 <b>TRIMAS</b> CORPORATION	Effective Date:: July 1, 2011	Last Revision Date : June 1, 2011
	Approved By: Senior Management Compliance Committee	
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<b>Title: GLOBAL WHISTLEBLOWER POLICY</b>		

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

**PURPOSE:** To encourage employees to:

- (1) report promptly and in good faith any suspected financial improprieties or irregularities, violation of the Code of Ethics and Business 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.

**POLICY:** TriMas requires officers, directors, management, employees and agents of the Company to observe high standards of business and personal ethics. Ethical behavior includes acting with honesty and integrity in fulfilling job responsibilities and complying with all laws and regulations applicable to the Company. In order to maintain these standards of conduct, the Company relies on its employees to communicate suspected behavior that does not conform, including:

#### **FINANCIAL ISSUES**

- Fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement or other financial report of the Company
- Fraud or deliberate error in the recording and maintaining of financial records of the Company
- Deficiencies in or noncompliance with the Company’s internal accounting controls or policies
- Misrepresentation or false statement to or by a senior officer or accountant regarding a matter contained in the financial records, financial statements, or other financial reports of the Company
- Deviation from full and fair reporting of the Company’s financial condition.


#### **OTHER AREAS TO REPORT**

- Activities that are not in line with the Code of Ethics and Business Conduct, such as fraud, anti-trust, conflict of interest, theft and bribery
- Conduct that may violate an applicable law or regulation
- Violation of a Company policy

#### **NON-RETALIATION**

**No officer, director, employee or agent of the Company shall take any harmful action with the intent to retaliate against any employee, including but not limited to any action negatively impacting their employment or any form of harassment, due to the employee’s good faith reporting\* of suspected misconduct or violation of an applicable law, regulation or Company policy or due to the employee providing assistance in an investigation by the Company or a governmental agency.**

**\*Good Faith Reporting:** A good faith report may not necessarily lead to a conclusion that there was inappropriate or unlawful conduct. A good faith report is made when the employee believes that there may be activity about which the Company should be aware or should investigate. A report that the employee knows is false is not a good faith report.

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***REPORTING OPTIONS***

Employees are encouraged to raise issues to their manager, whenever possible. This is the easiest and fastest way to resolve issues. If the employee does not feel comfortable discussing a concern with their manager, the manager is part of the issue, or the employee believes that the concern was not addressed appropriately, the employee can also use any of the following options:

1. Contact another manager that the employee trusts
2. Contact local Human Resources
3. Contact the SBU Senior Management
4. Contact one of the following people at TriMas Corporate::
  - a. Senior VP of Human Resources;
  - b. Compliance Manager/Assistant General Counsel – Employment;
  - c. General Counsel and Senior Compliance Officer; or
  - d. Chief Financial 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](http://www.tnwinc.com/trimascorp). 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 AND CONFIDENTIALITY***

The Company will promptly and thoroughly investigate all complaints or concerns communicated under this Policy. To the extent possible, the Company will maintain the anonymity of employees who choose to provide their identity. However, in order to appropriately respond to a concern, the Company may need to interview other employees or individuals associated with the Company.

***CONSEQUENCES***

Any manager that retaliates against an employee under this Policy or who condones illegal or unethical behavior will be subject to disciplinary action up to and including termination.

Any manager or employee who is aware of, or suspects, unlawful or unethical conduct by another employee or a manager of the Company and fails to report it will be subject to disciplinary action up to and including, termination.

Any employee who brings forth a complaint or concern that is not in good faith, or that the employee knows or suspects is false, will be subject to disciplinary action up to and including, termination.