



Global Conflicts of Interest Policy

SCOPE: This Global Conflicts of Interest Policy ("Policy") applies to employees, directors, officers, board members, and any other individual or entities acting for or on behalf of the Company ("Covered Persons") of TriMas Corporation and its subsidiary companies (collectively, the "Company") at all locations.

PURPOSE:

directly or indirectly, a conflict of interest between the Covered Person'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 a Covered Person or the personal interests or activities of an immediate family member may influence the exercise of the Covered Person's independent judgment in the performance of the Covered Person'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, Covered Persons should promptly disclose to their managers or the Company's 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 Covered Persons and contrary to Company policy:

1. Financial Interests:

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

5. **Confidential Information:** A Covered Person 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:** A Covered Person or immediate family member may not misuse, for personal gain or for the benefit of others, Company resources, time, or facilities, the Covered Person's position or influence to promote or assist a third party.
7. **Personal Relationships:** A conflict may exist if a Covered Person engages in any personal relationship or activity which lessens the impartiality, good judgment, effectiveness, or productivity expected from the Covered Person (which includes a Covered Person supervising or having a direct or indirect line of reporting to a family member who is also a Covered Person).

Covered Persons 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 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 CEO 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