



# Code of Conduct

Ethics and Integrity  
Here. There. Everywhere.



# A Letter from Our Chief Executive Officer

Our Code of Conduct sets forth our commitment to conducting business ethically and honestly.

## Dear Colleagues,

At Triton, we are committed to doing business the right way, anchored by our core value of Integrity. We do this by:

- keeping our customers' and colleagues' interests at the center of everything we do,
- being transparent with our stakeholders, and
- supporting the communities in which we operate.

We all share the responsibility to ensure that our commitment to integrity is never compromised. Accordingly, I am very pleased to share our Code of Conduct with you. Our Code applies to all of us, it guides us in our day-to-day business activities and prepares us to properly address difficult situations when they arise.

The Code is intended to better help you understand our expectations of how you should conduct business in an ethical and legal manner. It explains the standards we are all expected to follow, as well as specific laws, regulations and policies that apply to us. Please read the Code in its entirety, refer to it on an ongoing basis and ask questions if something is unclear.

If you notice something that makes you uncomfortable, or if a situation arises and you are unsure of how to proceed, feel empowered to speak up. The many resources available to assist you are also described in the Code. Please know that retaliation for raising questions or concerns or for making a good-faith report of possibly improper behavior will never be tolerated.

Thank you for your commitment to doing business the right way – **Here. There. Everywhere.**

Sincerely,

A handwritten signature in black ink, appearing to read 'Brian M. Sondey'.

**Brian M. Sondey**  
Chairman and  
Chief Executive Officer

*"Our Code of Conduct guides us in our day-to-day business activities, and prepares us to properly address difficult situations when they arise."*





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# Our Values Guide Our Decisions and Actions

Triton provides efficiency and certainty in an unpredictable world. Our equipment helps support economic growth, bring cultures together and build a better world.

Our values shape our culture and define who we are as an organization.



## INTEGRITY

We conduct business the “right way,” keeping our customers’ and colleagues’ interests at the center of everything we do. We are transparent with our stakeholders and support the communities in which we operate.



## CREATIVITY

We structure transactions with customers by finding that “win-win” sweet spot that works best for them and us. We foster entrepreneurship, and we respect it in our customers. Our approach enables us to be responsive, decisive, and pivot quickly in an ever-changing world.



## RELIABILITY

We provide efficiency and certainty in a variable world. Our scale and operational experience allow our customers to count on our promise to supply high-quality containers wherever and whenever they’re needed. We strive to exceed the highest expectations.



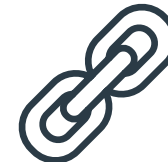
## EXCELLENCE

Our talented network of professionals represents the mark by which industry excellence is measured. Their experience, professionalism, and drive provide unmatched communication, service, and perspective to our worldwide customers.



## LONG-TERM VIEW

We strive for success over the long term. We take a disciplined approach to running our business and invest in our people, our equipment, and our customer relationships to create a Triton that is built to last.



## TEAMWORK

Our success is built on the collaboration of our globally diverse team. We believe every relationship is an opportunity to work together to achieve common business goals.



# Introduction

As the leading and most reliable intermodal container leasing company, our customers depend on Triton to meet their needs and help keep global commerce moving forward. They—along with our employees, shareholders, business partners and communities—also count on us to do business the right way. Therefore, we place a high priority on conducting our business in compliance with the law and in accordance with the highest standards of business ethics.

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The background of the page is a photograph of several stacked orange intermodal containers. The word 'TRITON' is printed vertically in large, white, sans-serif capital letters on the side of the container in the foreground. Various identification numbers and weight ratings are visible on the containers, such as '836155', '4561', '33,500 KGS.', '71,650 LBS.', '3,700 KGS.', '8,100 LBS.', '20,000 KGS.', '43,400 LBS.', and '76.4 CUH 2,700 LBS.'. The lighting is bright, creating strong shadows and highlights on the metal surfaces.

# Introduction

Our Code of Conduct (“Code”) outlines the standards we are all expected to follow in living Triton’s values, as well as specific laws, regulations and policies that apply to us. It is the cornerstone of our compliance program and guides us to win in the market with integrity. By following our Code, you play an integral role in maintaining Triton’s culture of integrity that ensures our long-term success.

## Our Code of Conduct

### Why do we have it?

We make countless decisions at work each day. Our Code can help you navigate challenging situations and align your decisions and behaviors with Triton’s values. The Code also helps you comply with applicable laws and Triton’s policies.

The Code covers a wide range of situations you may encounter to help you understand how you’re expected to handle them. Whenever you have a question, refer to the Code first for guidance. However, the Code can’t cover every situation. If you cannot find an answer in the Code, or if you have a question about the Code, Company policies or the laws that apply to you, please consult the resources listed under **How to Ask Questions or Raise Concerns**.

### Who must follow our Code?

Everyone in our Company—including our Board of Directors when they act in their capacity as directors and all full-time, part-time and temporary employees—has a duty to follow our Code and comply with all Company policies and all applicable laws, rules and regulations where we conduct business. We also expect any third parties working on our behalf, including agents, consultants, contractors and other business partners, to adhere

to and uphold the principles of this Code. Our Code applies to all of Triton’s locations and consolidated subsidiaries.

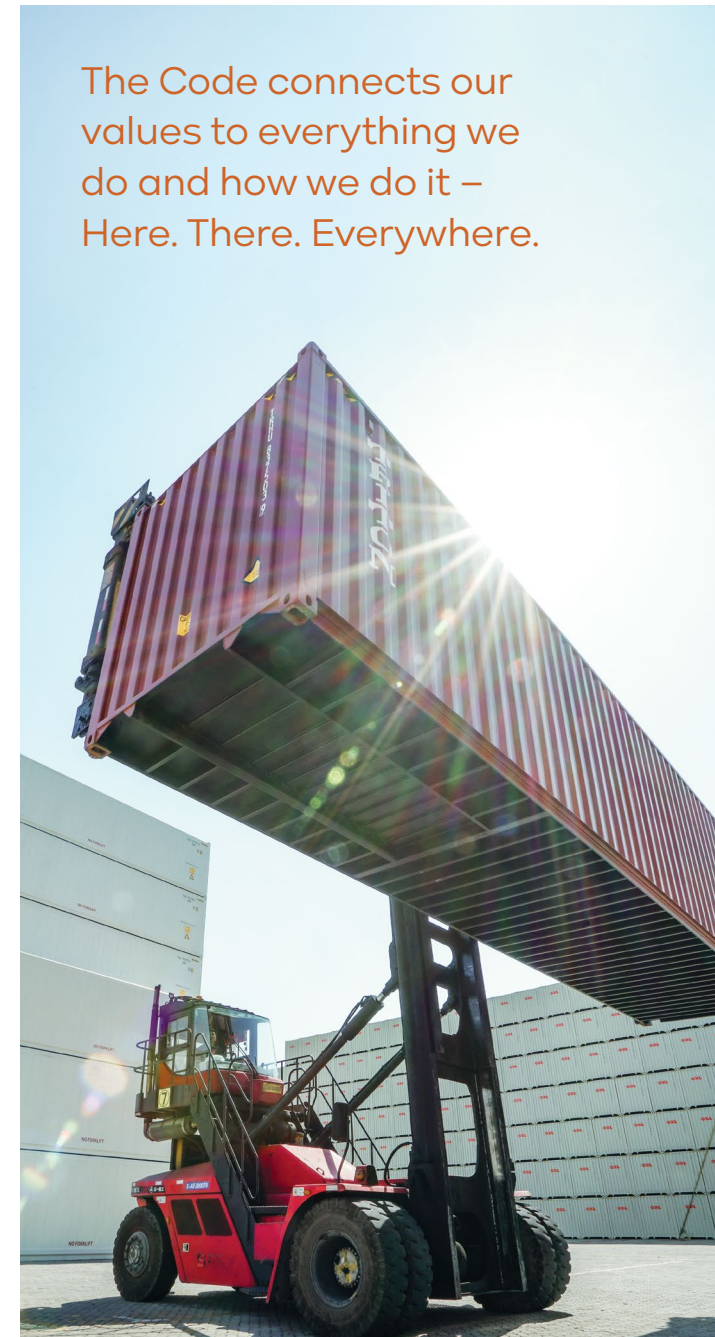
### Will waivers be granted if needed?

Any waiver of the Code for executive officers or directors may be made only by the Board of Directors or a Board committee and will be promptly disclosed to shareholders as required. Any waiver of the Code for any other employee may be made only by the Legal Department. The Code is not intended to create any contractual rights between Triton and anyone else. Triton reserves the right to interpret the Code and to change it at its discretion.

#### CONSIDER THIS

Laws and regulations can vary widely from country to country. There may be instances when our Code conflicts with local or any applicable law. Should this situation arise, we must comply with the applicable law. When our Code imposes additional expectations or higher standards than applicable law, we should embrace the expectations in our Code. If local customs or practices conflict with our Code, our Code must be followed.

The Code connects our values to everything we do and how we do it – Here. There. Everywhere.





# Our Responsibilities

*We count on each other to live our values and to act ethically and in compliance with the law.*

Our reputation for integrity depends on each of us doing the right thing. We must meet these important requirements:

- Read and understand our Code. Follow all policies and laws that apply to your work.
- Use good judgment and act with integrity and honesty.
- Never ask or allow a third party to act on Triton's behalf in any manner that would violate the Code, our policies or the law.
- Consult the resources listed under **How to Ask Questions or Raise Concerns** if you have questions or are not sure what to do.
- Speak up if you see something that doesn't seem right – report any concerns you may have about the matters addressed in this Code.
- Cooperate with investigations.

## Are there additional expectations for managers?

While each of us has a duty to follow the Code, managers have an even greater responsibility to:

- Lead by example by exhibiting appropriate behaviors consistent with our Code.
- Help those you supervise understand our Code, their responsibilities and the behaviors expected of them.
- Foster an open work environment in which employees feel comfortable asking questions and raising concerns without fear of retaliation.
- Respond timely and appropriately to those who seek advice or raise concerns.
- Report any known or suspected misconduct of which you are made aware.
- Prevent retaliation against those who speak up.



## Remember

- Managers must not take—or allow—any retaliatory action against someone for making a good faith report of suspected misconduct.
- If you are a manager and feel unsure of the answer to an employee's question or how to address an employee's concern, you should seek help by contacting the resources listed in this Code.

## What would you do



I told my team we must help Triton make its numbers this quarter. I made sure to let them know I don't care how they do it, as long as they meet our target. After all, when we hit our numbers, we all win. Did I send the right message?

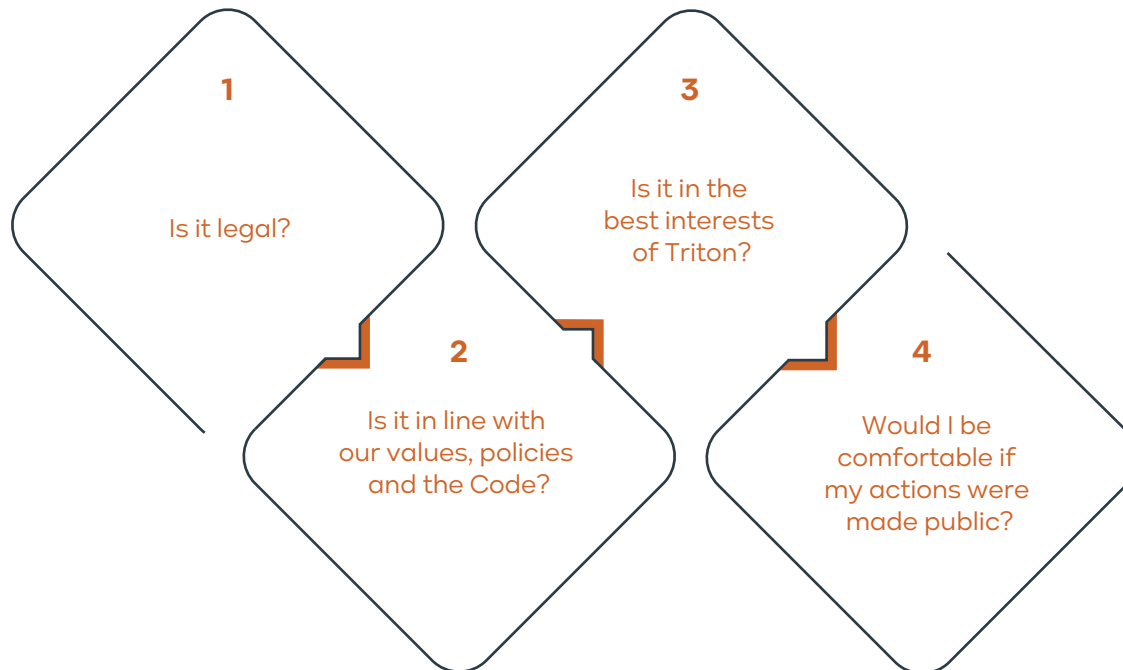
No. Though encouraging your team to reach a company goal is important, and working together builds a sense of unity, we need to do so with integrity. You should send the message that we achieve our goals the right way, by living our values and following our Code, our policies and the law.



# Using Our Code to Make Ethical Decisions

Sometimes we face difficult situations where the right choice isn't clear. In those times, it is important to pause and consider the best way to proceed.

## WHEN MAKING A DECISION, ASK YOURSELF THESE QUESTIONS



## IF THE ANSWER TO ALL OF THE ABOVE IS...

### YES

If you answer "yes" to all of these questions, it is probably ok to proceed.

### NOT SURE

If you are not sure on any point, it is always appropriate to ask your manager or someone else at the Company for guidance.

### NO

If you answer "no" at any point, stop and reconsider – your actions could have serious consequences. Seek help.



## Remember

Stay alert to warning signs.

If you hear comments like these, take a step back to re-evaluate the situation:

- Don't worry about it. Who's going to know?
- Our competition does it, so there must not be anything wrong with it.
- That's how they do business here.
- We've always done it this way and no one has ever said anything.





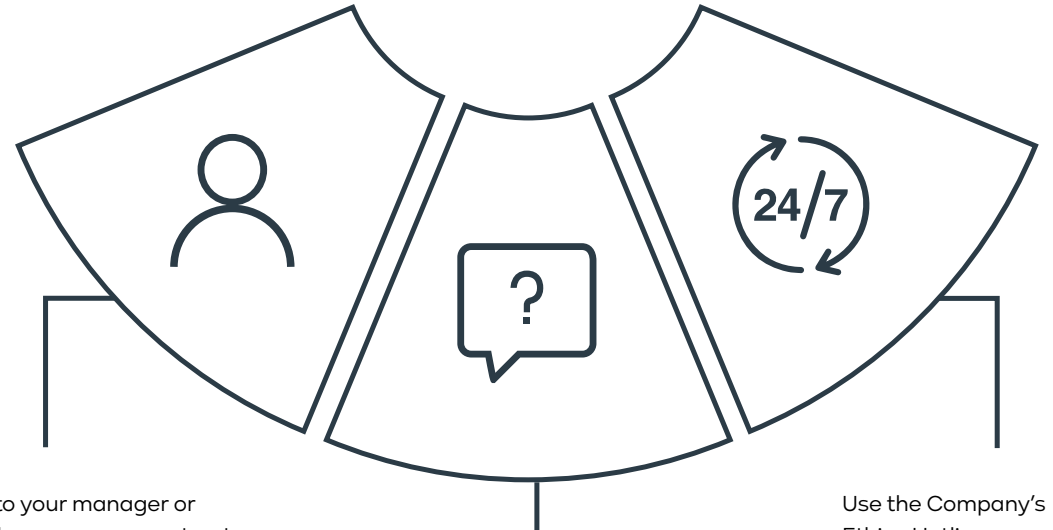
# How to Ask Questions or Raise Concerns

*If you see or experience conduct that is inconsistent with the Code, or if you have a question about how to handle a situation – speak up.*

If you find yourself in a situation where the right course of action is not clear, remember that you are not alone. Triton provides multiple resources for advice and help when you need it. By asking questions and reporting potential problems, you are helping the Company succeed. At any time, if there is any doubt about the best course of action in a particular situation, ask for assistance.

In addition, an essential part of operating with high performance and high integrity is taking action when you believe our Code, our policies, or the law may have been violated or are about to be violated. When you have a concern regarding unethical conduct or suspect a possible violation of the Code, Company policy or the law, you should report it immediately.

The Company provides multiple resources for you to ask questions or raise concerns. Please contact any of the following resources at any time:



Talk to your manager or another manager you trust

Report it to another internal resource, such as HR or the Legal Department

Use the Company's Ethics Hotline



## Did you know?

The Company's Ethics Hotline is staffed by an independent third-party provider and is available 24 hours a day, seven days a week, anywhere in the world. While individuals are encouraged to identify themselves, anonymous reports are accepted where local law allows. Anonymous reports will be addressed to the extent possible based on the information provided.

## How to Contact the Ethics Hotline



Visit

[www.tritoncontainer.ethicspoint.com](http://www.tritoncontainer.ethicspoint.com)



Call

+855-657-8028



Digital Intake URL:

<https://tritoncontainer.navexone.com/>

Point your smartphone camera at this QR code, then tap the pop-up notification to go to the ethics and compliance helpline. This digital intake option is available in multiple languages.

# What Happens When I Report a Concern?

**Concerns will be promptly reviewed and appropriately investigated. Retaliation will not be tolerated.**

The Company will promptly and fairly investigate reports of any known or suspected misconduct and any complaints of retaliation. Reports will be treated confidentially to the extent possible, consistent with the need to conduct a full and fair investigation and take appropriate corrective action, or as otherwise required by law.

You should always cooperate and provide complete and accurate information related to investigations of misconduct. You should not conduct your own investigation. Investigations often involve complex legal issues and acting on your own may compromise an investigation and negatively affect both you and the Company.

Anyone who violates the Code will be held accountable and disciplined, as appropriate, up to and including termination of employment. In addition, Triton may terminate the services or work engagement of non-employees who fail to comply

with the Code, our policies or applicable law. Violations of the law may also be subject to penalties determined by a court or other government entity.

## Do I have to worry about retaliation if I raise a concern?

We should all feel comfortable reporting any known or suspected misconduct or a violation of our Code, Company policies, or the law without fear of retaliation. Triton strictly prohibits acts of retaliation against any person for reporting in good faith or for participating in an investigation. Our policy of no retaliation protects anyone who makes a report in good faith, even if you are found at a later date to be mistaken.

If you think you have experienced retaliation or suspect retaliation against someone else, contact one of the resources listed under **How to Ask Questions or Raise Concerns**. By reporting retaliation, you are taking a stand for ethics and integrity in our workplace and making Triton a better place to work.



### Did you know?

Retaliation is any negative consequence that you experience as a result of making a report, participating in an investigation, or asking a question.

This might include being inappropriately demoted, getting an unfairly negative performance evaluation, or receiving an unjustified reduction in your bonus or pay.

It can also include more subtle actions, like being intentionally left out of important projects or meetings.

## What would you do



I believe that my manager is asking me to do something that violates the Code of Conduct. What should I do?

You should raise your concerns openly with your manager. If you are not comfortable with your manager's response or feel uncomfortable speaking with your manager, you should raise your concerns with any other resource listed under **How to Ask Questions or Raise Concerns**.





# Our Employees

We believe our people are our greatest asset. We are committed to providing an inclusive and respectful work environment where employees at all levels are empowered to speak up and implement new ideas.



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# Our Employees

We have a high-performing, talented and diverse global team that reflects the countries and communities in which we operate. We are committed to creating a diverse and inclusive work environment that promotes teamwork, trust and respect.

## Respect in the Workplace

*We create an inclusive workplace where everyone is treated with dignity and respect.*

We want all of our employees to succeed, and we want Triton to be a great place to work for everyone. Therefore, we are all expected to treat one another fairly and respect the unique contributions of others. Regardless of whether we are interacting face-to-face or communicating in writing or via electronic media, we will do so in a professional, respectful manner. Specifically, the use of offensive language, intimidating or hostile words or actions, and similar unprofessional behavior are contrary to our Code.

## Diversity, Equity and Inclusion — Stronger Together

The diversity of our employees and their backgrounds, cultures, languages and unique perspectives enhance our creativity, problem solving, customer relationships and competitive success. At Triton, diversity, equity and inclusion means valuing each employee's uniqueness by creating an environment where everyone is welcome. Our objective is simple: for all employees to feel equally supported and set up for success.

## No Discrimination or Harassment

Non-discrimination is important, not only from legal and ethical standpoints, but also because diversity enables us to best achieve our Company's business objectives. Employment-related decisions, such as hiring, promotions, training and development and compensation, therefore, must be made without regard to any legally protected characteristics. While these characteristics may vary by local law, they generally include: race, color, ethnicity, age, religion, national origin, sex, marital status, sexual orientation, gender identity or expression, physical or mental disability and military or veteran status.

Our actions and the way we treat one another are key to creating a productive and inclusive workplace. We believe no one should be subjected to behavior that creates an offensive, hostile or intimidating work environment, regardless of whether the conduct is illegal under applicable law. If you feel that you have experienced or observed any discriminatory or harassing behavior, you should immediately report the situation to any of the resources listed under **How to Ask Questions or Raise Concerns**. Keep in mind that Triton will not tolerate retaliation against you for making a report in good faith.



### Did you know?

Harassment refers to conduct relating to a person's legally protected characteristics that creates a hostile or abusive work environment.

Harassment can include, for example, offensive or derogatory comments or jokes, physical advances or unwelcome touching, emails, texts, instant messages, social media posts or inappropriate visual displays, including posters, screen savers and photographs.

It may come from many sources, including co-workers, managers, customers or suppliers, and it can be sexual or non-sexual in nature. Remember that harassment is determined by your actions and how they impact others, regardless of your intentions.

**Important Note** — What is sexual harassment? Sexual harassment may consist of verbal, visual or physical conduct of a sexual nature that is unwelcome and that a reasonable person would find offensive. It can take many forms, such as:

- Sexual advances, requests for sexual favors or unwelcome demands for dates.
- Sexually oriented jokes, pictures, texts or email messages.
- Explicit or degrading comments about appearance.
- Display of sexually suggestive pictures or pornography.



## What would you do



Randy, a manager in the office, has been making offensive and inappropriate jokes and is known for being quite crass. Often these comments are overheard by others in the office. His comments have not been directed at me, but they make me feel uncomfortable. I'm afraid I'll lose my job if I report the situation to my manager. Should I stay silent?

No. You should speak up about the matter to another internal resource. Although the conduct is not specifically directed at you, Randy's actions might rise to the level of creating a hostile work environment for those around him, even if they are not being directly targeted by his behavior. If you are uncomfortable reporting it to your manager, then you should contact Human Resources or the Legal Department.

I applied for a position with another team that requires a lot of travel. I learned a less qualified co-worker got the job, and I think it was because he is single. What should I do?

Raise your concern. Employment decisions should be based on job-related criteria without regard to whether you're married or single. If you're not comfortable talking with the hiring manager, reach out to Human Resources or one of the other resources listed in the Code.

## Employee Privacy

The Company needs to collect and process certain personal information about employees for various human resources functions and as otherwise required by law. We respect employee privacy and diligently take precautions to protect the personal information of our employees to which we have access. We only collect or use employee personal information when we have a legitimate business purpose for its use. Personal information privacy laws vary by country, and those with access to personal employee information, such as government issued identification numbers or medical records, must comply with all applicable privacy and data protection policies and laws regarding the collection, use and disclosure of this information.

While the Company respects employees' privacy, Triton does reserve the right to inspect Company facilities and property, such as computers, telephone records, emails, files, business documents and workspaces. Unless otherwise provided by applicable law, we should not expect privacy when using Company-provided services or equipment.

If you have questions about the laws concerning privacy, please contact the Legal Department.



## Remember

"The diverse experiences, backgrounds, and perspectives of our employees help us innovate and find solutions for our customers and keep us at the forefront of our industry. The value of our collective differences grows even stronger when they are brought together as one team."

**-Brian Sondey,**  
Chairman and Chief Executive Officer



# Workplace Health and Safety

*We want a healthy, safe and productive working environment.*

We are committed to providing a safe work environment for everyone at Triton. We take our commitment to ensuring a safe and healthy workplace seriously and believe it’s everyone’s responsibility. No matter where you work or what you do, you are expected to put safety first.

## Safe Working Conditions

At Triton, we perform a variety of jobs in different environments, from our offices to third-party depots to supplier and customer facilities around the world. No matter where we work, we must follow applicable safety standards. You must follow all Company policies, as well as applicable laws and regulations designed to prevent workplace hazards and promote a safe and healthy work environment. Immediately report to your manager or Human Resources any workplace accidents, injuries or conditions that may endanger others. You should always speak up if you are asked to do a job or task that you consider unsafe or that you are not properly trained or equipped to perform. Of course, if you feel that you or someone else may be in immediate danger, contact your local emergency responders right away.

## Workplace Violence

At Triton, we have a zero tolerance policy for workplace violence, including verbal or written threats, intimidation or acts of aggression or violence. Report any activity or behavior you believe could result in, or has resulted in, workplace violence immediately to your manager or Human Resources. Triton prohibits the possession of weapons in the workplace to the fullest extent permitted by local law. Our zero tolerance policy for workplace violence applies to behavior of all of our employees as well as third parties, including visitors, on company premises, as well as to the behavior of our employees, customers, vendors, suppliers and temporary personnel engaged in Triton business anywhere in the world outside of our premises. Workplace violence also includes any violent act by a third party against a Triton employee who is conducting business on behalf of Triton.

## Substance Abuse

Substance abuse creates serious health, wellness and safety risks in the workplace. Alcohol and drugs can impair your judgment and ability to perform your job and place others at risk. It can also create other workplace problems including absenteeism and decreased morale and productivity levels. You are prohibited from using or working under the influence of alcohol, illegal drugs, controlled substances or misused over-the-counter or prescription drugs in the workplace or while conducting business on behalf of the Company. Check with your doctor about any impact your prescriptions or over-the-counter medications might have on your ability to perform your job safely and communicate any concerns to your manager. These concepts apply in the workplace and in any work-related setting outside the workplace, such as during business trips, meetings and business-related social events.

If you have a drug or alcohol problem, you are encouraged to seek assistance. Contact Human Resources to learn of applicable assistance programs in your region or to find specific resources.

### What would you do



While inspecting equipment at a depot, I noticed a depot employee making repairs to one of our containers in an unsafe manner. We need our repairs completed quickly, so I did not want to slow down the work by asking him to stop. Did I do the right thing?

No work is so important or urgent that it can’t be performed safely. You should report this situation to a member of the depot’s management team and reiterate Triton’s expectations that our business partners adhere to the principles in the Code, including worker safety.

I pulled a muscle in my back last night, so I took some prescription painkillers this morning before coming to work. I feel a little bit dizzy, but I think I will still be able to get my work done, so I haven’t said anything about the pills to my manager. Is this the right choice?

No, the medication could affect your ability to work. You should speak to your manager right away.

**Important Note** — On occasion, alcohol may be provided or available at work-related or Company-sponsored events. Remember that you are still acting as a representative of Triton. If you choose to drink at these events, we expect you to behave safely and responsibly. Managers who organize these functions must ensure responsible alcohol distribution and use.



# Human Rights

*We respect the human rights and dignity of our people and those who support our business.*

We are committed to upholding fundamental human and workplace rights in all aspects of our global operations and supply chain, guided by the United Nations Universal Declaration of Human Rights and the International Labor Organization’s Declaration of Fundamental Principles and Rights at Work.

The framework for our engagement on human rights is set out in our **Human Rights Policy**, which covers the following topics:

- Safe and Healthy Workplace
- Diversity and Inclusion
- Respectful Workplace
- Workplace Security
- Work Hours, Wages and Benefits
- Freedom of Association
- Forced Labor and Human Trafficking
- Child Labor

We also expect our business partners and suppliers to adhere to the principles of our Human Rights Policy and our **Vendor Code of Conduct**, including the commitment to uphold human rights, treat employees with dignity and respect and follow all applicable employment laws.

## What would you do



I saw a story on social media about one of our vendors that suggested they may have been involved in an incident related to child labor practices. Since it has not been proven and did not necessarily involve work that they do for Triton, do I need to do anything?

Yes. We hold our vendors accountable to our high standards, and if there is even a hint of improper or illegal behavior, you should report your concern. Even if there is no direct connection between the allegations and the work they do for Triton, our Company should be alerted so that we can evaluate how it might affect our relationship.



# Our Company and Our Shareholders

Our shareholders are the owners of our Company and investors in our future. They put their trust in us to protect the Company from risk. To earn that trust, we must act with integrity and honesty.



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# Our Company and Our Shareholders

Acting with responsibility and transparency goes hand in hand with our core value of Integrity. We protect the Company and its shareholders by safeguarding Triton's assets and reputation. We maintain accurate business records and ensure our financial statements accurately reflect our business, our earnings and our financial condition.

## Proper Use and Protection of Company Assets

*We ensure proper use of Company resources and confidential information.*

In our work, we are each entrusted with Company assets, and we must use those assets for ethical and legal purposes and protect them against loss, damage, theft, misuse, fraud and waste. These assets include physical property, such as equipment and inventory, phones and computer equipment, and financial assets, such as funds and bank accounts. It also includes intangible assets, such as confidential

and proprietary information, intellectual property, and information systems. You should always safeguard Company assets, use them honestly and efficiently and protect them from unauthorized use. Be honest, accurate and complete in your expense reporting. And if you're responsible for approving expenses, use the same care in protecting our Company's financial assets as you would your own.

### What would you do



I work in accounts payable. I received an email from my manager, asking me to wire \$50,000 to an account I do not recognize. In looking more closely at the email, I noticed that it came from an email account in my manager's name, but not her usual Triton account. I decided the email must be a phishing attempt, so I deleted it. Did I do the right thing?

Almost. You were right to be on the lookout for phishing and take a closer look at the email to make sure it really came from your supervisor. However, instead of just deleting the email, you should notify IT so that they can look into the situation further and determine how to proceed.

I am responsible for inventory audits at several locations. During a periodic physical audit of the containers I am responsible for, I noticed that a few containers were recorded as being stored at a certain depot, but those containers were not present when I checked the Triton inventory in person. Because there were only a few containers missing out of the thousands I monitor and track, I decided not to record the missing containers in my audit report. Is that ok?

No. It is our policy to report the loss or misplacement of Triton containers, even if just one container is missing. You should correct your report to indicate the missing containers are not where they should be, and discuss your findings with your manager.





## Confidential Information and Intellectual Property

While working at Triton, you may receive or have access to confidential business information about our Company or our customers and suppliers. You must maintain the confidentiality of information entrusted to us, except when disclosure is authorized by an appropriate Company officer, by contract or required by law. Your duty of confidentiality continues after your employment with the Company ends.

The same guidance applies both inside and outside our organization. Only share confidential information within the Company with those who have a legitimate business need to know. Take special care to secure sensitive materials to further protect confidential information from disclosure. In addition, you should avoid discussing confidential information in places where you can be overheard, including restaurants, taxis, airplanes, elevators or Company common areas. If you encounter legal or regulatory rules that require you to disclose confidential information, please contact the Legal Department for guidance.

In addition, we must protect and enforce our Company's intellectual property rights. Intellectual property includes patents, trademarks, copyrights, brands, logos, social media accounts, domain names, inventions, processes, ideas and innovations and trade secrets. The law protects our rights to this property as it does other forms of physical property. To the extent permissible by law, the rights to all intellectual property created with Company materials, on Company time, at Company expense or within the scope of our duties belong to the Company. Just as we expect others to honor our intellectual property rights, we must respect the rights of others, including compliance with licensing and other similar agreements.



### Did you know?

Examples of Confidential Information include:

- Proprietary business information, such as business plans and strategies, customer lists, and pricing and other terms of customer agreements
- Financial Information, such as budgets, forecasts, projections or financial results
- Intellectual property, such as proprietary software, processes, methods, models and algorithms

## What would you do



I received an email with confidential business information. I know I can't share it with anyone outside of Triton who isn't authorized to see it, but I can forward it to a co-worker, right?

No. You should only share confidential business information with employees who have a legitimate need to know the information as part of their job duties.



# Information and Communication Systems

## Appropriate Use of Company Technology

The Company provides you with a wide variety of technology resources, such as laptops, cell phones and software, for your use in conducting Company business. You are responsible for safeguarding these resources and should use these electronic resources wisely. When conducting Triton business, use only devices and systems managed and maintained by Triton, unless otherwise authorized. All devices must meet the Company's security standards. Always protect passwords and user IDs and be careful when using electronic resources in public. When you use Company electronic assets, you must follow both the law and our Company's policies, and you should always be cautious when opening attachments or clicking links from unknown sources.

Your personal use of electronic resources must be limited and appropriate, and you must never use them to send or view inappropriate materials, or to conduct outside business. Use of any Company resource should never interfere with your work-related obligations or violate a Company policy.

It is strictly prohibited to use Company systems (including email, instant messaging or the Internet) for activities that are unlawful, unethical or otherwise contrary to this Code or Company policy. This applies at all times, including after hours or while on vacation. When allowed by local law, our Company may monitor and disclose your use of any Company assets, including electronic resources. Accordingly, you should have no expectation of privacy when using Company electronic resources.

## Privacy and Data Protection

We respect the privacy of our employees, customers and business partners, and we are committed to securing and preventing unauthorized access to or disclosure of third-party personal information. If you have access to personal information, you must safeguard it, use it lawfully and properly, and never share it with anyone who does not need to know it or is not authorized to receive it. Data privacy laws can vary by country, so you should speak to the Legal Department if you have any questions about the right way to handle such information.



### What would you do



I will not have access to work email during my vacation and I am expecting an important email. I am planning to give my username and password to a co-worker so she can respond to the message while I am away. Is this okay?

No. You should never share your username and password with co-workers. You are responsible for what happens in the system under your username and password.

# External Communications

*We present a consistent message in all communications to protect our brand and reputation.*

Everything we communicate about our Company can have an impact on our reputation, co-workers and brand, which is why we make sure the information we communicate is reliable, consistent and accurate.

## Media, Investor and Other External Requests

As a public company, it is critical that all external communications with investment analysts, investors, the media and the public generally be reliable, consistent and accurate, which is why only certain people are authorized to speak on our Company's behalf. You may not speak on our Company's behalf unless you're authorized to do so. Any speaking engagements related to the Company's business must be approved by Communications in advance. If you are contacted and asked to discuss Company business with members of the press or other media representatives, investors or investment analysts, do not provide any information. Instead, you should refer them to a member of the Communications or Investor Relations teams. Similarly, you should forward all information requests from any government or regulatory body to the Legal Department immediately. By following our policies, we avoid sending confusing messages or sharing inaccurate information about Triton.

**Important Note** — "Expert Networks" are research firms that connect industry experts with institutional investors who usually pay for these insights. You may receive invitations from representatives of expert networks to consult on matters relating to Triton or the industry or customers we serve. These expert networks may ask you to participate in telephone consultations, in-person meetings or educational events to benefit their clients. Participation in such activities is generally prohibited (any exceptions require written pre-approval from the General Counsel).



Refer all requests for information to the appropriate Company resource:

### Who is Calling

Media inquiries (such as reporters, editors and other media representatives)

### Who is Calling

Investment community inquiries (such as financial analysts and shareholders)

### Refer To

Communications

### Refer To

Investor Relations

## What would you do



I was reading an article online that contained inaccurate information about Triton. Can I respond in the comments section to correct this misinformation?

No. While your intentions are good, only authorized individuals may speak for our Company. Instead, notify your manager or a member of the Communications team about the article so that appropriate steps can be taken to respond.



## Social Media

Social media offers a great way to express yourself, build relationships and exchange ideas. However, social media has the potential to blur personal and professional lines, which is further complicated by laws around the world that regulate what our Company can and cannot say about itself and its business. When using social media, be mindful that posting on social media channels can result in unintended consequences that could impact both you and Triton. Therefore, only a limited number of people are authorized to speak on behalf of the Company on social media. If your position with the Company involves posting on social media sites, you must follow applicable policies and guidance from the Legal Department, the Human Resources Department and/or Communications.

Otherwise, keep in mind that how you conduct yourself on social media not only reflects on you—it can be a reflection on the Company. When posting on social media you should never claim to be speaking on behalf of the Company or to be expressing an official

company position. Social media should never be used in a way that violates any Company policy or other legal obligation. Discriminatory remarks, harassment, defamatory remarks or other inappropriate or unlawful conduct will not be tolerated. Do not post confidential information about the Company, our customers or other business partners. Remember that internet content can live forever.

If you have any questions about who may communicate on a given issue, or whether a communication is appropriate, please seek guidance from Communications or any one of the resources listed under **How to Ask Questions or Raise Concerns**.



Please refer to our **Social Media Policy** for more information.



### Remember

- We expect you to use good judgment when you post information online about our company, fellow employees or your job.
- You are responsible for any content you publish, and you may not speak on behalf of Triton without receiving prior approval.
- Always be clear when you post online that your opinions are your own and not those of Triton.



## What would you do



### Which of these social media updates is okay to post?

#### Sergio:

🗨️ I just heard my company is about to announce its best quarter ever. Can't wait to get my bonus!

#### Eric:

🗨️ Just landed in Shanghai! Looking forward to getting down to business and closing the big deal I've been working on!

#### Margaret:

👍 I had a great time volunteering with my co-workers today! Check out the pictures on the Company's page.

The updates from Sergio and Eric give away confidential information about the Company, so they are not appropriate to post on social media.

Margaret's update is appropriate as it only references information that is already publicly available on Triton's site.

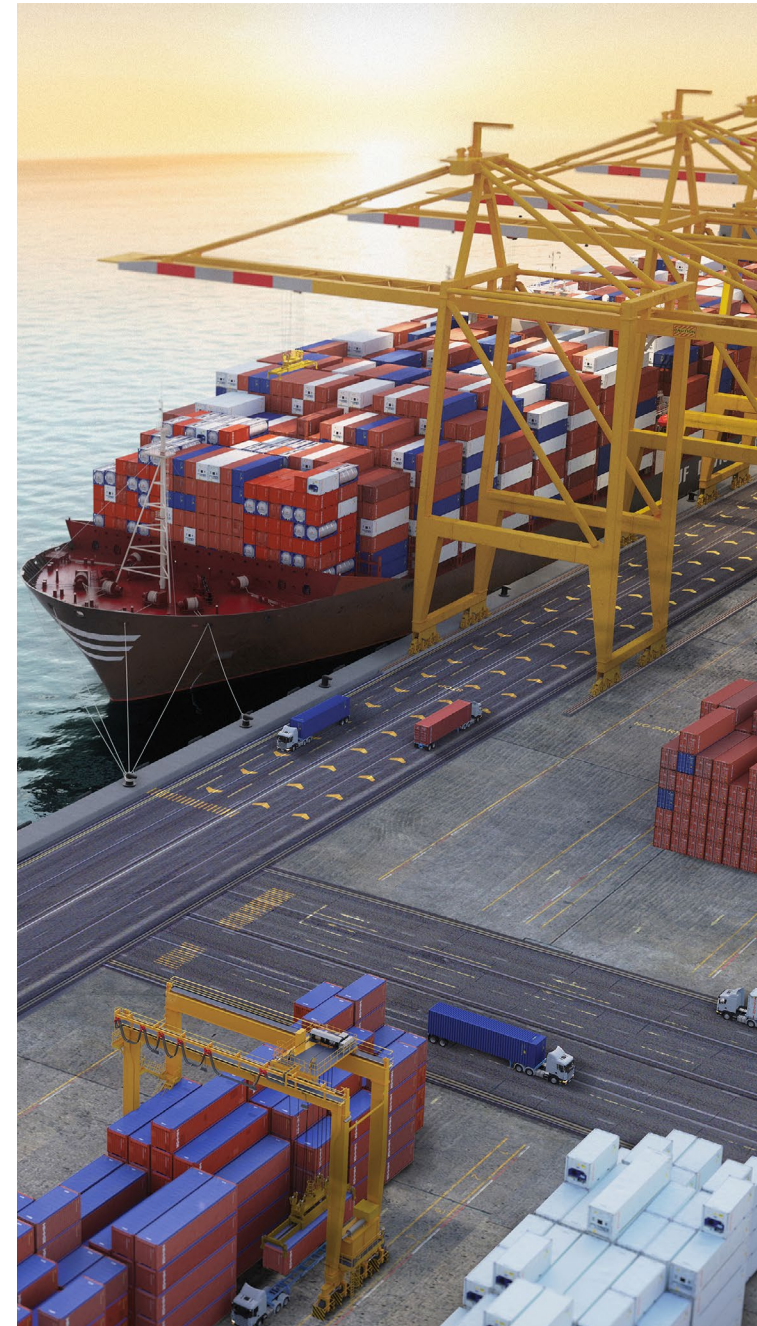
## Conflicts of Interest

***We do not allow our personal interests to interfere with our ability to make objective decisions on behalf of Triton.***

We are all expected to act in the best interest of our Company. This means we must never allow our personal interests, including those of our family members or friends, to influence our actions on behalf of the Company. A “conflict of interest” occurs when our private interest interferes with the independent exercise of our judgment in the best interest of the Company. Conflicts of interest can harm the Company’s reputation and erode the trust that people place in us and Triton. Every decision we make while on the job must be objective and with our Company’s business interests in mind. We work to avoid even the appearance of a conflict.

Situations involving a conflict of interest may not always be obvious. Understanding what conflicts of interest are and when they typically arise is the key to avoiding them. While it is impossible to list every situation that could present a conflict, the following are some common situations in which conflicts may arise:

- Hiring or directly or indirectly supervising a family member, close friend or someone with whom you have a romantic relationship.
- Allowing a second job or service to another organization to interfere with your job performance or responsibilities to Triton. This could include not only any enterprise which is a competitor of Triton or that conducts (or seeks to conduct) business with the Company, but also can include charitable, educational or non-profit organizations as well.
- Investing in companies that are Triton’s competitors, suppliers or customers; however, ownership of less than 1% of the outstanding equity securities (or in excess of 1% through mutual funds or similar non-discretionary, undirected arrangements) of any publicly-traded company is permissible.
- Taking an opportunity you learned about through your work at Triton for yourself or starting a business that competes with our Company. You (or any of your immediate family members) should never personally accept any business or investment opportunity presented during the course of your employment with Triton that is related to our business without first presenting it to the Company.
- Using Triton property or information or your position for improper personal benefit, or to compete with our Company. You may not divert Company property or Company personnel to work on your outside business interests.
- Providing a family member who has a personal or financial interest in a company that is a Triton customer, potential customer, vendor, potential vendor or competitor with an unfair business advantage.





You are responsible for using your best judgment to evaluate any potential conflict of interest because even the appearance of a conflict may cause our motives to be questioned. Disclosing conflicts of interest as soon as possible protects you and the Company and helps us maintain our culture of integrity. If you are involved in a conflict of interest situation, or suspect that you may be, you have an obligation to formally disclose this promptly to your manager and the Legal Department. The Legal Department will work with you to determine whether a conflict of interest exists and, if so, how best to address it. Many conflicts can be resolved by open and honest discussion. It is important to note that while being involved in a potential conflict of interest does not necessarily violate our Code, failure or delay

in reporting a potential or actual conflict of interest is a serious violation. You are required to disclose potential conflicts in writing on an annual basis, but you also have the obligation to promptly disclose conflicts of interest that arise throughout the year.



Please refer to our **Employment of Relatives Policy** and **Personal Relationships Policy** for more information.



## Remember

In any potential conflict of interest situation, we should ask ourselves:

- Could my personal interests interfere with those of the Company?
- Might it appear that way to others, either inside or outside of the Company?

## What would you do



My brother-in-law is seeking to become a Company supplier. Could this relationship create a conflict of interest?

If you have decision-making authority in the supplier selection process or with respect to your brother-in-law's company, a conflict of interest exists. Even if you do not have such authority, this relationship may create the appearance of a conflict of interest. You should report the situation and remove yourself from the decision-making process if you are in any way involved. Additionally, you should not seek to influence any other team members in the selection process.





## Business Gifts and Entertainment

***We exercise good judgment in the exchange of business gifts, meals and entertainment.***

It can be common practice to offer or receive gifts or entertainment to express appreciation, create goodwill and strengthen working relationships with customers, suppliers and other providers, but if you are not careful, this can present a conflict of interest or the appearance of a conflict and, in some cases, violate the law. We should always ensure that any gift or entertainment provided or received is permitted under our Code and any applicable policies and laws. We are expected to be transparent and exercise good judgment when giving and receiving gifts and entertainment, and we must never give or receive gifts or entertainment that are, or that could look like, an attempt to improperly influence a business decision or compromise independent judgment. Any offer of a gift or other business courtesy of more than modest value should be reported to and approved by your manager, and in some cases a more senior level of management. You must also immediately report any offers of cash, a fee or kickback to the Legal Department.

Gifts of modest value (typically up to USD \$150) and reasonable entertainment (typically up to USD \$250) may be accepted as long as it is professionally appropriate, infrequent and complies with Company policy. If you are offered or receive gifts or entertainment in excess of these values, you should seek approval from your manager. If cultural custom or business courtesy dictate that you cannot return the gift to the donor, contact your manager to determine how best to handle the situation.

If you give a gift or entertainment it is important to exercise discretion, submit proper expense reports in accordance with our policies, and obtain approval from your manager. You should also make sure the gift complies with the recipient's gift giving policy. It is important to be certain of this before giving any gifts. As discussed under **Anti-Corruption/Anti-Bribery**, there are additional considerations and requirements that apply to providing gifts and entertainment to government officials.

The giving and receiving of Company-sponsored gifts between employees may be permissible if the gift is professionally appropriate, does not exceed a reasonable value and is approved by your manager.



### Did you know?

#### Generally Appropriate

- Non-lavish business lunch or dinner
- Round of golf with customer
- Holiday gift baskets and flowers
- Shirts, hats, mugs, water bottles or other logo items of nominal value

#### Not Appropriate

- Expensive tickets to a sporting event without gift-giver in attendance
- Gift cards or cash
- A case of fine wine
- An expensive watch

## What would you do



I was invited by a customer to join them at the World Cup this summer. Before I accept or decline the offer, what should I do?

Seek approval from your manager. Additionally, for high profile events, such as the Olympics, World Cup, Super Bowl, etc., VP level or above approval should be obtained.

Kerry is a marketing manager who works with several regional customers. During the holiday season, one customer sends Kerry a traditional gift basket to thank her for her excellent service during the year. Attached to the basket, however, is an envelope containing a USD \$50 gift card to a local business. Kerry knows that, while the basket is likely an acceptable gift, the gift card is a cash equivalent and is therefore not permitted under the Code. What should she do?

Kerry should contact her manager to discuss the gift. If her manager is unsure how to handle the situation, they should contact the Legal Department. By reporting the gift, Kerry allows Triton to evaluate the gift and avoid the appearance of inappropriate influence.

### CONSIDER THIS

#### Can I ever accept a gift?

Before accepting a gift from a vendor, customer, etc., ask yourself "Is this reasonable and appropriate? Or does this cross a line?"

#### Examples

Accepting a moderately priced bottle of wine at the holidays? → Not a big deal.

An all expenses paid trip to a fabulous destination? → Not appropriate.

## Accurate Books and Records

*We maintain books and records that accurately reflect our business and financial situation.*

As part of our work for Triton, many of us create business and financial records. These records are important to our Company's business decisions and operations, and we all have a responsibility to ensure they are accurate, up-to-date and complete.

Our shareholders rely on the integrity of our financial statements. These documents are the foundation of our public disclosures and filings. They must provide an accurate view of our Company's business, earnings and financial condition. If you're responsible for preparing public financial disclosures or providing information for those disclosures or reports, you must ensure that the information we report or that you provide is accurate, complete and timely.

You should never make false or misleading entries in any Company accounts, financial documents, business reports or other business documents. You are also prohibited from conducting any transaction that is not recorded in our books and records.

We are all expected to:

- Make sure that any financial or non-financial information we create or report is true, fair and complete and accurately communicated to appropriate Company personnel in a timely fashion.
- Follow all applicable laws, internal accounting policies and control processes and accounting and reporting standards, seeking guidance when needed.

Keeping accurate records is not just about creating documents—it is also about managing them. We manage our records properly and retain the records we need to support our tax, financial and legal obligations. Always follow our record retention policies and securely dispose of records that are no longer needed. Remember to never alter, conceal or dispose of any information that may be relevant to an investigation or subject to a litigation hold. If you have any questions regarding whether a record is under a litigation hold, please contact the Legal Department.

### What would you do



It is the last week of the quarter and I expect to make a customer sale shortly. So that we can show good results for the quarter, can I record the sale now even though we don't have a firm agreement from the customer in place yet?

No. Costs and revenue need to be recorded in the correct time periods. The sale has not officially been completed. Until then, it would be a misrepresentation to include this sale. Never make false or misleading entries in any Triton document.

I have been traveling a lot on business lately and have lost some of my receipts. A colleague who has been in this situation says it is okay to submit a few fictitious receipts. Is it?

No. If you do that, you will be falsifying your expense report, and that is not acceptable. You should talk to your manager to find an appropriate solution.



### Remember

We should never compromise our core value of integrity by committing fraud. Fraud is committed when an employee misuses Company resources, or intentionally conceals, alters, falsifies or omits information for his or her benefit or the benefit of others. Watch for and report as soon as possible:

- Signs of potential fraud, bribery or money laundering activity
- Any suspected accounting or auditing irregularities

## Audits and Investigations

We each have an obligation to cooperate with external and internal audits and investigations. You should never attempt to interfere with or improperly influence any investigation, audit or review. If you are asked for records or information as part of an audit or an investigation, you have a responsibility to be transparent and provide full and complete information. Doing so helps the Company complete the audit or investigation quickly, and it demonstrates our culture of compliance and ethics.

If a government investigation occurs, follow any local protocols, including contacting the Legal Department as soon as possible before proceeding. If you have any questions during the course of an audit or investigation, consult your manager or the Legal Department.

## Code of Ethics for Chief Executive and Senior Financial Officers

The Code of Ethics for Chief Executive and Senior Financial Officers are additional requirements that apply to the Chief Executive Officer, the Chief Financial Officer and the Controller. The **Code of Ethics for Chief Executive and Senior Financial Officers** is available on the Company's website.





# Insider Trading

*We do not buy or sell securities if we have material non-public information.*

Insider trading is the buying or selling of a company's securities based on material non-public (or "inside") information. Our work for Triton may give us access to material non-public information. If you obtain material non-public information about the Company, you may not legally trade in Triton stock or other securities or tell others to trade until a reasonable time has passed after the information has been made public.

Material non-public information does not have to be about Triton; we may also have access to material non-public information about other companies, such as our customers or suppliers. Regardless of what company the information relates to, the expectation is the same: we must never trade in that company's stock or other securities while we have material non-public information.

Insider trading laws also apply to the sharing of material non-public information with friends or family. Passing along this information to someone else so they may trade is called "tipping." Tipping is considered a form of insider trading, and both you and the person to whom you provided the tip are in violation of insider trading laws—even if you did not make a trade or profit.

Many countries have laws regarding insider trading. Even if the activities prohibited by our **Insider Trading and Disclosure Policy** are not illegal in the country where you are based, our Insider Trading and Disclosure Policy and the Code apply to you regardless of your location. These policy requirements also apply to family, including spouses, minor children or any family member living in the

same household with you. Additionally, certain types of transactions involving Triton stock are not allowed, such as hedging, pledging or short selling. Refer to our Insider Trading and Disclosure Policy for more information.

Insider trading laws can be complex, and it is vital that we all follow them. It is important to avoid even the appearance of an improper transaction. Violating our Insider Trading and Disclosure Policy or insider trading laws puts not only the Company's reputation at risk, but also may subject you to serious repercussions, including employee disciplinary action and severe civil and criminal penalties in the form of fines and possible jail time. Contact the Legal Department if you have any questions before you engage in any securities transactions.

## What would you do



While talking to one of Triton's customers I learned about a big acquisition they are about to make. It is not public yet, and I really think that it will cause the customer's stock to increase in value. Is it ok for me to encourage my sister to buy as much of the customer's stock as she is able if I don't tell her about the pending acquisition?

No. Even though you would not be giving all the details in your possession, you would still be offering a tip. You should not provide a stock tip or share the information with your sister or anyone else.

I want to sell some Triton stock to pay for my child's education expenses. I might have material non-public information about the Company, but this is not the reason I want to sell stock. Can I still sell my Triton stock?

No. If you are aware of material non-public information about the Company you should not trade in Triton stock. Even if you have an unrelated reason why you want to sell the stock, you must not have material non-public information about Triton when you sell.



### Did you know?

Material non-public information is any information that a reasonable investor would consider important in determining whether to buy, sell or hold a security and that has not yet been widely disseminated to the public with sufficient time for the financial market to become aware of it. Material non-public information can be either positive or negative.

Examples of material non-public information:

- Revenue or earnings results or forecasts
- Acquisition or divestiture plans
- Strategic business plans, such as new product lines
- Significant litigation and other legal developments
- Significant changes in executive management
- Gain or loss of a significant customer
- Cybersecurity breaches

### What would you do



I have been working hard on a press release for a significant corporate announcement. I am going to be late to dinner with my spouse and in-laws because I was finalizing the press release, which is scheduled to be issued first thing tomorrow morning. I know my mother-in-law will ask what exactly was so important that I was late to the family meal. Can I tell her?

Unfortunately, no. You cannot tell your mother-in-law or even your spouse specifically what you were working on. You may tell them it was an important issue to the Company, but you may not provide them any specifics.





# Our Customers and Our Business Partners

We have built our reputation, and our relationships, by dealing honestly and fairly with our customers and suppliers at all times. We believe that doing business with integrity is the right way to do business, and we are committed to competing fairly and within legal boundaries in all jurisdictions where we operate.

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# Our Customers and Our Business Partners

We compete fairly and within legal boundaries – winning business based on our products and services. We know that everyone benefits from a competitive marketplace, so we follow the antitrust and fair competition laws everywhere we operate.

## Treating Others Fairly

### *We value our customers and suppliers.*

We are committed to providing quality products and customer service to our customers. We honor this commitment at each step of the customer relationship, from marketing, to contracting to billing and operations. We never engage in unfair or deceptive trade practices and treat all customers in a fair and respectful manner. We also value our suppliers and other business partners and hold them to the same standards of integrity to which we hold ourselves.

### Dealing Fairly with Customers

Triton is proud to work with the world's major shipping lines and freight forwarders. We are committed to treating our customers ethically, fairly and in compliance with all applicable laws. Customer agreements reflect the value we place on their business. All statements about products and services must be fair, factual, and complete. You must never deceive or mislead current or potential customers – do not make any claims you cannot substantiate, and do not make inaccurate remarks about our competitors or erroneous comparisons between their products or services and ours. You should avoid disparaging competitors to our customers. Instead of referring to competitors, use language that focuses on the benefits and services offered by Triton to our customers.

### Working with Governments

All of our customers are important to us, but we have special obligations when our customer is a governmental entity. In these cases, certain legal rules and contractual requirements are often much stricter and more complex than when we deal with commercial customers. As with everyone we do business with, we work to be a responsible partner to government entities and follow all applicable requirements in government contracts. If there is any doubt about how to comply with these rules, please seek guidance from the Legal Department.

### Choosing Suppliers

Our success depends on establishing and maintaining open, honest and fair relationships with trusted suppliers. Suppliers include any third-party manufacturer of equipment or components, contractor, service provider or other vendor. We work diligently to build and maintain business relationships with suppliers who share our commitment to conduct business in compliance with the law and in accordance with the highest ethical standards. Triton's **Vendor Code of Conduct** is designed to promote honest, ethical and lawful conduct by certain suppliers of goods and services to the Company by describing the expectations we have for suppliers who want to do business with us. Compliance with the Vendor Code of Conduct is a condition of doing business with the Company.

We base supplier selection decisions on legitimate business-related criteria, not on personal relationships or interests. This includes criteria such as quality of products and services, cost, reliability, reputation and experience. You can aid in this process by exercising due diligence in selecting suppliers and always disclosing potential conflicts of interest so that all sourcing decisions are based on objective criteria. Once a contract is in place, stay alert for signs that a supplier could be engaging in corrupt or unethical behavior and report any concerns.

### Working with Agents

Commission or fee arrangements may be made only with firms or persons serving as bona fide commercial sales representatives or agents. These kinds of arrangements may not be entered into with any firm in which a government official or employee is known to own an interest, unless such arrangement is permitted by applicable law and approved by the Legal Department. All commission and fee arrangements with agents must be set forth in a written agreement approved by the Legal Department. Any commission or fee to be paid to an agent must be competitive as to amount and be consistent with customary industry and local practice. Payments may not be made in cash.

## Competing Fairly

*We are committed to competing fairly and honestly.*

The way we compete is as important as the results we achieve. Antitrust and competition laws promote fair competition by prohibiting certain types of agreements and practices that restrict competition. We must always compete with integrity and follow applicable laws.

### Fair Competition Laws

Most countries around the world have competition laws (known in the U.S. as antitrust laws) designed to encourage competition in business for the benefit of customers and consumers. These laws are complex and may differ from country to country and violations can result in substantial penalties for our Company and individuals, including imprisonment. Any time you have questions about how antitrust and competition laws apply to a particular situation, seek advice from the Legal Department. If an individual tries to raise topics with you that you think may be anti-competitive, stop the conversation immediately and report this exchange to the Legal Department.

### Avoiding Improper Agreements

When we interact with competitors we must exercise caution to ensure our discussions comply with applicable competition laws. This applies to all settings where interactions may occur, such as participation in industry conferences, trade shows or trade associations. Antitrust or competition laws generally forbid any agreements with competitors that may restrain trade. In particular, agreements regarding coordinating pricing, allocating markets or dividing customers are not consistent with our values, Company policy and the law. These agreements do not have to be formal or written to be illegal—informal handshake agreements may also violate competition laws. For more information and guidance or if you have questions, please contact the Legal Department.



#### Did you know?

You should avoid agreements or practices that may limit competition, such as:

- Agreeing with a competitor to set prices, fees, sales volumes or other competitive terms
- Agreeing with a competitor to coordinate bids or allocate customers, product lines or territories
- Agreeing with a competitor to boycott a supplier or customer

You should not discuss these topics with a competitor, even in an informal setting such as a trade show or industry conference.

## What would you do



I am a marketer for Triton. I was at a café and ran into a friend who works for one of our competitors. I mentioned that lately we always seem to be competing for the same customer deals, and he said, "Let's make it easy on ourselves. Let's alternate quoting lower on big contracts, so that we both win." What should I have said in response?

You should tell him that would not be right and firmly terminate the conversation. Anti-competitive behavior like this is never okay. Remember that even discussing this type of behavior can be against the law, so it is important to make your position clear and end the discussion. You should also report the conversation as soon as possible to the Legal Department.

## Competitive Information About Others

It is important for the Company to gather timely information about the industry, including information about our competitors, in order to stay competitive. While this practice is appropriate and permissible, you may only use information obtained by fair and legal methods. For example, you may always use public sources, such as trade publications, press releases or company websites. Customer feedback is also generally an appropriate source of information. You may not obtain non-public information by illegal or unethical activities, such as through misrepresentation. Similarly, you must never ask a third party to obtain competitive information that would be unacceptable if gathered by you. Use good judgment, be honest about who you are and who you work for, and avoid even the appearance of anything inappropriate. Never ask current or former employees of competitors to share confidential business information. If you are offered or receive information that you believe is confidential or obtained unethically, speak up or contact the Legal Department.

## Advertising, Marketing and Sales Practices

To our customers, the Company's promotional and marketing materials represent more than just our products and services—they represent our Company as a whole and each of us who works here. These materials must always represent our products and services fairly and accurately. Any claims we make about our products and services should be appropriately substantiated and approved, helping us make sure that we are making commitments we can keep.

We do not disparage others in order to succeed. Never unfairly criticize our competitors or seek to improperly discredit their products or services.

For additional information and guidance, please refer to our [Antitrust Compliance Guidelines](#).



### Remember

When you gather information about our competitors, you should never:

- Use their proprietary information
- Act in ways that are unethical or unlawful
- Use others to help obtain information through improper means

## What would you do



I was attending the Intermodal trade show on behalf of Triton, and struck up a conversation with a few colleagues from other companies. After chatting about the supply chain issues experienced this year, one person casually asked me about Triton's current pricing strategies in light of the current market. How should I have responded?

You must politely but firmly tell them that you cannot discuss pricing strategies. If the discussion continues among other members in the group, you must object again, promptly leave the conversation and contact the Legal Department.





# Anti-Corruption/Anti-Bribery

## *We do not tolerate bribery or corruption.*

We have zero tolerance for bribery and corruption because we are committed to winning fairly and honestly.

## Bribes and Kickbacks

We pursue our business objectives with integrity and in compliance with the law, no matter where we operate. Triton prohibits any form of corruption in our business dealings. We must comply with applicable laws in the U.S. and other countries in which we do business that are designed to prevent bribery and corruption, including the U.S. Foreign Corrupt Practices Act (FCPA), which applies to all of our global operations. Consequences for violating anti-bribery laws can be severe, not just for corporations, but also for individuals, often carrying harsh sentences and large monetary fines and penalties. Corruption can also damage our reputation and customer relationships.

Bribes come in many forms, and they are not always obvious. A gift, the promise of a job, the offer of a trip, a charitable contribution – all could be considered bribes, if offered in exchange for any decision or favorable treatment.

- A bribe is anything of value to get or keep business, gain any sort of business advantage or influence decisions.
- A kickback is a form of corruption that involves two parties agreeing that a portion of sales or profits will be improperly paid, rebated or otherwise returned as a reward to one of the parties for making or fostering business deals.
- A facilitating payment is a small payment made to a government official to speed up routine government actions like processing paperwork.

You may never offer, make, request or accept anything of value that could be perceived as a bribe, including kickbacks or facilitation payments. Before you offer or accept anything of value, check

our policies, and ask for help if you are not sure of what to do. If an offer is permitted by our policies, be accurate and complete in recording payments or expenses.

What about people who do business on the Company's behalf? As a company, we are not only responsible for the actions of our employees, but also for the actions of third parties who represent us. You may never offer or accept anything of value through a third party (such as an agent, sales representative or consultant) that you could not offer or accept directly. To protect yourself and the Company, follow our due diligence procedures if you are responsible for hiring agents or other third parties and monitor their work. If you suspect an agent or other third party is misusing funds from Triton (or its own funds) to make illicit payments, report your suspicions to the Legal Department.

For additional information and guidance, please refer to our **Anticorruption Compliance Program**.

## What would you do



A manager at a depot contacted me to report that local customs inspectors had visited the facility and were threatening to impose duties and fines on some of our containers located onsite. The officials told the depot manager that any duties could be overlooked in exchange for a small payment. Should I go ahead and authorize the payment, as long as it is a small amount of money?

No. You might think you are helping the Company by avoiding these duties and penalties. However, this is a request for a bribe, so you must not agree to allow the payment to be made—and you should contact the Legal Department immediately.

### CONSIDER THIS

- "Do not worry, that is just the way we do business in this country."
- "This payment does not require approval."
- "A political contribution might help speed things along."

Hearing comments like these? Stop and seek help. If it sounds illegal or unethical, it probably is.

## Interacting with Government Officials

Be particularly careful when interacting with public officials, including employees of state-owned enterprises. No matter how we interact with government officials, whether they are customers or regulators, we must ensure our interactions reflect our commitment to the highest ethical standards. We must know and abide by the various anti-corruption laws that apply to us when interacting with government officials. Many countries, states, local jurisdictions and state-owned enterprises have limits and restrictions on what gifts and other things of value can be offered.

Know the thresholds and legal requirements applicable to the recipient. While gifts and business entertainment provided to a public official for a legitimate business purpose may be reasonable in some locations, they may violate legal thresholds or be prohibited in others. Providing even small gifts or inexpensive meals to government officials or their family members may be improper or illegal and could be considered a bribe. Laws regarding interactions with government officials are complex. If you have questions about interacting with government officials or if you observe or suspect a bribe, contact the Legal Department immediately. For additional information and guidance, please refer to the Anticorruption Compliance Program.



### Remember

When working with third parties who deal with governments on behalf of the Company, we should pay special attention to certain “red flags” that may indicate a risk of bribery. Be alert where a third party:

- Provides services in a country that is perceived as highly corrupt;
- Suggests they can circumvent “red tape” or “expedite” normal business processes;
- Requests payments in cash or via an unknown third party; and/or
- Declines to provide documentation for expenses or detailed invoices regarding services.

Red flags may include a request to:

- Transfer payment to or from entities or countries not related to the transaction.
- Process a transaction in a way that circumvents the normal process.
- Make or receive payments in cash.

Red flags are a signal to ask more questions to better understand the transaction. If it sounds suspicious, speak up – awareness is the key to combatting corruption or money laundering.





## What would you do



I know someone who works for a customer that is a state-owned entity. He asked if I would be willing to hire his daughter as an intern for the summer. He implied that offering her the position might help Triton win contracts in the future with his company. Would it be okay if I offered her a position or recommended her to another department for a position?

No. Offering the official's daughter a position or ensuring she receives special consideration in the hiring process could be considered a form of bribery and may violate anti-bribery laws. You should report the situation to the Legal Department.

## Anti-Money Laundering

We are committed to conducting business in a way that prevents the use of our business transactions by those who might abuse them, so we comply with anti-money laundering, financial crime and anti-terrorism laws in all countries where we operate. This means, in part, that we cannot enter into transactions involving funds generated through criminal activities such as fraud, terrorism or drug-dealing. Doing so may violate anti-money laundering and anti-terrorism laws.

- Money laundering is a process where funds generated through criminal activity – such as drug dealing, tax evasion, human trafficking and fraud – are moved through legitimate businesses in order to hide their criminal origin.

We must ensure that Triton is conducting business with reputable customers or business partners, for legitimate purposes, with legitimate funds. We take the time to know our customers, suppliers and other business partners and the reputations they have for following the law, by performing appropriate due diligence and screenings. That said, we should be aware of "red flags," such as requests for cash payments or other unusual payment terms. We would never knowingly look the other way when it comes to illegal activities, but we understand that criminal activity like money laundering may not always be obvious, so it is important that we work to reduce our exposure and speak up about anything suspicious. If you encounter any transaction that doesn't seem right, you should contact the Legal Department.





## Doing Business Internationally

*We are proud to do business around the world. Understanding and complying with international trade laws is critical.*

We are subject to trade compliance laws and regulations around the world and we are committed to complying with these laws. These include country-specific import and export control laws, economic sanctions laws and antiboycott laws. These laws can be complex and change frequently, often without advance notice. If you have questions about these laws or if you suspect a violation of any trade compliance laws has occurred or is about to occur, contact the Legal Department.

### Economic Sanctions and Boycotts

The U.S. and other jurisdictions and international organizations utilize economic sanctions to promote national security or advance foreign policy objectives. These sanctions prohibit companies from conducting business with certain countries, individuals or entities.

Restricted activities may include transfers of assets, monetary payments, provision of services, financial dealings, exports and imports and travel to certain countries. Triton complies with all applicable restrictions wherever we are doing business.

Some countries have adopted boycott laws which try to prohibit companies from conducting business with individuals and companies in designated countries. For example, a purchase order, tender, contract, supplier questionnaire, letter of credit or shipping documents might prohibit the use of goods or services from a specific country or from persons or companies on a "blacklist." In the U.S., it is against the law for companies to participate in boycotts that the U.S. does not support. Triton complies with all trade sanctions imposed by the U.S. and strictly adheres to all antiboycott laws. If you receive a boycott-related request, you should immediately contact the Legal Department for guidance. Such requests may be required to be rejected and reported to regulatory authorities.



### What would you do



An existing TCS customer wants to purchase 500 containers that they will then re-sell to a customer in another country. This seems like a great business opportunity, but I think the end customer is in a country subject to broad economic sanctions. What should I do?

In many cases, Triton cannot sell to someone if we know or have reason to know the goods are intended for a sanctioned country. Contact the Legal Department for further guidance.



# Our Communities

Triton is committed to having a positive global impact on the environment and communities in which we operate. We believe operating as a responsible corporate citizen contributes to our long-term success and allows us to leverage our resources to be a leader in addressing environmental and social issues related to our industry or communities.



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# Our Communities

We respect our environment and the communities in which we live and work. We are committed to making a positive impact in our communities and encourage our employees to get involved.

## Environmental Sustainability

*We strive to be good stewards of our environment.*

At Triton, we are committed to environmental sustainability, and seek to conduct our business in a manner that minimizes environmental impact and conserves natural resources. We strive to take a leadership role in our industry's environmental initiatives and work proactively and collaboratively with our suppliers, customers and within our own

operations. We comply with the environmental laws and regulations of the jurisdictions in which we operate, and we expect our vendors to do the same. We ask our employees to do their part by not only following applicable regulatory requirements but to strive to go beyond compliance by staying mindful of the principles outlined in Triton's **Environmental Policy Statement** and reporting any actual or potential environmental hazards right away.

## Political Activities

*We respect the rights of our employees to engage in the political process.*

Triton understands that we each have the right to support political activities of our own choice on our own time and at our own expense. Remember your views and actions when engaging in political affairs are your own and not those of the Company. You may never use Company property or resources, including work time, for personal political activities. Also, you may never pressure a colleague to support a particular cause.

In addition, you should never engage in any political activities on Triton's behalf, unless authorized by the Legal Department. The Company's ability to support political candidates or engage in political activities, such as lobbying, are highly regulated in some countries, including the United States, and they often come with detailed registration and reporting requirements.

If you have any questions or need guidance, please contact the Legal Department.





## Charitable Giving/Employee Volunteer Activities

*We are committed to making positive contributions to our global communities.*

Just as we are passionate about our work for Triton, many of us are also passionate about volunteering for charitable causes. As a company, we support a variety of global and local causes and non-profit organizations, many inspired by the activity and recommendations of our employees. We also provide employees with company-sponsored

volunteer opportunities in areas aligned with our corporate social responsibility priorities. Employees are also able to participate in our matching gift program where the Company financially supports organizations identified as worthy by employees. We are all encouraged to become involved in our communities and give back. If you choose to volunteer in charitable activities outside of work, avoid conflicts of interest and do so on your own time.

### What would you do



I have a good friend who is running for political office and has asked if I would endorse her at a rally. Is that a problem?

Also, can I use my office printer to print promotional materials for my friend, if I do it before or after work?

You can endorse your friend, just be sure to make it clear that your endorsement is your own personal action and that you are not speaking on behalf of the Company. If the rally or other campaign event is during your work hours, be sure to use appropriate time off.

However, you cannot use Company resources to support your personal political activities, even if outside work hours.

I am involved in a personal charitable activity in my community. May I obtain a list of Company vendors that I work with and send them emails from my Company email address to solicit contributions?

No, soliciting Company vendors for personal charitable activities may create the appearance of impropriety or a conflict of interest.






# Company Resources

Thank you for taking the time to read our Code of Conduct and for committing to help preserve our reputation and honor our values. It is up to all of us to do the right thing. You are not in this alone – there are resources available to help you uphold the Code.  
***Here. There. Everywhere.***



| Resource                      | For help with                                                                                                                            | Contact                                                                                                                                                                                                                                                                                                                                           |
|-------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Communications Department     | Concerns or questions about media inquiries, social media and other communications matters                                               | <a href="mailto:Communications@trtn.com">Communications@trtn.com</a>                                                                                                                                                                                                                                                                              |
| Human Resources Department    | Concerns or questions about employment, benefits and other HR matters                                                                    | <a href="mailto:triton-hrteam@trtn.com">triton-hrteam@trtn.com</a><br>Or the Chief Human Resources Officer                                                                                                                                                                                                                                        |
| Investor Relations Department | Concerns or questions about investment community inquiries and other shareholder matters                                                 | <a href="mailto:TIL.Investors@trtn.com">TIL.Investors@trtn.com</a>                                                                                                                                                                                                                                                                                |
| Legal Department              | Concerns or questions about suspected violations of the Code, law, our policies or any other legal, ethics or compliance-related matters | <a href="mailto:Triton-HQ-Legal@trtn.com">Triton-HQ-Legal@trtn.com</a><br>Or the General Counsel                                                                                                                                                                                                                                                  |
| Triton's Ethics Hotline       | Concerns about suspected violations of the Code, law or our policies                                                                     | Visit: <a href="http://www.tritoncontainer.ethicspoint.com">www.tritoncontainer.ethicspoint.com</a><br>Call: +855-657-8028<br>QR Code:<br><br>Digital Intake URL:<br><a href="https://tritoncontainer.navexone.com/">https://tritoncontainer.navexone.com/</a> |

### Policy Links

Below are links to detailed policies referenced in the Code. Note that this is not an exhaustive list of policies.

- [Anticorruption Compliance Program](#)
- [Antitrust Compliance Guidelines](#)
- [Code of Ethics for Chief Executive and Senior Financial Officers](#)
- [Employment of Relatives Policy](#)
- [Environmental Policy Statement](#)
- [Human Rights Policy](#)
- [Insider Trading and Disclosure Policy](#)
- [Personal Relationships Policy](#)
- [Social Media Policy](#)
- [Vendor Code of Conduct](#)

[www.trtn.com](http://www.trtn.com)

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