

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 in writing their commitment to compliance with this Policy. TriMas will also require these suppliers to be a member of TRACE International. As a member of TRACE, a supplier will be required to certify that it complies with international standards and all laws regarding forced labor, slavery, human trafficking and the worst forms of child labor of the country or countries in which it does business. TriMas’ Global Sourcing Office (GSO) currently visits suppliers to assess working conditions. TriMas’ GSO and members of the subsidiaries’ procurement team will audit our major suppliers, announced and unannounced, to determine their compliance with the Policy and applicable laws regarding human trafficking and slavery.

Audit. TriMas will institute annual audit procedures to assess suppliers’ adherence to its Social Compliance Policy. As stated above, TriMas’ GSO currently visits suppliers to assess working conditions. TriMas’ GSO and members of the procurement team and Corporate Audit will continue these audits on an annual basis, some unannounced, to determine suppliers’ compliance with the Policy and all applicable human trafficking and slavery laws.

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 employee 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 its TRACE International certification or fails an announced or unannounced on-site audit, TriMas would place the supplier on probation until the deficiency is resolved. If the deficiency is not resolved to TriMas’ satisfaction, TriMas would begin efforts to replace the supplier. As part of a process to approve a new supplier, TriMas will require: (i) certification of compliance with TriMas’ Social Compliance Policy, (ii) certification through TRACE International, and (iii) ability to pass an on-site audit to assess compliance with applicable human trafficking and slavery laws. In addition, TriMas’ Code of Conduct requires compliance with all laws and regulations, which includes human trafficking and slavery. A violation of a provision of the Code of Conduct could result in disciplinary action up to and including termination.

Training. Training will be conducted for TriMas’ GSO, relevant procurement employees and Corporate Audit to assist in their on-site supplier audits for compliance with the Social Compliance Policy and applicable laws prohibiting human trafficking and slavery.