



Whistleblower Policy

1. PURPOSE

The purpose of this Whistleblower Policy (this "Policy") is to establish procedures for the receipt, retention and treatment of complaints, reports, concerns and other inquiries regarding accounting, internal accounting controls or auditing matters, suspected violations of applicable laws, rules and regulations, or suspected violations of the codes, policies and procedures of the Company. 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").

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.

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

4. STATEMENT OF POLICY

It is the policy of the Company to allow any person to submit to the Company, in good faith, a complaint, report, concern or other inquiry regarding the Company's accounting, internal accounting controls or auditing matters, suspected violations of applicable laws, rules and regulations, or suspected violations of the codes, policies and procedures of the Company, without fear of dismissal or retaliation of any kind. The Company is committed to achieving compliance with all applicable laws and regulations, accounting standards, accounting controls and audit practices.

The Audit Committee of the Board of Directors (the "Audit Committee") has delegated to the Company's Ethics & Compliance Committee (the "Ethics Committee"), the authority to receive, retain, and handle complaints, reports and concerns regarding accounting, internal accounting controls or auditing matters ("Accounting Matters") and those involving suspected violations of applicable laws, rules and regulations, or the codes, policies and procedures of the Company ("Compliance Matters").

4.1. RECEIPT OF INQUIRIES

If anyone has a question or would like to obtain guidance regarding a business practice or compliance issue, or report a concern or questionable behavior and a possible violation, the person may do so by contacting the Trinity Integrity HelpLine at 1-877-876-5463 (U.S.) or 800-020-4627 (Mexico) or the Integrity HelpSite at www.trinityintegrity.com. The Company will handle all inquiries discreetly and maintain confidentiality consistent with conducting a proper investigation and with the limits allowed by law. Anyone may submit their concerns anonymously. The Company will not tolerate any retribution or retaliation taken against any employee who has, in good faith, sought out advice or has reported questionable behavior or possible violation.

Nothing in this Policy is intended to prevent directors, officers, employees, or others from reporting to any governmental agency or entity possible violations of federal law or regulations, or from making other disclosures that are protected by the whistleblower provisions of federal or local laws or regulations. Such governmental agencies could include, but are not limited to, the Department of Justice, the Securities and Exchange Commission, the U.S. Congress, and any agency Inspector General, and any



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equivalent governmental agencies in foreign countries. No one impacted by this Code needs prior authorization from their supervisors (if applicable), the Company's Chief Legal Officer, or Trinity to make such reports or disclosures.

4.2. SCOPE OF MATTERS COVERED BY PROCEDURES

4.2.1. **ACCOUNTING MATTERS:**

- fraud or error in preparation, evaluation, review, or audit of any financial statement of the Company;
- fraud or error in the recording and maintaining of financial records of the Company;
- deficiencies in or noncompliance with the Company's internal accounting controls;
- misrepresentation or false statement to or by a senior officer or accountant regarding a matter contained in the financial records, financial reports (including discussions in quarterly and annual reports filed with the U.S. Securities and Exchange Commission or audit reports of the Company); or,
- deviation from full and fair reporting of the Company's financial condition.

4.2.2. **COMPLIANCE MATTERS:**

- applicable laws, rules and regulations;
- listing standards of the New York Stock Exchange;
- the Company's Corporate Governance Principles;
- the Trinity Code of Business Conduct and Ethics, including, but not limited to, the Insider Information and Insider Trading provisions;
- any other code, policy or procedure established by the Company.

4.3. TREATMENT OF COMPLAINTS, REPORTS OR OTHER INQUIRIES

4.3.1. The company has retained a third-party provider to accept and maintain records of inquiries received on the Trinity Integrity HelpLine and Integrity HelpSite. Upon receipt of an inquiry, the third-party provider will notify certain designated representatives of the company.

- Inquiries relating to Accounting Matters will be monitored by the Ethics Committee, and the Internal Audit Group will investigate and resolve the matter with the involvement of the SOX Steering Committee, Group and Business Unit compliance committees, the Corporate Legal Group, external Auditors, outside legal counsel, or such other persons as deemed appropriate.
- Inquiries relating to Compliance Matters will be monitored by the Ethics Committee, and the Corporate Legal and Compliance Group will investigate and resolve the matter with the involvement of Group or Business Unit Human Resources or Compliance committees, the Internal Audit Group, outside legal counsel, or such other persons as deemed appropriate.



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4.3.2. If, at the completion of the investigation, the Company determines that a violation of Accounting Matters or Compliance Matters has been substantiated, appropriate remedial or corrective action will be taken.

4.3.3. The Company will not tolerate any retribution or retaliation taken against any person who has, in good faith, sought out advice or has reported questionable behavior or a possible violation. However, submitting a complaint, report, or concern will not be a defense to the imposition of disciplinary action where an employee is in violation of any policy of the company.

4.4. REPORTING AND RETENTION OF INQUIRIES AND INVESTIGATIONS

The Company's third-party administrator will maintain records of all inquiries received from the Trinity Integrity HelpLine and Integrity HelpSite. The Company's Office of Ethics and Compliance will provide regular summary reports of material matters, if any, for the Audit Committee.

The Chairman of the Audit Committee will be notified immediately if any inquiry (i) might result in financial exposure to the Company in excess of \$100,000.00, (ii) involves an alleged violation by an executive officer of the Company's Code of Business Conduct and Ethics, or (iii) involves an alleged Accounting Matter. The Internal Audit Department will report the results of investigations of these inquiries to the Chairman of the Audit Committee as frequently as the Chairman deems necessary, but no less than monthly until they are resolved.

4.5. AMENDMENTS

The Corporate Governance and Directors Nominating Committee of the Board of Directors may amend these procedures at any time, consistent with the requirements of applicable laws, rules and regulations.

5. EXCEPTIONS AND QUESTIONS

Questions about this document should be directed to 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 service 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	AC	IA	Compliance	Legal	EE	TPA
Accept, maintain, and notify Trinity of inquiries	I	I	C	C		A
Provide regular summary reports of material matters	C	I	A	C		
Investigate and resolve matters	C	C	R	A	I	
Report on significant accounting matters	C	A	C	C		
Enforce appropriate remedial or corrective action for substantiated matters	C	C	R	A	I	
Reporting concerns about known or suspected by violations of this policy.	I	I	A	C	R	
Refrain from retaliation in any form	I	I	A	C	R	

AC = Audit Committee of Trinity's Board of Directors IA = Internal Audit
TPA = Third Party Helpsite Administrator

EE = Trinity Employees and service providers

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)

9. APPROVAL

Final approval by Matt Pittman (Chief Compliance Officer) on April 1, 2024. All approvals are captured electronically in the Trinity Enterprise Document System.

10. HISTORY AND REVISION LOG

Version	Author	Published Date	Summary of Changes
3.1.0	M. Pittman	2024-11-07	Form update, updated Trinity's HelpSite link
3.0.0	M. Pittman	2024-04-18	Form update, Canadian update
2.0.0	S. Teachout	2019-12-20	Restatement
1.0.0	S.T. Rice	2003-12-10	Initial release