



Supplier Code of Conduct

TriMas Corporation and its subsidiary companies (collectively “**TriMas**”) are committed to conducting business in an ethical, legal and socially responsible manner and are proud of the global reputation and trust that we have earned. TriMas is determined to protect and enhance that reputation.

TriMas is committed to providing innovative products of exceptional performance and value through market-leading brands. Our guiding core values which may be found on trimascorp.com are:

Integrity. We operate in a culture of the highest ethical standards, seek to lead by example, and are committed to improving the safety in our work areas, our communities and the environment.

Customer-Focused. We continuously strive to provide superior levels of quality, delivery, service and total value to differentiate ourselves from our competitors.

Teamwork. We value all of our employees, treat each other with mutual respect and encourage collaboration to drive innovation.

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

Continuous Improvement. We embrace the tools of Kaizen and foster a culture of employee engagement to drive performance improvements and Operational Excellence.

We select suppliers, vendors, contractors, consultants, partners and others with whom we do business (collectively “**Suppliers**”) who align with our values and the principles outlined herein. To clarify what TriMas expects from our global supply chain, this Supplier Code of Conduct has been developed to specify the behaviors, practices and regulations TriMas expects to see demonstrated and complied with. This Supplier Code of Conduct focuses on ensuring that TriMas’ Suppliers act in a way that is ethical and responsible, and aims to ensure compliance with all applicable laws and regulations.

At TriMas, we expect our Suppliers to comply with all of the following:

Legal Compliance

Suppliers must operate in full compliance with all applicable statutes, rules and regulations in the respective countries in which they operate.

Ethical Standards

Suppliers shall comply with TriMas’ Code of Conduct as published on the TriMas website under Policies at [TriMas Code of Conduct](#), including the following policies and ethical business practices:

Bribery and Corruption

Suppliers shall comply with all applicable anti-corruption laws (such as the U.S. Foreign Corrupt Practices Act, the Canadian Corruption of Foreign Officials Act, the UK Bribery Act 2010 and PRC Criminal Law). Suppliers shall not directly, indirectly, openly or secretly give, authorize or offer to give money or anything of value to any entity or person for the benefit of obtaining or retaining an improper business advantage. Suppliers shall comply with TriMas’ [Anti-Corruption Policy](#).

Conflicts of Interest

Suppliers shall avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest. Suppliers are expected to provide notification to all affected parties if an actual or potential conflict of interest arises. Suppliers shall comply with TriMas’ [Global Conflicts of Interest Policy](#).

Accurate Records

Suppliers shall record all business transactions accurately, prudently and transparently, in compliance with applicable accounting standards. Records should be retained based on the applicable retention requirements.

Fair Trade Practices

Suppliers shall not engage in collusive bidding, price fixing, price discrimination or other unfair trade practices in violation of antitrust laws. Suppliers shall comply with TriMas’ [Global Competition Laws Policy](#).

Gifts and Business Entertainment

Suppliers must compete on merits of their products and service. Any payment of cash or cash equivalents (gifts, personal discounts, entertainment invitations, etc.) by a Supplier to any TriMas employee to influence a business decision are strictly prohibited.

Employment Standards

TriMas 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. We reserve the right to choose not to work with a supplier who does not follow ethical labor standards. Suppliers shall comply with TriMas' [Global Human Rights Policy](#), including the following principles:

Forced Labor and Human Trafficking

Suppliers must employ their workers on a voluntary basis, respecting the rights of employees to decide to work or not. TriMas is committed to ensuring our operations and supply chain are free of slavery and human trafficking, and prohibits the use of all forms of forced and compulsory labor, including indentured labor, bonded labor, prison labor, military labor, slave labor and any form of human trafficking. Suppliers shall not use forced labor in their contracting, subcontracting or other relationships for the manufacture of their products. Suppliers shall comply with TriMas' [California Transparency in Supply Chain and the UK Modern Slavery Act Disclosure Statement](#).

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

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.

Fair Remuneration

Suppliers shall comply with all national regulations or industry standards on pay and benefits for a standard working week. Suppliers shall provide their employees with written and understandable information about their employment conditions in respect to wages before they enter employment.

Free Association and Collective Bargaining

Suppliers shall respect the rights of workers, without distinction, to have the right to join or form trade unions of their own choosing and to bargain collectively.

Discrimination and Harassment

Suppliers shall not discriminate in regard to hiring, compensation, access to training, promotion, termination, or retirement based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, or sexual orientation. Suppliers shall prohibit unwanted conduct related to a relevant protected characteristic that has the purpose, or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive working environment.

Diversity, Equity and Inclusion

TriMas is committed to achieving an environment of diversity, equity and inclusion globally, throughout all levels of the organization and throughout our supply chain. We expect our Suppliers to adhere to similar principles and support diversity programs within their organizations. Suppliers should comply with TriMas' [Diversity, Equity & Inclusion Statement](#). In addition, TriMas is committed to utilizing a diverse supplier base which includes businesses whose owners come from underrepresented identities such as minority-owned, women-owned, LGBTQ-owned, veteran-owned and small businesses. We encourage our Suppliers to self-identify as diverse (if applicable) during the Supplier onboarding process.

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. Employees must be

provided with appropriate safety training and protective equipment. We promote and encourage the certification and registration of conformity to recognized international standards for occupational health and safety, including the ISO 45001 – Occupational Health and Safety Management System standards or equivalent.

Environment

Suppliers must adhere to all applicable environmental laws and regulations regarding the protection and preservation of the environment. We promote and encourage certification and registration of conformity to recognized international standards for environmental management systems, including the ISO 14001 – Environmental Management System standards or equivalent. Suppliers shall comply with TriMas' [Environment, Health and Safety Policy](#).

Material Compliance and Conflict Minerals

Suppliers shall have a policy to reasonably assure that the tantalum, tin, tungsten and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. Suppliers shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available upon request. TriMas expects its Suppliers to provide information regarding the presence and sourcing of conflict minerals used in the products supplied to TriMas. Suppliers shall comply with TriMas' [Responsible Sourcing and Conflict Minerals Policy](#).

General

Intellectual Property

Suppliers shall respect intellectual property rights and safeguard proprietary information. Transfer of technology and know-how shall be done in a manner that protects intellectual property rights.

Confidential Information

Suppliers shall protect all confidential information provided by TriMas and our respective business partners, and only use it for the purposes for which it is provided. When requested, Supplier will execute a mutually agreeable nondisclosure agreement (NDA).

Data Privacy

Suppliers shall comply with all applicable data privacy laws, including, where appropriate, the EU General Data Protection Regulation and the California Consumer Protection Act.

Cybersecurity

Suppliers shall take care to safeguard and protect the information entrusted to them, as well as information generated or developed by them, from unauthorized access, destruction, use, modification or disclosure. Suppliers are encouraged to maintain risk-based cybersecurity programs designed to mitigate emerging threats to their information systems, products, services and supply chain, while complying with all applicable contractual and legal requirements.

Audit Rights

TriMas reserves the right to inspect, or to hire a third party to inspect on its behalf, any production location for compliance with this Supplier Code of Conduct. TriMas 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 TriMas or its third party auditor to confirm compliance with any provision contained in this Supplier Code of Conduct.

Reporting

Suppliers shall inform TriMas if they become aware of any actual or potential breach of this Supplier Code of Conduct by any person or business who has a direct relationship with TriMas. If the expectations of this Code of Conduct are not met, in full or in part, the business relationship may be reviewed and corrective action pursued.

Concerns regarding any potential violations of these Supplier standards can be reported 24/7 through TriMas' Ethics Hotline at <https://trimascorp.ethicspoint.com>. For other concerns or for general questions regarding TriMas' Supplier standards or the TriMas Supplier Code of Conduct, please contact generalcounsel@trimascorp.com.

Agreement to Comply: As an authorized representative of the Supplier, I certify that Supplier agrees to comply with and adhere to the laws and principles identified in TriMas' Supplier Code of Conduct and the policies incorporated within.

Supplier: _____

Name: _____

Title: _____

Date: _____

Signature