

Exhibit A

Foreign Official Hospitality Guidelines

All hospitality offered on behalf of TriMas Corporation and/or its subsidiaries (collectively TriMas or the Company) must be directly related to the Company's business, i.e., the sale of its products and services, or otherwise directly in support of the Company's business interests. Hospitality in all cases must be reasonable in amount, must be offered in good faith only in connection with the promotion, demonstration or explanation of company products or services or the execution or performance of a contract with a foreign government or agency thereof, and must be lawful under applicable local law. In no event may any hospitality be offered or provided in return for any favor or benefit to the Company.

Note: Frequency of hospitality must be carefully monitored, as the cumulative effect of frequent hospitality may give rise to the appearance of impropriety. Hospitality for an individual should not exceed twelve events in any calendar year. Where additional hospitality is anticipated, the Legal Department shall be consulted and prior written approval shall be obtained.

Unless otherwise provided in these Guidelines, in the case of plant visits or similar activities by foreign government officials or employees which will involve the Company paying airfare or lodging expenses for such officials, the Company shall send invitations or itineraries, or both, to the foreign officials to inform them, to enable consultation with superiors, and to afford them the option to decline. The Company also will obtain prior written approval or confirmation from the invitee's superior or other authorized official or prepare a file memorandum of relevant conversations in this regard. If this is not practical in connection with very senior invitees, the Legal Department shall obtain a written legal opinion from in-country counsel that specifically addresses the particular circumstances of the visit. In the case of plant visits that are specifically required by the terms of a contract with a foreign government customer, prior written approval or confirmation from the invitee's superior or other authorized official is not required, but all hospitality expenses related to any such visit shall be subject to these Guidelines. In no case will payment or reimbursement be made directly to the individual official incurring the expense. Such payment or reimbursement shall be made to the foreign government or agency involved.

Refreshments, meals or mementos of reasonable value and otherwise in accordance with these Guidelines which are furnished in connection with trade shows, association meetings, official governmental functions, or ceremonial, commemorative or celebratory functions such as ship launchings, airplane rollouts, deliveries or demonstrations are permissible. For such events or occasions to which foreign government officials or employees from three or more countries are invited, in-country counsel opinions will not be required with respect to the foreign government officials' or employees' participation, provided the refreshments, meals or mementos to be offered are of reasonable value and otherwise strictly in accordance with these Guidelines, and are not offered improperly to influence any official decision. However, notification of such events shall be made in writing to the Legal Department at least 15 days in

advance of such event. The notification shall generally describe the event, the per person cost of the refreshments, meals and mementos offered, and any other relevant aspects of the event.

Cash gifts to foreign officials are not permitted under any circumstances. Per diem payments are similarly prohibited, except where expressly provided for in a written contract with a foreign government customer. In such case, per diem payments shall be paid strictly in accordance with the contract requirements. Any such payment shall be made by check, rather than cash. Whenever feasible, the check for per diem payments should be made payable to the foreign government customer, rather than to any individual foreign official. Any such per diem payment shall always be accompanied by appropriate documentation accurately recording the amount and nature of the payment in accordance with the contract requirement.

Unless otherwise provided in these Guidelines, product models or pictures of little or no intrinsic value bearing the company logo or other items of small dollar value (less than U.S. \$100) that are distributed for advertising or commemorative purposes are permitted. Gifts valued at \$100 or more must have the prior written approval of the Legal Department. Whenever appropriate, a gift should be made to the customer organization, and not to an individual.

Use of Company aircraft to transport foreign officials is prohibited unless prior written authorization is obtained from the Legal Department. Other transportation may be approved, after legal review, on a case-by-case basis.

Prior written approval by the Legal Department is required for any hospitality offered to the spouse and/or children of a foreign official.