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# CODE OF BUSINESS ETHICS AND CONDUCT

*ALWAYS ON THE MARK*



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# MESSAGE FROM THE EXECUTIVE CHAIRMAN



At TriMark, we focus on being the most successful foodservice equipment, supply, and design company by exceeding our commercial and government customers' expectations and building trust. In addition, our employees, working with integrity and creating an inclusive, safe, and fair workplace, build confidence in each other as they accomplish TriMark's goals.

The TriMark Code of Business Ethics and Conduct sets forth TriMark's commitment to ethics and compliance. The Code articulates our values and establishes ground rules and responsibilities for how we do business. TriMark is "Always on the Mark."

Thank you for your hard work and for staying focused on our shared trust and values.

Sincerely,

Mitchell Jacobson  
Executive Chairman of the Board of Directors



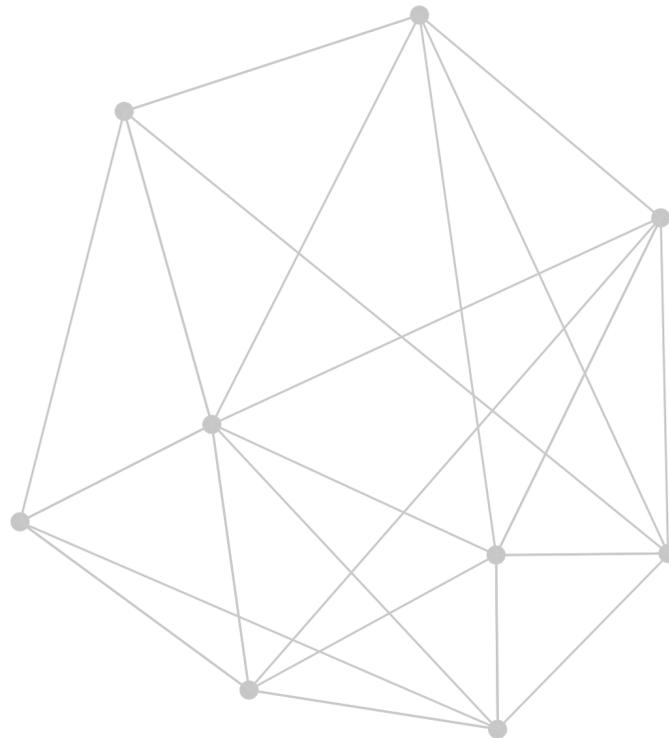
# COMPANY PRIORITIES



## 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 safe 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 PROFESSIONAL SUCCESS AMONG OUR EMPLOYEES, CUSTOMERS, SUPPLIERS, AND OVERALL BUSINESS



# OUR PURPOSE

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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 AND EMPLOYEES CONDUCT THEMSELVES IN THE WORKPLACE IS A DIRECT REPRESENTATION OF HOW TRIMARK LIVES OUT THE 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.

## We emphasize:

01. Committing to Compliance
02. Respect and Honoring
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.

### 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. However, determining disputes is not always easy—direct all questions to management and/or the [Chief Compliance Officer](#).

### 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 responsible for preventing violations of law or company policy and speaking up to report concerns.



# DO THE RIGHT THING

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## 02. RESPECTING AND HONORING

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 by fostering safe and transparent work environments, specifically by:

- »»» *Respecting People*
- »»» *Honoring Human Rights*



# DO THE RIGHT THING

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## 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 Human Resources Officer and refer to the [Employee Handbook](#) and [Anti-Harassment Policy](#).

## 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

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## 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



## 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

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## 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.

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.



# DO THE RIGHT THING

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## 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.

### Public Disclosures:

We ensure that all financial and public document disclosures are accurate, timely, understandable, and accessible. We expect our employees to notify leadership if any public 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. In addition, we fight against 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 the General Counsel. No one may issue a press release on behalf of the company without first consulting with the General Counsel.



## 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?





## ADDRESS

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



## PHONE

+1 888.662.6935



## EMAIL

[compliance@trimarkusa.com](mailto:compliance@trimarkusa.com)



## REPORTING CHANNELS

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



## LINKS

[www.trimarkusa.com](http://www.trimarkusa.com)  
[Employee Handbook](#)  
[Anti-Harassment Policy](#)  
[Supplier Code of Conduct](#)  
[Antitrust and Competition Policy](#)  
[Government Contracting Supplement](#)

