

July 19, 2021

BY EMAIL

Benjamin Sawyer
The New York Stock Exchange
11 Wall Street, 22nd Floor
New York, NY 10005
benjamin.sawyer@nyse.com

Dear Mr. Sawyer:

I am writing on behalf of The Hillman Companies, Inc. (the “Company”) (symbol: HLM-P) to notify you that on July 13, 2021 a notice of redemption in respect of all outstanding 11.6% Junior Subordinated Debentures due 2027 (the “Debentures”) was delivered in accordance with the terms of the Indenture, dated as of September 5, 1997 (as amended, modified and supplemented, the “Debentures Indenture”), between the Company and The Bank of New York Mellon, a New York banking corporation, as Trustee (the “Debentures Trustee”) and a notice of redemption was also delivered in respect of all outstanding 11.6% Trust Preferred Securities (the “Trust Preferred Securities”) and Common Securities (the “Common Securities”) issued by The Hillman Group Capital Trust (the “Hillman Trust”) pursuant to the Amended and Restated Declaration of Trust, dated as of September 5, 1997 (the “Declaration of Trust”).

On July 14, 2021, Hillman deposited with the Debentures Trustee cash in an amount sufficient to satisfy and discharge all of its obligations under the Debentures Indenture and, in accordance with the terms of the Debentures Indenture, the Debentures will be redeemed in full on August 12, 2021 (the “Redemption Date”). Interest accrued for the month of July on the Debentures will be paid on August 2, 2021 in accordance with the Debentures Indenture and an aggregate redemption price equal to \$109,127,484.31 (the “Redemption Amount”) for the redemption of all outstanding Debentures (including accrued but unpaid interest through the Redemption Date) will be paid on August 12, 2021.

Immediately following the paying of the Redemption Amount in respect of the Debentures on August 12, 2021, the proceeds received from the redemption of the Debentures will be applied on behalf of the Hillman Trust to redeem in full all of the outstanding Trust Preferred Securities and Common Securities pursuant to the Declaration of Trust. On August 12, 2021, the Trust Preferred Securities and the Common Securities will be redeemed in full for \$105,853,649.24 and \$3,273,835.07, respectively.

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Therefore, we respectfully request that you take the actions necessary to: (i) suspend trading in of the Trust Preferred Securities on the New York Stock Exchange (“NYSE”) effective prior to the opening of trading on August 12, 2021; (ii) terminate the Company’s NYSE listing effective prior to the opening of trading on August 12, 2021; and (iii) suspend the effectiveness of the Company’s NYSE trading symbol, HLM-P, prior to the opening of trading on August 12, 2021. The Company will file a Form 25 with the Securities and Exchange Commission in accordance with Rule 12d2-2 promulgated under the Securities Exchange Act of 1934, as amended (the “Exchange Act”), on August 2, 2021 to remove the Trust Preferred Securities from listing on the NYSE and to withdraw the registration of the Debentures, Trust Preferred Securities and Common Securities under Section 12(b) of the Exchange Act.

If you have questions, please feel free to contact me by phone at 617-951-7243 or by email at taylor.gorman@ropesgray.com.

Sincerely,

Taylor Gorman