

Human Rights and Modern Slavery Policy

Prepared by:

Trillium Flow Technologies

Effective Date: 11 November 2020

Purpose of the Policy

This Policy sets out Trillium Flow Technologies' ("Trillium" or the "Company") principles on human rights and combatting forced labor in our business and in our supply chain. The term forced labor used in this Policy includes slavery, servitude, any type of forced or compulsory labor, and trafficking for the purposes of exploitation. By promoting sound ethical values and human rights principles, we aim to be a company people are proud to join.

Trillium is a world class global engineering and manufacturing group, which pursues and promotes human rights principles in all aspects of its business. We oppose the use and exploitation of forced labor, and we expect all those who work for us or on our behalf to share our zero-tolerance approach. We are committed to ensuring that we are not complicit in any human rights violation, and we hold our partners and suppliers to this same high standard.

Trillium acknowledges and respects the principles contained in the Universal Declaration of Human Rights, the guidelines of the International Labour Organisation Conventions, and the Convention of the Rights of the Child. Our Human Rights and Modern Slavery Policy reflects the Company's commitment to conduct its business in a manner consistent with these principles and to protect human rights within the Company's sphere of influence.

Scope of the Policy

This Policy applies to all those who work for us and those who work on our behalf, including employees, agents, contractors, suppliers, and other business partners.

Ethical Business Conduct

Trillium requires that its business be conducted with honesty and integrity and in full compliance with all applicable laws. Company policies establish clear ethical standards and guidelines for how we do business and establish accountability. All those who work for us and those who work on our behalf are required to obey the law and comply with specific standards relating to legal obligations, ethics and business conduct. The Company has clear accountability mechanisms in place to monitor and report on compliance with these policies.

Why Combatting Forced Labor Matters

Forced labor is a global problem. It affects over 20 million people around the world. Taking steps to combat forced labor protects vulnerable workers and helps prevent human rights violations.

Modern Slavery is a crime and a fundamental violation of human rights. It is constituted in the UK Modern Slavery Act 2015 and other anti-slavery legislation by the offenses of slavery, servitude, forced or compulsory labor, and human trafficking. The use of forced, compulsory or trafficked labor, or anyone held in slavery or servitude, whether adults or children, is strictly prohibited in all Trillium companies. We expect the same high standards from our contractors, suppliers and other business partners, regardless of where they are located.

We do not tolerate forced labor within our business. Eradicating forced labor is consistent with our ethical principles and is important to protect our reputation, sustain investor and consumer confidence, and secure our commercial position.

We support the long-term global objective to eliminate child labor, consistent with the United Nations Convention on the rights of the Child and ILO Convention 138. No children are to be employed directly or indirectly by Trillium. All those who work for us and those who work on our behalf must meet the minimum age requirement set by local laws.

Our Responsibilities

The Board of Directors has overall responsibility for ensuring that this Policy aligns with our legal and ethical duties.

Trillium Legal has day-to-day responsibility for implementing this Policy, monitoring its use and effectiveness, answering queries on it, and auditing internal processes aimed at ensuring that forced labor is not occurring in our business or our supply chains. Trillium Legal is also responsible for preparing the annual statement and presenting it to the Board for approval.

The Modern Slavery Act 2015 requires commercial organizations over a certain size to publish a slavery and human trafficking statement each financial year, disclosing the steps the organization has taken to ensure that slavery and human trafficking are not taking place in its business or supply chain. Our statement is published on the home page of our website and should be read in conjunction with this Policy.

What We Are Doing

We are confident that we employ no forced labor directly within our business. However, we regularly review that and assess our supply chain in an effort to ensure that there is no use of forced labor in our supply chain.

We take the following steps to prevent, evaluate and address risks of forced labor in our supply chain:

- We have established a Supplier Code of Conduct (see Annex 1) with which we expect our suppliers to comply. We may also impose and require compliance with contractual obligations;
- We periodically review our supply chains to evaluate forced labor risk, and if a risk is identified, we take appropriate steps to address it; and
- We consider the conduct of each supplier against the Supplier Code of Conduct when awarding and/or renewing business with the supplier.

In order to reduce the risks of forced labor in our supply chain, Trillium educates personnel working with our supply chain on forced labor and the Supplier Code of Conduct.

Employee Responsibilities

Managers are responsible for ensuring that this Policy is applied within their area of responsibility.

Our employees are expected to be alert to any indicators of forced labor in our business or supply chain. We expect employees to maintain the highest standards in conformity with these principles. It is the responsibility of management to ensure that employees are aware of the expected standards and conduct themselves accordingly. The prevention, detection and reporting of human rights violations in any part of our business or supply chain is the responsibility of all those working for us or those working on our behalf. Employees are required to avoid any activity that might lead to or suggest a violation of this Policy.

We do not tolerate any forced labor within our business. If you suspect that there has been a violation of this Policy or if you have any concerns regarding the use of forced labor in any part of our business or our supply chain, you should report it in accordance with Trillium's Code of Conduct.

Disciplinary measures will be taken against any employee who is in violation of these human rights principles.

Protection of the Rights of Employees

Trillium supports and upholds the elimination of discriminatory practices with respect to employment and occupation and promotes and embraces diversity in all aspects of its business operations as described in the Trillium Diversity & Inclusion Policy. Trillium further supports the elimination of all forms of forced, bonded or compulsory labor and the freedom of association. Trillium is committed to providing a safe and healthy working environment for all its employees.

Monitoring our Effectiveness

We will periodically review this Policy to ensure its effectiveness. Where concerns have been raised through this Policy, we will consider how they have been handled and, if appropriate, ensure that follow-up action has been taken.

Status of this Policy

This Policy is not part of any contract of employment and does not create contractual rights or obligations. It may be amended by the Company at any time.

References

- United Nations Universal Declaration of Human Rights
- Conventions of the International Labour Organisation
- United Nations Convention on the Rights of the Child
- Trillium Code of Conduct
- Trillium Flow Technologies Diversity & Inclusion Policy

Revision History

Revision Number	Date	Author	Modification Change Summary	Approved by
	11 Nov 2020	M. Wichuk	Initial version	Board of Directors

Trillium Supplier Code of Conduct

Trillium Flow Technologies (“Trillium”) is committed to conducting business in a legal, ethical, and environmentally and socially responsible manner. The Supplier Code of Conduct (“Supplier Code”) sets out Trillium’s principles regarding compliance with laws and regulations, ethics, human rights and labor, fair treatment, non-discrimination, health, safety and environmental sustainability. Trillium expects its suppliers to acknowledge and adhere to the principles stated in the Supplier Code and to take reasonable steps to ensure that their suppliers and subcontractors comply with the principles of the Supplier Code.

Legal Compliance and Ethics

Trillium is committed to identifying and complying with all applicable laws, regulations and standards. Trillium is dedicated to conducting business in an ethical manner and to utilizing suppliers who conduct business ethically and with integrity. Trillium prohibits all forms of corruption and bribery, including facilitating payments, payments to obtain an unfair or improper advantage, money laundering, embezzlement, and fraud. Trillium complies with trade regulations and restrictions of recognized national and international regulatory authorities.

Human Rights and Labour

Trillium is committed to upholding the human rights of workers, maintaining a fair and ethical workplace, and treating workers with dignity and respect. Trillium refuses to utilize any form of forced, bonded or indentured labor. Trillium complies with legally mandated minimum wages and working hours in compliance with local laws and strictly prohibits illegal child labor in its operations. The term “child” refers to any individual under the minimum legal employment age in the country where the work is performed, provided the legal age is consistent with the minimum working ages defined by the International Labour Organization (ILO). Trillium prohibits actions or behaviours, including gestures, language and physical contact, which may be considered coercive, abusive, or exploitative.

Fair Treatment and Non-Discrimination

Trillium is committed to providing a workplace free from harassment and discrimination and does not condone mistreatment or abuse of individuals based on race, colour, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership or marital status.

Health, Safety and Environmental Sustainability

Trillium is committed to providing its employees with a safe and healthy working environment and complying with all applicable laws and regulations regarding working conditions. Trillium is dedicated to operating in an environmentally responsible manner and integrating sustainability, responsibility and accountability into its business and supply chain in order to minimize its negative impacts on and positively contribute to society, the economy, and the environment.

Material Compliance and Conflict Minerals

Trillium is committed to complying with regulatory and customer requirements regarding the prohibition and restriction of hazardous substances and conflict minerals, as well as sourcing from suppliers who ensure that goods provided to Trillium meet those same requirements.

Ethics Hotline

Employees and suppliers may report ethics concerns via the Trillium Ethics Hotline, currently available in its countries of operation. Reports to the hotline may be made anonymously, if desired and requested. Trillium has a zero-tolerance policy regarding retaliation against anyone who reports honest concerns in good faith. Employees and suppliers may report concerns via the web at www.trilliumflow.ethicspoint.com or via telephone at the numbers provided on the same website.

Trillium strives to conduct business with suppliers who share in our commitment to operating in a responsible and ethical manner. The principles stated in the Supplier Code are minimum standards, and Trillium encourages its suppliers to exceed the minimum requirements where possible. In cases where a supplier is subject to other local standards or requirements relating to the principles contained in the Supplier Code, supplier should adhere to the most stringent applicable requirements.

As a supplier to Trillium, you shall:

- (1) Acknowledge receipt of and agree to adhere to the principles contained in the Supplier Code;
- (2) Establish and maintain a management system to ensure compliance with the principles contained in the Supplier Code;
- (3) Maintain documentation to demonstrate your adherence to the Supplier Code; and
- (4) Take reasonable steps to communicate the content of the Supplier Code to your employees, affiliates, subsidiaries, agents, suppliers, and subcontractors, and take necessary actions to assure their adherence to same.

Supplier Acknowledgment

On behalf of _____, the undersigned hereby acknowledges and agrees to abide by the principles set forth in the Trillium Supplier Code of Conduct and to ensure that all of its employees, affiliates, subsidiaries, agents, suppliers, and subcontractors are aware of and shall abide by the Supplier Code in the provision of goods and services to or on behalf of Trillium Flow Technologies.

Signature: _____

Authorized Signatory Name and Job Title: _____

Date: _____