

Code of Conduct Policy

Our Code of Conduct Policy also includes our fundamental Principles that affect employees on a daily basis.

Twin Rivers Technologies (TRT) requires that all employees uphold the highest standard of integrity. The following Code of Conduct policy has been developed to communicate the Company's expectations of all employees and contract personnel. The success of our business is dependent on the trust and confidence we earn from our employees, customers and shareholders. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching company goals solely through honorable conduct. It is easy to *say* what we must do, but the proof is in our *actions*.

Vision Statement

TRT's vision is to be the preferred choice for Naturally Based Specialty Chemicals by consistently manufacturing and delivering high quality products through a sustainable and diversified supply chain. Our mission to deliver superior value to our stakeholders is partly achieved by fostering an engaged culture that empowers our employees to achieve goals and provide an exceptional customer experience.

Mission Statement

It is the mission of Twin Rivers Technologies to deliver superior value to our stakeholders by:

- Providing uncompromising customer satisfaction by continually meeting or exceeding expectations for quality and service.
- Focusing on home and personal care, food, and industrial markets in line with our core competencies.
- Fostering an engaged culture that empowers our employees to achieve goals and provide an exceptional customer experience.
- Ensuring competitive returns and viable growth to our shareholders.

CORE Principles – STRIVE CARE

- **S**afety First
- **T**eamwork Oriented
- **R**eliability
- **I**ntegrity Based
- **V**alue Driven
- **E**ntrepreneurial Spirit
- **C**ustomer Centric
- **A**daptable
- **R**esponsible
- **E**mployee Focused

Code of Conduct

The following Code of Conduct has been developed to communicate the Company's expectations of all employees and contract personnel. The purpose of this Code of Conduct is for employees and contractors of Twin Rivers Technologies to maintain the highest level of professionalism and integrity. Violations of this Code of Conduct are serious and will be considered cause for disciplinary action, up to and including termination.

Quality - Provide uncompromising customer satisfaction by continually meeting or exceeding customer and regulatory requirements for quality and service.

Integrity - Exhibit standards of personal integrity and professionalism that reflect positively on your association with fellow employees, customers, contractors, suppliers, and others.

- Conflict** - Avoid activities or influences that impair the performance of your responsibilities, use common sense.
- Compliance** - Conduct personal and business dealings in compliance with the letter, spirit, and intent of all relevant laws, regulations and policies.
- Objectivity** - Be fair and objective when making decisions.
- Honesty** - Be truthful to your fellow employees, customers, contractors, suppliers and others.

The following are examples of, behaviors that will not be tolerated while on Company property or while performing Company business:

- Violation of Confidentiality policy.
- Damaging or defacing equipment or property.
- Violation of the Harassment policy.
- Stealing any Company products or property.
- Abusive or threatening language.
- Being under the influence of alcohol or drugs.
- Physical abuse, fighting or horseplay.
- Falsifying Company or employee records or documents.

This is not a complete list and the company reserves the right to expand the list to include other behaviors it believes are inappropriate in the workplace based on the specific circumstances.

Company Beliefs/Fundamental Principles

Company Beliefs... We believe in:

- Achieving goals and objectives through individual and team efforts
- A clean, safe and caring work environment
- Being environmentally and socially responsible
- Being compliant with all legal, civil, regulatory and business requirements at all times
- Open and direct communications
- Trust and honesty
- Professionalism and respect being maintained at all times
- Providing the best quality, service and value to our customers all the time.

Fundamental Principles

Safety - Every employee is involved in the Safety Program and is responsible for their own safety. All accidents and incidents are avoidable.

Quality - To provide uncompromising customer satisfaction by continually meeting or exceeding customer requirements for quality and service. Every employee of TRT is empowered to fulfill this commitment.

Compliance - Every employee participates to create a clean and orderly workplace. Every employee participates to meet the intent and spirit of all regulatory requirements. Total compliance in all aspects of our business is the only way to conduct business.

Employee Relations Philosophy

We are committed to providing the best possible climate for maximum development and achievement of goals for all employees. Our practice is to treat each employee as an individual. We seek to develop a spirit of teamwork: individuals working together to attain a common goal. In order to maintain an atmosphere where these goals can be accomplished, we strive to provide a workplace that is comfortable for all. Most importantly, we strive to have a workplace where communication is open and problems can be resolved in a mutually respectful atmosphere, taking into account individual circumstances. We firmly believe that by our communicating with each other directly we can continue to resolve any difficulties that may arise in developing a mutually beneficial working relationship.

Health, Safety and Security

Twin Rivers Technologies is committed to the health, safety and security of each individual working at, working for, or visiting TRT. We will operate in an environment that meets or exceeds applicable laws on health, safety and

security. Employees are strongly encouraged to contribute to this commitment and to report any issues or concerns related to health, safety and security to the Safety Manager, the Regulatory Affairs Manager, or any member of the TRT management team immediately.

Confidentiality

During the course of employment at Twin Rivers Technologies employees may be permitted access to technical information, procedures, programs, methods, or business, account, or customer information which is not readily known to others or publically disclosed. This is protected trade secret information under the law. Under no circumstances can one use confidential and/or proprietary information for benefit, nor should these issues be discussed outside of our company during the course of employment. Upon termination of employment for any reason, employees must return all materials to the Company that contains proprietary information.

All work products created, designed or developed during the course of employment at TRT is the property of the Company. Anyone with questions about what information may be discussed with others should consult their manager or the Human Resources Manager.

Outside Employment

A Full-time employee's primary place of employment is Twin Rivers Technologies. Employees may engage in outside employment if it does not interfere with the employee's ability to complete their work/hours for TRT and if the outside employment does not depend upon confidential information regarding the Company or those with whom the Company does business. Under no circumstances may an employee engage in outside work that could be deemed in conflict of interest with TRT's business. Anyone with questions about outside employment or an opportunity of additional employment should consult their manager or the Human Resources Manager.

Non-Discrimination Hiring Practice- EEO Employer

As defined by and enforced under applicable state and federal law, Twin Rivers Technologies will provide equal employment opportunity for all regardless of race, creed, color, religion, age, sex, pregnancy, marital status, citizenship, veteran status, genetic information, disability, national origin, criminal arrest record, sexual orientation or gender identity.

Pursuant to applicable federal and state law, any decision regarding recruitment, employment, placement, compensation, benefits, training, transfer, promotion and dismissal of personnel will be made without regard to race, creed, color, religion, age, sex, pregnancy, marital status, citizenship, veteran status, genetic information, disability, national origin, criminal arrest record, sexual orientation or gender identity. Twin Rivers encourages the hiring, promotion, transfer and training of the overall best-qualified individuals available.

Non-Discrimination and Non-Harassment Statement

It is the goal of Twin Rivers Technologies to promote a workplace that is free of discriminatory harassment of any type, including sexual harassment. We all deserve to work in an environment where we are treated with dignity and respect. Discriminatory harassment consists of unwelcome conduct, whether verbal or physical, that is based on a characteristic protected by law. Harassment occurring in the workplace or in other employment settings is unlawful and will not be tolerated. Any retaliation against an individual who has complained about harassment or retaliation against individuals for cooperating with an investigation of a harassment complaint is similarly unlawful and will not be tolerated. Because Twin Rivers Technologies takes allegations of harassment seriously, we will respond promptly to complaints of harassment. When it is determined that inappropriate, conduct has occurred we will act promptly to eliminate the conduct and impose such disciplinary action as necessary, up to and including termination of employment.

Please note that while this statement outlines our goal of promoting a workplace that is free of harassment, the policy is not designed or intended to limit our authority to discipline or take remedial action for workplace conduct, which we deem unacceptable, regardless of whether that conduct satisfies the definition of harassment. Employees

should refer to TRT's Non-Discrimination and Non-Harassment Policy for complete guidance and details or speak with Human Resources.

Social Responsibility

Twin Rivers Technologies believes it is the duty of every individual to act and perform their duties to maintain a balance between the business and the environment. We have a Sustainability report that reflects our position and care of our environment. The Sustainability report is distributed and available to all employees annually. TRT regularly creates opportunities for employees to participate in local charitable events and benefits to the community.

Accountability

Each of us is responsible for knowing and adhering to the values and standards set forth in this Code and for raising questions if we are uncertain about company policy. If we are concerned whether the standards are being met or are aware of violations of the Code, we must contact the HR department. Twin Rivers takes seriously the standards set forth in the Code, and violations are cause for disciplinary action up to and including termination of employment.

Gifts, Entertainment and Hospitality

While an occasional gift or offer of entertainment is viewed as normal part of business, at times, a well-intentioned gift can cross the line, create a sense of obligation or compromise an employee's professional judgment. It may also give the appearance of something improper. It is TRT's policy that employee shall not receive gifts from or provide gifts to External Party unless the gift possesses all the following characteristics:

- a) Corporate Gifts that are of nominal value
- b) The provision of the gift is legally acceptable
- c) The provision of the gift is for specific occasions such as events, promotional activities etc.

Employees are expected to immediately declare a gift received to Human Resources; however, only gifts with estimated value of \$100 or more shall be declared, otherwise, no declaration is required. Employees may also refer to TRT's Supplier Code of Conduct policy for guidance and details.

Questions or Reporting concerns of any violation

It is the responsibility of every employee to report any misconduct or violation of the above. Employees who see, suspect and report anything illegal or unethical must understand Twin Rivers Technologies will not retaliate or permit retaliation against anyone who raises questions or concerns about corporate actives or who makes a good faith effort to report about possible misconduct or legal violation to TRT or any government authority or assists in an investigation of misconduct or legal violation. Regardless of whom an employee contacts, the concern will be handled promptly and appropriately disclosing information to only those who need to know. Employees may report concerns confidentially to the FGV Whistleblowing Channel by going to <https://www.fgvholdings.com/whistleblowing/>, Call or text the *Safeline* by phone at 1(855)662-7299 (company ID #6545074286), speak to HR or the CEO.

I have received the policy electronically and my signature serves as acknowledgement that I have read the above information. I understand I may save and print a copy for my future reference. I understand I may speak to any member of management or HR with any questions regarding this policy.