



## Conflict Minerals Policy

Policy #	POL-EC-24-EN-TRN
Organizational Unit	Ethics and Compliance
Effective	12/15/2022
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### **I. PURPOSE**

The purpose of this Conflict Minerals Policy (CM Policy) is to facilitate compliance with the Dodd-Frank Wall Street Reform and Consumer Protection Act conflict minerals reporting rules (Conflict Minerals Rules).

### **II. SCOPE OF POLICY**

This policy is in full force and effect throughout all business operations of Trinity Industries, Inc. and its subsidiaries in the United States of America and its territories (collectively "Trinity"). The CM Policy describes Trinity's commitment to compliance with the Conflict Minerals Rules and Trinity's expectations for its suppliers.

### **III. DEFINITIONS**

- A. Conflict Minerals Questionnaire** – Sent to selected suppliers on an annual basis to conduct Trinity's country of origin inquiry to identify raw material inventory items potentially containing tin, tantalum, tungsten or gold (3TGs). Trinity uses the most current version of the Conflict Minerals Reporting Template (CMRT) as its Conflict Minerals Questionnaire.
- B. Conflict Minerals Reporting Template (CMRT)** – A standardized reporting template developed by the Responsible Minerals Initiative (RMI), an initiative of the Responsible Business Alliance Foundation, that facilitates the transfer of information through the supply chain regarding the presence of 3TGs and the mineral country of origin and the smelters and refiners being utilized.
- C. Conflict Minerals Steering Committee** – A committee consisting of representatives from Trinity's Legal, Compliance, Engineering, Supply Chain, and Accounting functions that oversees Trinity's Conflict Minerals Program (the Program).
- D. OECD Framework** – The Organization for Economic Cooperation and Development (OECD) is a unique forum where governments work together to address the economic, social and environmental challenges of globalization. The OECD developed a framework to assist countries in systematically evaluating the design and implementation of regulatory policy, against the achievement of strategic regulatory objectives, identifying priority areas for improvements in regulatory policy and communicating progress.

### **IV. STATEMENT OF POLICY**

#### **A. Background**

In 2010, Congress passed the Conflict Minerals Rules, which requires the Securities and Exchange Commission (SEC) to issue rules specifically relating to the use of "Conflict Minerals" within manufactured products. Conflict Minerals are defined as the 3TGs originating from the Democratic Republic of the Congo (DRC) or an adjoining country (collectively, the Covered Countries). By enacting this provision, Congress intends to further the humanitarian goal of ending the extremely violent conflict in the Covered Countries, which has been partially financed by the exploitation and trade of 3TGs originating in the Covered Countries.

#### **B. Commitment**

Trinity does not knowingly purchase raw materials containing 3TGs that could directly or indirectly finance or benefit armed groups in the Covered Countries. We are guided by our core beliefs and values as stated in Trinity's Code of Business Conduct and Ethics. As a result, Trinity has designed its conflict minerals reporting procedures to align and comply with the Conflict Minerals Rules.

#### **C. Expectations of Suppliers**

Trinity expects its suppliers to act as partners in compliance with the Conflict Minerals Rules. Trinity expects its suppliers to:



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1. Avoid procuring products from sources that are known or suspected to directly or indirectly finance or benefit armed groups in the Covered Countries;
2. Source responsibly and monitor their suppliers for any human rights abuses;
3. Implement and communicate their own Conflict Minerals Policy;
4. Complete Trinity's Conflict Minerals Questionnaire, if requested by Trinity, identifying 3TG products they sell to Trinity and the smelter that provided the original 3TG material (Trinity's direct suppliers may have to require successive upstream suppliers to complete Trinity's Conflict Minerals survey until the smelter is identified);
5. Agree to cooperate with Trinity in connection with any due diligence that Trinity chooses to perform with respect to its country of origin inquiries; and
6. When Trinity deems it necessary, provide reasonable written evidence of the due diligence performed by the supplier to support the country of origin determination of the raw materials used to produce the 3TGs, used in the materials to manufacture components and products provided by the supplier to Trinity.

We evaluate our relationship with our suppliers on an ongoing basis. If we determine that a supplier's efforts are insufficient to comply with this Conflict Minerals Policy, Trinity reserves the right to take appropriate actions necessary up to and including discontinuing our business relationship with the supplier.

## V. RESPONSIBILITIES

### A. Employees

The Chief Compliance Officer's (CCO) designee (CM Program Manager) is responsible for facilitation of the Program and for monitoring for regulatory changes that could impact the Program. Responsibilities include coordinating with Supply Chain and Engineering to conduct a reasonable country of origin inquiry to identify raw material inventory items potentially containing 3TGs, using Trinity's Conflict Minerals Questionnaire. The CM Program Manager must perform due diligence efforts in compliance with the OECD Framework. The CM Program Manager is also responsible for drafting Trinity's public filing of the Form SD and Conflict Minerals Report (collectively, Form SD), and coordinating the review and filing processes.

### B. Management

The CCO and Conflict Minerals Steering Committee are jointly responsible for overseeing the Program and reviewing the Form SD prior to filing with the SEC. The CCO is also responsible for reviewing a summary of the work performed to support the Form SD filing.

### C. Departments

1. **Supply Chain** is responsible for providing a Q1-Q3 inventory report detailing all materials that Trinity purchased for the manufacturing and repair of railcars during the respective period (Inventory Report). Supply Chain also provides contact information for suppliers selected to receive the Conflict Minerals Questionnaire and follows up with any non-responding suppliers. In addition, Supply Chain reviews for any new suppliers of 3TGs added during Q4 so that the CM Program Manager can send additional Conflict Minerals Questionnaires, as appropriate.
2. **Engineering** is responsible for reviewing the Inventory Report and identifying materials that potentially contain 3TGs.



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3. **Accounting** is responsible for filing the Form SD with the SEC prior to the annual filing deadline.

**D. Suppliers**

See "Expectations of Suppliers" section above.

**VI. POLICY OWNER**

Chief Compliance Officer

**VII. POLICY REVIEW CYCLE**

This CM Policy must be reviewed for revisions at least every three years by the CCO.

**VIII. APPROVAL**

Approved Electronically

\_\_\_\_\_  
R. Matthew Pittman  
Chief Compliance Officer, Head of ESG

See Electronic Approval Date

\_\_\_\_\_  
Date



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**I. HISTORY AND REVISION LOG**

**E. Original Policy:**

- Policy POL-EC-24-EN-TRN  
Effective December 15, 2022

**F. Revision History**

<b>Revision Date</b>	<b>Summary of Changes</b>
12/15/2022	Formalized legacy Conflict Minerals Policy as a Trinity Enterprise Policy in the adopted Trinity policy format.



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