



TrMas

CODE OF CONDUCT

We operate in a culture of the highest ethical standards



TABLE OF CONTENTS

LETTER FROM OUR PRESIDENT & CEO.....	3	OUR COMMITMENT TO OUR SHAREHOLDERS	25
OUR COMMITMENT AND VALUES	4	Product Integrity and Quality.....	26
RESOURCES FOR EMPLOYEES.....	5	Protection of Assets	27
INTRODUCTION TO OUR CODE.....	6	Conflicts of Interest	28
Principles of Business Conduct.....	7	Financial Responsibility and Disclosure.....	29
Ethical Decision-Making.....	8	Insider Trading.....	30
When the Code Applies.....	9	External Communications.....	31
Which Law Applies.....	9	OUR COMMITMENT TO OUR BUSINESS PARTNERS.....	32
What Employees Must Do.....	10	Business Relationships.....	33
What Leaders Must Do	11	Gifts and Business Entertainment.....	34
Penalties for Violation	13	Campaign Finance and Lobbying.....	35
Interpretation, Approvals and Waivers.....	13	OUR COMMITMENT TO THE LAW.....	36
What Happens When Concerns Are Raised.....	14	Anti-Corruption.....	37
Our Rule Against Retaliation.....	15	Complying with Competition Laws	38
OUR COMMITMENT TO EACH OTHER	17	International Trade Controls.....	39
Health and Safety.....	18	CONCLUSION.....	40
Environment and Sustainability.....	19		
Substance Abuse and Workplace Violence	20		
Fair Employment Practices	21		
Diversity, Equity and Inclusion	23		
Privacy	24		

LETTER FROM OUR PRESIDENT & CEO

Dear Colleagues,

Operating with integrity is a core value that guides how we at TriMas and our family of businesses interact with our fellow colleagues, customers, suppliers, investors and other stakeholders.

At TriMas, operating in a culture of the highest ethical standards protects each of our brands and is critical to our success. TriMas strives to maintain the highest standards of conduct and compliance at all times. Our reputation as an ethical company and trustworthy business partner is one of our most valuable assets and vital to our businesses.

As evidence to this commitment, we are refreshing the **TriMas Code of Conduct** (the “Code”). It summarizes the principles that should guide our actions as we strive to be the best in everything we do. Our Code of Conduct promotes not only “doing things right” but also “doing the right thing.” I encourage each of you to read, understand and apply the guidelines and principles outlined in this Code to your daily work. Thank you for your role in making integrity an integral part of our businesses and success.

Thomas J. Snyder
TriMas President and CEO

OUR COMMITMENT AND VALUES

Our reputation as an ethical company and trustworthy business partner is one of our most valuable assets and critical to our business. To safeguard our reputation and brands, we hold ourselves to ethical behavior that goes well beyond legal minimums.



In conjunction with this Code and its policies, TriMas is committed to the following Core Values:

SAFETY FIRST

We prioritize the safety and well-being of our employees, contractors and communities, ensuring that every decision and action reflects our commitment to maintaining a safe workplace

INTEGRITY

We operate with the highest ethical standards, act with honesty and transparency, and strive to build trust in every interaction with our employees, customers, suppliers and communities.

RESULTS-DRIVEN

We are committed to achieving our performance goals, with a focus on fact-based decision making.

ACCOUNTABILITY

We take ownership of our commitments, follow through on our responsibilities, and hold ourselves and each other accountable for delivering results aligned with our values and objectives.

CUSTOMER-DRIVEN

We continuously strive to provide superior levels of quality, delivery, service and total value to empower customer success.

TEAMWORK

We value all of our employees, treat each other with mutual respect and encourage collaboration to drive innovation and best-in-class operation.

CONTINUOUS IMPROVEMENT

We embrace the tools of continuous improvement and foster a culture of employee engagement to drive Operational Excellence.

These values reflect our culture, guide our actions and drive our performance.

RESOURCES FOR EMPLOYEES

At TriMas, we value open, honest communication and strive for a culture where we are comfortable asking questions and raising concerns without fear of retaliation. We will not tolerate retaliation against anyone who, in good faith, speaks up, seeks help or takes part in an investigation about actual or suspected violations of the Code, TriMas' Core Values or the law.

**WE VALUE
OPEN,
HONEST
COMMUNICATION**

Below are several resources for you to utilize if you have questions or would like to raise a concern.

RESOURCES WITHIN YOUR BUSINESS

No matter the question or concern – whether it involves a workplace issue, safety concern, or illegal or unethical conduct – we want to hear from you. If you have something to say, you should contact any of these resources.

- **SUPERVISOR** - Your supervisor is usually in the best position to resolve your concern quickly. If you're not comfortable raising a concern with your supervisor, you may also contact another local leader, as noted below.
- **HUMAN RESOURCES** - You may contact your business' human resources representative.
- **DIVISION LEADERSHIP** - Your local or business leadership (including your plant manager, division president or division finance officer) is another option.

ADDITIONAL RESOURCES

In addition to the above resources available to you, TriMas offers resources outside of your business for reporting concerns about illegal or unethical conduct.

- **TRIMAS LEGAL DEPARTMENT** - The TriMas Legal Department can assist you, especially with questions concerning applicable laws and policies. Please email legal@trimas.com to reach the TriMas Legal Department.
- **EMPLOYEE ETHICS HOTLINE**
 - Call 1-800-971-4338 from the United States or visit <https://trimascorp.ethicspoint.com> to find a toll-free number for other countries outside of the United States.
 - Report electronically at <https://trimascorp.ethicspoint.com>

In the United States, and as allowed by law in certain other countries, you may remain anonymous when using the Employee Ethics Hotline. Due to local privacy laws in certain countries of the European Union region, the hotline may permit only specific types of calls, such as accounting, financial, auditing and bribery matters. In those countries, contact one of the other Resources for Employees listed above to report other issues.

Policies may be found on TriMas' internal and external websites.

INTRODUCTION TO OUR CODE



Principles of Business Conduct	7
Ethical Decision-Making.....	8
When the Code Applies.....	9
Which Law Applies	9
What Employees Must Do	10
What Leaders Must Do.....	11
Penalties for Violation	13
Interpretation, Approvals and Waivers	13
What Happens When Concerns Are Raised.....	14
Our Rule Against Retaliation	15

PRINCIPLES OF BUSINESS CONDUCT

Our Code of Conduct represents our business philosophy and values, and defines how we as a company conduct ourselves around the world. We are committed to operating ethically and honestly, and to leading with integrity in all of our business activities. Our Code provides principles of business conduct for our employees, officers and directors to live up to in order to achieve our ethical standards and commitment to integrity.

THE FOUNDATION OF THE CODE CONSISTS OF THE FOLLOWING IMPORTANT PRINCIPLES OF BUSINESS CONDUCT, WHICH ARE THE KEY INGREDIENTS IN ESTABLISHING AND MAINTAINING TRUST:

- Comply with all applicable laws, regulations, policies and contracts governing our businesses.
- Be honest, fair and trustworthy in all your business activities and relationships.
- Treat one another fairly and foster a safe, diverse and environmentally responsible workplace.
- Protect our assets and information, and the assets and information entrusted to us by others.
- Avoid conflicts of interest, and the appearance of such conflicts, between work and personal affairs.
- Compete responsibly in the marketplace.
- Ask questions, raise concerns and speak up. Promptly report any concern you have about compliance with laws, Company policy or this Code.
- Through leadership at all levels, create and sustain a culture where ethical conduct is recognized, valued and practiced by all employees.

COMMITMENT TO INTEGRITY

ETHICAL DECISION-MAKING

ASK YOURSELF THESE QUESTIONS

WHAT TO DO

In today's rapidly changing workplace, you may encounter unfamiliar situations that present ethical dilemmas. In these circumstances, the right thing to do is not always clear. For this reason, you should become familiar with the contents of the Code. The Code contains a broad overview of key policy areas and examples within the areas. It is not all-inclusive. Situations will arise that are not covered here.

FOR THOSE SITUATIONS, ASK YOURSELF THESE QUESTIONS:

- Does it potentially violate any applicable law, regulation, policy or contract?
- Does it feel right?
- Should I check with my supervisor or another local leader?
- How would it look if it was covered in the news?
- Would I feel comfortable explaining it to my family?
- Could it appear improper?

WHAT TO WATCH OUT FOR

Sometimes it is difficult to recognize an ethical problem. When in doubt, ask your supervisor, your local human resources representative or the TriMas Legal Department. Do not disregard a potential issue because you think:

- It is none of my business.
- The Company wants me to do this.
- Everyone does it.
- No one will ever know.

If you find yourself thinking these thoughts, ask yourself the questions listed here to help guide your actions or contact any of the available employee resources provided.

WHEN THE CODE APPLIES



It does not matter where you work or what you do for the Company, you have a responsibility to use good judgment and follow our Code and policies. Our Code applies to everyone in our Company including all global subsidiaries and divisions of TriMas, at every level, including employees, officers and board members. We expect third parties, including our suppliers, consultants, agents and service providers to act in a way that is consistent with the principles and values of our Code when doing business with TriMas. We are all required to periodically acknowledge that we have received and are in compliance with the Code. Throughout the Code, “Company” means all subsidiaries, divisions, locations and businesses that are part of the TriMas family. Nothing in the Code limits employees from exercising any right provided by law.

WHICH LAW APPLIES

TriMas conducts business globally. As a result, our operations are subject to the laws of many countries, provinces, states and municipalities. An important challenge for all of us is to understand how these laws may apply to our operations.

The laws of the United States generally extend to all operations of TriMas and its subsidiaries throughout the world, as well as to the business activities of our employees wherever they live and work. Sometimes, other countries where we do business apply their own laws outside of their borders to their own citizens and to our subsidiaries that are organized under their laws.

The references in Company policies to the laws of the United States and the other countries where we do business reflect the reality that

a global company is regulated by many different laws at the same time. Contact the TriMas Legal Department if you encounter a conflict between the laws of two or more countries.

While we embrace diversity and respect cultural differences, if a local custom or business practice violates our Code or a specific Company policy, we must follow the Code or Company policy. If something permitted in our Code violates local law, we must follow local law. If you are unsure if a local law conflicts with this Code, contact the TriMas Legal Department.

Throughout the Code, references to United States currency and generally accepted accounting principles (GAAP) mean the foreign equivalent for TriMas business conducted outside of the United States.

WHAT EMPLOYEES MUST DO



COMPLY WITH THE CODE

- Personally commit to following the Code.
- Follow the Code even if it goes against what you are asked to do by management, makes you unpopular with your co-workers, creates more work for you or means jeopardizing a customer or a supplier relationship. If you feel pressured to do something that might violate the Code, you should promptly raise your concern as previously noted on the Resources for Employees page.
- Periodically certify that you have read, understood and complied with the Code.
- Disclose circumstances that require approval under the Code.

RAISE YOUR CONCERNS

- Promptly raise any concern about actual or suspected illegal, unethical or unsafe conduct using any of the available options listed under Resources for Employees.
- Cooperate fully and honestly in Company investigations.
- Notify the TriMas Legal Department if you have notice of or believe the Company will be the subject of an external investigation, litigation matter or other legal or governmental proceeding.
- Nothing in this or any other Company policy limits your ability to communicate with or provide information to any governmental agency or commission, including the Securities and Exchange Commission, regarding possible legal violations, without disclosure to the Company, as protected under whistleblower laws.
- The Company will not retaliate against you for raising integrity or compliance related concerns in good faith.

SATISFY YOUR COMPLIANCE OBLIGATIONS

- Understand the laws, regulations, policies and contracts relevant to your job and our Company.
- Promptly complete required trainings assigned to you.

WHAT LEADERS MUST DO

Corporate, division, plant and local leaders have additional responsibilities. As a leader at TriMas and any of our family of businesses, you must also:

SET THE RIGHT EXAMPLE

- Know the Code. Model the Code with words and actions, setting a strong example for other employees to follow.
- Be prepared to answer employee questions about the Code.
- Lead with integrity through your own words and actions – every day.
- Demonstrate that ethical conduct and compliance with Company policies are more important than business needs and results.
- Support our compliance program training and initiatives, and encourage your employees to do the same.

CREATE AN OPEN REPORTING ENVIRONMENT

- Foster an environment where employees feel safe and comfortable asking a question or raising a concern.
- Make yourself available to employees to listen to and discuss their concerns.
- Ask for additional information in a respectful and reassuring manner.
- Remind employees that we strictly prohibit retaliation for any report made in good faith.
- Thank employees for bringing issues to your attention.

LEAD WITH INTEGRITY EVERY DAY

WHAT LEADERS MUST DO



KNOW HOW TO RESPOND TO A CONCERN

- For a workplace issue, such as a day-to-day problem with a co-worker or question about Company benefits, take immediate action to resolve the issue or contact your supervisor or a local human resources representative to help provide a timely response to the employee.
- For an integrity issue, such as an allegation of illegal or unethical conduct, report it to a more senior person within the Company, the TriMas Legal Department or the Employee Ethics Hotline.
- Prevent retaliation against any employee who reports, in good faith, a concern about actual or suspected misconduct, and discipline anyone who retaliates or allows retaliation to occur.
- If an employee asks you to interpret or apply the Code or any applicable law, regulation or policy and you are unsure how to respond, contact the TriMas Legal Department.
- Never investigate an integrity issue yourself or hire an outside investigator.

SPECIAL RESPONSIBILITIES FOR SENIOR OFFICERS

Although this Code applies to everyone, the Chief Executive Officer, Chief Financial Officer and other senior officers are under heightened responsibilities to report violations. In particular, these persons will bring to the attention of the Audit Committee:

- Significant deficiencies in the design or operation of internal controls that impact the Company's ability to record, process or report financial data.
- Any fraud (material or not) that involves management or employees with significant financial reporting or internal controls obligations.
- Any conflict of interest involving themselves or any senior personnel.
- Any material violation of law, regulation, this Code or a Company policy.

PENALTIES FOR VIOLATION

The Code is important for employees to know and follow. Violations of the Code and certain Company policies can also mean breaking the law, putting you and the Company at risk for criminal penalties (fines, jail sentences or both) and civil sanctions (damage awards or fines). We may need to report violations to criminal and civil authorities when appropriate or necessary.

Employees, officers and directors who violate the Code or applicable laws, regulations, policies or contracts are subject to disciplinary action up to and including termination of employment or service. Misconduct that may result in discipline includes:

- Actions that violate the Code or a specific Company policy.
- Directing others to violate the Code or a specific Company policy.
- Failure to promptly raise a known or suspected violation of the Code or a specific Company policy.
- Failure to cooperate in any investigation of possible violations of the Code or a specific Company policy.
- Threaten or retaliate against another employee for reporting a concern.
- Failure to demonstrate the leadership and diligence needed to ensure compliance with Company policies and applicable law.
- Knowingly reporting a violation of this Code or a specific Company policy that is false or misleading.

INTERPRETATION, APPROVALS AND WAIVERS

INTERPRETATION

Consistent application of the Code is essential. For help interpreting and applying the Code or any applicable law, regulation, policy or contract to a given situation, contact any of the resources within your business, including your supervisor, local human resources representative or the TriMas Legal Department.

APPROVALS

In some sections of the Code, you must obtain approval from a supervisor, your business or location's senior leader or the TriMas Legal Department before engaging in a particular activity. Always follow the Code's instructions regarding who to contact if you need to seek an approval.

WAIVERS

In rare circumstances, an employee may seek a waiver under the Code. Any employee Code waiver request must be raised to TriMas' Chief Executive Officer and the TriMas Legal Department. Any waiver of the Code for a TriMas executive officer or director may only be granted by TriMas' Board of Directors.

WHAT HAPPENS WHEN CONCERNS ARE RAISED

CONCERNS ABOUT ILLEGAL OR UNETHICAL CONDUCT WILL BE INVESTIGATED

- An investigation will be conducted to determine the facts through interviews, review of documents or other appropriate means.
- Based on the investigation, the Company will determine what action, if any, to take with the individuals involved.

CONFIDENTIALITY IS RESPECTED

When you contact the Employee Ethics Hotline, you are encouraged to identify yourself. This makes it easier for us to communicate with you and investigate concerns. If you provide your name, we will keep your identity as confidential as possible, consistent with conducting a thorough investigation. However, you may also communicate your concern anonymously, if you prefer.

For more information about reporting concerns, please review the **Global Whistleblower Policy**. Remember: Speak up. Ask questions. Get answers.

ETHICS SPOTLIGHT

I reported misconduct through the Employee Ethics Hotline, but never heard about an investigation or other action.

If you use the Employee Ethics Hotline and remain anonymous, you need to use the code provided by the hotline to check back for messages or questions regarding the investigation of your report. Since the Company keeps investigations and employee discipline matters as confidential as possible, the results may not always be communicated to you. With any investigation, cooperate fully and answer all questions completely and honestly.



OUR RULE AGAINST RETALIATION

At TriMas, we value open, honest communication and strive for a culture where we are comfortable asking questions and raising concerns without fear of retaliation. We will not tolerate retaliation against anyone who, in good faith, speaks up, seeks help or takes part in an investigation about actual or suspected violations of the Code, TriMas' Core Values or the law. In other words, raising an honest concern cannot be used as the reason for taking any adverse employment action, such as termination, demotion, reassignment, suspension, loss of benefits, threats or harassment.

Our policy strictly prohibits retaliation against any employee, officer or director who in good faith raises a concern or participates in good faith in the handling or investigation of a concern regarding an actual or suspected violation of the Code or policies, or applicable laws, regulations or contracts (even if the concern is eventually unsubstantiated). No employee, officer or director should be

discharged, demoted, suspended, threatened, harassed, intimidated, coerced or retaliated against in any other manner as a result of raising in good faith or assisting in good faith in the handling or investigation of a complaint.

If you feel that you have been retaliated against, speak up. Our commitment against retaliation includes employees reporting through a government agency or in connection with an external investigation.

SPEAK UP

CODE POLICIES



OUR COMMITMENT TO EACH OTHER	17
Health and Safety.....	18
Environment and Sustainability.....	19
Substance Abuse and Workplace Violence	20
Fair Employment Practices	21
Diversity, Equity and Inclusion	23
Privacy	24
OUR COMMITMENT TO OUR SHAREHOLDERS	25
Product Integrity and Quality.....	26
Protection of Assets	27
Conflicts of Interest	28
Financial Responsibility and Disclosure.....	29
Insider Trading	30
External Communications	31
OUR COMMITMENT TO OUR BUSINESS PARTNERS	32
Business Relationships.....	33
Gifts and Business Entertainment.....	34
Campaign Finance and Lobbying	35
OUR COMMITMENT TO THE LAW	36
Anti-Corruption.....	37
Complying with Competition Laws	38
International Trade Controls.....	39

OUR COMMITMENT TO EACH OTHER



Health and Safety.....	18
Environment and Sustainability.....	19
Substance Abuse and Workplace Violence	20
Fair Employment Practices.....	21
Diversity, Equity and Inclusion	23
Privacy	24

HEALTH AND SAFETY

We are committed to protecting the health and safety of our employees, contractors, customers and visitors. Our health and safety policies and procedures are designed to help you work safely.

WHAT TO KNOW

- Safety is everyone's responsibility. You must insist that work be performed safely, no matter what your job is.
- We comply with all health and safety laws and regulations applicable to our operations.
- We develop, and expect every employee to follow, safe work procedures.



WHAT TO DO

- Conduct your job safely and consistently with applicable health and safety policies and standards, including avoiding unsafe activities and conditions such as:
 - Failing to use prescribed safety equipment, such as safety eyewear or gloves, or observe safety related signs.
 - Distracted or reckless driving.
 - Working in high places without fall protection.
 - Disabling safety controls or guarding on equipment and machinery.
 - Exposed or unsafe wiring.
 - Blocked safety exits.
- Assess health and safety impacts and issues before starting a new activity or project.
- Identify methods to reduce any environmental impact associated with your work activity.
- Report to your supervisor or Environmental, Health and Safety (EHS) onsite coordinator any accidents, injuries, occupational illnesses and unsafe practices or conditions.

ETHICS SPOTLIGHT

You should always speak up and raise a concern if you:

- Are asked to do a task you consider unsafe.
- Are asked to do a job you think you are not properly trained to perform and that may harm you or others.
- See someone performing a task that you think is unsafe or that the person is not properly trained to do.
- Suspect that a vehicle or piece of equipment is not operating properly and may be unsafe.
- Observe or are made aware of an unsafe condition or a potential danger to yourself or others.

ENVIRONMENT AND SUSTAINABILITY

We are dedicated to protecting human health, natural resources and the environment. Our environmental principles provide guidance to TriMas personnel worldwide in the conduct of our daily business practices.

WHAT TO KNOW

- We promote environmentally responsible business practices.
- We are committed to actions that restore and preserve the environment.
- We are committed to reducing waste and pollutants, conserving resources and recycling materials at every stage of the product life cycle.
- We will continue to pursue the development and implementation of technologies for minimizing pollutant emissions.
- We will continually assess the impact of our facilities and products on the environment and on the communities in which we live and operate as we strive for continuous improvement.
- In addition to environmental compliance, TriMas is also committed to sustainability in our operations. Our commitment to environmental protection and sustainability includes:
 - Continuous improvement in environmental performance and minimization of waste, water consumption and energy use.
 - Prevention of pollution.
 - Integration of sound environmental practices into our business practices including procurement and product design, testing, manufacturing and support.
 - Consideration of environmental impacts while developing new products or processes, in selecting production materials and before buying, leasing or selling property.

WHAT TO DO

- Comply with all applicable environmental laws and regulations and adhere to the requirements, limitations, and conditions of our environmental permits and licenses.
- Ensure that information recorded on environmental-related forms and disclosures is true and accurate.
- Vigorously investigate unplanned environmental releases to understand and correct root causes.
- Follow Company policies for managing, shipping, transporting, importing/exporting, recycling or disposing of regulated materials and chemicals.
- Make prompt and accurate responses to appropriate information requests from governmental agencies.
- Contact your supervisor, your local EHS personnel or the TriMas Legal Department as soon as you recognize a violation or potential violation of any environmental law, regulation, permit, license or TriMas' environmental policies and procedures.
- For additional information on our initiatives, please review our **Sustainability Reports** located on the TriMas website.



ETHICS SPOTLIGHT

I accidentally spilled a container of oil on the shop floor. It was contained. Do I report this?

Yes. You should promptly report the incident to your supervisor because there is a risk of harm that should be investigated to determine the cause and to be sure appropriate measures are in place to prevent any recurrence. Appropriate clean up and disposal practices must be followed to prevent harm to our employees, visitors to our facilities and the environment.

SUBSTANCE ABUSE AND WORKPLACE VIOLENCE

Our commitment to safety includes ensuring our workplaces are free from violence and substances that are either illegal or could impair our ability to perform our jobs.

WHAT TO KNOW

- Working under the influence of drugs or alcohol poses an unacceptable safety risk to yourself and others and affects your judgment. That is why we strictly prohibit employees from working under the influence of those substances. No one may report to work, remain at work or operate a vehicle while on TriMas business with diminished capacity due to drugs or alcohol. Drugs may include illegal drugs, controlled substances or misused prescription medication.
- If you have a drug or alcohol problem, you are encouraged to seek assistance from qualified professionals and where available, from the Employee Assistance Program.
- There may be instances where drinking alcoholic beverages while conducting company business, such as at a customer meeting, is permitted, but make sure you comply with all laws and Company policies, and always exercise moderation and good judgment.
- TriMas does not tolerate workplace violence. You are prohibited from engaging in any act that could cause another individual to feel threatened or unsafe. This includes verbal assaults, threats or any expressions of hostility, intimidation, aggression or hazing.
- We prohibit the possession of firearms, explosives or illegal weapons in Company facilities (including parking lots), to the extent permitted by law, in Company owned or leased vehicles, or while conducting Company business.

WHAT TO DO

- Do not work under the influence of alcohol, illegal drugs or controlled substances on or off TriMas premises.
- Do not possess, use, transfer or distribute illegal drugs or controlled substances while working or on the premises.
- Do not work while impaired by a lawful prescription medication or over-the-counter drug.
- Never threaten anyone or display violent behavior in our workplace.
- Be considerate of others and exhibit appropriate behavior to help foster a workplace that is free from violence. We prohibit acts or threats of physical harm or violence, hostile physical contact, including intimidation, harassment or coercion on Company property or in connection with Company operations.
- Report to your supervisor or any other member of management any actual or potentially violent behavior that could cause risk to others.



ETHICS SPOTLIGHT

I suspect a fellow employee is occasionally coming to work under the influence of illegal drugs or alcohol. What can I do?

Contact your supervisor or local human resources representative who will take appropriate steps to address the situation.

I'm a supervisor and one of my employees told me a co-worker has threatened to "get" him. What do I do?

We take all threat reports seriously. Do not attempt to second-guess the seriousness of a threat. Contact your supervisor or local human resources representative who will take appropriate steps to address the situation.

FAIR EMPLOYMENT PRACTICES

Fair employment practices are an essential part of our business and help contribute to a culture of respect. We are committed to complying with all applicable labor and employment laws wherever we operate, including laws prohibiting employment discrimination, human trafficking, forced labor and the employment of underage children. We are also committed to complying with laws that ensure freedom of association and the right to collectively bargain.

WHAT TO KNOW

- We prohibit any form of discrimination and are committed to providing a harassment free environment in which we all have the opportunity to contribute to our highest potential.
- Sexual harassment is one form of harassment. Sexual harassment may involve individuals of the same or different gender. Like all harassment, sexual harassment is strictly prohibited. Sexual harassment can be:
 - Verbal: Sexual innuendoes, suggestive comments, jokes of a sexual nature, sexual propositions or threats, in any form.
 - Non-Verbal: Sexually suggestive objects or pictures, graphic commentaries, suggestive or insulting sounds, leering, whistling or obscene gestures.
 - Physical: Unwanted physical contact, including touching, pinching, coerced sexual activity or assault.
- We promote equal employment opportunities in compliance with applicable laws.
- We are an equal opportunity employer and we make employment decisions based on merit. We prohibit discrimination in employment opportunities on any unlawful basis.

- We comply with the applicable laws regarding child labor wherever we conduct business, and in accordance with International Labor Organization standards. We do not employ anyone under the age of 16. If children between the ages of 16 and 18 are employed, we will ensure that this work does not affect or preclude their educational opportunities or obligations nor jeopardize their health or safety.
- We do not use or tolerate forced or slave labor, or any form of human trafficking.
- We commit to providing fair working conditions with work hours set in compliance with applicable local laws.
- We recognize the right of employees to communicate openly with management regarding working conditions without fear of retaliation or intimidation.
- We are careful to select suppliers who are committed to treating all workers with dignity and respect, and comply with these employment practices.



ETHICS SPOTLIGHT

During a visit to a supplier, I noticed that their employees appeared to be younger than the legal working age in that country. What should I do?

You should raise any concerns about TriMas suppliers operating in a manner prohibited by local law with your supervisor, division president or the TriMas Legal Department. Raising such concerns both supports TriMas' values and may help us to identify if a supplier is in breach of its commitments to TriMas.

I believe that I did not receive a promotion due to age. What should I do?

Our policies require that all employment decisions be made without regard to age. If you believe that you were treated unfairly, contact a local human resources representative or use another one of our reporting resources.

FAIR EMPLOYMENT PRACTICES



WHAT TO DO

- Base employment decisions on job qualifications and merit, such as education, experience, skills and other job-related criteria.
- Make all employment decisions, which includes recruiting, hiring, tenure of employment and all terms and conditions of employment, without considering an individual's gender, age, race, color, religion, marital status, national origin, ancestry, genetic information, veteran status, disability, sexual orientation, gender identity or expression, citizenship, membership in the uniformed services, or pregnancy, childbirth, or related medical conditions, or any other status protected by applicable law.
- Never engage in harassing, offensive, disrespectful or retaliatory conduct.
- Raise any concern if you see, experience or suspect harassment, discrimination or any other workplace violation.
- Make all employment decisions – including hiring, firing, pay, promotion and work assignments – based on the person's qualifications, performance and ability to succeed.
- Contact your supervisor, a local human resources representative or the TriMas Legal Department if you encounter a conflict between this policy and local rules or practice.
- If your work involves selecting or managing suppliers, practice due diligence. Make sure they comply with our Code and the law, and that they honor our commitment to respecting fundamental human rights.
- For additional information, please review our **Human Rights Policy**.

DIVERSITY, EQUITY AND INCLUSION

We celebrate diversity, and respect people for who they are and what they bring to our workplace. We foster working environments that are fair and safe, where rights are respected and everyone can achieve their full potential. Embracing an environment of inclusion and equity – one of involvement, respect and support – will help ensure we leverage our best ideas and the contributions of all employees.

WHAT TO KNOW

- We build our best teams by seeking out a wide range of unique backgrounds, perspectives, talents and experiences. This allows us to attract talent that is as diverse as the markets and customers we serve.
- At TriMas, we define diversity as anything unique that makes us who we are, including how we think, our work ethic, where we are from, our experiences and what we look like.
- We define inclusion as the process of creating a culture and environment that is open-minded, respectful and accepting of all.
- By valuing the input of all employees, we foster a spirit of trust and openness.

WHAT TO DO

- Create a workplace that is inclusive by actively working to remove barriers to collaboration and take steps to help the best ideas and solutions come to the forefront.
- Value the input of others. Seek to put yourself in the other person's shoes and keep an open mind.
- Listen to the many voices that represent our customers and their needs.
- Foster a work environment that encourages learning, improving and striving for better.
- For more information, please review our **Diversity, Equity & Inclusion Statement** on our website.



ETHICS SPOTLIGHT

One of my co-workers sends e-mails containing jokes and derogatory comments about certain nationalities. They make me uncomfortable and I usually delete them. No one else has spoken up about them. Should I do more?

Yes, everyone has a role in ensuring we maintain our culture of respect. You should notify your supervisor or human resources.



PRIVACY

Trust is the basis of any good relationship. We are committed to protecting and respecting the privacy rights of our employees, customers and business partners, including suppliers and contractors. Each employee must know and follow our policies for the responsible use of personal information.

WHAT TO KNOW

- In the United States, many laws regulate customer and employee personal data and information (such as name, home and office contact information, financial information, medical information and other data) and a number of countries more stringently regulate the collection and use of such information. We are committed to handling personal data and information responsibly and in compliance with applicable privacy laws worldwide.
- Every employee is responsible for safeguarding personal data and information within the Company's control, and must be familiar with all Company policies and security guidelines for the protection of this information.
- Special rules apply for the personal data of European Union employees, and they are included in our **Global Data Privacy Policy** and **Privacy Policy** on our website.
- Be aware that anything you write, send, download or store on our system is Company property, and we may monitor your use. You should not have the expectation of privacy when using our system.



ETHICS SPOTLIGHT

Someone accidentally emailed me a Human Resources report that includes names, addresses and social security numbers of employees. Should I just close it and pretend I did not see it?

No. If you were able to access it, it could be accessed by others without the proper authorization or need to know. Contact your supervisor, a local human resources representative or the TriMas Legal Department.

WHAT TO DO

- Understand and comply with laws and regulations of locations from which personal data is collected and in which it is processed or used.
- Be aware of personal data that is subject to specific laws, such as customer financial information, health data and children's information, and contact a local human resources representative or the TriMas Legal Department with any questions.
- Collect, process and use only the personal data you need for legitimate business purposes. Certain personal information is sensitive and requires an extra level of protection and a higher duty of care based on applicable law.
- Do not disclose Company information to anyone who does not need to know the information to perform his or her job. If a third party needs to have the information, be sure that a confidentiality agreement is in place to protect the information.
- Use Company confidential information gained from your employment only for specified business purposes – it cannot be used for personal purposes or for the benefit of persons outside the Company.
- Treat confidential information with adequate care to protect it from unauthorized disclosure.
- Retain and dispose of personal data in accordance with our **Records Management Policy**.
- If you learn that personal data has been used in violation of this policy, or if you learn that the security of any system, device or document containing personal data has been compromised, notify your supervisor or the TriMas Legal Department.

OUR COMMITMENT TO OUR SHAREHOLDERS



Product Integrity and Quality	26
Protection of Assets	27
Conflicts of Interest	28
Financial Responsibility and Disclosure	29
Insider Trading	30
External Communications	31

PRODUCT INTEGRITY AND QUALITY

TriMas is committed to outstanding product design, quality and flawless execution. We know these efforts, together with our firm commitment to integrity in business, allow our customers to have great confidence in our capabilities, and will strengthen a sustainable competitive advantage for our businesses.

WHAT TO KNOW

- We are committed to providing our customers with quality products that meet or exceed their needs and expectations.
- Every employee is responsible for ensuring the integrity of the products under his/her control and the accuracy of the documentation he/she provides supporting product integrity.
- A failure to maintain quality standards could disappoint our customers, create liability for TriMas and damage our reputation with our customers and shareholders.
- As applicable, products will be tested to assure quality and safety standards are met.



WHAT TO DO

- Maintain a quality system which contains policies and procedures to help ensure that we comply with the quality requirements of TriMas and our customers.
- Foster a culture that encourages innovation and continuous improvement of our products and processes.
- Ensure that everyone in a work area understands TriMas' quality requirements, certifications and standards.
- Never ignore quality controls or take shortcuts that could sacrifice quality.
- Never misrepresent or falsify any quality or production record.
- Never conceal defective work or material, make false certifications or claims regarding our products, or authorize the shipment of product known to be defective or unsafe.
- Report concerns to your supervisor, plant manager or division president and take steps to address any information regarding a potential or actual product quality, regulatory or safety issue.

ETHICS SPOTLIGHT

We are behind schedule for the quarter and are under pressure to increase production. Can we alter a few manufacturing steps to speed things up?

When looking at a change to a production process, do not compromise safety or product quality. Always follow the quality standards and specifications for the related product. Also, go through the required approval steps, which sometimes involves the customer. If you have an idea for a process improvement, take it to your supervisor or your quality leader.

PROTECTION OF ASSETS

We rely on Company assets to support our work every day. Through hard work and investment, TriMas has built and secured assets that support its employees in reaching a high level of performance. We each have a duty to protect the Company's assets. Improper or careless handling of those assets can harm TriMas' brand and stability, and could deter investors from supporting the Company, its programs and strategies.

WHAT TO KNOW

- Company assets include everything that the Company owns or uses to conduct business. Each of us is entrusted with the care of these assets, so be proactive in safeguarding them from loss, damage, theft, waste or improper use.
- We comply with the laws and regulations that govern protection of our assets, as well as the assets of others.
- Company assets may only be used for proper business purposes and Company systems cannot be used to access inappropriate or offensive content.
- Every employee is responsible for protecting our assets, including intellectual property (IP), and respecting the valid IP rights of others.
 - IP often refers to information protected by the Company's trademarks, trade names, patents and trade secrets. It can also include many other things such as our brands, logos, research data, product development plans, marketing strategies, website content, inventions and other confidential business ideas and information.

WHAT TO DO

- Be alert to business practices that may result in the unauthorized distribution or use of Company assets, and contact the Legal Department with any concerns.
- Do not, without specific approval, take, loan, borrow, lease, license, donate, sell, damage, destroy, or otherwise dispose of any TriMas property or use such property for non-TriMas purposes.
- Follow security procedures and be alert to situations that might lead to loss or misuse of Company assets.
- Ensure equipment and processes are well maintained and in safe operating condition.
- Take care in everyday matters by not sharing your identification badge, password or other access information, and secure all physical and electronic proprietary content when not in use.
- Use caution when discussing Company business in common areas and public places, such as elevators and airplanes.



ETHICS SPOTLIGHT

Examples of company assets include:

- Physical assets such as land, buildings, tools, vehicles, equipment, inventory, raw materials, and supplies;
- Financial assets such as cash, receivables and investments;
- Proprietary information and intellectual property such as trade secrets, patents, copyrights and confidential business information;
- Contract rights and licenses; and
- Software and digital data, such as messages stored in or sent through our information and communications systems.

What are examples of misuse of company resources?

Examples include taking products or supplies for personal use, seeking reimbursement from the Company for personal expenses, using Company vehicles for unauthorized personal transportation and reselling scrap or waste for your financial gain.

CONFLICTS OF INTEREST

On the job or in your free time, nothing you do should conflict with your responsibilities or duty of loyalty to the Company. Even when nothing wrong is intended, the appearance of a conflict can have negative effects. Always consider how your actions may appear and avoid situations that create a real or perceived conflict of interest.

WHAT TO KNOW

- A conflict of interest may exist when you are involved in activities that might interfere, or appear to interfere, with your TriMas duties and responsibilities, your ability to make business decisions in the best interest of the Company, or that could harm the Company's reputation or business relationships.
- You must promptly disclose in writing and receive approval, as needed, for all outside work, financial interests and other personal activities or relationships that may create, or appear to create, a conflict of interest. A potential conflict of interest could arise if you have the ability to influence Company decisions relating to employment or business transactions that affect a family member or close personal relationship.
- Examples of conflicts of interest may include:
 - Having ownership in, or being a lender to, a supplier, where the employee is responsible for choosing the supplier or supervises those who do.
 - Having an employment or consulting relationship with a customer, supplier or competitor.
 - Serving as an officer, director or board member of a customer, supplier or competitor, unless approved in writing by senior management.
 - Engaging in outside employment or other activities that could interfere with the employee's ability to do his or her job.
 - Taking actions while conducting TriMas business to favor the interests of a family member, friend or relative.

WHAT TO DO

- Avoid personal interests or activities that interfere, or appear to interfere, with your ability to fulfill your obligations to TriMas.
- Devote your time, attention and best efforts to the Company's interests while at work.
- Do not pursue for personal gain opportunities that you learn of through your Company position or access to Company information.
- Do not choose a supplier or business partner based on personal interest. Speak up if you know of a possible conflict of interest involving a supplier or other business partner.
- Do not use Company assets, information, resources or influence for personal benefit or to promote an outside business or activity of yours, a family member or a close personal relationship. This includes the use of Company facilities, office equipment, email, employee or customer information, software or computer applications.
- Contact the TriMas Legal Department if you need help determining whether something raises a conflict of interest.
- For additional information, please review our **Global Conflicts of Interest Policy**.



ETHICS SPOTLIGHT

When trying to decide whether a particular situation might create a conflict of interest, ask yourself:

- Does the situation appear to influence your ability to make business decisions?
- Could you or a relative personally benefit from the situation?
- Could you be forced to choose between what is in your best interest and TriMas'?

If you answer "yes" to any of these questions, there is at least the appearance of a conflict of interest and you should disclose it to your supervisor, a local human resources representative or the TriMas Legal Department.

FINANCIAL RESPONSIBILITY AND DISCLOSURE

Financial responsibility principles require us to protect the Company through integrity in recordkeeping, financial reporting and public disclosures. Financial records serve as a basis for managing our business and for compliance with regulatory, tax and financial reporting requirements. Our shareholders trust us to make full, fair, accurate, timely and clear disclosures in all government filings and in all our public communications.

WHAT TO KNOW

- We comply with all applicable laws, rules and regulations governing financial accounting, reporting and disclosure.
- Financial records include journal entries and supporting documentation, general ledgers and supporting subsidiary ledgers, transaction processing records (including payroll, banking, customer and vendor invoices), audit reports, strategic plans, sales and purchasing reports, and manufacturing and quality documents.
- Financial responsibility includes:
 - Timely, complete and accurate processing of all transactional activity.
 - Honest and accurate financial reporting.
 - Making full, fair, accurate, timely and understandable disclosures in government filings and in our other public communications.
 - Complying with our system of internal controls.
- Corrections to our financial records and reports made in a timely manner and properly corrected within our internal controls system do not violate this policy.
- If you are involved in any aspect of our financial reporting or the certifications on which they rely, you must always follow our financial policies, our system of internal controls and generally accepted accounting principles.

WHAT TO DO

- Make sure that our books and records fairly and accurately reflect transactions and are free of any false or misleading statements.
- Do not change accounting or business practices or policies for the sole purpose of enhancing near-term financial performance at the expense of longer-term shareholder value.
- Maintain accurate, appropriate and reasonably detailed documentation to support all transactions.
- Provide all relevant information to, and never conceal information from, our internal or external auditors.
- Prepare all external reports and disclosures based on our books and records and in accordance with generally accepted accounting principles and applicable laws.
- To avoid improper disclosures, follow these guidelines:
 - Direct all inquiries from the financial community or media to the TriMas Investor Relations and Communications Department.
 - Get approval from the Chief Financial Officer or TriMas Investor Relations and Communications Department before releasing information that could be material to investors (such as forecasts and other forward looking statements, including in business proposals).
- Direct requests from governmental agencies or attorneys (unless ordinary course of business) to the TriMas Legal Department.



ETHICS SPOTLIGHT

Sometimes regulations and paperwork slow me down and make it harder to achieve my quarterly target numbers. If I know how to get the job done, why can't I just do it my way?

Doing business with integrity is far more important than "making the numbers." TriMas does not want you to cut corners. TriMas has business/accounting policies and the Code in place to ensure that we comply with applicable law, regulations and generally accepted accounting principles.

INSIDER TRADING

As employees of TriMas, you may learn of material information about the Company or other companies before it becomes public. “Material” information is information that an investor may consider important in deciding whether to buy, sell or hold securities such as stock and bonds. You may not buy or sell securities while aware of material information that has not been made public (“insider trading”) or give such information to others who might trade before that information is made public (“tipping”).

WHAT TO KNOW

- Material non-public (or “inside”) information should never be discussed with or provided to outsiders. Such disclosures are against the law as they can, if known publicly, affect a company’s stock price. This applies to information about TriMas, a supplier, competitor, customer or business partner.
- Material non-public information may include:
 - A planned acquisition or merger
 - Financial information, such as earnings or sales estimates
 - Significant expansion or curtailment of operations
 - A government investigation or lawsuit against the company
 - Significant new technologies or business opportunities
 - Gain or loss of a significant customer or supplier
 - Changes in key management personnel
- If you learn of material non-public information about a company (TriMas or any other company), you cannot buy or sell that company’s securities until the information has been publicly disclosed. These rules apply even if you are not an employee of the company.
- It also is illegal to provide inside information, or “tips,” to others, such as a family member or friend.
- Insider trading and tipping are against the law. This type of violation can result in severe civil or criminal penalties, including imprisonment and monetary damages.

WHAT TO DO

- Do not buy or sell securities of TriMas or any other company while you are in possession of material, non-public information. If you know non-public information about a company, wait until the information becomes public before buying or selling the stock.
- Do not disclose any material, non-public information about TriMas or any other company that you learn in connection with your employment to anyone until that information is generally available to the public. This duty regarding non-public information lasts beyond your employment.
- Never share non-public information from a former employer – or ask others to do so – and, if you leave TriMas, do not share our non-public information with others.
- Contact the TriMas Legal Department with any questions about rules regarding buying or selling stock or other securities.



ETHICS SPOTLIGHT

I know my sister holds TriMas stock and I happened to mention that I was working long hours because we were trying to close a deal that would really boost our sales for the fourth quarter. If my sister buys additional stock based on this information, could that be illegal?

Yes. If the deal was material non-public information, you would be in violation of insider trading laws because of the “tip” to your sister, and your sister would be in violation for buying securities based on that information.

EXTERNAL COMMUNICATIONS

By communicating carefully, we can help positively shape the public's perception about TriMas, our businesses, and our products and services. In addition, we have a duty to guard TriMas' image and brand, and the brands of each of our businesses, respect our co-workers, and to protect confidential and proprietary information.

WHAT TO KNOW

- To be professional and consistent in our communications outside the Company, all contact with investors, analysts and the media (newspapers, magazines, trade publications, radio, television or other external sources), including requests for information and interviews, should be directed to the TriMas Investor Relations and Communications Department.
- If you are contacted to discuss company business with any investors, analysts or the media, politely advise the outside party that you are not authorized to discuss the subject, and refer them to the TriMas Investor Relations and Communications Department.
- Many of us use social media for business and personal purposes. The growing reach of the internet means that what we say in an email, blog post or tweet can reach millions of people in seconds.
- If you engage in social media activity that identifies you as a Company employee, even if done while not at work, you could affect our reputation, image or brand.
- Be aware that social media (including posts on social networking sites, blogs, chatrooms and media sharing sites) are sometimes monitored by customers, fellow employees and regulators.
- Remember, sometimes internal communications can become public. Think twice. You should avoid exaggeration, derogatory remarks, guesswork or inappropriate characterizations of people and companies, including in email or internal memoranda.

WHAT TO DO

- Direct interview requests and the press to the TriMas Investor Relations and Communications Department.
- Be thoughtful about how you present yourself in online social networks, including expressing ideas and opinions in a respectful manner. Ask yourself if your online content is consistent with your work at TriMas.
- Use your personal email account (not your Company email) when setting up or participating in external social media channels. Exceptions can occur if you have received prior authorization from your supervisor.
- Do not give the appearance of representing the Company unless you have been given specific permission to do so. Do not use our logos or proprietary graphics in a way that suggest you are representing the Company.
- Do not disclose confidential business information about TriMas, our businesses, our customers or our business partners.
- Know and follow the TriMas **Media Policy** and **Global Electronic Communications Policy**, other Company policies, and related laws.
- Do not post photographs or video of the nonpublic areas of our premises, or of our processes, operations or products without TriMas' prior written approval.



ETHICS SPOTLIGHT

A local newspaper reporter contacted me about a new plant expansion. What should I do?

Notify your supervisor and the TriMas Investor Relations and Communications Department to ensure that the most appropriate person responds. Employees are not authorized to respond to the press.

OUR COMMITMENT TO OUR BUSINESS PARTNERS



Business Relationships.....	33
Gifts and Business Entertainment.....	34
Campaign Finance and Lobbying.....	35

BUSINESS RELATIONSHIPS

We value our business relationships and are committed to doing what's right for our customers, suppliers and other partners. Our business relationships are based on lawful, ethical and fair practices. We interact honestly and with integrity in the marketplace and expect our partners to do the same. We also expect our suppliers to obey the law, including laws that require them to treat workers fairly, provide a safe and healthy work environment and protect environmental quality, as well as laws prohibiting trafficking in persons and forced, compulsory and child labor.

WHAT TO KNOW

- We do what is right for our customers by being honest and forthright in our dealings and communications with them and delivering on what we promise.
- We are committed to maintaining and improving customer satisfaction.
- We strive to do business only with suppliers and business partners who uphold our values and comply with applicable laws and standards governing safety, labor and health.
- We provide competitive opportunities, where practical, to all suppliers.
- We promote respect for human rights in our supply chain and other business activities.

ETHICS SPOTLIGHT

One of TriMas' suppliers mentioned that a company that supplies it with raw materials is the focus of a child labor investigation in its home country. Since we don't deal directly with this company, is this something we should be concerned about?

Yes. All of the companies in our supply chain have the potential to impact TriMas' reputation. We require our suppliers to comply with laws and human rights standards, and we expect them to demand the same of their suppliers. You should inform your supervisor, plant manager, division president or the TriMas Legal Department.

WHAT TO DO

- Conduct all business in a responsible manner and compete fairly in the marketplace.
- Be honest, fair and transparent in all interactions with customers.
- Conduct business only with suppliers that comply with national, local and other applicable legal requirements and Company guidelines.
- Treat our suppliers, customers, other business partners and competitors with the same level of respect and professionalism that you expect them to provide.
- Evaluate all supplier offerings on the basis of quality, reliability, performance, price, service and technical requirements.
- Avoid potential conflicts of interest with respect to suppliers or potential suppliers, and customers or potential customers.
- Build long-term business relationships and be a model of integrity in all of your business interactions.
- Follow all applicable procedures to safeguard confidential and proprietary information entrusted to us by our suppliers, customers and other business partners.
- Raise any concern regarding a supplier or business partner's failure to comply with applicable law or our business practices to your supervisor, plant manager, division president or the TriMas Legal Department or the Employee Ethics Hotline.

GIFTS AND BUSINESS ENTERTAINMENT

Gifts and business entertainment can provide opportunities to build business relationships, network with our business partners and promote our products. If not handled appropriately, however, gifts or business entertainment can damage our reputation and even violate the law. It is the responsibility of every employee to understand the principles to consider before offering or accepting a gift or business entertainment and to know when pre-approval is required.

WHAT TO KNOW

- It is a common business practice for business partners to give and receive modest gifts and engage in reasonable and customary business entertainment. However, we never want these practices to create even a perception that we are seeking to shape a business decision or that our judgment is open to influence.
- If we use good judgment and follow these guidelines, the occasional exchange of gifts and entertainment can achieve the purpose of creating goodwill and establishing trust in business relationships.
- This policy does not apply to gifts or business entertainment offered to, or for the benefit of, a Government Official. All gifts, business entertainment or other things of value offered to Government Officials require pre-approval from the TriMas Legal Department and must comply with our **Global Anti-Corruption Policy**.



WHAT TO DO

- Never offer or accept any gift of more than a modest value. When offered a gift of more than a modest value, report it to your supervisor and return it.
- Do not offer or accept monetary gifts, such as cash, gift cards or personal discounts.
- Ensure that entertainment has a legitimate business purpose. Whenever we accept such entertainment, we should respond in kind at a suitable time. Doing so helps us avoid any obligation to our host.
- As a rule, give or receive a gift only as part of a pattern of standard commercial courtesy and the exchange should not impair a reasonable person's judgment. Acceptable gifts are infrequent, not excessive in value and small enough as to not embarrass TriMas if made public.
- Never offer or accept any gift or entertainment that may be embarrassing to the Company.
- Direct any questions regarding giving or accepting gifts or entertainment to your supervisor, a local human resources representative or the TriMas Legal Department.

ETHICS SPOTLIGHT

What type of gift would be of "modest" value?

Infrequent gifts with a value less \$100 (or the foreign currency equivalent) would count as modest in most places where TriMas does business. Some examples include branded promotional items, small fruit or snack baskets, and other gifts meant to create goodwill. However, even gifts of modest value can be a problem if they become frequent or are conditional.

CAMPAIGN FINANCE AND LOBBYING

We engage with governments and political processes in ways that separate personal views from TriMas' interests. We comply with all laws governing political donations and lobbying. We do not use corporate funds for the purposes of political advocacy, including campaign contributions or payments to tax-exempt groups including trade associations.

WHAT TO KNOW

- We often work with government bodies while conducting TriMas business and always do so in an ethical and transparent manner.
- As a Company, TriMas chooses not to make corporate donations to any political candidates, parties or political action committees. The law generally prohibits the use of corporate resources to support or oppose political candidates.
- As individuals, we each have rights to express our beliefs and to take part in political processes. We must ensure our actions are legal and ethical. We must stay away from any indication that our personal activities have TriMas support. We must avoid having TriMas activities seen as illegal lobbying.



ETHICS SPOTLIGHT

A customer invited me to attend a political fundraiser for a local politician. I am interested in attending the event. Will the Company pay my travel and entry ticket expenses?

Employees may engage in the political process as a matter of personal choice. In this example, even though invited by a customer, the Company would not reimburse the employee for these expenses related to the political fundraiser.

WHAT TO DO

- Engage with governments with transparency and integrity.
- Follow guidelines to ensure we participate in the political process in a responsible manner:
 - Employees may take part on their own in elections and political activities, including making personal contributions. The Company will not try to influence this activity.
 - TriMas will not pay or reimburse personal political contributions or expenses related to political activities.
 - Employees may not solicit contributions for candidates or political causes while on work time or on Company property.
 - TriMas does not permit the use of Company premises or equipment for political campaigning, fundraising or partisan political activity.
 - Employees must not promote their political or personal views or beliefs by posting or distributing signs or other material in offices, workspaces or near Company property.
 - Employee participation in political activities does not imply TriMas' endorsement.
- Secure prior written approval from the TriMas CEO and TriMas General Counsel before engaging in any lobbying activities or the hiring of lobbyists on behalf of the Company.

OUR COMMITMENT TO THE LAW



Anti-Corruption.....	37
Complying with Competition Laws.....	38
International Trade Controls.....	39

ANTI-CORRUPTION

TriMas employees are subject to a number of laws that prohibit bribery in any setting. As a result, all employees must be careful not to give or receive bribes or kickbacks of any sort. TriMas employees should always operate in an open and honest manner, compete fairly with others, and not rely on illegal or unethical methods. This means that you may not provide, offer, authorize, or promise to provide anything of value in order to secure an improper advantage or obtain or retain business.

WHAT TO KNOW

- TriMas employees in all locations must follow applicable anti-corruption and anti-bribery laws and statutes. These include the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act. If you have questions about these rules, contact your supervisor, a local human resources representative, division president or the TriMas Legal Department.
- Corruption often involves a payoff demanded by or offered to a government official as a trade for a benefit. The payoff may involve money or anything else of value. These cases often involve low-level bureaucrats who seek payment to perform routine, non-discretionary acts. Common examples involve permits or visas, or routine customs clearances.



ETHICS SPOTLIGHT

I am working on a project to open a new facility in another country, but a local official expects a “special fee” to “cut through the red tape” and get our permit within 30 days so we can meet our internal deadlines for this project. I understand this is customary for this country. Can I pay him?

No. TriMas’ **Global Anti-Corruption Policy** and the relevant laws of many countries prohibit this type of facilitation or grease payment – even if “everyone does it.” If you feel pressured to pay a bribe, firmly say no and notify the TriMas Legal Department.

WHAT TO DO

- Never offer bribes or improper advantages to any public official or other individual or third party, which are, or give the impression that they are, intended to influence decisions by any person about TriMas.
- Never request or receive bribes or improper advantages from any third party, which may, or give the impression that they may be, intended to influence decisions by TriMas about that third party.
- Never pay a commission to a third party agent not documented in an authorized TriMas agreement.
- Do not take part in over-invoicing requests from a buyer of goods.
- Do not use a third party, such as a distributor, sale agent or business partner, to do something inconsistent with these guidelines.
- Follow TriMas due diligence, approval and contractual requirements when selecting and hiring third parties to represent TriMas to ensure that they are reputable and qualified, and that they agree to comply with applicable anti-corruption laws and policies.
- Record all financial transactions accurately in our records with reasonable detail and reflect the true nature of the transactions.
- Contact the TriMas Legal Department if you believe an improper payment or other thing of value has been or will be offered in connection with TriMas business activities.

COMPLYING WITH COMPETITION LAWS

Competition laws, known as anti-trust laws in the United States, are designed to ensure open and vigorous competition in the marketplace. We comply with competition laws in all countries where we conduct business. These laws protect us, our customers and the public against unfair business practices that can restrict trade and reduce competition.

WHAT TO KNOW

- We all benefit from fair, free and open markets, and we work to outperform our competition fairly and honestly.
- Fair competition reflects our own corporate values as well as the law.
- Competition laws exist in most countries in which TriMas conducts business.
- We encourage you to speak with the TriMas Legal Department before participating in trade association activities.
- We compete strictly on the merits of our products and services and never attempt to restrain or limit trade.

WHAT TO DO

- We never discuss prices, pricing strategies, product planning, marketing or terms of sale with competitors. If a prohibited subject comes up during a discussion or meeting in which competitors are present, you should excuse yourself from the discussion. Inform the TriMas Legal Department if you have been involved in, or have been requested to participate in, such discussions.
- We do not enter into agreements with our competitors concerning prices, production volumes, customers or sales territories.
- We do not link purchase of one product to another, or compel suppliers to buy from us to retain TriMas business.

- We do not dishonestly represent the products or services of a competitor.
- We do not induce customers to break contracts with competitors unlawfully.
- We collect competitive information through proper public or other lawful channels. We will not use information illegally or improperly obtained by others, including through misrepresentation, invasion of property or privacy or coercion.
- For additional information, please review our **Global Competition Laws Policy**.



ETHICS SPOTLIGHT

I recently attended an industry conference, and spoke with a longtime friend, who now works for a TriMas competitor. My friend began discussing her company's pricing strategy for a product that is similar to one we make at TriMas, and asked about our pricing. Was this appropriate?

No. You should terminate the conversation and report it to the TriMas Legal Department. In addition to being an improper request to disclose confidential TriMas information, the conversation could be seen as an attempt at price fixing, which is illegal in most countries, and could lead to serious penalties for the companies and individuals involved.

May I speak to customers to gather information about what the competition is doing?

Information we learn about our competition from customers can be useful, but context is key. First, we never seek or use a competitor's confidential information. Second, we must be sure a third party would not view the discussion as an indirect effort to conspire with our competitors. Consult in advance with the TriMas Legal Department if you have any concerns.

INTERNATIONAL TRADE CONTROLS

We comply with all trade control laws that regulate the transfer of goods, software, services and technology across borders and the conduct of business with certain countries, entities and individuals. Trade laws include export and import regulations, as well as economic sanctions, and are often based on national security and foreign policy concerns.

WHAT TO KNOW

- The export of certain items may require government authorization, depending on the product, its use, the destination country and the end user.
- Export restrictions apply to the export of goods and services, as well as to the licensing of software and the transfer of technology (such as plans, designs and technical assistance). They can apply when we send technical data across national borders over the internet or through email. They can also apply to our transfer of information or products to TriMas facilities in other countries, and the in-country transfer of goods or information to a person from a country other than the goods' country of origin. Exporting of goods, technology or services without the appropriate government approvals can result in the loss of export privileges as well as civil and criminal penalties.
- We must also comply with all laws that govern our importing practices. The international movement of TriMas products requires appropriate classification, customs documentation, country of origin markings and proper valuation declarations.
- As a U.S.-based company, TriMas is also prohibited from any international trade involving certain restricted countries, institutions, persons and products. Because this restriction list changes from time to time, you should check with the TriMas Legal Department for an updated list whenever you are uncertain whether trade restrictions might apply.
- U.S. law prohibits U.S. companies and their affiliates from cooperating in or supporting foreign boycotts that are not supported by the United States.

WHAT TO DO

- Ensure compliance with all customs laws and regulations when importing goods into our global operations.
- Know and comply with all export controls and trade restrictions, and allow sufficient time to obtain the necessary government approvals so that shipments are not disrupted.
- Keep complete and accurate records of international transactions to demonstrate our compliance.
- Contact the TriMas Legal Department if your work involves cross-border transactions and you have questions about the applicable regulations or requirements.



ETHICS SPOTLIGHT

A good customer asked me to send products to a country that is the target of a U.S. government-imposed trade prohibition. May I route the shipment to a TriMas division outside the United States and have them sell it to the customer in the restricted country?
No. The law prohibits any TriMas entity from selling to a restricted country. Routing it through a neutral country does not get around the restriction.

CONCLUSION

At TriMas, we value open, honest communication and strive for a culture where we are comfortable asking questions and raising concerns without fear of retaliation. We will not tolerate retaliation against anyone who, in good faith, speaks up, seeks help or takes part in an investigation about actual or suspected violations of the Code, TriMas' Core Values or the law.

WE VALUE OPEN, HONEST COMMUNICATION

Our Code represents our business philosophy and values, and defines how we as a company conduct ourselves around the world. We are committed to operating ethically and honestly, and to leading with integrity in all of our business activities. Our Code provides principles of business conduct for all of our employees, officers and directors to live up to in order to achieve our ethical standards and commitment to integrity.

No matter the question or concern – whether it involves a workplace issue, safety concern, or illegal or unethical conduct – we want to hear from you. If you have something to say, you may contact any of these resources.

- **SUPERVISOR** - Your supervisor is usually in the best position to resolve your concern quickly. If you're not comfortable raising a concern with your supervisor, you may also contact another local leader, as noted below.
- **HUMAN RESOURCES** - You may contact your business' human resources representative.
- **DIVISION LEADERSHIP** - Your local or business leadership (including your plant manager, division president or division finance officer) is another option.

ADDITIONAL RESOURCES

In addition to the above resources available to you, TriMas offers resources outside of your business for reporting concerns about illegal or unethical conduct.

- **TRIMAS LEGAL DEPARTMENT** - The TriMas Legal Department can assist you, especially with questions concerning applicable laws and policies. Please email legal@trimas.com to reach the TriMas Legal Department.
- **EMPLOYEE ETHICS HOTLINE**
 - Call 1-800-971-4338 from the United States or visit <https://trimascorp.ethicspoint.com> to find a toll-free number for other countries outside of the United States.

- Report electronically at <https://trimascorp.ethicspoint.com>

In the United States, and as allowed by law in certain other countries, you may remain anonymous when using the Employee Ethics Hotline. Due to local privacy laws in certain countries of the European Union region, the hotline may permit only specific types of calls, such as accounting, financial, auditing and bribery matters. In those countries, contact one of the other Resources for Employees listed above to report other issues.