

CODE OF BUSINESS CONDUCT AND ETHICS

Delivering Goods for the Good of All



TRINITY INDUSTRIES



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TRINITY’S INTEGRITY: A MESSAGE FROM JEAN SAVAGE

Every railcar we build carries more than goods. It carries the trust of the communities that depend on what we move — the farmers, families, and businesses whose lives run on the supply chains we keep in motion. That trust is not a given. It is earned, every day, by the people of Trinity.

I have seen what that looks like up close: the welder who flags a defect no one asked her to find. The supervisor who speaks an uncomfortable truth to protect his team. The colleague who, in a moment of pressure, chooses the harder right over the easier wrong. These are not exceptional acts. At Trinity, they are who we are.

Integrity is the word we use for all of it. And it matters now more than ever — not because the world is more complicated, though it is, but because the standard we set for ourselves has always been higher than what the world requires.

This Code is your guide for living that standard. It won’t cover every situation you’ll face — no document could. What it will do is give you a framework for thinking clearly when the right path isn’t obvious, and connect you to people who can help when you need them. Use it. Return to it. Share it with your team.

Most importantly, speak up. Every concern you raise — whether it’s a safety issue on the floor, a question about a business decision, or something that simply doesn’t feel right — makes Trinity stronger. I mean that. Your voice is not a disruption. It is how we learn, how we improve, and how we hold ourselves to the promises we’ve made.

We built this company one honest act at a time. Let’s keep building it that way — together, and always with **Integrity**.

Jean Savage
Chief Executive Officer and President



Trinity’s Integrity: A message from Jean Savage, Chief Executive Officer and President





WHO WE ARE

OUR PURPOSE

At Trinity, our Purpose is to **Deliver Goods for the Good of All**. We remain committed to rail solutions that deliver goods safely, efficiently, and sustainably—for the good of our customers, shareholders, and employees in all the communities we serve.



OUR CORE VALUES

Our Core Values guide how we carry out our Purpose. We do so with:

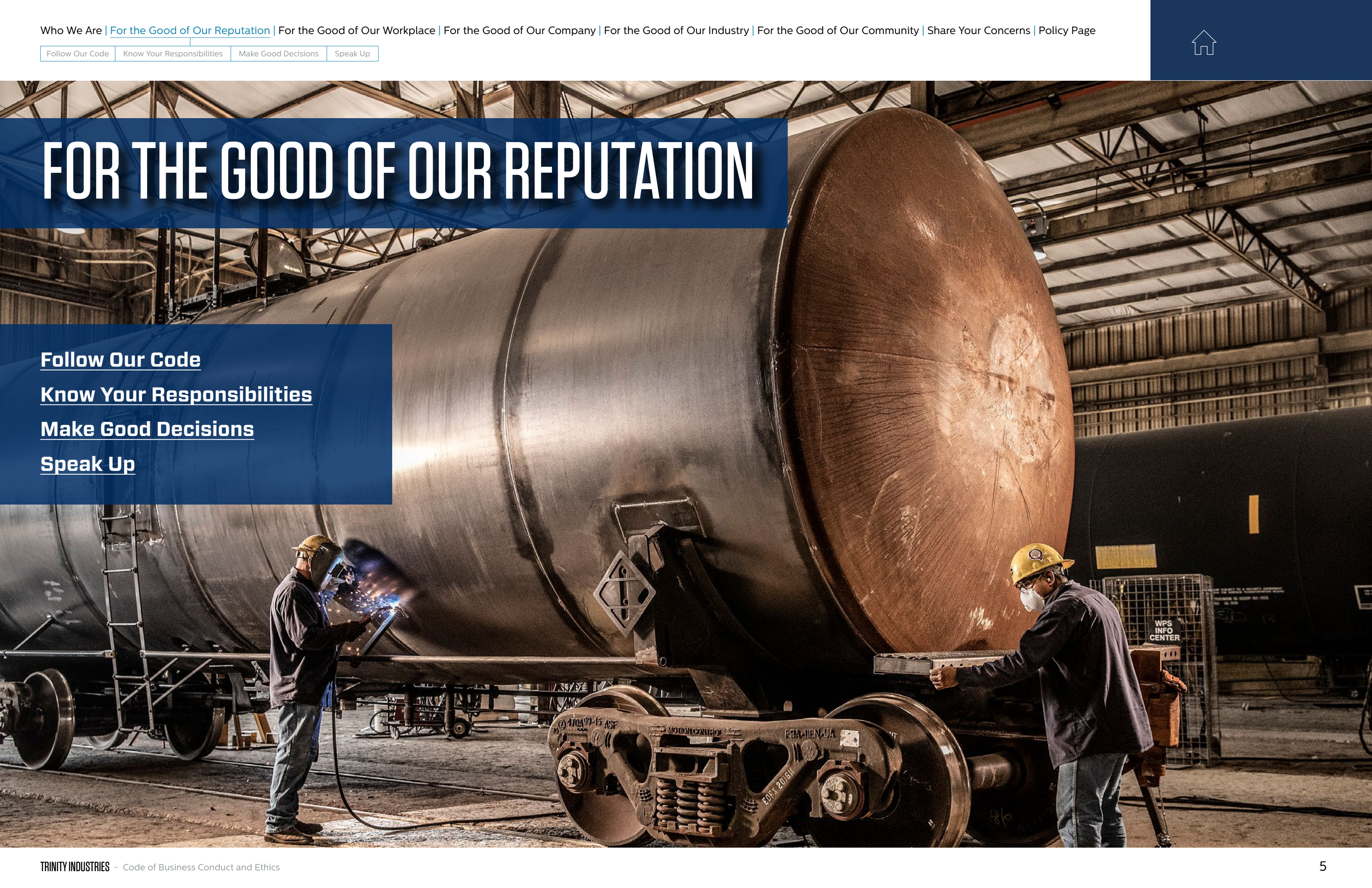
- **INTEGRITY**—We do the right thing
- **DIVERSITY AND INCLUSION**—We pursue diverse talent and perspectives
- **COMMITMENT**—We do what we say we will do
- **EXCELLENCE**—We passionately do our best
- **INNOVATION**—We boldly seek to improve





FOR THE GOOD OF OUR REPUTATION

- [Follow Our Code](#)
- [Know Your Responsibilities](#)
- [Make Good Decisions](#)
- [Speak Up](#)





FOLLOW OUR CODE

At Trinity, we create the connections that make life better. Bringing companies to customers. People to products. And colleagues, right here, to our Code.

Our Code helps us all honor a commitment to an ethical work life—a better work life—where we not only feel proud of the amazing job we do, but are safe, valued, respected, and included while doing it.

It provides a unified starting point to live out our Purpose and Core Values. The Code contains:

- Information on why and how we work ethically as a company
- Questions with answers, terms with definitions, and other forms of guidance on everyday situations
- Statements on integrity from real employees within Trinity
- Links to Trinity policies that provide additional details when they matter most

What doesn't it include? Every single scenario you may potentially face on the job or the answer to every question you may have—that just wouldn't be possible.

However, if you do find yourself needing more support, the Code contains a list of [additional resources](#). No matter the issue, we are here to help.

Overall, we want you to know that while we each are committed to transporting the goods that keep our lives, and economy, rolling, we must also commit to following our Code.

It's there to ensure we don't just deliver goods, but we deliver integrity. Every mile of the way.

We ALL must follow the Code.

The Code applies to all of Trinity Industries, Inc.'s (Trinity's):

- Employees
- Directors
- Subsidiaries
- Agents

The spirit and principles of the Code apply to all of Trinity's:

- Contractors
- Consultants
- Representatives
- Suppliers
- Customers
- Partners
- Any other third parties
- The employees, representatives, and agents of any third parties

As noted within the Code, certain areas may also apply to Family Members: An employee's spouse, domestic partner, parents, grandparents, siblings, children, any person with whom the employee is in a romantic relationship or shares a household, and any other familial relationship that could create the appearance of a conflict.

In short, if you're reading this Code, chances are it applies to you.





KNOW YOUR RESPONSIBILITIES

In addition to following our Code, we have a set of shared responsibilities as Trinity employees.

As a member of our team, be sure to:

- 
- Come to work with the Purpose of **Delivering Goods for the Good of All.**
 - Keep our Core Values top of mind in every action and interaction.
 - Take responsibility for following our Code, our policies, and the law.
 - Reach out for clarity if any legal or ethical responsibility isn't clear.
 - [Speak up](#) if you ever see, suspect, or experience a violation.

Keep in mind that Trinity supervisors have additional responsibilities. As a supervisor, always:

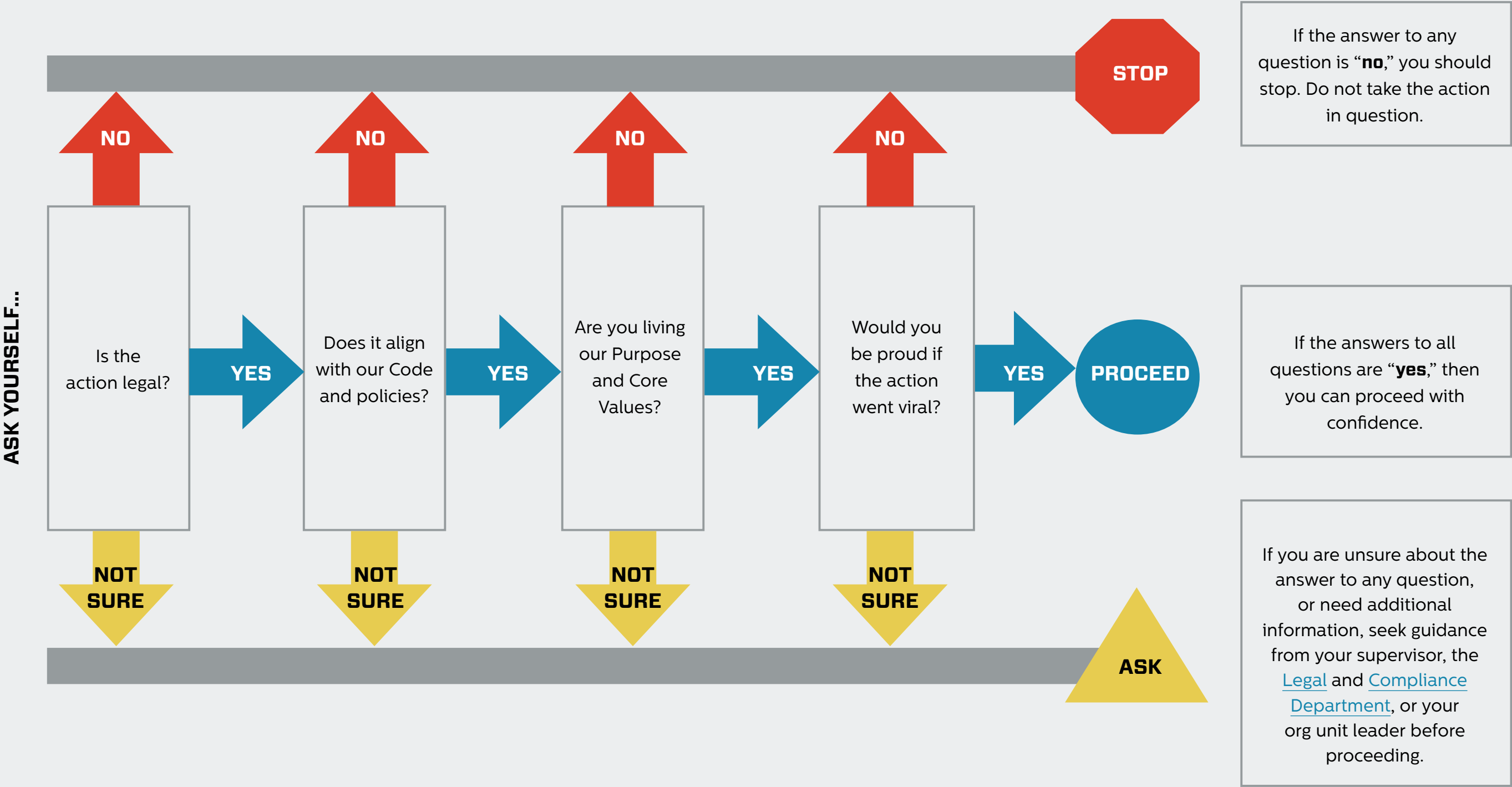
- 
- Serve as a model of what it means to live our Purpose and our Core Values.
 - Study the Code well enough to answer questions that may arise from your team.
 - Promote the Code whenever possible and find items to spotlight when beneficial.
 - Be a safe space for team members to speak up, then escalate their concerns when needed.





MAKE GOOD DECISIONS

Consider using the following guide to help decide if a particular action is appropriate.





SPEAK UP

When to Speak Up

While the Code covers a variety of ethical and legal issues you may face on the job, it is important to speak up if you still have questions, particularly if you believe any situation isn’t in line with applicable law or our:

- Purpose
- Core Values
- Code
- Policies
- General sense of what’s right

Situations to report may include:

- Personal violations
- Witnessed violations
- Supervisors ordering or knowingly permitting violations
- Failures to report actual or reasonably suspected violations

How to Speak Up

You can make reports to:

- A supervisor you trust
- A plant manager
- Your Human Resource representative
- [Legal](#)
- [Compliance](#)
- [Internal Audit](#)
- Our [Chief Ethics, Compliance, and Sustainability Officer](#)

We understand that you might not always be comfortable discussing a sensitive matter with someone inside of Trinity. In those instances, you can report behavior anonymously, by contacting:

- The Trinity Integrity HelpLine at (US) 1-877-TRN-LINE (1-877-876-5463) or (MX) 800-020-4627
- The [Trinity Integrity HelpSite](#)

Note that you are protected by the whistleblower provisions of U.S. federal and state laws and regulations, including under the Dodd–Frank Act, the Sarbanes–Oxley Act, and applicable state statutes. Many states, including Texas, have enacted their own whistleblower protections. Similar protections exist under foreign laws and regulations, including in Mexico. Nothing in this Code prevents you from reporting possible violations of federal law or regulations to any governmental agency or entity.

Examples of **governmental agencies** include:

- Department of Justice
- Securities and Exchange Commission
- Occupational Safety and Health Administration
- U.S. Congress
- Secretaria del Trabajo y Previsión social (STPS)
- Any agency Inspector General
- Local authorities

How Reports Are Handled

Internal Investigations:

Trinity strives to conduct internal investigations of all reported violations of the law, the Code, or our policies or business practices promptly, thoroughly, and fairly.



A message from Matt Pittman, Chief Ethics, Compliance, and Sustainability Officer



KEEP GOING

Policy:
[EC-017: Whistleblower Policy](#)

We will maintain confidentiality to the extent possible while ensuring a proper investigation.

At the conclusion of each internal investigation, we will determine whether a violation has occurred, and what the appropriate disciplinary, legal, and/or corrective action should be.

External Investigations:

Sometimes an investigation can come from an outside source, such as a government employee. Promptly contact Legal if you’re ever made aware of an external investigation or audit, to ensure we respond appropriately.

It will be important to follow any valid government order and keep the process as confidential as possible. Legal can help.

Each of us has a duty to fully cooperate with and respond honestly and truthfully to **all** investigations. Never alter or destroy records in response to or in anticipation of an investigation and never obstruct the process in any way or impede any witnesses.

Non-retaliation Policy

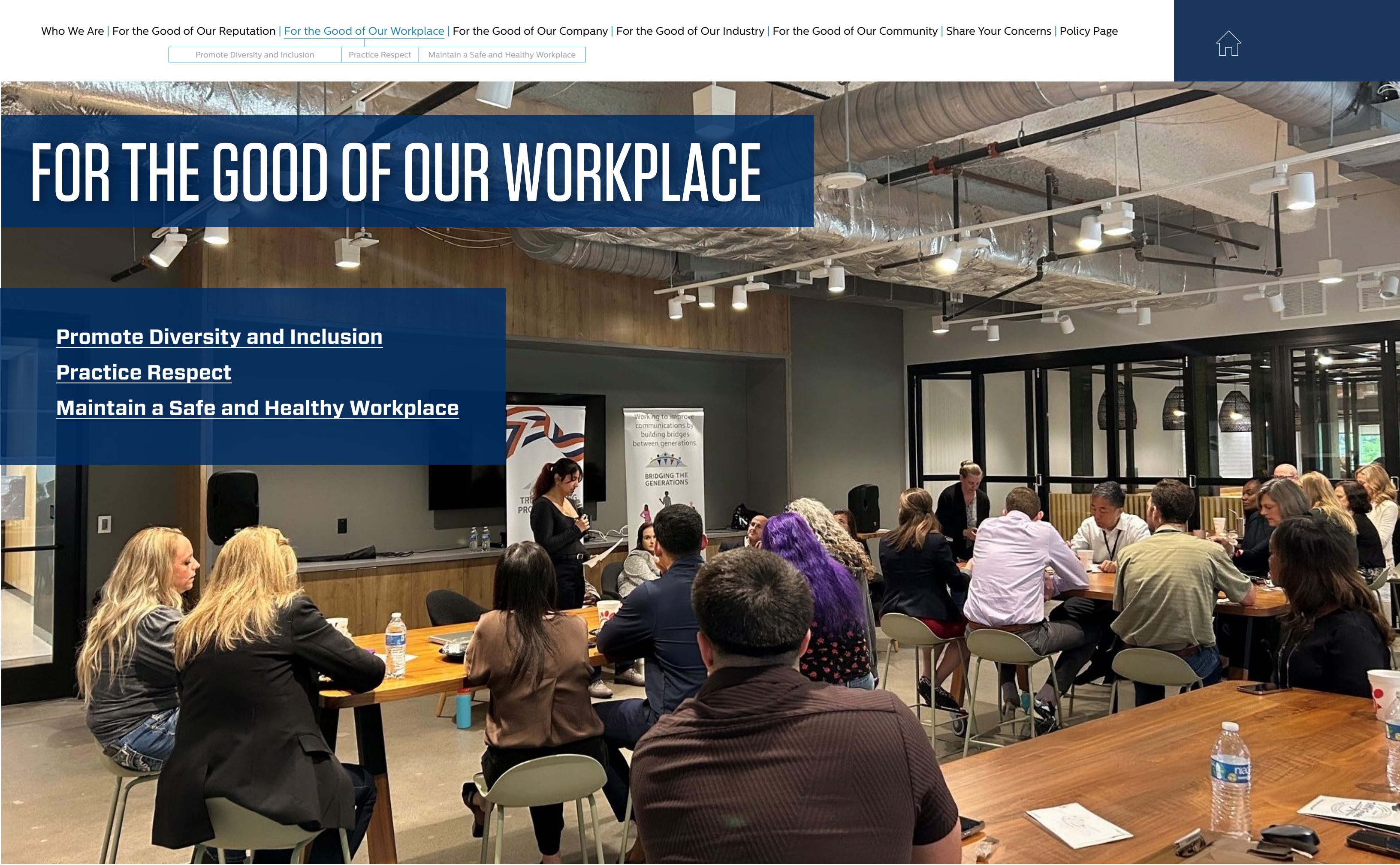
We want you to speak up confidently and without fear. That’s why we never tolerate retaliation — including termination, demotion, suspension, harassment, or any other adverse employment action — for any complaints made by an employee who reports a violation or cooperates in an investigation honestly and in good faith. This protection applies whether you report internally or to a government agency.

If you believe you have suffered or witnessed retaliation, please [report it](#) immediately.



FOR THE GOOD OF OUR WORKPLACE

- [Promote Diversity and Inclusion](#)
- [Practice Respect](#)
- [Maintain a Safe and Healthy Workplace](#)





PROMOTE DIVERSITY AND INCLUSION

We recruit and retain a thriving, diverse workforce that reflects our broader community.

At Trinity, we encourage our employees to bring their whole selves to work. Diversity strengthens us, so we want you to share your unique perspectives. We greatly value your individual skill set and background.

Join in our commitment to foster an environment where everyone feels valued and appreciated for who—not what—they are and without the fear of discrimination based on **protected characteristics**.

Protected characteristics include, but are not limited to:

- Age
- Color
- Disability (mental or physical)
- Gender identity or gender expression
- Genetic information
- Marital status
- National origin
- Pregnancy
- Ethnicity
- Race
- Religion
- Sex
- Sexual orientation
- Any other characteristic protected by applicable law



What Does Inclusion Look Like?





Know that it starts with us.

Diversity and inclusion thrive when we all do. When each of us is at our best, it leads to a greater sense of belonging, creativity, innovation, and employee engagement—an environment where differences are celebrated and what we can achieve together becomes the focus. To do your part, take advantage of corporate-sponsored development opportunities, including:

- [Employee resource groups \(ERGs\).](#)
- Employee networks
- Social Engagement events
- Let’s Talk series events
- Focus group sessions
- Safe Space sessions

Promote a dynamic workplace culture.

We promote an inclusive culture that creates a greater sense of belonging for our people and evolves to fit the needs of our employees.

Always:

- Respect the similarities and differences of your colleagues
- Remain open to varying viewpoints and perspectives
- Base employment decisions on objective criteria, like knowledge, skills, and abilities
- Contact Human Resources if you want to request reasonable accommodations for:
 - Religious beliefs and practices
 - Disabilities
 - Pregnancy, childbirth, and related medical conditions
- Immediately [speak up](#) if you see, experience, or suspect mistreatment of any kind
- Never retaliate against anyone for raising a concern about potential discrimination



THE RIGHT WAY

“Being a part of BETRUE at Trinity has helped to bring balance to my work life. In the past, I have been completely consumed by work, and I have come to realize that is not how I want to live life. BETRUE has afforded me the opportunity to use my talents to help and educate others. Our BETRUE executive board is a joy to work with, and I have developed new friendships. From a professional standpoint, I am meeting a lot of new people and developing a network of peers in other departments. This will only strengthen our quest to being One Trinity.” --- **Pedtra Flournoy, Sr. Quality Engineer, BETRUE Officer, Dallas, TX**



KEEP GOING

Contact:
[Human Resources Department](#)

Policy:
[HR-021: Equal Employment Opportunity and Harassment](#)



PRACTICE RESPECT

We accomplish more together, so we prioritize collaboration and respect.

Because respect is the foundation of a healthy, productive workplace, we aim to promote an environment that’s free of **harassment**, bullying, and abuse.

Treat everyone with dignity, respect others’ opinions and boundaries, and practice common courtesy and politeness on a consistent basis.

Harassment is behavior that either creates an intimidating, hostile, or offensive work environment, or that interferes with someone’s ability to do their work.



THE RIGHT WAY

“Ignorance of policies and laws is not an excuse. Opportunities should be extended based upon qualifications, skills, and performance. We must conduct ourselves with integrity and treat each other respectfully and fairly, celebrating different ideas and perspectives.”

--- Mayra Susana Cruz Morales, Labor Relations, Monclova, MX





Recognize and put an end to harassment.

To stop harassment, we must first be able to identify it. It comes in many forms, including:

- Stalking
- Bullying
- Displays of offensive materials
- Discriminatory jokes, slurs, or gestures
- Electronic badgering
- Threats or intimidation
- **Sexual harassment**

Keep in mind that harassment is typically mistreatment based on a protected characteristic, such as race, age, gender, or sexual orientation. However, all forms of abusive and bullying behaviors, whether tied to a protected characteristic or not, go against our Core Values and everything we stand for.

Sexual harassment includes:

- Unwanted sexual advances or requests for sexual favors
- Nonconsensual physical contact
- Sharing of sexual materials
- Other acts of a sexual nature

Always stay alert.

It's important to keep in mind that harassment may occur in various contexts. Speak up whether harassment:

- Happens on or off the clock
- Involves members of the same or opposite sex
- Occurs on or off Trinity property
- Is committed by an employee or a third party
- Takes place via email or text or on social media



THE RIGHT WAY

“If in the family, with our neighbors, in our work, school and friendship environments, we respect all ideas and encourage this practice, our society would have a better coexistence. As a consequence, we would have less harassment of people and our work environment would be optimal.”

--- **Edgardo Paz, Finance Operations Director, Mexico City**



Harassment-free Job Site

Our Core Values in Action

Q: One of my colleagues made sexually suggestive comments toward me. When I confronted them, they claimed they didn't mean it in a sexual way. Should I let it go?

A: No, you should speak up. Harassment doesn't have to be intentional to go against our Core Values. In other words, saying, “That's not what I meant” won't excuse offensive behavior. Your colleague needs to be aware of how their words impact others. The best way to ensure that is to speak up.



KEEP GOING

Policy:
[HR-021: Equal Employment Opportunity and Harassment](#)



MAINTAIN A SAFE AND HEALTHY WORKPLACE

We strive to maintain a safe and healthy work environment and promote a culture of safety for our employees, customers, suppliers, and visitors.

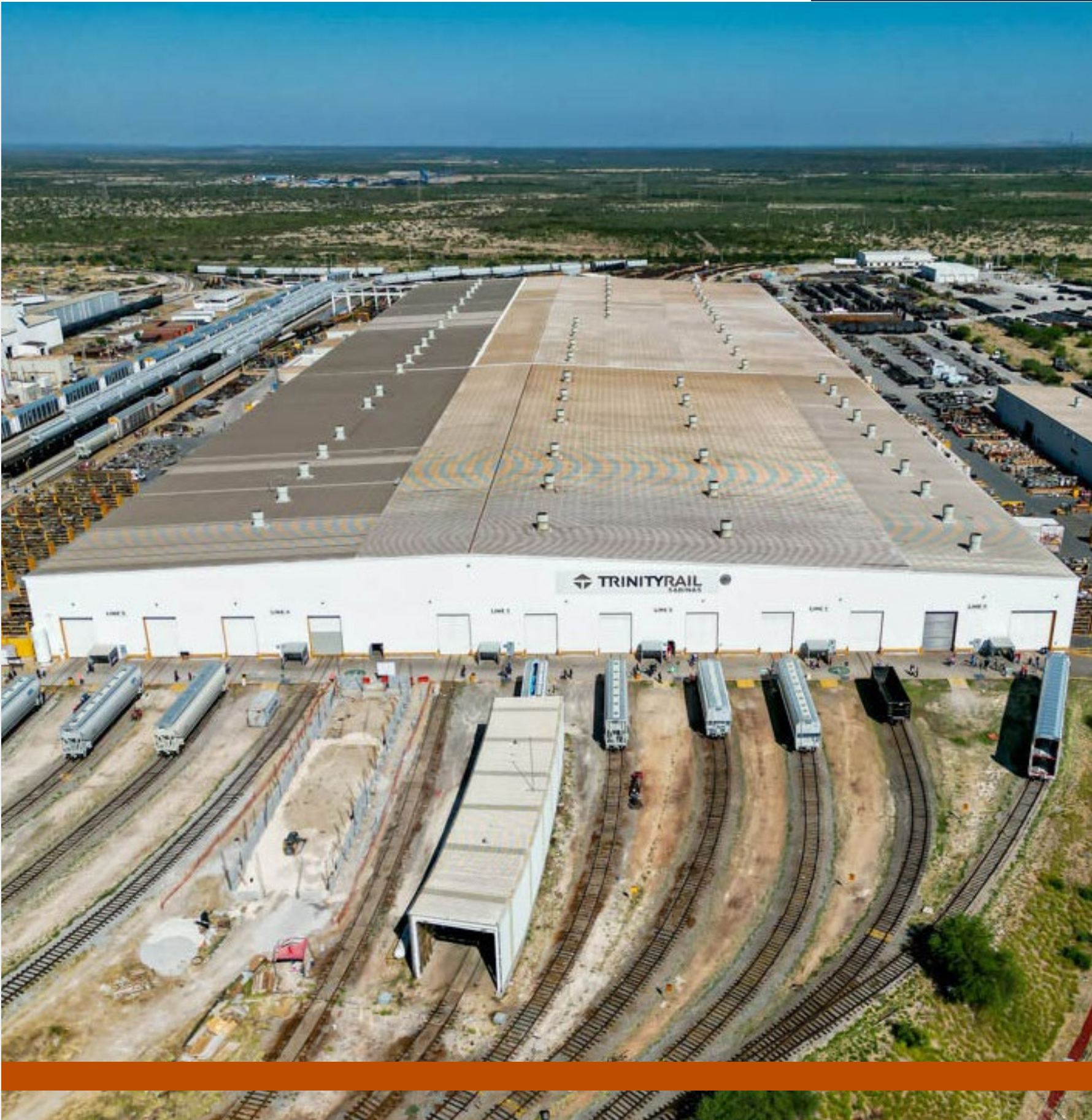
Everyone deserves a safe, healthy, and secure place to live, work, and do business. That’s why we regularly implement safety policies, procedures and trainings through various programs and partnerships.

Contribute to our efforts by preventing work-related injuries, illnesses, and property damage both within our company and throughout our supply chains and neighboring communities.

A safe workplace includes your mental health and wellbeing. If you are struggling with stress, mental health challenges, or concerns about your workload or working conditions, Trinity’s Employee Assistance Program (EAP) is available to you. Speak with Human Resources for more information. Supervisors must also be alert to signs of mental health distress in their teams and connect employees with available resources.

Support corporate initiatives.

Trinity is the only North American railcar company that is certified to both the **ISO 14001** (Environmental) and **ISO 45001** (Safety) Standards, and we are a certified partner company in the American Chemistry Council’s Responsible Care® Management System (RCMS). That means we are committed to continually improving our environmental, health, and safety (EHS) performance. To do your part, help us continue to improve in the areas of leadership commitment, employee engagement, and risk reduction. Do your part by actively participating on your local site safety committee or become CPR/First Aid certified. Talk to your supervisor or your site safety manager.

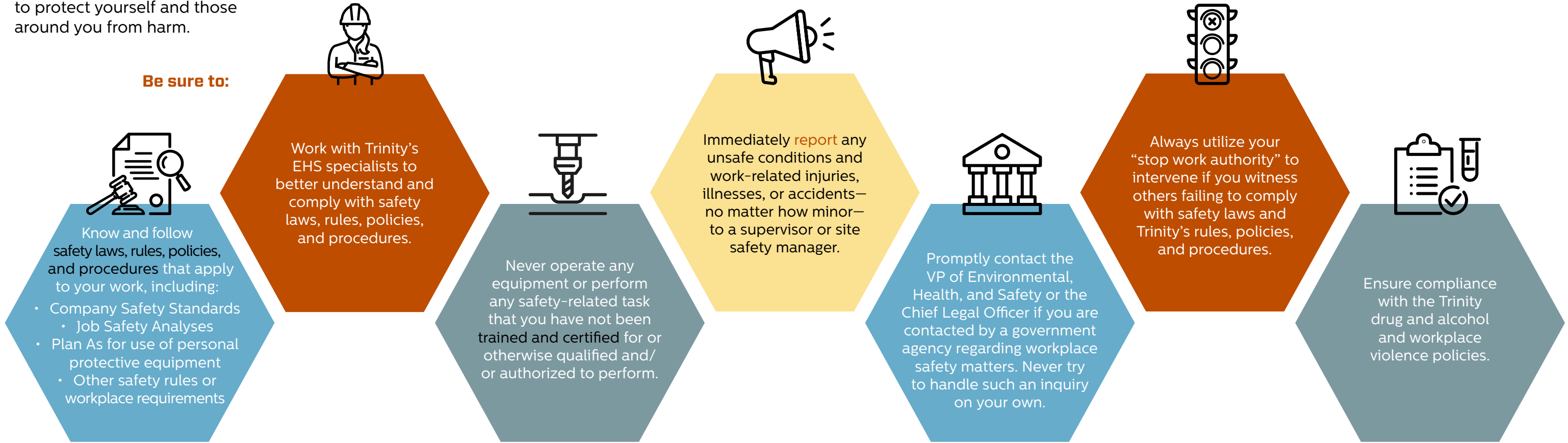




Take proper precautions.

Being vigilant is the best way to protect yourself and those around you from harm.

Be sure to:



THE RIGHT WAY

“Actively protecting the health and safety of workers, both physically and mentally, enhances productivity and performance, leading to better results at work. We should always advocate for safer ways of performing tasks, ensuring employees are prepared to identify and manage risks that arise. By making workers feel at ease and calm in their workplace, we foster a more productive environment.”

--- **Fernando F. Carrillo, Manufacturing Operations Manager, Monclova, MX**



KEEP GOING

Contact:
[Safety Department](#)

Policies:
[HR-026: DOT Drugs and Alcohol](#)
[HR-023: Non-DOT Drugs and Alcohol](#)
[Safety Standards](#)
[LGL-002: Trinity Contacts](#)
[HR-044: Workplace Violence and Weapons](#)



FOR THE GOOD OF OUR COMPANY



- [Secure Our Assets](#)
- [Protect Business and Personal Information](#)
- [Use Artificial Intelligence Responsibly](#)
- [Avoid Conflicts of Interest](#)
- [Communicate Responsibly](#)



SECURE OUR ASSETS

We know that our assets are essential to our success.

Our railcars play a significant role in enriching the lives of people across the continent. We transport everything from gas to groceries and grain to gravel. Consequently, there is great value in what we do and in the **assets** that we use to do it.

To ensure we continue to **Deliver Goods for the Good of All**, it is important that we take responsibility for the proper and efficient use and protection of our assets.

Use them for approved purposes and in legal and ethical ways—always safeguarding them from loss, damage, misuse, theft, embezzlement, and destruction.

Types of **assets** (everything we own or use for work) include:

- Physical—such as machinery, office equipment, and computers
- Informational—such as employee personal information, trade secrets, designs, and other forms of intellectual property
- Reputational—how we are viewed by our customers, competitors, regulators, and partners



Cybersecurity: Think Before You Click



KEEP GOING

Policies:

[IRM-002: Acceptable Use](#)

[IRM-003: Information Security](#)

[TE-001: Travel Safety and Security](#)

[SEC-003: Reporting Criminal Activity](#)



Prolong the life and use of physical assets.

Physical assets include everything we can see and touch. To keep them secure, be sure to:

- Keep inventory of everything in our care and report any operational issues or needed repairs
- Never borrow, lend, sell, trade, or give away company assets without proper authorization
- Use our physical assets only for legitimate business purposes—with minor exceptions for personal use. However, keep in mind that personal use should:
 - Be limited and authorized
 - Never interfere with your work
 - Never support outside business interests
- If you drive a company vehicle (including a pool car), obtain authorization by following all applicable procedures
- If you drive any vehicle for company reasons, maintain the proper license and operate safely and in accordance with the law

Take the proper precautions when it comes to information assets.

Manufacturing environments are increasingly targeted by ransomware and other cyberattacks — protecting our systems protects our ability to build and deliver goods safely. To protect the tools that support our electronic systems, always:

- Follow Trinity policies to keep them safe and secure
- Only use Trinity-approved hardware, software, applications, and storage devices
- Remember that anything you write, download, store, or transmit on our systems, devices, or networks may be recorded or monitored.
- Keep personal use to a minimum and work ethically, always



Practice good cybersecurity

- Use strong, unique passwords and never share them with anyone — including IT staff. Trinity will never ask for your password.
- Turn on multi-factor authentication (MFA) wherever you can. MFA means that logging in requires both your password and a second verification step (like a code sent to your phone).
- Request only the access needed to do your job. Never share login credentials with a coworker, even temporarily.
- Be suspicious of urgent or unexpected requests — by email, text, or phone — that ask you to click a link, transfer funds, change account information, or bypass normal procedures. This is called ‘social engineering’ and it is the most common entry point for attackers.
- Report any suspicious message, unexpected system behavior, or potential security incident immediately to your supervisor and the Information Risk Management team. Speed matters — early reporting can stop a breach.
- Never connect personal USB drives, devices, or storage to Trinity systems or equipment without IT authorization.

Our Core Values in Action

Q: I’m packing for a work trip in the morning and don’t want to forget my laptop and ID badge. Would it be OK to place them in my car the night before?

A: No. If the wrong person sees you placing something valuable in your car, it could make you more vulnerable to theft. Consider placing these items in your work bag then leaving your bag inside by the front door, to easily grab on your way out. That way your items remain safe and protected and, more importantly, so do you. Also, remember to check before your travel to determine if any additional protections or restrictions apply to the use of your company assets during your travel.



PROTECT BUSINESS AND PERSONAL INFORMATION

We protect our people and our business by protecting the information in our care.

Goods may be at the heart of Trinity, but information truly drives our operations. When it’s secure, we can better serve our customers, promote and protect our colleagues, and maintain our competitive advantage.

Do your part to prevent the loss, damage, unauthorized use, disclosure, and modification of the business and personal information entrusted to you. Work with integrity, always.

Trinity uses three data categories to identify **information**. They include:

RESTRICTED DATA

Highly sensitive or proprietary information that should be shared on a need-to-know basis only.

GENERAL USE DATA

Business information that may be generally used within Trinity but should not be publicly released without approval.

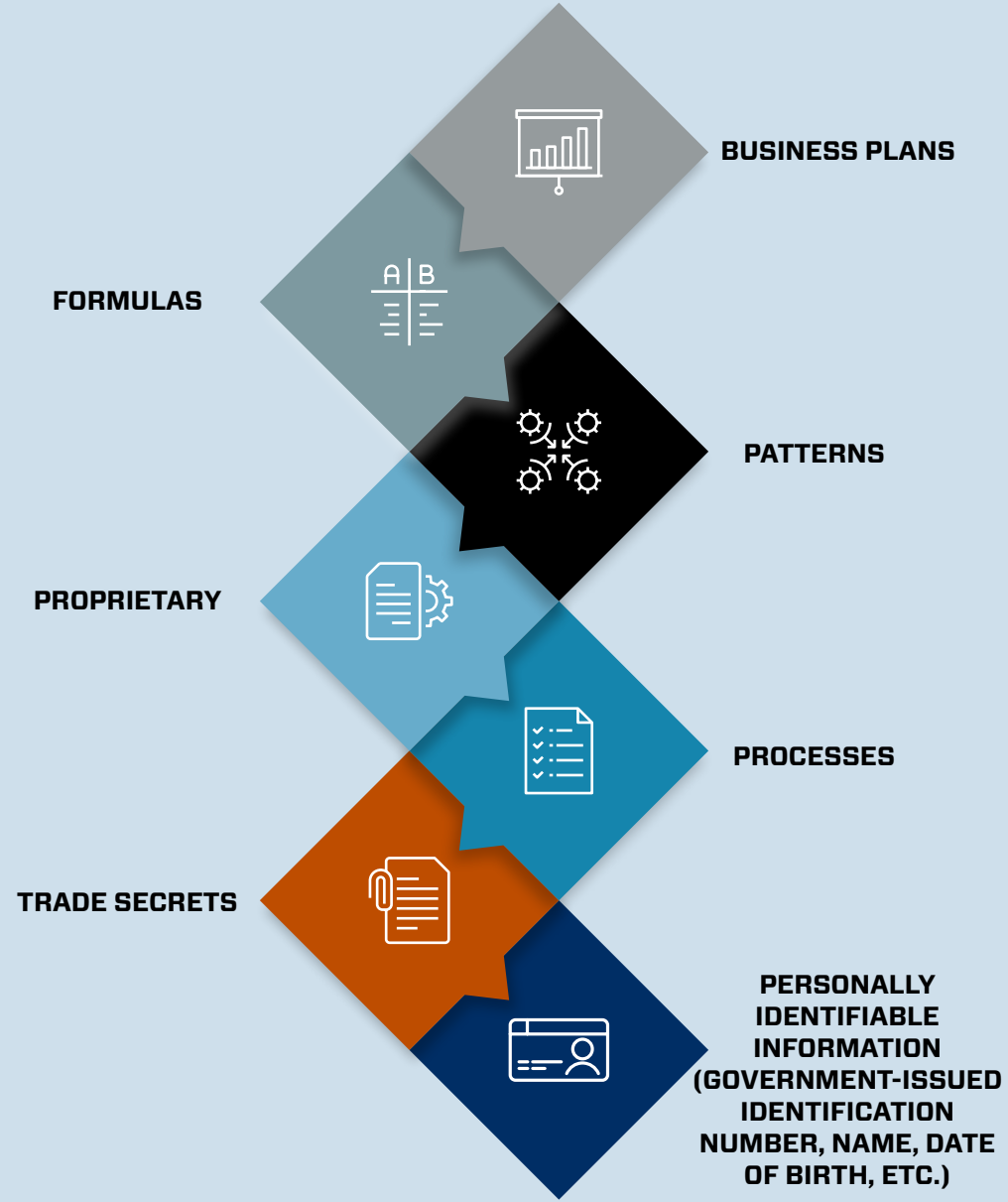
PUBLIC DATA

Information approved for public release.



Know what to protect.

Whether our work involves General Use Data or Restricted Data, take appropriate measures to safeguard and protect it. Examples of information to protect include:



All information should be treated as General Use Data unless otherwise marked.



Know how to protect it.

To keep business and personal information secure:

- **Use** it only for its intended purpose and share it only with those who have a legitimate business need to know it
- **Ensure** all personal information is collected, stored, and handled in accordance with data privacy policies and applicable laws. If your role involves collecting, handling, or accessing personal information about employees, customers, or vendors, follow Trinity’s data privacy policies closely and contact Legal if you have questions about what is required.
 - Restrict and monitor access to such data.
 - Notify [Legal](#) of any known or suspected unauthorized access or use
- **Remember** that all intellectual property (e.g., any discovery, improvement, or invention) conceived while employed here, that pertains or relates to our business, belongs to Trinity
- **Contact** Legal if you receive, possess, or discover Restricted Data or General Use Data and are uncertain whether and how it is permitted to be used
- **Honor** all legal and contractual obligations related to maintaining confidentiality, including nondisclosure or confidentiality agreements
- **Obtain** appropriate licenses or permissions before using third-party information or property, if applicable
- **Protect** Trinity’s Restricted Data and General Use Data—never using it for personal financial gain or for the financial gain or benefit of others
- **Never** record or transcribe any voice or video communications without the explicit consent of all involved parties except where otherwise approved by Trinity policy and permitted by law.
- **Report** any known or suspected data breaches or malicious IT system activity to the Information Risk Management team



THE RIGHT WAY

“Business records are more than files. They’re the evidence of every decision, transaction, and commitment we make as a company. As someone who works in Information Governance, I see firsthand what’s at stake when data isn’t handled properly. A leaked record, a misclassified file, and a retention policy ignored. These aren’t abstract risks. They affect real people. When we treat every piece of information entrusted to us as something worth protecting, handling it with care, guarding it from unauthorized access, and disposing of it responsibly, we’re not just following policy. We’re honoring our obligations to everyone who counts on Trinity to do the right thing.” ---**Concetta Harris; Analyst, Information Governance, Risk and Compliance, Dallas, TX**



KEEP GOING

- Policies:
- [IRM-002: Acceptable Use](#)
 - [IRM-012: Data Classification](#)
 - [LGL-018: Global Data Privacy](#)
 - [IRM-003: Information Security](#)
 - [SEC-002: Use of Photographic, Video and/or Audio Equipment](#)



USE ARTIFICIAL INTELLIGENCE RESPONSIBLY

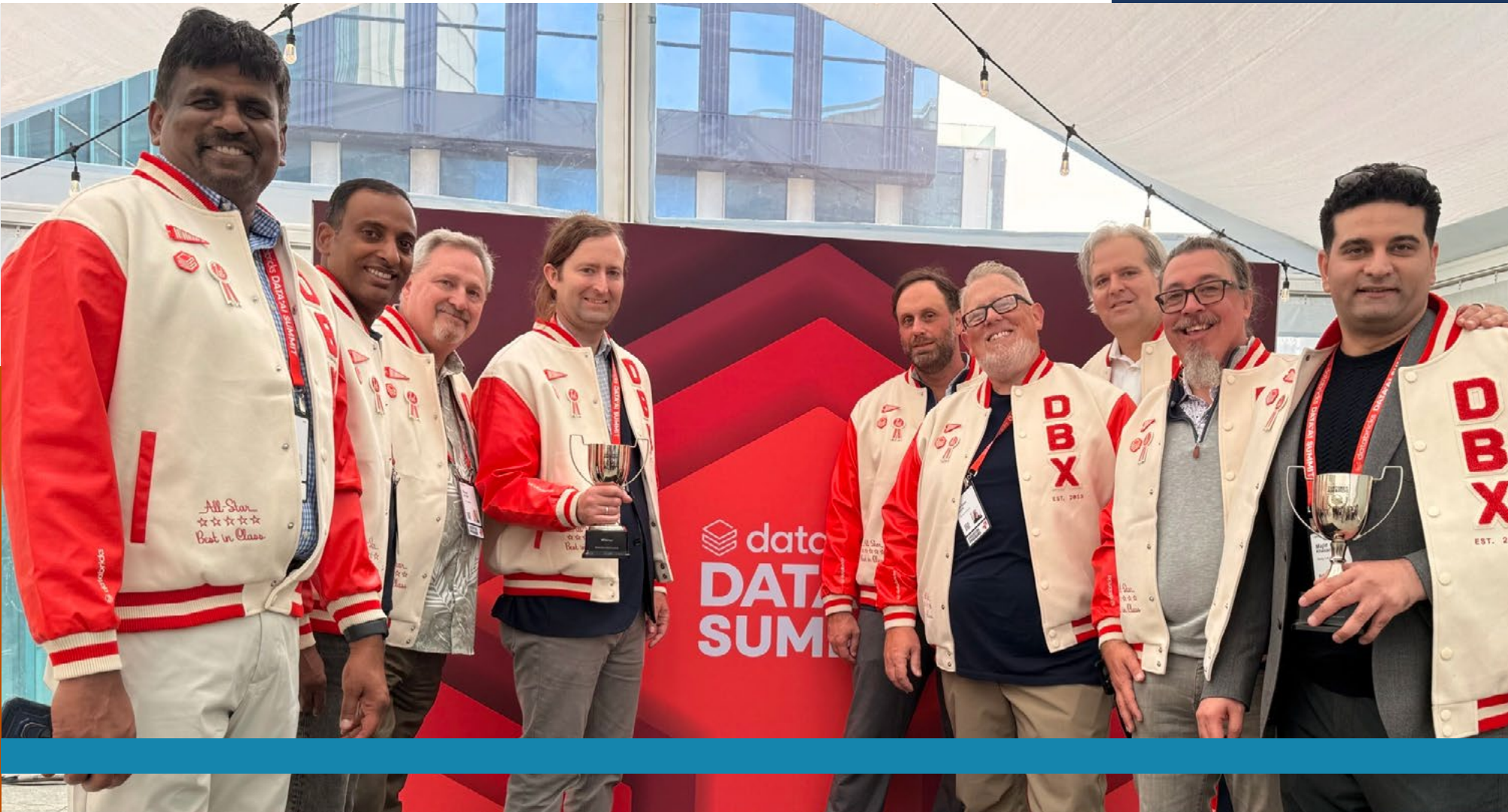
At Trinity, we embrace innovation, but we use Artificial Intelligence (AI) thoughtfully, transparently, and in line with our Core Values.

- **Take responsibility for your work:** Using AI does not change your responsibility for your work. Whether you use AI or not, you are always responsible for making sure your work is accurate, appropriate, and ready to support a business decision.
- **Protect our intellectual property:** Treat AI-generated work product the same as any other work product created for Trinity—it belongs to us.
- **Be transparent:** If AI helps make a decision that affects a customer, employee, or business partner, make sure that use is disclosed in accordance with our policies.
- **Know when review is required:** The use of AI for general queries that do not involve Trinity Data is generally permissible. However, certain uses of AI must first be reviewed and approved by the AI Governance Committee or the AI Operating Committee. Make sure your use complies with our AI Policy.

Our Core Values in Action

Q: I want to use a free AI chatbot to help me summarize notes from a customer meeting. Is that OK?

A: It depends on what’s in your notes. If they contain the customer’s confidential information, financial details, or any nonpublic information about Trinity, don’t submit them to a tool that hasn’t been approved for that purpose. Check with your Business Process Owner or the AI Operating Committee first.



THE RIGHT WAY

“Innovation is one of our Core Values, driving us to think boldly and continuously improve. AI can amplify our people, accelerate decisions, and create significantly more value. Realizing that potential requires discipline and individual accountability. We protect sensitive information, validate important decisions, and pair AI with approved tools, enterprise governance, strong data protections, and controls matched to the stakes. Together, these practices define responsible AI use. By combining ambition with discipline, we give our people greater leverage to solve problems, focus on higher value work, and deliver more. That is how we turn innovation into sustained competitive advantage.” --- **Garrett Mucha, VP, Data & Analytics, Dallas, TX**



KEEP GOING

Contact:
[AI Operating Committee](#)

Policies:
[IRM-070: AI Policy](#)



AVOID CONFLICTS OF INTEREST

We want our colleagues, customers, and communities to feel confident that the decisions we make are free from conflicts of interest.

Our team at Trinity is comprised of a vibrant and dynamic group of employees with rich work and personal lives. However, we must keep a clear distinction between the two, and never allow our personal interests to negatively affect our professional judgment. If that happens, it’s a conflict of interest, and even the appearance of a conflict could damage our brand and our business.



Identify common conflicts of interest.

Avoid situations where your personal interests, or the interests of a **Family Member** or close friend, conflict or appear to conflict with the best interests of Trinity. We cannot include every possible example, however some scenarios to watch out for include:

- **Interests in suppliers, customers, or competitors**—any financial or business relationship with a third party that could impair your business judgment
- **Personal relationships**—situations where you either supervise or direct business to a Family Member, friend, or romantic partner
- **Financial interests**—any substantial investment (generally over 1%) that you have in a third party that does business with Trinity
- **Improper payments**—any outside payment for negotiating, procuring, recommending, or aiding in the purchase or sale of goods or services by Trinity
- **Outside employment**—any outside business activity that could:
 - Harm or compete with Trinity
 - Interfere with your work for Trinity
 - Use company property or company time
- **Business opportunities**—taking for yourself business opportunities that rightfully belong to Trinity
- **Inappropriate gifts and bribes**—any gift, business courtesy, or donation that violates our [Global Anti-Corruption](#) or [Conflict of Interest](#) policies
- **Charitable and political contributions**—the unauthorized use of company assets for charitable or political contributions

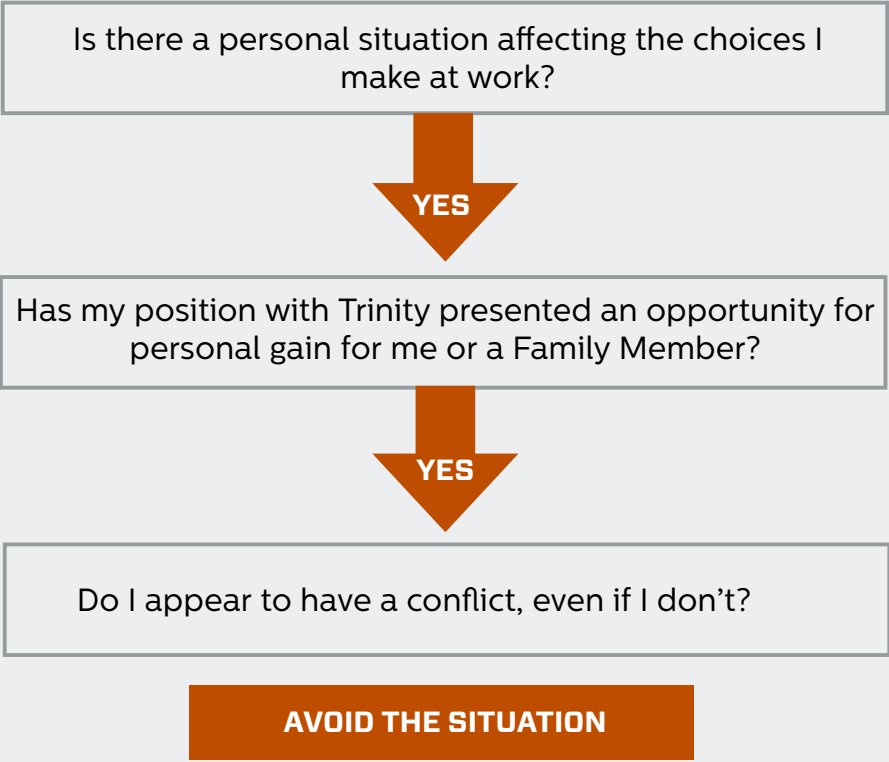
Family Members include:

- A spouse or domestic partner
- Parents
- Grandparents
- Siblings
- Children
- Any person with whom you are in a romantic relationship or share a household
- Any other familial relationship that could create the appearance of a conflict





To help avoid a conflict of interest, ask yourself:



If you are unsure, seek guidance from our Chief Ethics, Compliance, and Sustainability Officer or Chief Legal Officer.

If the answer to any question is “**yes**,” you should take immediate steps to avoid the conflict or the appearance of a conflict.

Disclose all identified conflicts.

If you think you may be facing a conflict, the appearance of a conflict, or if you’re unsure, you are required to report it immediately using the online [Disclosure Form](#). You may also report it to your supervisor or our [Chief Ethics, Compliance, and Sustainability Officer](#), or through the Code certification or e-learning Code and certification course, if applicable.



KEEP GOING

- Policies:
- [EC-002: Conflict of Interest](#)
 - [EC-009: Global Anti-Corruption](#)





COMMUNICATE RESPONSIBLY

We aim to send one clear, accurate message about our company.

Words have power—so it’s important to make sure we’re sending the right message, always. Although we are a team of thousands, we have one Purpose and one set of Core Values that we hold near and dear. To communicate our shared principles appropriately, we have appointed a team of dedicated spokespeople to speak on Trinity’s behalf. With their help, our collective voice will always be heard.

Forward requests.

Unless you’ve been authorized to speak on Trinity’s behalf, forward all requests for a statement or information on behalf of the company to the appropriate resources. For inquiries, refer to the [LGL-002: Trinity Contacts](#) for a comprehensive list of appropriate resources.

Use social media, the internet, and email responsibly.

Keep in mind that no matter how personal a communication feels, anything transmitted online can quickly become public. Be responsible.

When using social media:

- If posting about Trinity in a nonemployment capacity, always disclose your relationship with the company and label posts as personal and purely your own opinions, not that of the company

- Never share Restricted Data or other nonpublic information, including any nonpublic information that is financial, operational, or legal in nature. Examples include legally protected personal information, business plans, trade secrets, and similar business information
- Maintain high levels of respect, honesty, and integrity, and never post anything that is harassing, abusive, or discriminatory

When online at work:

- Never intentionally transmit, retrieve, review, store, or access communications, websites, or other materials that are:
 - Discriminatory, harassing, or threatening
 - Pornographic or obscene
 - Maliciously false or misleading
 - Illegal or go against our policies, including [IRM-002: Acceptable Use](#)

When using email for business purposes:

- Only include relevant and factual information
- Avoid speculation, personal opinion, or commentary as they may be misunderstood
- Never use personal email accounts for Trinity’s business purposes
- Never use Trinity email accounts for personal business
- Remember that all emails, messages, and attachments may be subject to review and disclosure—there is no right to privacy in emails from a Trinity email account or on Trinity equipment



THE RIGHT WAY

“Negative social media posts about Trinity can cause others to question Trinity’s values and integrity. I’ll always try to protect our company’s reputation and communicate Trinity’s expected culture.” --- **Sam Elliott, Area Manager Human Resources, Vidor, TX**



KEEP GOING

Contact:

[Human Resources Department](#)
[LGL-002: Trinity Contacts](#)

Policies:

[IRM-002: Acceptable Use](#)
[C-024: Social Media Use and Access](#)
[C-024-ATT: Social Media Guidelines](#)





FOR THE GOOD OF OUR INDUSTRY



- Compete Fairly
- Do Not Tolerate Bribery
- Follow the Rules for Gifts and Entertainment
- Prevent Insider Trading
- Follow Trade Compliance Laws
- Keep Accurate Records
- Be a Good Partner



COMPETE FAIRLY

We succeed based on our quality products and services—not unfair business practices.

Antitrust laws set rules for how we can deal with our competitors, suppliers, and customers. At Trinity, we are committed to following antitrust laws and all other applicable laws that govern fair dealing and competition in the markets we serve. That’s why we never participate in unlawful business practices, agreements, or activities that interfere with the marketplace.

Promote competition.

Free and fair competition leads to increased innovation, variety, and quality in the marketplace—which is what our customers deserve. Always:

●

Avoid agreements and activities that could violate antitrust laws. Under the antitrust laws, agreements or informal “understandings” that could interfere with free and fair competition are illegal

●

Document significant interactions with third parties

●

Gather competitive information from public sources

●

Use equitable, fair, and ethical practices

●

Consult [Legal](#) before:

- Sharing, receiving, or otherwise exchanging commercial information with a competitor
- Entering into any **agreements** with a competitor (including supply agreements or collaborations) to ensure the agreement is permissible

●

Agreements can be:

- Verbal or written
- Direct or indirect
- Formal or informal

●

Be careful when interacting with competitors at conferences, trade shows, and trade associations. Participation in activities offered at such events should relate to legitimate business reasons for which you are in attendance. When in doubt, consult [Legal](#) before events to ensure that the topics covered are permissible. If competitors begin sharing information improperly in your presence, remove yourself from the situation immediately and report the incident to Legal

●

Respect the freedom of customers to conduct business as they see fit:

- Offer goods and services at prices that are fair and reasonable
- Avoid any form of discounting or bundling that favors one customer over another
- Avoid any form of tying agreements, where a customer is forced to buy something it does not want to get something it needs
- Never make customers feel pressured to buy anything from Trinity based on an existing relationship

●

Avoid the following contract provisions unless approved by [Legal](#):

- Imposition of product resale restrictions or resale price restrictions on products bought by the customer
- Requirements for exclusive dealing arrangements (by controlling the customer’s choice of suppliers or its own customers); or
- Establishing control over the customer’s handling of the products it is purchasing

●

Specifically, avoid agreements or even conversations about:

- Fixing prices (including discounts or any other terms of sale by raising, setting, or holding them at a particular range or level)
- Divvying up customers, markets, or territories
- Influencing or coordinating competitive bidding processes
- Restricting production or output
- Preventing others from entering the market
- Refusing to deal with a competitor or third party
- Coordinating employee compensation or the restriction of hiring (“no poach” agreements)

●

Remove yourself from any situation where competitors begin sharing competitive information



Our Core Values in Action

Q: I recently noticed that one of our customers is receiving lower pricing on our products than other customers. Is that OK?

A: It depends. Some reasons to charge different prices may include a good faith effort to meet competition, differences in the cost to serve the customers, volume or quantity discounts, changed conditions, or different circumstances of sale (including different regions or manufacturing requirements). If none of these reasons apply, speak to a supervisor to ensure our prices are reasonable.



THE RIGHT WAY

“Trinity has long established that we will compete fairly and with integrity in hope of gaining customer trust and loyalty. We work to sell attributes that are differentiators in the market, allowing customers to obtain our products to their specification, while working to provide a positive customer experience.” --- **Steven Barnett, VP - Leasing Company Sales, Dallas, TX**



Unintended Consequences:
Antitrust and Fair Competition



DO NOT TOLERATE BRIBERY

We win business based on our ability to deal fairly, as well as the merits of our products and people.

At Trinity, we never engage in corrupt business practices, including **bribery**. Instead, we are committed to conducting business the right way—by keeping our promises, delivering world-class goods and services, and working with fairness and integrity every step of the way.

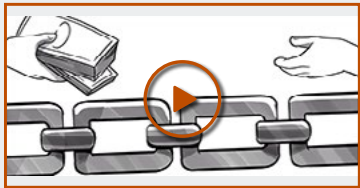
Bribery is the offering, promising, giving, receiving, or soliciting of any item of value to influence someone’s business decisions or professional judgment.

Follow the law.

Many of the countries in which we do business have anti-corruption or anti-bribery laws, such as:

- The U.S. Foreign Corrupt Practices Act
- Mexico’s Federal Criminal Code and Anticorruption Regulations
- The United Kingdom’s Bribery Act of 2010

Many of these laws apply to business conduct around the world, regardless of where you live, work or are doing business, so you must know what laws apply to the work you do for Trinity and follow them carefully. Bribery laws can vary, so if there is a conflict, reach out to [Legal](#) for guidance.



Business Pressure and Bribery: The Weakest Link



Know how to identify a bribe.

Preventing bribery starts with identifying bribery. It’s natural to think of a bribe as a cash payment. However, it can take many other forms such as:

- Favors
- Business opportunities
- Hiring relatives
- Loans
- Lavish gifts
- Costly hospitality
- Charitable or political donations

Combat bribery.

Not tolerating bribery goes beyond not committing bribery. Also:

- Never let others bribe on our behalf
- Never knowingly work with third parties who commit bribery
- Avoid even the appearance of anything improper
- Keep clear and accurate books and records
- Never use (or authorize the use of) ”off-the-books” or ”slush” funds
- Report any suspected bribery or corrupt activity to the [Chief Legal Officer](#) or [Chief Ethics, Compliance, and Sustainability Officer](#)
- Seek guidance from [Legal](#) when needed

Deal carefully with government officials.

Never offer anything to a government employee or representative unless you have prior approval from the Chief Legal Officer in writing. Even small payments made to government officials to speed up routine, administrative tasks (“facilitation payments”) are considered bribes, and we don’t pay them.



KEEP GOING

Policy:

[EC-009: Global Anti-Corruption](#)





FOLLOW THE RULES FOR GIFTS AND ENTERTAINMENT

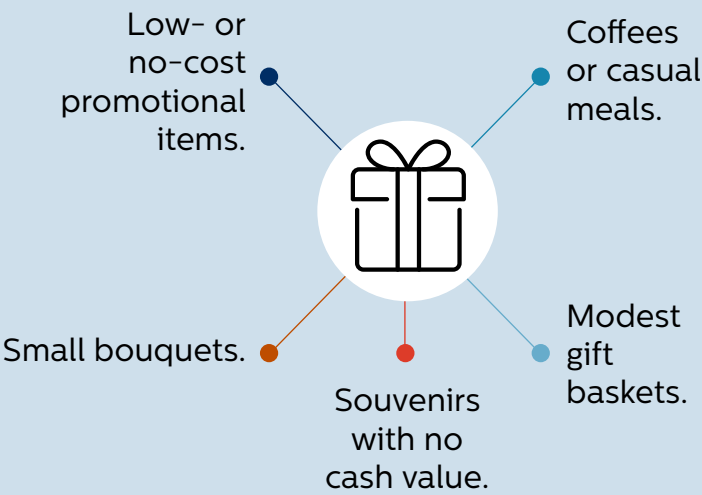
We give in ways that make everyone we work with feel appreciated, but never pressured.

The occasional exchange of small gifts, meals, or other kind gestures can foster goodwill between professionals and organizations. However, we never cross the line by giving or receiving anything inappropriate.



Give appropriately.

When it comes to offering or accepting gifts, know where to draw the line. Examples of generally acceptable gifts include the infrequent exchange of:



Beyond these examples and similar items of nominal value, it's important to use good judgment. Never offer or accept a gift that:

- Could be perceived as a bribe, payoff, kickback, or an attempt to inappropriately influence, including the awarding or retaining of business
- Creates an obligation in return
- Comes in the form of cash or a cash equivalent (e.g., a gift card)
- Inappropriately benefits a Family Member
- Has not been accurately recorded
- Could harm our reputation
- Could appear improper regardless of intent
- Violates local laws, customs, policies, or guidelines

Be mindful when working with government officials.

We are extremely careful when dealing with government officials. Seek approval in advance before giving or receiving anything of value in these instances as in some jurisdictions, there is an absolute prohibition on giving anything of value to government officials.

Our Core Values in Action

Q: I received two tickets for an upcoming basketball game from one of our suppliers. The supplier won't be able to attend, so they suggested I take my spouse instead. The tickets seem inexpensive. Would it be OK to accept?

A: No, not in this instance. Offers of entertainment are only appropriate when a representative of both organizations is there. If someone else on the supplier's side can accompany you, it should be OK. Otherwise, send a note explaining our policies, and why you can't accept their offer.



Policies:

- [EC-002: Conflict of Interest](#)
- [EC-009: Global Anti-Corruption](#)



PREVENT INSIDER TRADING

We never use our jobs to gain an unfair advantage in the securities marketplace.

If, in the course of our work with Trinity, we learn of material, nonpublic information that could impact the price of a security—often stock—in a company (“inside information”), we never trade on that information, regardless of whether it is Trinity’s inside information or another company’s.

We also don’t share that information with others, such as family members and friends, so they may trade (“tip”).

Learn how to spot inside information.

Inside information is both material and nonpublic.

Information is material when it could affect or influence a reasonable investor’s decision to buy, sell, or hold a company’s securities.

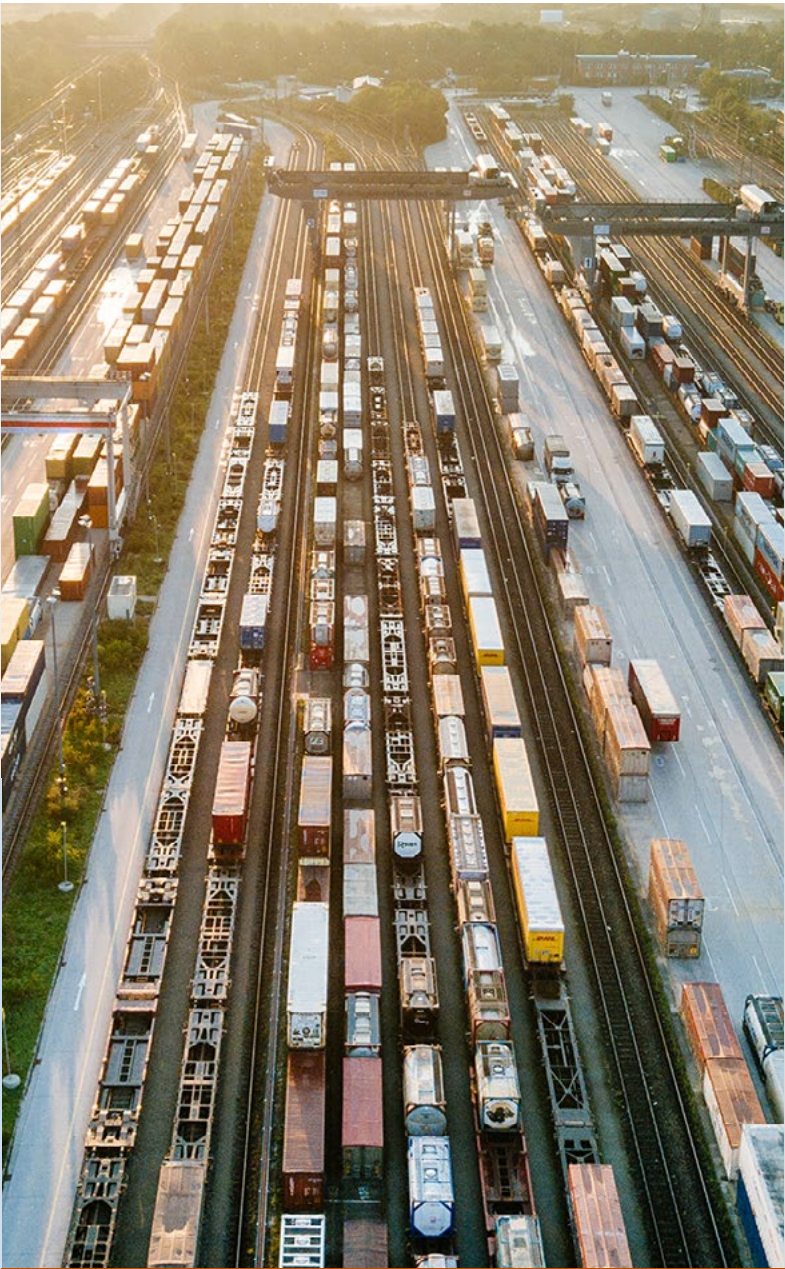
It is nonpublic if it has not yet been released to the public or a reasonable amount of time has not yet passed after it has been released to the public.

Examples of inside information include nonpublic information about a company’s:

- Financial condition
- Gain or loss of a significant customer or supplier
- Strategic plans (including acquisitions)
- Major changes in management
- Developments regarding significant litigation
- Major cybersecurity incidents
- Governmental agency investigations

Keep all such information confidential and never disclose it without prior authorization.

If you have questions about whether you are in possession of inside information, contact our [Corporate Secretary](#) or [Chief Legal Officer](#) before making any trades.



Don’t Participate in Prediction Markets

We never use our position in a way that could expose Trinity’s confidential information, create a moral hazard, or damage Trinity’s reputation.

Prediction markets and event contracts have recently become commonplace. Participation in these markets could constitute insider trading, expose Trinity’s confidential information, create perverse incentives, or damage Trinity’s reputation. Never participate in any prediction markets (such as Kalshi or Polymarket), event contracts, betting, or other speculative activities where the subject of the bet or prediction is Trinity, directly or indirectly, or the railcar industry, directly or indirectly. Regardless of whether you are in possession of confidential information, these activities are prohibited.

These acts go against our policies and could result in disciplinary action, fines, and criminal penalties for the individuals involved.



Insider Trading: Learn About Your Responsibilities



KEEP GOING

Policy:

[LGL-001: Transactions in Trinity Securities](#)



FOLLOW TRADE COMPLIANCE LAWS

We deliver goods across the globe, and honor local customs and laws everywhere we operate.

As our business continues to expand, so does the number of countries and regions we serve. To protect our operations and our communities, learn and implement the trade compliance laws that apply to your role and help ensure any third parties you work with do the same.

Follow the laws everywhere we operate.

As an employee of a global company, be sure to know, and carefully follow, all applicable trade laws and regulations. Be sure to:

- Always conduct a business review with your supervisor first to determine if a **transaction screening** is necessary
- If exporting anything manufactured in the U.S., make sure it is not subject to **dual use restrictions**. Contact [Legal](#) for assistance if needed
- Use only company-approved freight forwarders or customs brokers, as well as approved powers of attorney, for imports or exports by truck, mail, ocean, or air
- Before traveling internationally on business, check with Legal to see if your business-related property, data, or information should be “declared” under applicable customs rules, embargo regulations, and other trade restrictions

Transaction screenings help make sure that the countries, organizations, and individuals we work with are not subject to sanctions or trading restrictions.

If they are, stop doing business with them and immediately report the situation to Legal for further investigation.

Dual use restrictions involve items that, besides their intended use, could have a military use as well.





Get your paperwork in order.

Accurate and organized records can help ensure we follow the law. To do your part:

- Keep records of all import and export transactions, including:
 - Purchase orders
 - Certificates of origin
 - Contracts
 - Invoices
 - Payment records
 - Transportation documents (e.g., bills of lading, courier bills)
- Document and file any arrangements or understandings reached with customs or other governmental agencies
- Obtain proper clearances, licenses, and government approvals
- Accurately characterize imports and exports in advance—clearly identifying the:
 - Proper, declared value
 - Country of origin
 - Final destination
 - End user and end use
 - Incoterms
- Contact the [Chief Ethics, Compliance, and Sustainability Officer](#) or the Global Trade Compliance team for assistance

Our Core Values in Action

Q: My work requires regular interaction with customs officials. As part of my job, I am routinely asked to provide the Customs Service with information about our imports and exports. Do I really need to contact the Compliance Officer prior to every submission of information to the government?

A: The right approach here would be to discuss with the Compliance Officer the types of requests your department routinely receives from Customs. These routine requests, once understood, might be handled without any compliance review. Extraordinary requests would still require Legal review to ensure that you are responding accurately, fully, and in accordance with the law.



THE RIGHT WAY

“Working at the border means trade compliance isn’t abstract for me — it’s the reality of every transaction we process. The laws governing what crosses this line, in which direction, with which documentation, change more often than people realize. Sanctions lists are updated. Export classifications shift. What was routine last year may require a license or whole new tariff calculation today. Staying current isn’t optional in this work — it’s the foundation everything else is built on. Trinity’s reputation at the border is only as strong as the last shipment we got right.”

--- **Edu Reyes, Import/Export Specialist, Eagle Pass, TX**



KEEP GOING

Policies:

[IRM-028: Business Records Management](#)

[EC-006: Global Trade Compliance](#)





KEEP ACCURATE RECORDS

We handle our records with care and in ways that align with our Core Values.

Our **business records** provide insights into how we are performing. When they’re accurate, it empowers us to make the best and most prudent business decisions.

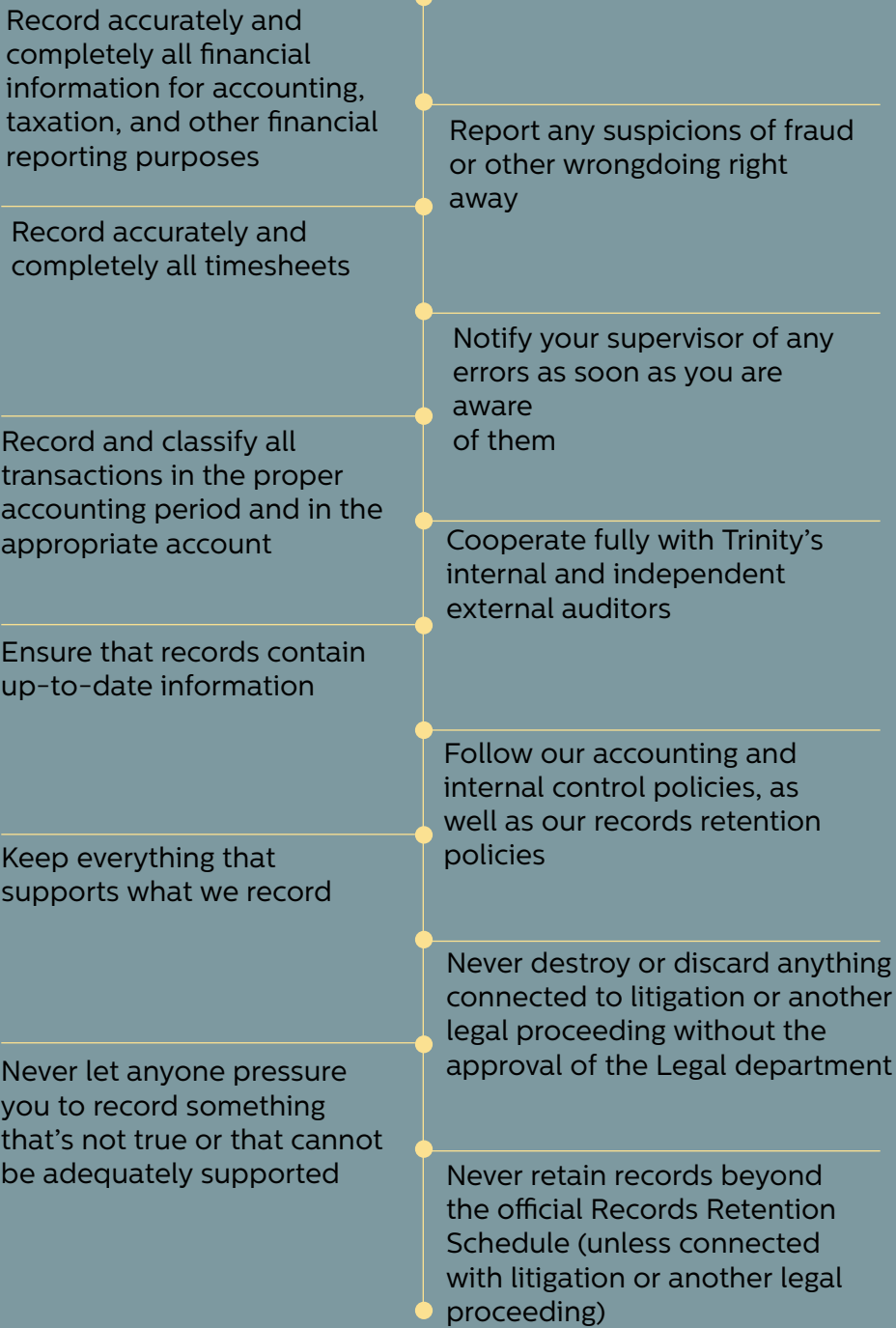
Additionally, because we often provide financial information to various government agencies, keeping accurate physical and electronic records protects our company from legal penalties, while protecting our reputation.

Examples of **business records** include:

- Asset records
- Database records
- Invoices
- Timesheets
- Social media
- Videos
- Contracts
- Bids and proposals
- Performance reviews
- Emails, voicemails, and other correspondence

Record accurately and completely.

To keep proper business records:



KEEP GOING

Policies:

[IRM-028: Business Records Management](#)



BE A GOOD PARTNER

We recognize that relationships serve as one of our greatest assets.

Relationships are a vital part of our success as a company. Selecting and partnering with the right customers, vendors, suppliers, and other third parties helps connect us to the resources, locations, and services needed to keep our business moving.

However, we don’t work with just anyone. Because third parties are often seen as a reflection of our company, we choose wisely, monitor closely, and only maintain relationships with those willing to uphold our Core Values and high standards and comply with legal obligations in all countries.



Choose third parties wisely.

When determining whether to work with someone, conduct due diligence, as appropriate, including:

- Complete background checks
- Check business registrations and credit history
- Verify trade accreditations and insurance
- Research public sources
- Read news articles
- Speak to previous customers
- For foreign entities, request their organizational documents

Third parties storing, processing, or transmitting Trinity data or providing IT services to or for Trinity are also required to undergo a risk assessment from the Information Risk Management (IRM) organization prior to contract execution.

It’s also important to make decisions based on objective criteria (such as price and availability of products and services offered).

Avoid conflicts of interest, or even the appearance of a conflict, and choose third parties that will best serve our needs as a company.

Monitor third parties closely.

Once we’ve begun working with a new partner, ensure they are meeting our standards. Always:

- Provide clarity in contractual agreements
- Maintain an open-door policy while monitoring performance



Our Core Values in Action

Q: I am part of the decision-making team for a new supplier, and my brother-in-law works for one of the companies we’re considering. His company has a great track record in terms of on-time delivery and the best rates by far. Is it OK for me to recommend the company since I think it will be in the best interest of Trinity?

A: Even if you feel like this would objectively be the best choice, remember that we must avoid even the appearance of anything improper. Disclose your relationship then remove yourself from the decision-making team in this instance.



THE RIGHT WAY

“Trust and honesty are key factors in any business partner relationship. Trust starts with ethical character and culture, but our business partners must continue to build credibility by communicating effectively and delivering on commitments.” ---

Eduardo A. Reyes, Purchasing Director, Trinity Monclova



KEEP GOING

Policies:

[IRM-028: Business Records Management](#)

[EC-006: Global Trade Compliance](#)

[IRM-007: Third Party Cybersecurity Management](#)



Third Parties: Facilities Security



FOR THE GOOD OF OUR COMMUNITY



Protect Human Rights
Ensure Product Safety and Quality
Preserve Our Environment
Support Our Communities
Participate Responsibly in Political Activities



PROTECT HUMAN RIGHTS

We work in ways that are good for all, including our colleagues and contractors.

We are committed to respecting human rights throughout all our operations, and we seek to provide respect, dignity, and all basic needs for everyone we work with and for.

We are legally required — and ethically obligated — to ensure that our products and supply chain are free from forced labor. The Uyghur Forced Labor Prevention Act (UFLPA) creates a legal presumption that goods produced in China’s Xinjiang region involve forced labor and are prohibited from import into the U.S. unless proven otherwise. Other laws, including the California Transparency in Supply Chains Act and international frameworks like the ILO Forced Labor Protocol, may also apply to our operations.

If your role involves sourcing materials, components, or finished goods — or managing supplier relationships — you must understand these requirements and escalate any concerns about the origin of materials to Legal or the Global Trade Compliance team promptly.



Supporting Human Rights: The Ethical and Legal Choice

Know your rights as an employee.

We value you, not just the work you do, and we want to ensure you are paid fairly and cared for while you’re with Trinity. To do your part:

- Speak up if you have any questions about:
 - Pay
 - Benefits
 - Working conditions
- Take the breaks and time off you’re entitled to
- Follow all health and safety policies and laws

Respect and protect others.

Prioritize the protection of human rights by supporting our prohibitions on:

- Human trafficking
- Modern slavery
- Forced or involuntary labor
- Child labor
- Physical punishment
- Inhumane treatment
- Harassment and discrimination
- Conflict minerals

Speak up if you suspect any human rights violations.

Monitor third parties.

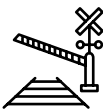
We never knowingly do business with any company that violates human rights laws or engages in human rights abuses. Watch our third parties closely and make sure they watch **their** third parties as well.



THE RIGHT WAY

“The protection of human rights means to respect the moral principles and norms of others by showing compassion and understanding, no matter if I am at work, home, or in public. I carry myself as an example to others.”

--- **Brenda L. Guthrie, Human Resources Professional, Saginaw, TX**



KEEP GOING

Policy:

[HR-007: Labor and Human Rights](#)



ENSURE PRODUCT SAFETY AND QUALITY

The railcars we design, build, and maintain carry the goods that keep communities running—and they travel through the same neighborhoods we call home. Product quality is more than a matter of performance—it is essential to protecting people, property, and the environment. That’s why product quality and safety is never optional, never negotiable, and never something we compromise.

Build it right, every time.

Our customers, their crews, and the public trust that every railcar bearing the Trinity name meets or exceeds the design specifications, engineering standards, and regulatory requirements that apply to it. To do your part:

- Follow all applicable design, engineering, manufacturing, and testing specifications. Never skip a step to save time
- Complete all inspection, testing, and quality-control procedures before a product or component is released
- Document inspections and tests completely and honestly, even when the news isn’t good
- Never approve, ship, or sign off on a product or component you know or suspect does not meet engineering, manufacturing, and testing specifications
- Treat a customer’s operating environment and intended use as part of the design and quality conversation, not an afterthought

Every Trinity employee is encouraged and empowered to raise concerns when they arise.

You don’t need to be certain something is wrong to say something. You just need a good-faith concern that a product, component, or design choice could create an unreasonable risk of harm to a customer, end user, or the public. Report it right away to your supervisor, Quality, Engineering, or the Trinity Integrity HelpLine. We will never tolerate retaliation against anyone who raises a product safety concern in good faith.

Our Core Values in Action

Q: I noticed a weld on the production line that doesn’t look quite right, but the inspection log already shows it passed. My shift is almost over, and flagging it means the car doesn’t ship on schedule. Should I let it go since it already passed inspection?

A: No — speak up immediately. A passed inspection doesn’t override your own good-faith concern, and a shipping deadline is never a reason to let a potential safety issue go unaddressed. Report what you saw to your supervisor or Quality right away. It’s always better to hold a railcar for a closer look than to let a defect reach a customer or the public.



KEEP GOING

Contact:

- Quality Department
- Engineering Department
- [Safety Department](#)

Policies:

- [EHS-019: Environmental Notification](#)
- [LGL-002: Trinity Contacts](#)



PRESERVE OUR ENVIRONMENT

We are committed to preserving natural resources and protecting the environment. Environmental Stewardship is integral to our guiding Purpose of Delivering Goods for the Good of All.

With sustainability as a key component of our Purpose, we aim to preserve natural resources, protect the environment, and minimize the impact of our operations. By complying with all applicable environmental laws and regulations and by promoting a culture of environmental stewardship, we are committed to providing solutions while improving our care of the natural environment.



THE RIGHT WAY



“We share this planet with diverse ecosystems and species. It’s our ethical duty to protect the environment and Trinity. Efficient management of our resources such as energy, water, gas, and raw materials is not only environmentally responsible but also reduces operational costs for Trinity.” ---
Mitchell Way, Sr. Environmental Analyst, Longview, TX

Our Core Values in Action

Q: I have been paying attention to some of our practices for recycling and disposing of waste in our facility. While I know we’re complying with environmental laws, I think we could do better. Is Trinity open to suggestions?

A: Always! We’re constantly looking for ways to reduce our environmental impact and welcome any thoughts you might have. Talk to your supervisor or another Trinity resource to see if we can implement your ideas.



KEEP GOING

Contact:
[Environmental Department](#)
Policies:
[EHS-019: Environmental Notification](#)
[LGL-002: Trinity Contacts](#)

Support our environmental management system.

Our industry faces specific environmental challenges, including energy management, fuel economy and efficiency, and materials sourcing. That’s why we maintain our certification to the **ISO 14001** Standard and support the guiding principles of the American Chemistry Council’s **Responsible Care® Management System**. Doing so empowers us to set environmental objectives and targets, monitor and measure our progress, and achieve goals that surpass expectations. To help support this initiative:

- Know and follow the environmental legal requirements and Trinity policies that apply to your work
- Speak with our environmental specialists to better understand ways your specific role helps fulfill our mission of preserving the environment
- Adopt eco-friendly daily habits whenever and wherever you can. Remember to:
 - Reduce your use of paper, water, and electricity
 - Use renewable energy sources as much as possible
 - Recycle materials both at home and at work
 - Reduce waste and properly dispose of any materials that cannot be recycled
- Continuously consider new ways we can protect our business, while protecting our environment—remembering that innovation is critical to sustainability
- Report any environmental concerns, observations, or related issues to the Environmental Department right away
- Forward any inquiries about environmental matters to the [Vice President—Environmental, Health, and Safety](#) or the [Chief Legal Officer](#) right away





SUPPORT OUR COMMUNITIES

We seek to add value to the communities where we live and work.

Our Purpose means that we are always looking for ways to do good. We honor the personal ways employees give back to their communities, but also recognize that when we give together, we can amplify our impact. Let’s all find ways, both personally and professionally, to make meaningful contributions through community outreach, charitable giving, and employee volunteerism programs.

Give with us.

When we pool our time, talent, and resources together as a team, we can do more. Ways we have contributed to our surrounding communities include:

- Increasing accessibility to make donations, volunteer, and get involved though GivingTrack, our employee giving app
- Hosting annual employee giving campaigns benefiting United Way
- Coordinating on-site and off-site volunteer activities for local organizations

Give on your own.

Because we are such a diverse group, we understand that we may differ in our support of charitable causes as well.

If giving or volunteering on a personal basis, make sure to:

- Avoid [conflicts of interest](#)
- Use our own time and resources
- Never pressure coworkers
- Make it clear your views are your own



THE RIGHT WAY

“Trinity’s community involvement is powerful because it reflects our values and builds lasting trust. It’s not just about giving—it’s about showing we’re invested in the long-term well-being of the places we live and work. One event I’m especially passionate about is the HEB Feast of Sharing, where we connect directly with our neighbors, serve meals, and witness the immediate impact of our support.” --- **Derick Christopher, Customer Delivery Manager, HOPE Community Liaison, Dallas, TX**



KEEP GOING

Policy:

[EC-023: Philanthropy and Volunteerism](#)



PARTICIPATE RESPONSIBLY IN POLITICAL ACTIVITIES

We promote fairness in the political process.

Despite how aligned we are on our Purpose and Core Values, we understand and honor the differing opinions and personal perspectives of our team, particularly when it comes to politics.

At Trinity, we encourage all our employees to exercise their civic responsibilities. However, we also encourage you to respect your colleagues in the process—keeping your politics separate from your profession.

Keep it personal.

Whether donating time or money, providing or posting an opinion, or supporting your favorite local candidate, make sure it’s clear that your political activities do not involve Trinity:

- Avoid using company resources (e.g., email or facilities)
- Never solicit participation from colleagues
- Make it clear in all public forums that your views are personal and purely your own

Our Core Values in Action

Q: I have a good friend who is running for political office who has asked if I would endorse her at a rally being held outside of work hours. Is that a problem?

A: No, generally this should not be a problem, but if your association with our company is known, make it clear that your endorsement has nothing to do with your connection to Trinity.



CLOSING THOUGHTS

You’ve just read a document full of policies, principles, and procedures. But if there’s one thing I hope stays with you, it isn’t any particular rule. It’s this: the people who built Trinity – and who build it still, every day – have always believed that how you do the work matters as much as the work itself.

That belief is what this Code is trying to put into words. Not to constrain you, but to remind you of something you already know. **Integrity** isn’t a compliance exercise. It isn’t a checklist or a training module. It’s the accumulation of every choice you make when no one is watching – every conversation you have honestly, every concern you raise even when it’s uncomfortable, every time you slow down and ask whether what you’re about to do is truly right.

That kind of integrity compounds. One person doing the right thing sets the standard for the team. One team doing the right thing raises the bar for the site. One company consistently doing the right thing – across thousands of employees, across two countries, across decades – earns something that cannot be purchased or manufactured: genuine trust.

We are in the business of moving goods. But the reputation we carry, in every community where we operate and every industry we serve, moves with us too. Protect it. Add to it. And when you’re not sure how, ask. That’s not weakness – it’s exactly what **integrity** in practice looks like.

Thank you for everything you bring to this work. Now go do it with everything you’ve got.

Matt Pittman
Chief Ethics, Compliance, and Sustainability Officer





SHARE YOUR CONCERNS

RESOURCE:	CONTACT:
If you see, experience, or suspect wrongdoing, contact the Trinity Integrity HelpLine or access the HelpSite. 	Call 1-877-TRN-LINE (1-877-876-5463). For those in Mexico, call 800-020-4627. For the Trinity Integrity HelpSite. For the Trinity Integrity HelpLine.
For any questions or concerns about the Code, contact a member of the Compliance and Ethics team.	Call 1-800-631-4420. For those in Mexico, call 001-800-631-4420.
For any questions about applicable laws, contact Legal.	Call 1-800-631-4420. For those in Mexico, call 001-800-631-4420.
For any questions about environmental matters, contact the Vice President—Environmental, Health, and Safety.	Call 1-800-631-4420. For those in Mexico, +00, or call 866 135 93 39.
For any questions about safety, contact the Safety Department.	Call 1-800-631-4420. For those in Mexico, call 866 135 93 39.
For any questions about audits, contact Internal Audit.	Call 1-800-631-4420. For those in Mexico, call 001-800-631-4420.
Human Resources	Call 1-800-631-4420. For those in Mexico, call 551 100 66 05.
Chief Legal Officer	Call 1-800-631-4420. For those in Mexico, call 001-800-631-4420.
Corporate Secretary	Call 1-800-631-4420. For those in Mexico, call 001-800-631-4420.
Chief Ethics, Compliance, and Sustainability Officer	Call 1-214-589-6585. For those in Mexico, call 001-800-631-4420.



POLICY PAGE

POLICY #	POLICY NAME
IRM-002-POL-EN/ES	Acceptable Use
IRM-028-POL-EN/ES	Business Records Management
EC-002-POL-EN/ES	Conflict of Interest
IRM-012-POL-EN/ES	Data Classification
HR-026-POL-EN/ES	DOT Drugs and Alcohol
HR-023-POL-EN/ES	Non-DOT Drugs and Alcohol
EHS-019-POL-EN/ES	Environmental Notification
HR-021-POL-EN/ES	Equal Employment Opportunity and Harassment
EC-009-POL-EN/ES	Global Anti-Corruption
LGL-018-POL-EN/ES	Global Data Privacy
EC-006-POL-EN/ES	Global Trade Compliance
IRM-003-POL-EN/ES	Information Security

POLICY #	POLICY NAME
TE-001-POL-EN/ES	Travel Safety and Security
HR-007-POL-EN/ES	Labor and Human Rights
EC-023-POL-EN/ES	Philanthropy and Volunteerism
SEC-003-POL-EN/ES	Reporting Criminal Activity
IRM-070-POL-EN/ES	Resonsible use of AI Policy
ATT-C-024-EN/ES	Social Media Guidelines
C-024-POL-EN/ES	Social Media Use and Access
IRM-007-POL-EN/ES	Third Party Cybersecurity Management
LGL-001-POL-EN/ES	Transactions in Trinity Securities
LGL-002-POL-EN/ES	Trinity Contacts
EC-002-POL-EN/ES	Use of Photographic, Video and/or Audio Equipment
EC-017-POL-EN/ES	Whistleblower Policy
HR-044-POL-EN/ES	Workplace Violence and Weapons