



Responsible Sourcing and Conflict Minerals Policy

In some regions of the world, natural resources are exploited to fund conflict or can be associated with violations of human rights. TriMas Corporation and its subsidiary companies (collectively, the “Company”) are determined to partner with suppliers who share our commitment to responsible sourcing and our values around human rights, ethics and environmental responsibility. Our responsible sourcing efforts include supplier acknowledgment of the Company’s Supplier Code of Conduct, which may be viewed at www.trimascorp.com/suppliers.

The Company’s commitment to responsible sourcing also includes support of the goals and objectives of the Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502, and related regulations (the “Act”), which aim to prevent the use of Conflict Minerals that directly or indirectly finance or benefit armed groups in The Democratic Republic of the Congo or an adjoining country defined in the Act and related regulations (collectively, “DRC”). Conflict Minerals include columbite-tantalite (coltan) (i.e. tantalum), cassiterite (i.e. tin), gold, wolframite (i.e. tungsten), or their derivatives, and could expand to include other minerals determined by the United States to be financing the DRC conflict. The Company will strive to conduct annual due diligence with respect to the sourcing of Conflict Minerals and will comply with reporting obligations required by the Act.

To the extent required by the Act, the Company will seek from its suppliers information related to the country of origin of any Conflict Minerals that are contained in materials, parts and/or products provided to the Company for manufacture and/or sale of products to our customers. The Company will work with suppliers and collect supply chain data using the industry standard Conflict Minerals Reporting Template (CMRT) developed by the Responsible Minerals Initiative.

The Company expect suppliers to:

- Comply with all federal and international laws in the sourcing of Conflict Minerals;
- Have a policy in place that includes DRC conflict-free sourcing and implement a system to trace the origin of Conflict Minerals supplied to the Company; and
- Submit, on an annual basis, a declaration of Conflict Minerals using the CMRT form.

The Company will request suppliers who supply the Company with materials containing Conflict Minerals to procure these materials from a validated supply chain. The Company may rely on efforts by third party organizations and third party assessments to enhance the Company’s efforts in furtherance of this policy. We expect complete cooperation and responsiveness from each of our suppliers.

The Company also expects all our suppliers to engage with us in a journey of continuous improvement and suppliers are expected to develop sustainability goals to minimize the sourcing and use of endangered and non-renewable raw materials wherever practicable and feasible.