	Effective Date: October 1, 2014	
	Approved By: Senior Management Compliance Committee	
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Title: GLOBAL CONFLICTS OF INTEREST POLICY		

SCOPE: This Global Conflicts of Interest Policy (Global Policy) applies to all employees of TriMas Corporation and its subsidiaries (collectively, the “Company”).

PURPOSE: The purpose of this Global Policy is to provide guidance for Company employees on recognizing and resolving real or apparent conflicts of interest.

DEFINITIONS: For purposes of this Policy, “immediate family member” means any child, stepchild, parent, stepparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law of an employee.


POLICY: Each employee has an obligation to promote the best interests of the Company. It is the responsibility of each employee to use sound judgment and to recognize and avoid any situation that involves or may involve, directly or indirectly, a conflict of interest between the employee's personal interest and the best interest of the Company as a whole or even the appearance of impropriety regarding a conflict of interest.

Generally, a conflict of interest exists when the personal interests or activities (financial or otherwise) of an employee or the personal interests or activities of an immediate family member may influence the exercise of the employee’s independent judgment in the performance of the employee’s duties to the Company and interfere with the interests of the Company. As the appearance of a conflict can often be as damaging as an actual conflict, the appearance of a conflict is also to be avoided.

Because it is not possible to list all situations or relationships which might create potential conflicts of interest, and because many situations must be evaluated on their individual facts and circumstances, employees should promptly disclose to their managers or the Company legal department any facts or circumstances which might constitute a conflict of interest or give the appearance of such a conflict. The situations listed below are representative of circumstances that could give rise to a conflict of interest and could be regarded as inconsistent with the duties of employees and contrary to Company policy:

1. Financial Interests

Employees or immediate family members who hold or acquire, directly or indirectly, a stake in a present or prospective competitor, or in any present or prospective customer, supplier, or third party business partner must disclose this fact to their manager or the legal department if this stake gives them the opportunity to exert influence on the management of that company. As a general rule, the possibility of exerting influence on management exists when a stake exceeds 1% of the company’s total capital. Once an interest has been disclosed, the Company may take suitable measures to eliminate any conflict of interest. These restrictions on outside investments do not apply to mutual funds or similar investments where the employee lacks any investment authority over the particular companies included in the fund.

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2. Personal Interests

A conflict may exist when an employee's personal interests influence the employee's ability to act in the best interest of the Company. Employees must not take a Company opportunity or make a business decision with a present or prospective competitor, or any present or prospective customer, supplier, or third party business partner for the benefit of the employee or an immediate family member. Employment related decisions should be based fair and objective criteria.

3. Outside Activities

A conflict may exist when (a) an employee, or an immediate family member, serves as a director, officer, employee or agent of an organization that is a competitor or that has a business relationship with the Company, or (b) an employee engages in a personal business venture which prevents devotion of loyalty, time and effort required by the Company. A conflict may also exist when an employee participates in a charitable or civic organization or serves in public office if the activities of any such organization or public body directly involve the business interests of the Company.

4. Gifts, Entertainment and Other Business Courtesies

Accepting or giving gifts, entertainment and other business courtesies from a present or prospective competitor, customer, supplier, third-party business partner or foreign government official can create the appearance of a conflict of interest, especially if the value of the item is significant. Accepting or giving gifts, entertainment and other business courtesies inconsistent with the terms of the Company's Global Anti-Corruption Policy may give rise to a conflict of interest.


Additionally, a conflict may exist if an employee gives or accepts any discounts or other benefits not available to the general public or to employees of the Company to a present or prospective competitor, customer, supplier or third-party business partner.

5. Confidential Information

An employee or immediate family member may not use, for personal gain or for the benefit of others, confidential information of the Company or other third-party business partners (such as suppliers and customers) obtained in the course of employment by the Company. [Types of confidential information and the restrictions thereof are further explained in the Company's Code of Conduct.]

6. Company Resources

An employee or immediate family member may not misuse, for personal gain or for the benefit of others, Company resources, time or facilities, the employee's position or influence to promote or assist a third party.

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7. Personal Relationships

A conflict may exist if an employee engages in any personal relationship or activity which lessens the impartiality, good judgment, effectiveness or productivity expected from the employee (which includes an employee supervising or having a direct or indirect line of reporting to a family member who is also an employee).

Employees must fully disclose all relevant information and otherwise fully cooperate with the Company's internal or external auditors or legal department in the course of audits or investigations related to any real or apparent conflict of interest.

In very rare circumstances, situations may arise in which a waiver from this policy may be appropriate. Waivers will be determined on a case-by-case basis by the Chief Executive Officer or a senior executive who reports to the CEO, with the advice of the Company legal department. Waivers for directors and executive officers may only be granted by the Company Board of Directors, or a committee of the Board, which shall have the sole and absolute discretion to approve any such deviations or waivers from this policy. Any waiver for directors or executive officers shall be promptly disclosed to the extent required by applicable law, Securities and Exchange Commission regulation or stock exchange requirement.

The Company retains the right to terminate or modify this policy at any time on a prospective basis. The Company reserves the right to discipline employees for failure to follow this policy, up to and including termination.