



CODE OF BUSINESS ETHICS AND CONDUCT

✓ *ALWAYS ON THE MARK*



Table of Contents

✓	Executive Statement	3
✓	Company Priorities	4
✓	Purpose and Values	5
✓	Do the Right Thing	8
✓	Resources	22



EXECUTIVE STATEMENT



Dear colleagues and partners,

As CEO of TriMark USA, I am pleased to share our company's Code of Business Ethics and Conduct, which outlines TriMark's commitment to ethical practices and our **I.C.A.R.E.** values: integrity, customer service, accountability, respect, and excellence.

Our Code is more than a set of guidelines; it is a compass that guides our organization's culture of honesty, trust, and responsible business practices. As TriMark continues to grow in a dynamic industry and marketplace, we maintain our commitment beyond what we offer in foodservice equipment, supplies, and design solutions. We steadfastly commit to service excellence and ethical leadership in all we do and across all facets of our operations.

Together, we are *Always on the Mark.*

Best regards,

Tom Wienclaw

CEO, TriMark USA



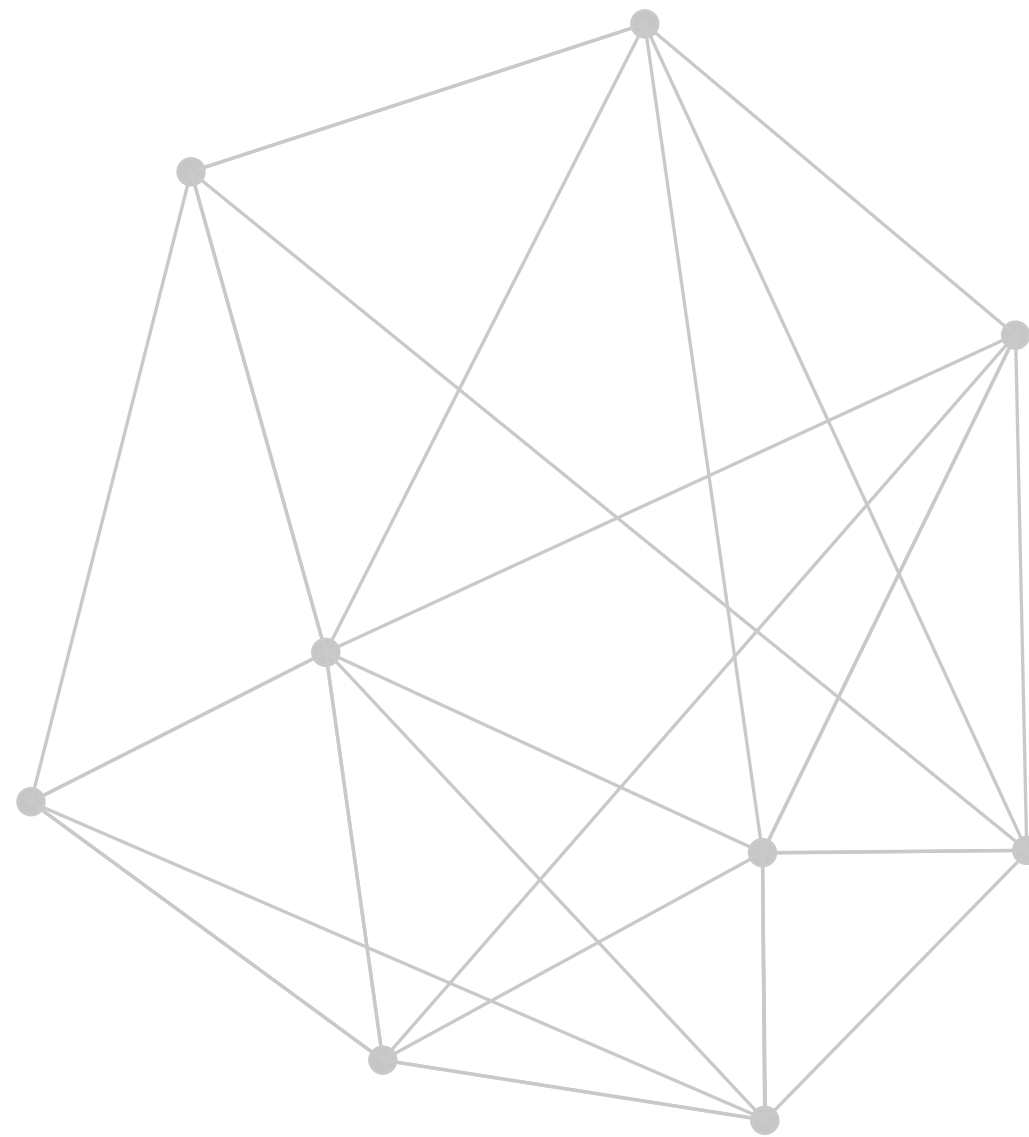
COMPANY PRIORITIES



Who We Are

Our entrepreneurial behavior and tight-knit family values guide our company identity. With a history spanning over a century, TriMark believes we should be health and safety focused, adaptable to changing environments, and producers of a productive and positive core culture.

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



What We Do

While selling foodservice products and designing spaces for multiple industries is how we make a living, we aim to deliver value to our employees, customers, and communities. In addition, TriMark is responsible for supporting small and large businesses, creating family experiences, enjoyable meals, and economic growth through prosperity and employment opportunities.





PURPOSE AND VALUES



TRIMARK SITS ON A FOUNDATION OF FIVE CORE VALUES THAT DRIVE SUCCESS AND INTEGRITY AMONG OUR EMPLOYEES, CUSTOMERS, AND PARTNERS



OUR PURPOSE

Our mission is to be our customers' essential partner in delivering foodservice equipment, supplies, and design.

Our Code serves as a framework of beliefs that show our sense of duty to conscientious living, working, and engagement. TriMark stands behind **FIVE CORE VALUES:**

01. Integrity
02. Customer Service
03. Accountability
04. Respect
05. Excellence

These values drive TriMark's business practices and establish an understanding of collective responsibility in bettering the workplace and doing business with integrity.



OUR CORE VALUES



Integrity

We go further with sound judgment, character, honesty, and encouraging humility and kindness wherever we go.

KEY TRAITS:

- *Authentic*
- *Values Time*
- *Fair Play*



Customer Service

We desire to support our customers' goals and employees' ambitions by providing strong communication, custom assistance, and high-quality products.

KEY TRAITS:

- *Patient*
- *Attentive*
- *Emotionally Intelligent*



Accountability

We are transparent in owning our wins and losses as we set the example for others to live ethically, honestly, and courageously.

KEY TRAITS:

- *Self-Awareness*
- *Accessible*
- *Mature*



Respect

We respect the value and dignity of all people by embracing individuality, celebrating achievements, and making mindful decisions.

KEY TRAITS:

- *Respect for Others*
- *Self-Respect*
- *Self-Discipline*



Excellence

We think outside the box and operate the highest-quality business through a dedication to teamwork and solving problems together.

KEY TRAITS:

- *Collaborative*
- *Creative*
- *Dedicated*





DO THE RIGHT THING



HOW OUR LEADERS, EMPLOYEES, AND PARTNERS CONDUCT THEMSELVES IN THE WORKPLACE IS A DIRECT REPRESENTATION OF HOW TRIMARK LIVES OUT OUR FIVE VALUES



DO THE RIGHT THING

TriMark's core values are a guidepost for our employees and partners making daily decisions on behalf of themselves, their teams, and the company.



Doing the right thing means making decisions that are best for the individuals around us and the projects we aim to complete. It means we live and work by TriMark's five core values and are personally responsible for understanding and following the Code. The behavior of our leaders, employees, and partners is of the utmost importance.

We emphasize:

01. Committing to Compliance
02. Respecting, Honoring, and Protecting
03. Setting the Tone From the Top
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

TriMark is committed to complying with company policies, laws, rules, and regulations wherever we do business. We understand how these rules apply to our specific positions and their impact on our daily activities. How our leaders, employees, and partners conduct themselves is paramount. TriMark expects all employees and partners, including vendors, suppliers, and third parties, to comply with these principles of integrity.

Bribery and Corruption

We strictly prohibit offering, promising, or giving money, gifts, loans, rewards, favors, or anything of value to any person, entity, customer, vendor, government official, government agency, or political party (in the United States or internationally) to influence their decision to act favorably toward TriMark.

Individuals offering or paying a bribe may subject TriMark and themselves to civil and criminal penalties. Similarly, employees and third parties acting on behalf of TriMark cannot accept bribes. Accordingly, no TriMark employee should accept an offer of money, gifts, or anything else of value without first seeking advice and approval from the [Chief Compliance Officer](#). See the [Government Contracting Supplement](#) for additional information on TriMark's work for the government and the company's anti-bribery and corruption obligations.

Competition

We devote ourselves to ethical, fair, and vigorous competition. We sell products and services based on merit, quality, functionality, and competitive pricing. We do not offer or solicit improper payments or gratuities concerning the purchase and sale of goods or services for TriMark. In addition, we do not engage in anti-competitive activities, including, but not limited to, collaborating with others to improperly manipulate prices or assisting customers with unlawful boycotts. See TriMark's [Antitrust and Competition Policy](#) for more details.



DO THE RIGHT THING



✓ Recognizing and Avoiding Conflicts of Interest

TriMark avoids activities and relationships that create conflicts to make objective and fair decisions when performing our jobs. We expect our employees to disclose potential conflicts of interest.

EXAMPLES OF POTENTIAL CONFLICTS OF INTEREST

- »»» *Being employed or acting as a consultant to a competitor*
- »»» *Hiring or supervising family members or close-related persons*
- »»» *Serving as a board member for an outside organization*
- »»» *Having a personal or financial interest, or potential gain, in any TriMark transaction*
- »»» *Accepting gifts, discounts, favors, or services from a customer/potential customer, competitor, or supplier as they may be seeking to influence a business decision*

** In certain circumstances, pre-approvals will be granted where gifts and other things of value are equally available to all TriMark employees.*

Recognizing conflicts is not always easy. If you are unsure whether an action is permitted by law or TriMark policy, direct all questions to management and seek advice from the [Chief Compliance Officer](#). We are all responsible for preventing violations of law or company policy and speaking up to report concerns.



DO THE RIGHT THING

02. RESPECTING, HONORING, AND PROTECTING

We all deserve to work in an environment where we are treated with dignity and respect. TriMark is committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our success. Everyone should feel comfortable speaking their mind, especially concerning ethics. TriMark prioritizes employee wellbeing and the communities in which we operate by fostering safe, transparent, and sustainable work environments, specifically by:

- »»» *Respecting People*
- »»» *Honoring Human Rights*
- »»» *Protecting the Environment*



DO THE RIGHT THING

Respecting People:

TriMark is an equal opportunity employer. Our commitment to equal opportunity employment applies to all persons involved in our operations and prohibits unlawful discrimination by any employee, including supervisors and coworkers. TriMark does not tolerate discrimination, harassment, retaliation, or violence. TriMark will investigate all reported questionable or unethical behavior and take appropriate action when we find improper conduct. We will not tolerate retaliation against employees who raise ethics concerns in good faith. For more information, please contact a TriMark HR Business Partner and/or TriMark's Chief People Officer and refer to the [Employee Handbook](#), [Anti-Harassment Policy](#), and [Reports and Investigation Procedure](#).

Workplace Behavior:

- Treat others with dignity and respect
- Address and report inappropriate behavior and language
- Encourage teamwork and employee participation
- Seek insights from those with different backgrounds and perspectives
- Avoid slang or idioms that might not translate across cultures
- Support flexible work arrangements for coworkers with different needs
- Be open-minded and listen when given constructive feedback



DO THE RIGHT THING

Honoring Human Rights:

It is essential to our business operations that we respect the needs of individuals and honor human rights wherever we do business. TriMark does not use child or forced labor in its operations or facilities and will not tolerate unacceptable worker treatment, such as exploitation of children, physical punishment, abuse, involuntary servitude, or human trafficking. We expect our suppliers and contractors with whom we do business to uphold the same standards. We will discontinue a partnership with any supplier that violates these standards. For more information, please refer to TriMark's [Supplier Code of Conduct](#).



DO THE RIGHT THING



Protecting the Environment:

TriMark is committed to commencing and continuing efforts to better our environmental impact. We take pride in providing practical solutions that impact sustainability efforts and increase resourcefulness. TriMark understands that we, as a company, are responsible for protecting our planet and, therefore, do our best to minimize our carbon footprint through waste reduction, energy conservation, and the usage of eco-friendly products.

Our efforts to protect the environment include:

- »» *Minimizing delivery drivers' fuel consumption by using route optimization software*
- »» *Instituting a recycling program of cardboard, plastic wrap, and stainless at our largest warehouse*
- »» *Reducing cubic feet of landfill waste by sending back unused building materials to our providers*



DO THE RIGHT THING

03. SETTING THE TONE FROM THE TOP

TriMark's leadership and management teams have added responsibilities to demonstrate the importance of the Code, the five core values, and commitment to compliance. Managers must set clear expectations and create a non-threatening environment that fosters open communication between managers and employees regardless of talking points.

Managerial Behavior:

- Being a good example
- Setting Expectations
- Referring to the Code in a positive way
- Keeping an open door
- Having a clear vision and team strategy
- Emotionally resilient
- Fair treatment



DO THE RIGHT THING

04. HOLDING EACH OTHER ACCOUNTABLE

TriMark is committed to doing the right thing. However, we must have the courage to tackle tough decisions and make difficult choices. Just because we can pursue a course of action does not mean we should. Although TriMark's core values cannot define a response to every situation, they serve as a guidepost in our daily conduct. Each of us is responsible for understanding and adhering to the values and standards outlined in this Code and for raising questions if we are uncertain about company policy.

We must always remain accountable for our actions. For example, suppose we are concerned about whether the standards are being met or are aware of violations of the Code. In that case, we raise questions and concerns through TriMark's multiple [reporting channels](#) including the [EthicsPoint](#) hotline.



DO THE RIGHT THING

05. BEING LOYAL AND RESPONSIBLE

Protecting confidential company information is an integral responsibility of TriMark employees and partners. Confidential information includes:

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

We provide company resources for business use, including time, materials, equipment, and information. Employees and those who represent TriMark are trusted to behave responsibly and use good judgment to conserve company resources. To protect the interests of the TriMark network and our employees, TriMark reserves the right to monitor or review all data and information on an employee's company-issued computer or electronic device, use of the internet, or TriMark's intranet. We will not tolerate using company resources to create, access, store, print, solicit, or send harassing, threatening, abusive, sexually explicit, or otherwise offensive or inappropriate materials.

All business communications are TriMark property, and employees must keep business conversations within official TriMark channels. Conducting business conversations "off-channel" via personal devices is discouraged and can result in TriMark reviewing applications and data from personal devices in connection to a workplace investigation. TriMark employees are prohibited from using unapproved messaging applications for business discussions, including applications that enable disappearing or "ephemeral" communications.



DO THE RIGHT THING

Intellectual Property

We must respect the property rights of others. We will not acquire or seek a competitor's trade secrets or other proprietary information. We will not engage in unauthorized use, copying, distribution, or alteration of software or other intellectual property.

Privacy and Security

TriMark is committed to the privacy of our employees' and customers' information. Specific details of TriMark's commitment are detailed in our [Privacy Policy](#). We uphold a culture of loyalty and responsibility and emphasize the utmost care in all business communications, interactions, and record-keeping processes. Safeguarding sensitive information is not just a legal obligation but a core tenet of our commitment to integrity, ensuring the highest standards of trust and accountability across all facets of our operations.

Respecting privacy and security, protecting trade secrets and customer information, and fostering a trusting work environment is paramount to our culture. Except for recordings made in the workplace that relate to employees' protected rights and concerted activities, TriMark prohibits the recording of colleagues without their explicit knowledge and consent. This no-recording policy includes but is not limited to audio, video, and photographic recordings.

TriMark is also mindful of the potential risks to privacy and security posed by the use of artificial intelligence (AI) tools. Use of AI tools within TriMark's IT environment is restricted to authorized personnel to prevent security risks and misuse. For more information, please refer to TriMark's [Responsible Use of AI Tools Policy](#).



DO THE RIGHT THING

06. COMMUNICATING HONESTLY AND ACCURATELY

We always carry out our work with integrity and in compliance with laws and regulations when pursuing the goals of our customers, including the vital work we do on behalf of government clients. However, no business goal is an excuse to misrepresent ourselves, facts, or falsify records.

Representations and Disclosures:

We ensure that all representations, certifications, and financial and public document disclosures are accurate, timely, understandable, and accessible. We expect our employees to notify leadership if any communication is misleading or incorrect.

Corporate Recordkeeping:

We create, retain, and dispose of company records as part of our normal business operations in compliance with TriMark policies, guidelines, and legal requirements. For more information, please refer to TriMark's [Records Retention Guidelines](#). TriMark prohibits improper influence, manipulation, and interference with auditors performing internal reviews.

Media Inquiries:

Periodically, reporters and other members of the media may approach employees. To ensure we speak with a consistent voice and provide accurate information about the company, we should direct all media inquiries to TriMark's General Counsel. No one may issue a press release on behalf of the company without first consulting with the General Counsel.



DO THE RIGHT THING



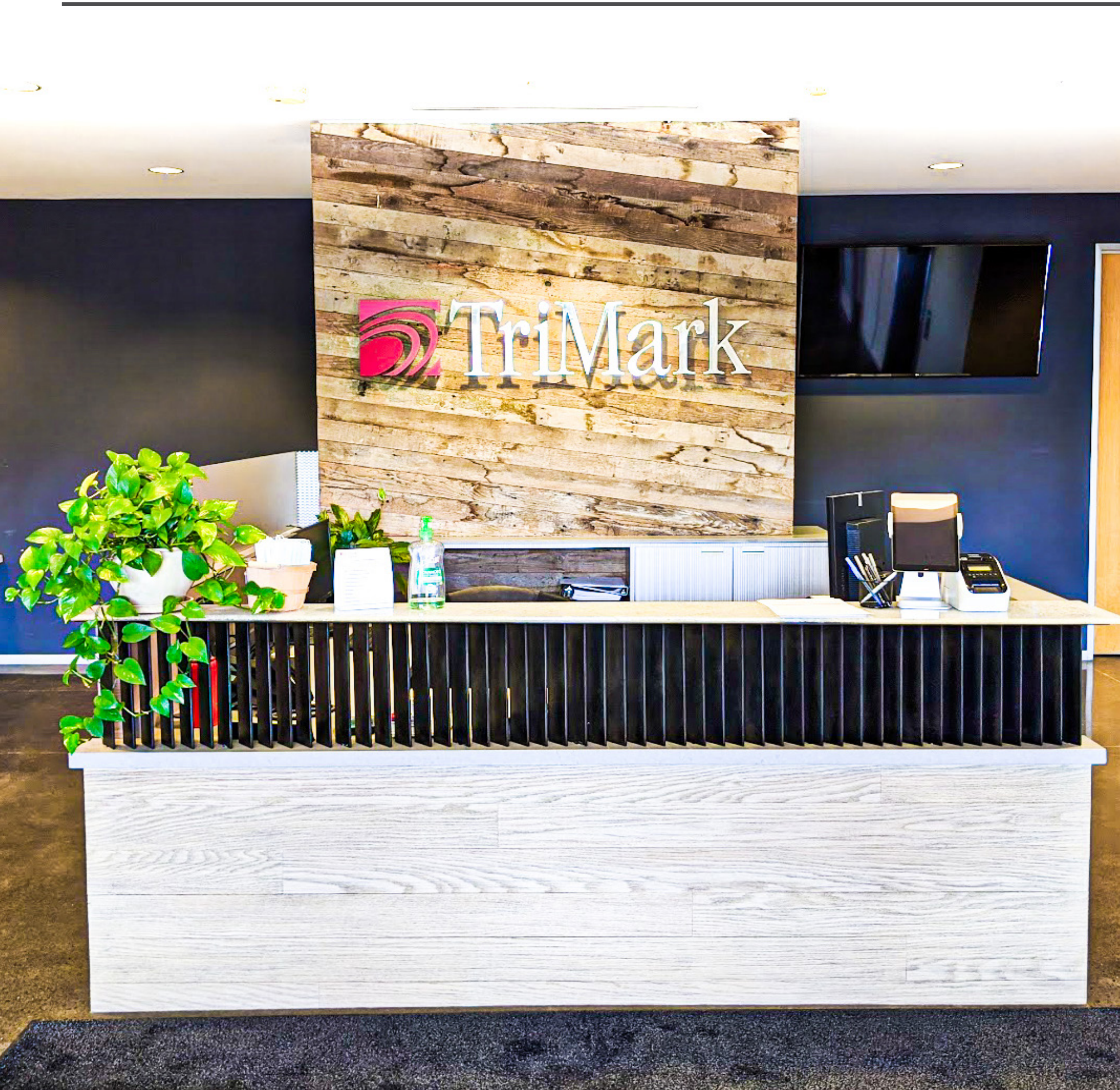
07. BUILDING TRUST AND CREDIBILITY

TriMark's success relies on the trust and confidence we earn from our employees, customers, and community members. Credibility is gained through commitment, adherence, displaying honesty, and integrity. Therefore, when making decisions, always consider the following questions:

- ✓ Will this action be perceived as helpful, trustworthy, and credible?
- ✓ Will this action create a long-term, prosperous environment?
- ✓ Can I follow through on the commitment that I am making?
- ✓ What would my colleagues, family, and friends think if this action made headlines?



RESOURCES



PHONE

+1 888.662.6935



ADDRESS

[9 Hampshire St., Mansfield, MA](#)



EMAIL

compliance@trimarkusa.com



REPORTING CHANNELS

Manager
 HR Business Partner
 Chief People Officer
 General Counsel
 Chief Compliance Officer
[EthicsPoint](#)



LINKS

www.trimarkusa.com
[Anti-Harassment Policy](#)
[Antitrust and Competition Policy](#)
[Employee Handbook](#)
[Government Contracting Supplement](#)
[Information Technology Policies](#)
[Privacy Policy](#)
[Records Retention Guidelines](#)
[Reports and Investigation Procedure](#)
[Responsible Use of AI Tools](#)
[Supplier Code of Conduct](#)
[TriMark Compliance Hub](#)

