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Document Owner	Sr. Specialist, Policy and HR Compliance / Pete Alfaro

Labor and Human Rights Policy

1. PURPOSE

The purpose of this document is to establish Trinity’s policy on labor and human rights. This document will be updated in accordance with the **Enterprise Document Management Policy (DMS-001-POL-EN)**.

2. SCOPE

This policy is in full force and effect throughout all business operations of Trinity Industries, Inc., its subsidiaries, and affiliates (collectively “Trinity” or the “Company”).

3. DEFINITIONS

General terms are defined in **Trinity Enterprise Definition Standards (DMS-003-STD-EN)**. The following terms have unique definitions applicable solely within this document and to this policy.

- **Company** or **Trinity** is used in this document to mean Trinity Industries, Inc., its subsidiaries, and affiliates.

4. STATEMENT OF POLICY

Trinity is committed to ethical business practices with respect to Human Rights, holding ourselves to the highest standards and operating our business in a way that respects the dignity of our employees and supply chain. As a company, we support and respect the internationally-recognized human rights framed under the Universal Declaration of Human Rights (UDHR). We will meet our responsibility to respect human rights by implementing the relevant sections of the UN Guiding Principles (UNGP) on Business and Human Rights and incorporating them into the processes and policies that govern all of our business activities.

4.1. APPLICATION OF POLICY

- This policy applies to all of Trinity’s business operations worldwide.
- This policy applies to all Trinity employees and individuals who provide services to Trinity under a contract, sub-contract, or similar agreement (including contract workers and consultants).
- Trinity expects its suppliers and vendors to adhere to the standards set forth in this policy.
- Trinity uses the commitments within this policy to select and monitor suppliers and sourcing partners.
- Trinity will terminate partnerships with suppliers and sourcing partners upon failure to uphold human rights commitments explained within this policy.

4.2. LEGAL COMPLIANCE

Trinity will comply with all applicable local laws governing working conditions, work hours, fair wages, and compensation.

4.3. SAFE WORKING CONDITIONS

- Trinity strives to maintain safe and healthy working environments for all employees and contract workers, in compliance with all applicable health and safety laws and regulations.
- At all facilities it owns and operates, Trinity is committed to meeting all applicable legal Occupational Health and Safety requirements as part of its minimum standards for safe and healthy working environments.



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4.4. MODERN SLAVERY, HUMAN RIGHTS, CHILD LABOR

- Trinity relies on strong partnerships with our suppliers and recognizes that human rights-related risks in our supply chain present a salient supply chain management issue in our industry.
- Trinity prohibits human trafficking, slavery, and any form of forced or involuntary labor as defined in Article 2 in the Forced Labour Convention 29 of the International Labour Organization.
- Trinity prohibits any form of child labor, defined as being under the legal working age in the appropriate jurisdiction or younger than 15 years of age – whichever reflects a more stringent standard.

4.5. EQUAL OPPORTUNITY AND NON-DISCRIMINATION

- Trinity is committed to equal employment opportunity. Trinity sets expectations, requirements, and standards of conduct to provide workplaces that are free of unlawful discrimination and harassment.
- Trinity does not allow discrimination or harassment on the basis of: age; color; disability (mental or physical); ethnicity; gender identity or expression; genetic information; marital status; national origin; pregnancy; protected military/uniformed service; protected veteran status; race; religion; sex; sexual orientation; or any other status protected by applicable law. See **Code of Business Conduct and Ethics (EC-000-POL-EN)** and **Equal Employment Opportunity and Harassment (HR-021-POL-EN)**.

4.6. WORK HOURS AND REST

- Trinity complies with all applicable legal requirements governing the payment of overtime, maximum working hours, rest breaks, and meal periods to workers.
- Trinity does not normally require or normally schedule employees to work more than 60 hours per week, except during emergencies or unusual situations.
- Trinity does not normally require or normally schedule employees to work in excess of six consecutive days without a rest day, except during emergencies or unusual situations.
- **Alternative Work Schedules:** Certain Trinity business operations, such as Mobile Repair Units, may have alternative work schedules that differ from the majority of Trinity operations. Such alternative work schedules are still designed to provide humane working conditions. Except in emergencies or unusual circumstances, these alternative schedules should provide similar maximum work hours and rest days per month as standard Trinity scheduling practices.
- The “emergencies and unusual situations” mentioned above are intended to be rare or infrequent exceptions to Trinity’s standard scheduling practices.

4.7. FREEDOM OF ASSOCIATION

- Trinity respects the rights of employees to: associate freely; organize; bargain collectively; and/or refrain from any such activities in compliance with existing local laws without unlawful discrimination, intimidation, or harassment.
- Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of unlawful discrimination, intimidation, or harassment.

4.8. COMMUNICATION AND COMPLIANCE TRACKING

- Trinity will seek to communicate this policy to stakeholders including employees, suppliers, vendors, and other partners.

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- Trinity will notify employees and others of this policy by posting this policy on the internal Trinity Portal, posting this policy on Trinity’s external website, and any other methods the Company deems appropriate.
- Trinity will monitor and report on its performance and compliance with this policy. As part of these efforts, Trinity will make periodic performance reports to relevant stakeholders (such as internal Management, the Board of Directors, and/or other stakeholders in the Company’s discretion).

4.9. REPORTING CONCERNS AND ANTI-RETALIATION

- **Reporting of Known or Suspected Violations:**
 - **Trinity Employees:** All Trinity employees are required to immediately report known or suspected violations of this policy using one of the methods listed below.
 - **Other Stakeholders:** Trinity encourages any non-employee stakeholder aware of an actual or suspected violation of this policy to report the issue using the Trinity Integrity HelpLine or the Trinity Integrity HelpSite.
- **Methods for Reporting:** Reports and concerns may be submitted using one or more of the following:
 - For Trinity employees, their immediate supervisor or another member of Trinity Management;
 - Trinity’s Corporate Compliance Department;
 - The Trinity Integrity HelpLine at 1-877-876-5463 (U.S.) or 800-020-4627 (MX); or
 - The Trinity Integrity HelpSite at www.trinityintegrity.com.
 Reports may be submitted to The HelpLine or HelpSite anonymously. However, Trinity will need sufficient information in order to properly investigate anonymous reports.
- **Investigation:** Trinity will undertake due diligence to investigate reported or suspected human rights violations. The Company will take appropriate steps to respond to any such violations and modify business processes as appropriate.
- **Anti-Retaliation:** Trinity strictly prohibits any form of retaliation in response to a stakeholder who in good faith reports a concern about an actual or suspected violation of this policy.

5. EXCEPTIONS AND QUESTIONS

Questions about this document should be directed to the Corporate Compliance Department or the Document Owner. Exceptions to this document will be handled in accordance with the **Exception Management Policy (IRM-001-POL-EN)**.

6. ENFORCEMENT

Employees who violate this policy are subject to disciplinary action up to and including termination of employment. Trinity will take appropriate action to address violations by contractors, consultants, and similar labor providers. This may include termination of a contractual relationship, depending on the circumstances. Additional reporting or communication may take place in accordance with regulatory or contractual requirements.

7. RESPONSIBILITIES

The following roles and responsibilities are defined for this document. Each role must be one of the following:

- **Accountable (A):** An accountable role assigns work, reviews, and accepts it upon completion, and acts as the final point of authority. There may be one and only one role accountable for each task. If a role is accountable, it is also responsible, consulted, and informed.

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- **Responsible (R):** A responsible role performs work to complete a task. There may be multiple roles responsible for each task. If a role is responsible, it is also consulted and informed.
- **Consulted (C):** A consulted role provides information, inputs, or guidance to a task. There may be multiple roles consulted for each task. If a role is consulted it is also informed.
- **Informed (I):** An informed role receives communications about the status of a task. There may be multiple roles informed for each task.

Action	Compliance	Employees	Management
Employees are responsible for reporting concerns about known or suspected by violations of this policy.	A	R	
Management is responsible for ensuring that Trinity business operations comply with this policy.	A		R
Compliance is responsible for monitoring Trinity’s performance and compliance with this policy and making periodic reports to designated stakeholders.	A		C
Compliance is responsible for monitoring and investigating reports of potential violations of this policy.	A	C	C

HR = Human Resources

8. REFERENCES

The following documents are related to this policy and should be reviewed as necessary.

- Enterprise Document Management Policy (DMS-001-POL-EN)
- Exception Management Policy (IRM-001-POL-EN)
- Trinity Enterprise Definition Standards (DMS-003-STD-EN)
- Code of Business Conduct and Ethics (EC-000-POL-EN)
- Equal Employment Opportunity and Harassment (HR-021-POL-EN)

9. APPROVAL

Final approval by David DelVecchio, Chief Human Resources Officer on 2024-05-31. All approvals are captured electronically in the Trinity Enterprise Document System.

10. HISTORY AND REVISION LOG

Version	Author	Published Date	Summary of Changes
2.0.0	P.Alfaro	2024-08-01	Updated policy number to HR-007-POL-EN/ES. Updated policy to new template. Minor updates to add clarifying language for some provisions (no change to substantive requirements). Updates to how this policy impacts relationships with suppliers and sourcing partners.
1.1.0	P.Alfaro	2022-01-07	Updated policy number to POL-HR-07-EN/ES-TRN. No substantive changes.
1.0.0	P.Alfaro	2021-04-01	Initial release of Policy F-07: Labor and Human Rights.