

TriMas is a diversified global manufacturer and provider of products for customers in the consumer products, aerospace, industrial, petrochemical, and oil and gas end markets with approximately 4,000 dedicated employees in 16 countries. TriMas is publicly traded on the NASDAQ under the ticker symbol “TRS,” and is headquartered in Bloomfield Hills, Michigan. We believe in responsible corporate citizenship. In that context, our approach to tax in the United Kingdom (UK) is supported by the following principles.

COMPLIANCE AND REPORTING

We provide Her Majesty’s Revenue and Customs (HMRC) with timely, accurate and complete information. Taxes are filed and paid in accordance with all relevant tax rules and regulations.

TAX PLANNING AND TAX RISK MANAGEMENT

We make business decisions in response to economic opportunities and activity, with a focus on value creation. Tax is one of many important factors that are taken into account when making such decisions. Tax incentives, reliefs and exemptions may be available, and where appropriate and aligned with substantive business activities, we seek the benefit of these provisions in a manner consistent with the intent of the applicable legislation. As part of these business decisions, we ensure that profit is earned and reported in the jurisdiction in which value is created, evaluated in accordance with the arm’s length principle.

TriMas takes a prudent and pragmatic approach with respect to its UK tax affairs. Tax risk can arise given the complexity of UK tax legislation and differences in interpretation of tax law, and therefore, we take every step to ensure our positions are reasonable and can be appropriately supported.

TRANSPARENCY

TriMas is transparent about its approach to tax and its tax positions. Tax filings, including all relevant disclosures, are made in accordance with UK requirements.

GOVERNANCE

TriMas’ Tax department is part of the Finance function which reports to the chief financial officer. We seek to maintain an open and constructive working relationship with HMRC and advise management on tax-related topics. We involve external advisors in material transactions or in the event a specific area of tax expertise is required.

The Tax department manages our approach to tax across TriMas’ businesses and is responsible for ensuring that policies and procedures that support our approach are in place, maintained and applied consistently around the world including in the UK, and that the Tax organization has the skills needed to implement the approach appropriately.

We review and update this document annually. It was approved on August 6, 2019.

This document is filed on behalf of all qualifying entities of TriMas Corporation pursuant to Paragraphs 19(2) and 22(2) Schedule 19, Finance Act 2016 and is intended to comply with all other relevant obligations within Schedule 19 Finance Act 2016 for the December 2019 financial year end.