

Effective Date: June 1, 2017

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Approved By: General Counsel

Cumpliar Nama

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Title: SOCIAL COMPLIANCE POLICY

TriMas Corporation and its subsidiary companies (collectively, the "Company") are committed to conducting business in a socially responsible manner and are determined to partner with suppliers who respect the rights and dignity of their workers. Our suppliers must comply with contract provisions, legal requirements, and standards of their industry under local, regional, and national laws and regulations of the countries in which the suppliers are doing business.

Ethical Labor Standards: The Company expects its suppliers to abide by the international standards of fair and ethical labor practices as reflected by the International Labor Organization and the United Nations. These ethical labor standards include, but are not limited to, treating employees with dignity, allowing employees the right to legal wages for work performed, providing employees a safe work environment, and giving employees freedom to leave their employment. We reserve the right to choose not to work with a supplier who does not follow ethical labor standards.

**No Forced Labor:** Suppliers must employ their workers on a voluntary basis, respecting the rights of employees to decide to work or not. Suppliers shall not use forced labor in their contracting, subcontracting or other relationships for the manufacture of their products.

**No Child Labor:** Workers of our suppliers must be at least age 16 (or the mandatory age allowed by the law of the country of manufacture) or the age at which compulsory schooling has ended, whichever is greater. In situations involving hazardous working conditions, workers should be at least 18 years of age.

Working Hours & Overtime: Suppliers shall not permit working hours to exceed applicable laws or industry standards, whichever affords greater protection. Suppliers must compensate their workers for overtime hours at rates legally required in the country of manufacture. In those countries where premium overtime rate laws do not exist, workers shall be compensated at a rate at least equal to their regular hourly wage. Suppliers shall also guarantee workers breaks and days off in compliance with applicable law.

**Wages:** Suppliers are required to pay minimum wage, or prevailing industry wage if no minimum exists, and shall provide all legally mandated benefits.

**Health and Safety:** Suppliers shall maintain a clean, safe, and healthy workplace in compliance with all applicable laws and regulations. Adequate steps shall be taken to prevent accidents and injury so far as reasonably possible. Workers must be provided with appropriate safety training and protective equipment.

**Environmental Practices:** Suppliers must adhere to all applicable environmental laws and regulations regarding protection and preservation of the environment in their country.

**Audit Rights:** The Company reserves the right to inspect, or to hire a third party to inspect on its behalf, any production location for compliance with this policy. The Company further reserves the right to cease doing business with any non-compliant supplier without any liability resulting from such termination. Suppliers are expected to comply with all requests for information from the Company or its third party auditor to confirm compliance with any provision contained in this policy.

**Agreement to Comply:** As an authorized representative of supplier, I certify that supplier agrees to comply with and adhere to the laws and principles identified in the Company's Social Compliance Policy.

Supplier Name
Printed Name and Title of Signatory:
Signature
Date: