

TriMas

Global Whistleblower Policy

SCOPE: This Global Whistleblower Policy (“Policy”) applies to all employees of TriMas Corporation and its subsidiary companies (collectively, the “Company”) at all locations.

PURPOSE: To encourage employees to:

- (1) report promptly and in good faith any suspected financial improprieties or irregularities, work-related injuries or illnesses, violation of the Code of Conduct or other Company policies, and legal or regulatory requirements of the Company (a “Report”); and
- (2) assist in any investigation by the Company related to a Report by assuring that the employee will be protected from any reprisals, victimization or retaliation related to these activities.

DEFINITIONS:

Good Faith: A Report is made in good faith when the employee believes that there may be activity about which

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- b. Chief Financial Officer; or
- c. Senior Vice President, General Counsel, and Chief Compliance Officer.

Ethics Hotline: Employees also have the option to report a concern through the Company's Ethics Hotline by calling the toll-free phone number designated for their country OR by going to the website www.tnwinc.com/trimascorp. These numbers are listed on the Company's website. All communications to the phone hotline or website are made to a third party provider, so if an employee would like to remain anonymous, the employee will not be identified in any way to the Company, where legally permissible. While an employee can remain anonymous if desired, it can sometimes make a thorough investigation by the Company more difficult.

Investigation: The Company will promptly and thoroughly investigate all complaints or concerns communicated under this Policy. Employees should not investigate on their own but leave such work to the appropriate persons chosen by