

Human Rights Policy

Consistent with our core values, TriMas is committed to upholding fundamental human rights. We believe that our employees are our most vital asset and all people around the world should be treated with dignity, fairness and respect. These expectations are also reflected in the <u>TriMas Code of Conduct</u>, which our employees are trained and bound.

The purpose of this Human Rights Policy is to ensure TriMas' respect for human rights is understood by our employees, customers, suppliers and other stakeholders. This policy applies to all TriMas employees and locations worldwide, including the employees of our global businesses and anyone doing business with or on behalf of TriMas. We expect our business partners, including suppliers, to adopt and adhere to our values and principles, as stated in the <u>TriMas Supplier Code of Conduct</u>.

We strive to respect and promote human rights in accordance with the United Nations Guiding Principles on Business and Human Rights (UNGP), the Universal Declaration of Human Rights, the International Labor Organizations' Declaration on Fundamental Principles and Rights at Work, and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises.

Commitment to Diversity and Inclusion

TriMas values the diversity and inclusion of the people with whom we work and the contributions they make. We are committed to equal opportunity and are intolerant of discrimination and harassment. Our policies and practices strive to assure equal employment and advancement opportunities for all qualified people. We will maintain appropriate standards of conduct in the workplace and always be sensitive to the concerns of our diverse group of employees.

We do not tolerate disrespectful or inappropriate behavior, unfair treatment or retaliation of any kind. Harassment is not tolerated in the workplace and in any work-related circumstance outside the workplace. We work to maintain workplaces that are free from discrimination or harassment on the basis of race, religion, color, ethnicity, national origin, sex, age, genetic information, sexual orientation, gender identification or expression, protected veteran status, disability or any other characteristic protected by applicable law. Discrimination or harassment based on any of the factors listed above is prohibited, as is retaliation against a person who has made a complaint or given information regarding possible violations of this policy.

The basis for recruitment, hiring, placement, development, training, compensation and advancement at TriMas is qualifications, performance, skills and experience. At TriMas, we are also focused on the protection of minority groups' and women's rights.

Forced Labor, Human Trafficking and Child Labor

We are committed to ensuring our operations and supply chain are free of slavery and human trafficking. TriMas 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 must employ their workers on a voluntary basis, respecting the rights of employees to decide to work. Suppliers are also required to certify that all materials incorporated into their products are sourced, processed and manufactured in compliance with human trafficking and slavery laws in the countries in which they operate.

We are opposed to child labor and are committed to complying with all applicable laws related to hiring minors. TriMas applies a minimum hiring age of 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. These requirements also apply to suppliers of TriMas.

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Freedom of Association and Collective Bargaining

We acknowledge the rights of our employees to join, form or not to join a labor union without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue and bargaining in good faith with their freely chosen representatives.

Safe and Healthy Workplace

TriMas is committed to providing a safe and healthy workplace, and complying with applicable safety and health laws, regulations and internal requirements. We are also committed to maintaining a safe work environment and engaging our employees to continually improve health and safety by addressing and remediating identified risks of accidents, injury and health impacts. Adequate steps shall be taken to prevent accidents and injury so far as reasonably possible. Workers are provided with appropriate safety training and protective equipment.

Work Hours, Wages and Benefits

TriMas compensates employees competitively relative to the industry and local labor markets. We commit to operate in full compliance with applicable wage, work hours, overtime and benefit laws.

Workplace Security

We are committed to maintaining a workplace that is free from violence, harassment, intimidation, retaliation, or other unsafe or disruptive conditions. We are also committed to protecting the privacy and dignity of our employees.

Water Resources

We believe sustainable water supplies and safe drinking water is a fundamental human right. A vast majority of our operations and processes are designed to not be water intensive.

Respecting Our Communities

We respect the human rights of all persons in the communities in which we conduct business, as well as recognize that we must be responsible for environmental stewardship and using resources wisely. We strive to be socially responsible in the use of Company resources for the long-term benefit of society. TriMas actively supports our employee efforts to make a difference in their local communities, including the annual funding of the TriMas Foundation.

At TriMas, we will not take actions which would infringe upon the rights and customs of indigenous peoples, including, for example, rights to autonomy, self-determination and retaining their own customs and institutions. We respect the cultures, customs and values of the people in communities where we operate and take into account their needs, concerns and aspirations by addressing the principle of Free, Prior and Informed Consent (FPIC).

Training

At TriMas, we believe that a talented and engaged workforce is important to our success. We provide training to our employees that meets or exceeds regulatory compliance requirements, and quality and safety standards. In addition to providing Ethics and Code of Conduct training, TriMas also provides training on Diversity, Equity & Inclusion, Global Workplace Harassment, Discrimination Free Workplace, Cybersecurity, Anti-Bribery & Corruption, Global Data Privacy and a variety of Environmental, Health & Safety topics, among others.

Supplier Expectations

We expect our suppliers to adhere to the principles included with this Human Rights Policy, in the <u>TriMas Code of Conduct</u> and in the <u>Supplier Code of Conduct</u>, while respecting human rights in their operations and business relationships. We expect our suppliers to have in place policies and due diligence measures to ensure adherence to these principles. TriMas reserves the right to audit and inspect, or to hire a third party to inspect on its behalf, any production location for compliance with this Human Rights Policy. Failure to abide by our Human Rights Policy may result in remedial action up to and including termination of our relationship.

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Governance and Oversight

Protecting human rights at TriMas is implemented through a number of policies and procedures. The ultimate oversight of human rights at TriMas is the responsibility of our President and CEO, while operational oversight of human rights is managed by Human Resources, in addition to our executive leaders across our business segments. The Board of Directors oversees and has responsibility for Company's commitment to human rights.

This policy is observed by all of our locations and employees worldwide. Our CEO and leaders are jointly responsible for ensuring compliance with this policy. A violation of this policy, or any other ethics or Code matter may be addressed through the **TriMas Ethics Hotline** which can be accessed through the online portal at: https://trimascorp.ethicspoint.com or by calling toll free 1-800-971-4338 from the United States.

If dialing from outside the United States, additional phone numbers are available at https://trimascorp.ethicspoint.com. Other reporting methods are contained in our TriMas Code of Conduct.

The Company reserves the right to amend this policy at any time. Nothing in this policy says or implies that a contract exists between the Company and its employees or that participation in this program is a guarantee of continued employment with TriMas.

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