

	Effective Date: June 1, 2017	Last Revision Date: December 6, 2016
	Approved By: Senior Management Compliance Committee	
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Title: GLOBAL WHISTLEBLOWER POLICY		

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

PURPOSE: To encourage employees to:

- (1) report promptly and in good faith any suspected financial improprieties or irregularities, work-related injuries or illnesses, violation of the Code of 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.

DEFINITIONS:

Good Faith: A report is made in good faith 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 made in good faith.

Whistleblower: Any employee, officer, director, or agent of the Company who in Good Faith reports any actual or suspected activity that he/she considers to be unethical, dishonest, illegal, or in violation of Company policy.

POLICY: The Company 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

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- matter contained in the financial records, financial statements, or other financial reports of the Company; or
- 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 Conduct, such as fraud, anti-trust, conflict of interest, theft, and bribery;
- Work-related injuries or illnesses;
- Conduct that may violate an applicable law or regulation; or
- Violation of a Company policy.

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 SBU senior management; or
4. Contact one of the following people at Corporate:
 - a. President and Chief Executive Officer;
 - b. Chief Financial Officer; or
 - c. Senior Vice President, General Counsel, and Chief Compliance 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. These numbers are listed on the Company’s website. 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: The Company will promptly and thoroughly investigate all complaints or concerns communicated under this Policy. In order to appropriately respond to a concern, the Company may need to interview other employees or individuals associated with the Company.

Confidentiality, Non-Retaliation, and Immunity: Whistleblower protections are provided in two important areas—confidentiality and against retaliation. To the extent possible, the

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confidentiality of the employee will be maintained. However, an employee’s identity may have to be disclosed to conduct a thorough investigation, to comply with the law or to provide accused individuals applicable defense rights. No officer, director, employee, or agent of the Company shall take any action with the intent to retaliate against any employee, including, but not limited to, any form of discrimination, harassment, or any action negatively impacting employment, due to the employee’s Good Faith Report or due to the employee providing assistance in an investigation by the Company or a governmental agency. The right of a Whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

Defend Trade Secrets Act Compliance: Immunity from Liability for Confidential Disclosure of a Trade Secret to the Government or in a Court Filing:

- (1) **Immunity:** An employee shall not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret that (A) is made (i) in confidence to a federal, state, or local government official, either directly or indirectly, or to an attorney; and (ii) solely for the purpose of reporting or investigating a suspected violation of law; or (B) is made in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal.
- (2) **Use of Trade Secret Information in Anti-Retaliation Lawsuit:** An employee who files a lawsuit for retaliation by the Company for reporting a suspected violation of law may disclose a trade secret to the employee’s attorney and use the trade secret information in the court proceeding, if the employee (A) files any document containing the trade secret under seal; and (B) does not disclose the trade secret, except pursuant to court order.

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.

Modification and Enforcement of this Policy: The Company retains the right to modify or replace this Policy at any time on a prospective basis.