are expected to enforce the safest practices available, especially in high-risk areas such as warehouses, fieldwork, and industrial settings. Suppliers are expected to foster and encourage a culture of safety and proactive risk prevention.
3. Suppliers shall conduct regular safety meetings and/or toolbox talks, as well as safety audits and inspections, appropriate to the scope, duration, and risk of their work to communicate hazards, reinforce safe work practices, and verify the effectiveness of implemented controls.

Environment and Sustainability

1. Suppliers are expected to implement reasonable environmental management practices appropriate to their operations, including identifying significant environmental risks, implementing controls to prevent pollution, and periodically reviewing performance for improvement opportunities.

Emissions and Waste Minimization

1. Suppliers are expected to take reasonable measures to minimize environmental impacts associated with their operations, including greenhouse gas emissions and other relevant air pollutants, where applicable.
2. Suppliers are expected to manage waste responsibly, including through waste minimization, reuse, recycling, and proper disposal, in accordance with applicable regulations and industry best practices. Suppliers providing waste-related or transportation services must ensure that waste is handled, transported, and disposed of in a manner that protects human health and the environment. Suppliers are expected to take reasonable measures to reduce the use of energy, water, and raw materials associated with their operations. Where applicable, Suppliers shall give preference to sustainably sourced or recycled raw materials when such sourcing is reasonably achievable given the scope and nature of the services provided.
3. Triumvirate encourages Suppliers to engage with us in identifying and exploring practical opportunities to reduce greenhouse gas emissions, improve resource efficiency, and support circular economy solutions, where relevant to products or services provided.
4. Where reasonably requested by Triumvirate, and commensurate with the scope and nature of the products or services provided, Suppliers may be required to support Triumvirate's environmental data collection or reporting efforts. This may include providing information related to greenhouse gas emissions, energy use, or other relevant environmental metrics associated with products or services provided to Triumvirate.

Ethics and Integrity

Anti-Bribery and Anti-Corruption

1. Suppliers shall conduct all business dealings with the highest standards of integrity, transparency, and ethical behavior.
2. Suppliers shall not make, offer, solicit, or accept bribes, kickbacks, facilitation payments, or anything of value intended to improperly influence business decisions.
3. Suppliers must comply with all applicable anti-corruption and anti-bribery Laws and regulations and maintain effective internal controls designed to prevent corruption in all forms.

Conflicts of Interest and Fair Business Practices

1. Suppliers must proactively disclose any actual, potential, or perceived conflicts of interest, that could compromise professional judgment or improperly influence business decisions, including relationships, financial interests, or other circumstances that could create bias or exert inappropriate influence.
2. Suppliers shall conduct business honestly and fairly by exercising fair competition practices, not engaging in price fixing or collusion, ensuring accurate and truthful marketing and representations. Suppliers shall not participate in the manipulation of bids or procurement processes.
3. Suppliers shall not solicit, offer, provide, or accept gifts, entertainment, favors, or hospitality that could improperly influence—or appear to influence—business decisions. Any permitted business courtesies must be modest, infrequent, and compliant with applicable Laws and Triumvirate policies.

Confidentiality and Information Protection

Confidential information includes, but is not limited to, proprietary business information, business strategy, intellectual property, pricing, financial data, client data, trade secrets, operational processes, personal data, and any information that is not publicly available.

1. Suppliers must not disclose confidential information to any third party or unauthorized individual, intentionally or inadvertently, including through casual conversations, unsecured communications, or improper handling of documents or systems.
2. Suppliers must comply with Triumvirate's information security requirements and all Laws related to data privacy, data protection, and information security.
3. Suppliers acknowledge that any access to Triumvirate systems, technology, or data is subject to monitoring, logging, and review by Triumvirate at any time, with no expectation of privacy.
4. Any violation of these confidentiality obligations may result in corrective action, termination of the business relationship, and/or legal action by Triumvirate, as permitted by Law and contract.

Commitment to Supplier Diversity

Triumvirate encourages diversity and inclusion within our organization—we expect our Suppliers to do the same and in context of the global supply chain. Our sourcing decisions, contracts, and evaluation of Supplier relationships promote diverse businesses' growth and development.

Triumvirate expects all Suppliers to operate with the understanding that engaging diverse businesses in the procurement process strengthens their position as "Preferred" vendors and/or subcontractors.

By promoting Supplier diversity, Triumvirate will develop and leverage a certified diverse Supplier base to enhance our competitive advantage as we collaborate to deliver differentiated, innovative and cost-effective products and services to our clients.

1. Suppliers will establish reasonable efforts to promote Supplier diversity in their procurement endeavors, including fair access to bids.
2. Suppliers will ensure that their examination of vendors will be unbiased and transparent.
3. If a Supplier is a certified diverse business, they shall provide evidence upon request.

Reporting and Monitoring

Triumvirate reserves the right to require Suppliers to participate in third-party assessments, desktop audits, or sustainability ratings to verify compliance with this Code. These assessments provide an objective evaluation of a Supplier's adherence to environmental,

safety, and ethical standards. Suppliers may also be required to implement corrective actions if deficiencies are identified.

1. Please contact <https://Triumvirate.allvoices.co> to report potential violations of the Code. Triumvirate will not tolerate retaliation of any kind. This link can also be found by accessing www.triumvirate.com home page and navigating to "About Us" and the Ethics section.
2. Triumvirate will not retaliate, nor knowingly permit retaliation, against any individual for raising a concern, filing a complaint, or participating in an investigation in good faith.
3. If Triumvirate determines that misconduct or a violation of this non-retaliation provision has occurred, effective remedial action commensurate with the circumstances will be taken, which may include corrective action, termination of the business relationship, and/or legal remedies.

Triumvirate's Rights

To ensure ongoing alignment with our standards, Triumvirate reserves the right to monitor compliance through periodic surveys and self-assessment questionnaires. Suppliers are expected to participate transparently in these evaluations and provide timely documentation upon request. As global standards and business needs evolve, Triumvirate also reserves the right to update or modify the requirements within this Code and to establish expectations from certain Suppliers based on risk, category, or strategic importance. Such expectations may include, where relevant, reducing greenhouse gas emissions; providing sustainably sourced, recycled, or recyclable materials; delivering products and services with lower environmental impacts; and addressing other compliance or sustainability priorities. Continued partnership is contingent upon the Supplier's commitment to meeting these expectations and demonstrating active adherence to our shared values.