



Code of Conduct and Ethics

Overview: Triple, Inc. is committed to the highest standards of ethics and business conduct. It's officers, directors, employees, and representatives must comply with the law, honor their commitments, act in good faith, uphold Triple's values, seek to advance the interests of its stakeholders, communicate openly and effectively, and hold themselves accountable.

Triple's customers and suppliers are critical to our success and our ability to provide superior products and services in a responsible manner. We have the same expectations of our customers and suppliers for ethics and compliance as we have for our officers, directors, employees and representatives.

General Disclaimer: The expectations set forth in this Code are not intended to conflict with or modify the terms and conditions of Triple, Inc.'s contracts with any customer or supplier. If a contract requirement is more restrictive than this Code, Triple will comply with the more restrictive contract requirement.

Ethics & Compliance: Triple, Inc. commits to having management systems, tools and processes in place that: ensure compliance with all applicable laws and regulations; promote an awareness of and commitment to ethical business practices; facilitate the timely discovery, investigation, disclosure and implementation of corrective actions for violations of law and regulations; and provide training to our employees on compliance requirements.

We shall expect and require the same basic principles of this Code of Conduct from all customers, suppliers or entities that provide goods or services to Triple, Inc. At a minimum, they must maintain full compliance with all federal, state and local laws and regulations applicable to the operation of their business and their relationship with Triple, Inc.

Reporting Misconduct: Triple, Inc. commits to providing our employees and business partners with access to adequate reporting channels to raise legal or ethical issues or concerns, including, without limitation, reports of a violation of this Code by any officer, director, employee or representative of Triple, Inc. or its business partners, without fear of retaliation, including opportunities for anonymous reporting. Such reporting channels include contacting directly the Chief Operations Officer of the company, or the Human Resources department.

In the event that any representative of Triple, Inc becomes aware of misconduct related its business undertaken by any its employees, or any employees of its business partners, Triple, Inc will promptly notify any affected business partner, customer or supplier through any or all appropriate channels. Any report of legal or ethical issues or concerns will be promptly investigated.

No Retaliation: Triple, Inc will not take any adverse action against anyone who reports conduct that he or she reasonably believes to be illegal or otherwise in violation of this Code. It will be a violation of this Code for any employee to be discharged, demoted, suspended, threatened, harassed, or in any way subject to adverse treatment in connection with their employment because he or she reported conduct that he or she reasonably believed to be illegal or in violation of this Code.

Quality: Triple's products and services will be designed, produced and delivered with the paramount consideration being the safety and health of its employees and customers. We will have established quality assurance processes to detect, communicate to our customers and suppliers, and correct defects to ensure delivery of products and services that meet or exceed contractual quality, legal and regulatory requirements. All required inspection and testing operations will be completed properly by appropriately authorized and qualified individuals, and any required certifications will be completed accurately.

Triple shall ensure the existence of methods and processes to: minimize the risk of introduction of counterfeit parts into final products; detect counterfeit parts and materials; provide notification to recipients of counterfeit products; and remove any counterfeit parts from the final products.

Environmental, Health and Safety: Triple, Inc will comply with all applicable environmental, health and safety laws, regulations and directives. It will conduct its operations in a manner that: actively manages risk; conserves natural resources; prevents pollution; safeguards the environment; and minimizes waste, emissions, and energy consumption. It will also assure safe and healthy work environments for its employees and business invitees.

Competition on Merit: Triple, Inc. will compete strictly on the basis of its products and services, based on cost, quality and completion time.

Anti-Corruption / Fair Competition / Anti-Trust: Triple, Inc. will not pay a bribe in any amount, to anyone, anywhere, for any reason whatsoever, whether on its own behalf or the behalf of others. It will never offer, promise, authorize, or provide, directly or indirectly, anything of value with the intent or effect of inducing anyone (including a customer, an employee, or a supplier) to forego their duties and providing an unfair business advantage to Triple or others. This includes facilitating payments (e.g., payments to expedite or secure performance of a routing government action like obtaining a visa or customs clearance).

Triple, Inc will not engage in any anti-competitive conduct for any reason whatsoever, whether on its behalf or the behalf of others. It will never rig bids, fix prices, allocate customers or markets, or exchange its', or its customers or suppliers competitively sensitive information (e.g., price, cost or output data) with its competitors. Triple, Inc will also refrain from abusing its market power, whether for its own benefit or the benefit of others, by refusing to deal, engaging in predatory or discriminatory pricing practices, conditioning the sale or provision of a particular product or service with that of another product or service, or undertaking similar abusive tactics.

Triple, Inc will not engage in other deceptive or unfair market practices, whether on its own behalf, or on behalf of others. It will not make misrepresentations regarding its products or services, or

the product or services of others. Similarly, it will not denigrate its competitors, or the competitors of its customers, or their products or services.

Insider Trading: Triple, Inc. will not use material, non-publicly disclosed information obtained in the course of its business relationship with any client or customer as the basis for trading or enabling others to trade in the stock or securities of any client or any other company.

Conflicts of Interest: Triple, Inc. will avoid all conflicts of interest or situations giving the appearance of a conflict of interest in its dealings with any client. Triple will report to any client any instances involving actual or apparent conflicts of interest between its own interests and those of that client, such as when one of Triple's employees may have a personal relationship with an employee of that client who can make decisions impacting its business.

International Trade Compliance: Triple, Inc. will conduct business in strict compliance with all applicable laws and regulations governing the: export, re-export and retransfer of goods, technical data, software and services; the import of goods; economic sanctions and embargoes; and U.S. antiboycott requirements.

Government Procurement: Triple, Inc. will take special care to comply with the unique and special rules that apply to contracting with the U.S. Government. If Triple supports any client's contract with the U.S. Government, it will at all times: follow the U.S. Government's rules for competing fairly; honor restrictions applying to U.S. Government employees (e.g., receipt of gifts and employment); deliver products and services that conform to specifications, laws and regulations; adhere to government accounting and pricing requirements; claim only allowable costs; ensure the accuracy of data submitted; and comply with all other applicable U.S. Government requirements.

U.S. Federal Acquisition Regulations, similar regulations, and report requirements applicable internationally require government contractors to disclose to the Inspector General of the Department of Defense (or to the Inspector General of the relevant government agency holding the contract), and to the contracting office, certain suspected violations of law. Therefore, it is important the employees and suppliers of Triple, Inc. promptly report suspected violations of the Code, law or regulations to the Ethics and Compliance department, or such other appropriate individual, of any customer of Triple, Inc. that may hold such government contracts.

Information Protection: Triple, Inc. will respect the legitimate proprietary rights and intellectual property rights of any of its customers and others. It will take proper care to protect sensitive information, including confidential, proprietary and personal information. It will not use such information for any purpose other than the business purpose for which it was provided, unless the owner of the information provided prior authorization.

Cybersecurity: Triple, Inc. will safeguard and protect all information provided to it by any customer or supplier, and information that it may generate or develop in support of its customers programs from unauthorized access, destruction, use, modification or disclosure. Triple will have risk-based cybersecurity programs designed to mitigate threats to its information systems,

products, services and supply chain, and will comply with all applicable contractual and legal requirements.

Security of Supply Chain: Triple, Inc. will implement practices and procedures to ensure the security of its supply chain. Triple and its subcontractors who either ship directly or package goods for shipment will participate in, or comply with all requirements of SAFE Framework security programs of the designation country (e.g., the Customs-Trade Partnership Against Terrorism (C-TPAT) Initiative of the United States Department of Homeland Security, Authorized Economic Operator (“AEO”), or similar programs).

Accuracy of Records and Submissions: Triple, Inc. will maintain books and records accurately and completely reflect all transactions related to each of its customers business and each of its submissions to any of its customers, and regulatory authorities must be accurate and complete. Triple will never make any entry in its books and records or alter, conceal, or destroy any document to misrepresent any fact, circumstance, or transaction related to any of its customers business.

Non-Discrimination: Triple, Inc. will provide its existing and prospective employees and business partners with equal opportunity without regard to race, color, religion, sex, sex stereotyping, pregnancy (which includes pregnancy, childbirth, and medical conditions related to pregnancy, childbirth, or breastfeeding), gender, gender identity, gender expression, national origin, age, mental or physical disability, ancestry, medical condition, marital status, military or veteran status, citizenship status, sexual orientation, genetic information, or any other protected status of an individual or that individual’s associates or relatives.

Harassment: Triple, Inc. will develop and implement policies and procedure to ensure that employees may perform their work in an environment free from physical, psychological or verbal harassment or intimidation, or any other form of abusive conduct.

Child Labor: Triple, Inc. will ensure that child labor is not used in the performance of its work related to any customer or client. The term “child” refers to any person under the minimum age for employment where the work is performed.

Human Trafficking: Triple, Inc. will comply with all laws and regulations prohibiting human trafficking. It will not engage in the use of forced labor, bonded labor, indentured labor, involuntary prison labor, slavery or trafficking in persons.

Wages and Benefits: Triple, Inc. will pay all workers at least the minimum wage required by the applicable laws and regulations and, at a minimum, provide all legally-mandated benefits. It shall compensate all hourly workers for overtime at the rate required by applicable laws and regulations.

Substance Abuse: Triple, Inc. shall have policies and procedures in place to ensure that its employees do not conduct work while under the influence of alcohol, illegal drugs, or misused medications, whether prescription or non-prescription. It shall implement and enforce policies and procedures that prohibit employees from using, possessing, or selling illegal drugs, alcohol, or misusing medications while performing job functions.

Business Partners: If Triple, Inc.'s contract with any customer or client prohibits it from assigning, delegating, or subcontracting its obligations, Triple will strictly enforce and comply with this prohibition.

If Triple's contract with any customer or client permits it to assign, delegate, or subcontract its obligations or procure products or services from others that will be incorporated in products or services acquired by any customer or client from Triple, it will carefully select its business partners, and perform due diligence, audit, and oversight to prevent and detect misconduct. Triple will flow down the principles set forth in this Code to these business partners, and will be held responsible for ensuring compliance by its business partners.

Code Compliance: Triple, Inc. will permit its customers or clients and/or their representatives to assess compliance with the expectations set forth in this Code in performing work for such customers, including on-site inspection of facilities and review of associated books, records and other documentation. Upon request, Triple will provide its customers with additional information and certifications evidencing compliance.

Triple will ensure that its customers have the right to assess its business partners compliance with the expectations set forth in this Code in performing work for any of its customers, including on-site inspection of facilities and review of associated books, records and other documentation. Triple will ensure that its business partners will provide Triple's customers upon request with additional information and certifications evidencing compliance.

In the event of any wrongdoing, Triple will fully cooperate with any related investigation conducted by any of its customers. It will ensure that its business partners also fully cooperate if such investigation involves their performance.

Triple, Inc. (and its business partners) will correct any non-conformances identified during assessments. Triple does not expect any of its customers to assume any duty to monitor or ensure compliance with this Code, and acknowledges and agrees that it is solely responsible for full compliance with this Code by its officers, directors, employees, representatives, and business partners.