



California Transparency in Supply Chains Act of 2010 Corporate Disclosure

Throughout the history of Trinity Industries, Inc. ("we," "us" and our "Company"), we have built a reputation of honesty, trust and integrity by being committed to the highest ethical standards, which we base on our Core Values that are vital to our reputation and success. Because our business success is closely related to our reputation, it is up to us to protect that reputation. Our Code of Business Conduct and Ethics (our "Code") and Core Values can be viewed on the [Investor Relations Section of our Website](#).

Under the California Transparency in Supply Chains Act of 2010 (the "Act"), we are required to disclose certain efforts we take to help eradicate slavery and human trafficking in our direct supply chain for the products that we sell. We are subject to the Act because we do business in California and meet certain revenue requirements specified in the Act. However, we believe that the nature of our business, products, and suppliers present minimal risk of slavery and human trafficking in our supply chain.

We are committed to compliance with all governmental laws, rules and regulations applicable to our operations, including, but not limited to, fair employment practices and compliance with equal employment opportunity, safe and healthful work environment, equitable treatment of employees, and all other employment laws in the United States and other countries where we manufacture our products or source products through our supply chain. We expect all employees and suppliers to conduct themselves in compliance therewith. Employees are to avoid any activity that could lead to our Company's involvement, or the involvement of our assets or personnel, in any unlawful practice. Slavery and human trafficking are illegal and not permitted by our Code.

Our employees, including those involved in our supply chain, are held to the high standards required by our Code. We require select employees and contractors to participate in **training** on, and to **verify** compliance with, our Code each year. Further, we are currently considering options for trafficking- and slavery-specific **training** with online modules.

While we perform periodic audits of supplier compliance with our agreements, these audits do not presently include **audits** or written **certifications** of legal compliance specifically regarding human trafficking and slavery. We are investigating, through our Manufacturing Center of Excellence, the addition of **audits** and written **certifications** of suppliers surrounding human trafficking and slavery.

Lastly, in accordance with our Code, all employees are held **accountable** for reporting in good faith (anonymously if necessary) any perceived violations of laws, rules, regulations or the Code to our Trinity Integrity HelpLine at 1-877-TRN-Line, submitting a report on www.trinityintegrity.com, or communicating directly with Trinity's Chief Legal Officer at 2525 N. Stemmons Freeway, Dallas, Texas 75207.

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