

Statement on Supplier Management

Trinity expects that its Suppliers (entities that provide a product or service) comply with applicable laws, rules, and regulations in all countries where Trinity and its affiliates conduct business. Specifically, we expect all Suppliers to adhere to the following, and to require their suppliers to do the same:

Humane Treatment: Suppliers must treat all workers with dignity and respect. Suppliers must not subject workers to, or threaten to subject workers to, harsh and inhumane treatment, including but not limited to sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse. Disciplinary policies and procedures related to this requirement shall be clearly communicated to workers.

Child Labor / Young Workers: Suppliers will not directly or indirectly employ workers that are younger than the applicable minimum age specified by applicable laws and regulations. A Supplier should not employ any worker under the age of 15. Additionally, young workers may not be required to perform work that may be hazardous to their health or safety.

Forced Labor: Suppliers will not utilize or source products or services from entities associated with forced, bonded, indentured, involuntary or exploitative prison, trafficked or slave labor. Involuntary labor includes transporting, harboring, recruiting, transferring, receiving, or employing persons by means of threat, force, coercion, abduction or fraud for labor or services. All work must be voluntary, and workers shall be free to terminate their employment at any time. Suppliers will take reasonable efforts to ensure that their own suppliers comply with this requirement.

Wages and Working Hours: Suppliers must comply with all applicable wage and hour laws, including those relating to minimum wage, overtime hours, and other elements of compensation, and must provide all legally mandated benefits. Suppliers will not require employees to work more than the maximum number of hours permitted under applicable laws.

Discrimination: Trinity expects Suppliers to treat their employees with respect and dignity and to refrain from any unlawful harassment and discrimination. Suppliers will not discriminate against any person because of their race, color, gender, religion, ethnicity or national origin, age, disability or other medical condition, sexual orientation, gender identity, genetic information, pregnancy, marital status, veteran status, political affiliation, union membership or any other basis protected by applicable national or local law.



Conflict Minerals: Trinity is committed to the sourcing of conflict minerals only from conflict-free smelters or refiners, maintains a Conflict Minerals Policy, and expects the same commitment from its suppliers. Suppliers must comply with applicable conflict minerals reporting laws and report once a year or upon request to determine whether any products provided by suppliers contain tin, tantalum, tungsten, gold, or any other material designated under the Securities and Exchange Commission's applicable rules as a conflict mineral. Suppliers shall also take such necessary actions and provide such additional information in the format requested by Trinity as may be necessary for Trinity to be or remain compliant with applicable laws, rules, and regulations relating to conflict minerals.

Emissions: Trinity strongly encourages suppliers to address their emissions to assist in reducing the carbon footprint of the entire rail ecosystem – including operators, infrastructure providers, and suppliers.

As part of the value chain map assessment, Trinity has analyzed its core suppliers and will continue to engage with suppliers to improve data from suppliers’ direct emissions to help reduce emissions throughout Trinity's value chain.

Climate-Related Regulations: Trinity expects all suppliers to comply with climate-related regulatory requirements. Trinity has an internal policy for addressing non-compliance and monitors compliance through a supplier scorecard, which includes climate-related questions that all suppliers must complete.

Steel-related Innovations: Trinity is committed to addressing steel as a carbon-intensive input material. Trinity’s TrinityRail® solution repurposes and reuses steel and other parts in idle railcars. Trinity developed an innovative process it calls the Sustainable Railcar Conversion™ Program, which not only revitalizes aging assets but also enhances safety and conserves resources. Additionally, Trinity Industries can work with customers to engage steel suppliers in the supply chain for lower-carbon initiatives within steel production and collaborate on railcar design.

History and Revision Log

Version	Author	Published Date	Summary of Changes
1.1.0	M. Pittman	2025-05-12	Updated for publication
1.0.0	M. Pittman	2020-03-01	Initial release

