

California Transparency in Supply Chains Act Disclosure

As a manufacturer doing business in California with worldwide gross receipts that exceed \$100 million, TriMas Corporation (collectively with its subsidiaries) complies with the California Transparency in Supply Chains Act of 2010 (the “Act”). TriMas recognizes the importance of assuring that our suppliers engage in appropriate behavior and comply with the laws that apply to them. Below is a description of TriMas’ plans and efforts to eradicate slavery and human trafficking from its direct supply chains.

Verification. TriMas has adopted a Social Compliance Policy (“Policy”) which requires suppliers to comply with applicable laws relating to human trafficking and slavery, including laws related to labor, working hours, wages, and health and safety. TriMas will request its suppliers to verify their commitment to compliance with this Policy. TriMas will require its foreign suppliers to complete disclosure materials administered by TRACE International (or another third party selected by TriMas) certifying compliance with international laws, including the Act.

Audit. TriMas will undertake an assessment of compliance with its Policy and the Act as part of its operational audits (onsite or otherwise) for a percentage of its foreign suppliers each year. Select TriMas suppliers are independently audited by a third party. TriMas Corporate Audit or its designee will review the verification process and the foreign supplier audits to assess compliance with the Policy and TriMas’ related procedures.

Compliance. TriMas will require suppliers to certify compliance with its Social Compliance Policy, which states that the supplier complies with all applicable laws related to human trafficking and slavery where they do business. TriMas’ Code of Conduct also requires employees and agents who act on our behalf to comply with all laws and regulations where we do business.

Accountability. In the event a supplier fails to certify compliance with the Social Compliance Policy, fails to complete the disclosure process through Trace International (or as otherwise designated by TriMas), or fails an audit, TriMas reserves the right to place the supplier on probation until the deficiency is resolved. If the deficiency is not resolved to TriMas’ satisfaction, TriMas reserves the right to replace the supplier. As to any new supplier, TriMas will require: (i) agreement to comply with TriMas’ Social Compliance Policy, (ii) certification of foreign suppliers through TRACE International (or as otherwise designated by TriMas), and (iii) agreement to ongoing audits as determined by TriMas .

Training. TriMas will train relevant procurement employees and management (and others as necessary) to facilitate their administration of supplier compliance with the Social Compliance Policy and the applicable laws prohibiting human trafficking and slavery.