

ENGLISH: Code of Conduct

Dear customers, vendors, and service providers, dear employees¹,

A code of conduct is a fundamental document that sets out the standards of conduct and ethical principles for an organization's employees and its vendors and service providers.

This Code of Conduct is intended to serve as a guide for respectful and professional conduct for all ToolsGroup B.V. 's employees and business partners to promote a positive and legally compliant organizational culture. It sets out ToolsGroup B.V. 's expectations for interactions, respect for diversity and the promotion of a safe, collaborative, and legally compliant work environment.

Please read this Code of Conduct carefully. Our employees, vendors, and service providers are obliged to respect, comply with, and implement all regulations, principles and values contained in this Code of Conduct. Our customers and other business partners are obliged to comply with the following export regulations and sanctions laws.

¹ For reasons of better readability, the simultaneous use of the language forms male, female, diverse and other gender identities (m/f/d/other) is avoided on our websites, in publications and in communication. All formulations used shall apply equally to all genders.

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I. Our values

At ToolsGroup B.V., we pride ourselves not only on doing business, but also on forming a community based on fundamental values. Integrity, respect, and sustainability are not just buzzwords for us, but the fundamental principles that guide our actions and form the essence of our corporate culture.

A. The importance of values

We consider values to be the backbone of every successful company. They are the basis for our daily actions, our decisions, and our interactions. Integrity forms the foundation of our business practices, respect characterizes our interpersonal relationships, and sustainability is our commitment to the environment and future generations.

B. Integrity as a basic principle

For the management of ToolsGroup B.V., integrity is not just a word, but an indispensable part of our corporate culture. We are committed to acting honestly, transparently, and responsibly. This means not only complying with applicable laws and regulations, but also acting ethically above and beyond the purely legal requirements. We strive to earn the trust of our customers, employees, and business partners through honest and reliable business practices.

C. Respect as a guiding principle

Respect for each person, regardless of position, background, or function is of central importance to the management of ToolsGroup B.V.. We value the diversity and different perspectives that our multicultural employees bring to our day-to-day business. For us, respect means not only polite behavior, but also recognizing the dignity of every person. We create a working environment in which openness, tolerance and teamwork are encouraged to enable inspiring cooperation.

D. Sustainability as responsibility

For the management of ToolsGroup B.V., sustainability is more than just a buzzword - it is a responsibility that we bear towards the environment and future generations. We are aware that our actions have an impact on the environment, and we are committed to using our resources responsibly. Our goal is to integrate sustainable practices into all areas of our business and to continuously reduce our environmental footprint.

E. The role of values in the company

The management of ToolsGroup B.V. firmly believes that values form the basis for a successful company. They not only serve as an ethical compass, but also shape our corporate identity. Employees, customers, and business partners can trust that our actions are guided by integrity, respect, and sustainability. These values are not only part of our corporate philosophy but are reflected in every aspect of our organization - from our business decisions to our social and environmental initiatives.

F. Employees as ambassadors of values

Our employees are the ambassadors of our corporate values. We expect not only professional excellence from them, but also a commitment to integrity, respect, and sustainability. These values should not only be present in our company but should also be reflected in the way we work together as a team and how we interact with customers and business partners.

G. Honorable and ethical conduct

Honorable and ethical behavior is at the heart of our corporate values. We expect our employees, vendors, and service providers to behave ethically in all business areas and interactions. This also means consciously choosing the right thing to do, even if it is not always the easiest way. We encourage our employees, vendors, and service providers to uphold moral principles and act as role models for ethical behavior.

H. Values as a model for the future

Our values serve as a guiding principle for the future. We are convinced that companies that are committed to fundamental principles are not only successful in the long term but can also have a positive impact on the world. By combining integrity, respect, and sustainability, we not only create a stable framework for our business, but also set standards for ethical behavior and responsible entrepreneurship. The management of ToolsGroup B.V. firmly believes that these values not only help us to build a successful company, but also to make a sustainable contribution to a better world.

For the aforementioned reasons, all employees of ToolsGroup B.V., vendors, and service providers are obliged to respect, comply with, and implement the values listed herein.

II. Responsibility and respect

The cornerstones of a strong community are based on responsibility, respect, and recognition. In every action and decision that employees of ToolsGroup B.V., or its vendors, and service providers make, there is also a responsibility to promote the well-being of the community and make a positive impact. This responsibility goes hand in hand with respect for our fellow human beings, regardless of their backgrounds, opinions, or roles in the community.

A central aspect of this responsibility is compliance with laws and regulations. Laws serve as a guide for upright behavior and the protection of all members of the community. By complying with and respecting applicable laws, the employees of ToolsGroup B.V. or its vendors, and service providers contribute to creating an environment in which everyone can live in safety and justice.

Recognition and honesty towards managers, customers, vendors, and service providers are other key aspects of a healthy community. Through open and honest communication, we create relationships of trust that strengthen cooperation and promote a sense of community. Recognition means not only

acknowledging the achievements and contributions of others, but also respecting and learning from different perspectives.

To build and maintain a harmonious community, it is crucial that each individual understands their responsibilities, practices respect, abides by the law and shows appreciation and honesty in their interactions. By living these values together, we can create a community characterized by mutual trust, cohesion, and prosperity.

III. Diversity and equality, non-discrimination

In an increasingly globalized world, the recognition and appreciation of diversity and equality has become a fundamental component of a successful corporate culture. ToolsGroup B.V. is fully committed to the principles of diversity, equality, and non-discrimination. The management of ToolsGroup B.V. believes that true innovation and sustainable success can only be achieved by creating an inclusive environment in which every employee is valued.

Our commitment begins with ensuring that we do not discriminate against anyone based on gender, race, color, ethnic or social origin, genetic characteristics, language, religion or belief, political or other opinion, membership of a national minority, property, birth, disability, age, sexual orientation or nationality. These principles are not only ethically correct, but also crucial to creating a working environment that attracts, develops, and retains the best talents.

The diversity of our workforce is a source of creativity, innovation and a broader perspective that leads to informed decisions. It is our belief that each person, regardless of their individual characteristics, can make a unique contribution that drives the overall success of our company. We recognize that each employee brings a unique perspective, experience and expertise that enriches our organization.

Promoting equality and non-discrimination means more than just complying with legal requirements. It requires active participation and proactive action to ensure that opportunities, resources, and recognition are equally distributed. To achieve this goal, we rely on a range of measures and initiatives aimed at promoting a non-discriminatory culture.

ToolsGroup B.V.'s human resources practices aim to ensure that every hiring decision is based on objective criteria and does not discriminate based on personal characteristics. We encourage open communication in which employees can freely express their concerns and worries without fear of reprisals.

ToolsGroup B.V. is committed to creating working groups and networks that focus on the concerns and needs of different groups to create a space for open dialog and the sharing of experiences. This not only promotes deeper understanding, but also collaboration across all levels and departments.

In terms of professional development, we emphasize equality in the allocation of tasks, promotions, and further training measures. Every employee should have the opportunity to develop their full potential and progress in their career, regardless of personal characteristics.

Creating an accessible environment for employees with different abilities is crucial for us. ToolsGroup B.V. takes steps to ensure that our workplaces, products, and services are accessible to all, and we promote a corporate culture that values the uniqueness of each individual.

In the area of remuneration, ToolsGroup B.V. focuses on transparency and fairness to ensure that salary structures are based on objective criteria and are not influenced by gender-specific or other discriminatory factors.

Our commitment to diversity and equality extends beyond the boundaries of our company. ToolsGroup B.V. is committed to collaborating with vendors, customers and business partners who share similar values and working together to promote a culture of inclusion throughout the supply chain.

Finally, we are aware that the journey to an inclusive and non-discriminatory organization is never complete. We are committed to constantly reviewing, improving, and evolving our practices to ensure that we create an environment in which every employee can reach their full potential.

By actively promoting diversity, equality, and non-discrimination, we not only create a positive working environment, but also strengthen our competitiveness and position as a responsible member of the global business community.

We are advocates of tolerance and diversity and pay attention to the individual needs of each employee. As an employer, we base our team compositions on skills and talents, and we do not tolerate discrimination of any kind, be it in terms of ethnicity or nationality, race or skin color, age, gender or sexual orientation, religion or beliefs, disabilities, or other legally protected characteristics.

For the aforementioned reasons, all employees of ToolsGroup B.V., vendors, and service providers are instructed and obliged not to discriminate against anyone on the basis of gender, race, skin color, ethnic or social origin, genetic characteristics, language, religion or belief, political or other opinion, membership of a national minority, property, birth, disability, age, sexual orientation or nationality, and to practice diversity and equal rights.

IV. Combating corruption and bribery

In today's globalized business world, in which companies operate and network worldwide, compliance with ethical principles and international anti-corruption regulations is of crucial importance. The management of ToolsGroup B.V. is clearly and unequivocally committed to conducting business in an ethical and lawful

manner and to strictly rejecting any form of bribery or corruption. This stance extends across all levels of our organization and underscores our commitment to integrity and transparency.

The basis of our business ethics is a consistent zero-tolerance policy towards bribery and corruption. Regardless of the intentions or involvement of individuals from public administration or private business, we do not tolerate any violation of these principles. Our employees, vendors, and service providers are obliged to act responsibly and with integrity by strictly adhering to all anti-corruption guidelines and laws.

At the heart of our beliefs is a clear statement that no gifts or favors for personal gain or intended to influence business decisions or obtain improper advantages from business partners will be tolerated. This position extends to all forms of gifts, entertainment, hospitality, or other benefits and emphasizes the need for all such activities to be consistent with our anti-corruption policy, standard business practices and appropriate restraint.

Every employee of ToolsGroup B.V., vendor and service provider has a responsibility to ensure that their professional objectivity is not compromised in any way by offering or accepting gifts or other benefits. This obligation extends across all departments and hierarchies and forms the foundation of a culture based on fairness, equal treatment, and ethical behavior.

Maintaining integrity and rejecting bribery and corruption are not only ethical principles for us, but also a business necessity. By adhering to these principles, we not only create a trustworthy and ethically managed organization, but also strengthen our competitiveness and position on the global market.

A. International anti-corruption rules and laws

As a globally active organization, we strictly adhere to international anti-corruption regulations. This includes compliance with national and international laws aimed at preventing and combating bribery and corruption. ToolsGroup B.V. works closely with relevant authorities where necessary and is committed to transparency to ensure that we comply with all legal requirements.

ToolsGroup B.V. management's commitment to legality means not only complying with the law, but also taking a proactive stance to avoid any practices that could create even the appearance of corruption. We rely on preventative measures, training, and clear guidelines to ensure that all employees, vendors, and service providers understand and comply with legal and ethical requirements.

B. Zero tolerance of bribery and corruption

Our zero-tolerance policy towards bribery and corruption extends to all business areas and business processes. Regardless of the intentions or involvement of individuals from public administration or private business, there is no room for compromise. Legislation has established clear definitions of bribery and corruption to ensure that all employees, customers, vendors, and service providers have a common understanding of what constitutes such improper practices.

This zero-tolerance policy is supported not only by clear communication, but also by concrete measures. Violations of our anti-corruption guidelines have serious consequences, including disciplinary action, legal action and, if necessary, termination of business relationships.

C. No tolerance for gifts or favors to influence business decisions

Bribery can take many forms. The management of ToolsGroup B.V. recognizes that even seemingly innocuous gifts or favors can potentially lead to improper influence. Our policy is therefore uncompromising with regard to any attempts to influence business decisions through gifts or other benefits.

The employees of ToolsGroup B.V., vendors, and service providers are obliged not to accept any gifts or benefits that are intended to obtain personal gain or undue advantages from business partners. This clear position is communicated through training and awareness programs to ensure that all employees understand the potential risks and consequences associated with accepting improper benefits.

D. Gifts, entertainment, and hospitality

The management of ToolsGroup B.V. recognizes that gifts, entertainment, and hospitality may play a role in business relationships. However, they are only permissible if they are lawful and in accordance with our internal anti-corruption policy, applicable laws, standard business practices and appropriate restraint.

It is the responsibility of every employee, vendor, and service provider to ensure that all actions are transparent and do not give the appearance of impropriety. Clear guidelines and training support employees, vendors, and service providers in making appropriate decisions and ensuring that all activities comply with the highest ethical standards and the relevant laws.

Employees, vendors, and service providers are obliged to immediately report any attempt at corruption or bribery to the management of ToolsGroup B.V..

V. Combating money laundering and terrorist financing

In a globalized economy characterized by constant networking and transactions, the fight against money laundering and terrorist financing plays a central role. ToolsGroup B.V. is clearly and emphatically committed to combating all forms of these illegal activities and to implementing strict measures to prevent money laundering and terrorist financing. This commitment extends to all aspects of our business activities and forms the basis of our efforts to safeguard the integrity of our company and the financial markets.

A. Compliance with relevant legal regulations

Our commitment to combating money laundering and terrorist financing is based on strict compliance with all relevant legal requirements. ToolsGroup B.V. recognizes the importance of complying not only with international standards, but also with national laws and regulations aimed at preventing money laundering

and terrorist financing. This includes compliance with regulations at global, regional, and national levels to ensure that our actions are in accordance with the highest legal standards.

B. Active commitment to prevention and detection

We are aware that the prevention of money laundering and terrorist financing is not only a legal obligation, but also a moral responsibility towards society and the financial markets. With this in mind, ToolsGroup B.V. is actively committed to preventing and detecting money laundering activities and terrorist financing. Our accounting staff are trained to recognize suspicious indicators and are encouraged to report possible cases immediately. We promote a culture of vigilance and cooperation to ensure that we as a company are proactive in combating illegal financial practices.

C. Cooperation with authorities and supervisory authorities

In order to strengthen our contribution to combating money laundering and terrorist financing, the employees of ToolsGroup B.V. work closely with authorities and supervisory authorities where necessary. This cooperation extends across local, national, and international levels, as money laundering often has cross-border dimensions. We strive not only to comply with legal requirements, but also to actively contribute to the further development and improvement of preventive measures.

Cooperation with law enforcement agencies and financial supervisory authorities can extend to the exchange of information, training, and joint initiatives to strengthen the fight against money laundering. This partnership not only serves to protect our own interests, but also the overarching goal of protecting the financial markets from criminal activities.

Employees, vendors, and service providers are obliged to report any suspicion of money laundering and terrorist financing to the management of ToolsGroup B.V. without delay.

VI. Health and safety in the workplace

The safety and health of ToolsGroup B.V.'s employees, vendors, and service providers are at the heart of our corporate values. We take health and safety in the workplace extremely seriously and attach great importance to the well-being of each individual. Our aim is to minimize the risk of accidents and injuries by taking comprehensive measures to ensure a safe and secure working environment.

A. Prevention as the top priority

Preventing accidents and promoting the health of our employees are not just legal requirements for us, but a moral obligation. The management of ToolsGroup B.V. understands that a safe workplace not only increases productivity, but also promotes the well-being of our employees. We therefore regard prevention as a top priority and do everything we can to identify and eliminate potential sources of danger.

B. Risk assessment and risk management

Our security strategy is based on a comprehensive risk assessment and effective risk management. We use systematic analyses to identify potential risks and develop measures to minimize or eliminate them. In doing so, we consider not only physical hazards, but also psychosocial aspects that can affect well-being in the workplace.

C. Continuous training and awareness-raising

Safety in the workplace requires the awareness and active participation of all employees, vendors, and service providers. For this reason, ToolsGroup B.V. relies on continuous training and awareness-raising measures. Our employees are not only trained in the correct handling of machines and equipment but are also made aware of potential hazards that are overlooked in everyday life. This also includes training on psychosocial stress and stress management.

D. Ergonomics and health promotion

Ergonomics is an important aspect of health protection in the workplace. ToolsGroup B.V. designs workplaces in such a way that they meet the individual needs and requirements of our employees. Ergonomic working conditions not only help to prevent physical strain, but also promote general well-being. We also support health promotion measures, which can range from fitness programs to nutritional advice.

E. Safety equipment, safety precautions

ToolsGroup B.V. ensures that employees have the necessary safety equipment to minimize potential risks. This includes personal protective equipment such as helmets, safety shoes, safety goggles and other specific protective equipment required depending on the area of activity. In addition, we implement safety precautions and safety regulations that ensure compliance with the prescribed safety standards.

F. Emergency preparedness and first aid

The ability to react appropriately in an emergency is crucial for safety in the workplace. For this reason, the management of ToolsGroup B.V. attaches great importance to effective emergency preparedness. We ensure that trained personnel are available for first aid measures. In addition, clear evacuation plans and emergency equipment are in place to enable us to act quickly and efficiently in the event of an unforeseen incident.

G. Health management and workplace health promotion

Our commitment to health protection in the workplace goes beyond mere compliance with safety standards. ToolsGroup B.V. has implemented a comprehensive health management system that promotes the physical and mental health of employees. Where appropriate, this includes regular health checks, stress prevention programs and other measures to promote health in the workplace.

H. Accident analyses, incident analyses

In the event of accidents or incidents, carries out detailed analyses to identify causes and derive preventive measures. These analyses not only serve to clarify accidents, but also aim to prevent recurrences. We view accidents as learning opportunities to continuously improve our safety precautions and safety processes.

I. Review and adaptation of safety standards

Security standards are subject to constant change, be it due to new technologies, legal changes, or findings from analyses. ToolsGroup B.V. therefore regularly reviews its security standards and adapts them to current developments. This continuous review ensures that our security measures are always up to date and meet the highest standards.

J. Integration of safety culture

Safety in the workplace is not just the result of individual measures, but of a practiced safety culture. ToolsGroup B.V. promotes a culture in which safety is seen as a shared responsibility of each individual. This includes an open reporting system for safety concerns, the involvement of employees in safety initiatives and the recognition of safety-conscious behavior.

VII. Child labor

ToolsGroup B.V. stands unreservedly for ethical action and social responsibility. With this in mind, we firmly condemn all forms of child labor. This Code of Conduct sets out clear guidelines to ensure that child labor is rigorously rejected and excluded throughout our supply chain.

For the purposes of this Code of Conduct, child labor is (1) the employment of a child under the age at which compulsory education ends under the law of the place of employment, provided that the age of employment shall not be less than 15 years, or (2) all forms of slavery or practices similar to slavery, such as the sale of children and child trafficking, debt bondage and servitude, forced or compulsory labor, or (3) the use, procuring or offering of a child for illicit work, or (4) work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of a child, or (5) the employment of a child which is prohibited and not exceptionally permitted under the law of the place of employment or the location of the benefiting company (our vendors, and service providers).

ToolsGroup B.V. expressly prohibits vendors, and service providers who have a contractual relationship with our company from using or promoting child labor themselves or through third parties. This includes any form of economic exploitation of children, whether in the form of exploitative labor, forced labor or other harmful practices.

ToolsGroup B.V. is committed to ensuring that all our vendors, and service providers adhere to the same high standards with regard to children's rights. We expect our vendors and service providers to take clear

measures to ensure that child labor is excluded throughout their supply chain. This includes auditing vendors and contractors to ensure that they also adhere to strict standards to prevent child labor.

In the event that child labor is suspected or identified, vendors, and service providers are obliged to report this to our company immediately. We attach great importance to transparent communication and expect vendors and service providers to cooperate in the event of such violations so that remedial measures can be taken quickly and effectively.

In addition, it is mandatory for vendors and service providers of ToolsGroup B.V. to report any suspected or identified cases of child labor to the relevant authorities. This reporting to the authorities is not only a legal obligation, but also an ethical imperative to ensure that all necessary steps are taken to protect the welfare of the children concerned.

ToolsGroup B.V. may conduct regular audits and reviews to ensure that our vendors, and service providers are complying with the provisions of this Code of Conduct. These audits are conducted by qualified auditors who ensure that the standards for children's rights are strictly adhered to.

We are aware that the impact of child labor is not only individual but also far-reaching socially. We are therefore actively committed to promoting education and social development to ensure that children have the opportunity to grow up in a safe and supportive environment.

The above is not only a commitment due to legal requirements, but also an expression of our belief that companies can and should play a significant role in ensuring that children's rights are respected and protected. We are committed to keeping our supply chain free from child labor and to making a positive change in the global community.

VIII. Human rights and environmental protection

In our globalized world, where goods and services are traded via complex supply chains, companies have an immense responsibility to respect human rights and protect the environment. ToolsGroup B.V. recognizes this responsibility and reaffirms its clear stance: We do not tolerate any human rights or environmental violations in our entire supply chain. This is not just a legal obligation, but rather an ethical imperative that we attach great importance to in our corporate philosophy and actions.

At the heart of our efforts is the rejection of practices such as forced labor, slavery, exploitation of persons and the disregard for freedom of association. We define forced labor as any form of employment in which a person is forced to work against their will under threat of punishment. This includes debt bondage and human trafficking, where the work is not voluntary.

The rejection of any form of slavery is a fundamental principle that is anchored in our corporate policy. ToolsGroup B.V. condemns not only traditional forms of slavery, but also slavery-like practices, servitude

and other forms of domination or oppression in the workplace. Extreme economic or sexual exploitation and humiliation are at the heart of our rejection.

Any exploitation of people within the supply chain of ToolsGroup B.V. is unacceptable. This refers in particular to the employment of persons in disregard of the applicable occupational health and safety obligations at the respective place of employment. We set clear standards and expect our vendors and service providers to comply with safety standards, create appropriate working conditions and implement protective measures against hazardous substances. The prevention of excessive physical and mental fatigue through appropriate work organization and compliance with working hours and rest breaks are other important aspects to which we pay particular attention. In addition, we attach great importance to the appropriate training and instruction of employees to ensure safety and well-being in the workplace.

The disregard for freedom of association is another area where we have clear principles and expectations. Freedom of association includes the right of employees to freely form or join trade unions. ToolsGroup B.V. does not accept discrimination or retaliation for forming, joining or being a member of a trade union. Trade unions have the right to operate freely and in accordance with the law of the place of employment, which includes the right to strike and the right to collective bargaining.

To ensure that these principles are not just written on paper, but are implemented throughout the entire supply chain, we hereby commit our vendors and service providers to strict compliance with these standards.

ToolsGroup B.V. is aware that responsibility extends beyond the direct supply chains. We therefore require our vendors and service providers to review their own supply chains and ensure that human rights are respected, and environmental impacts are minimized.

ToolsGroup B.V. sees itself not only as an economic company, but also as a social player that bears responsibility for society and the environment. We will continue to proactively contribute to bringing positive change to the world around us. Our mission goes beyond pure economic success and aims to shape a sustainable future for generations to come.

A. Preservation of natural resources

ToolsGroup B.V. is resolutely committed to the preservation of natural resources and expects the same from its vendors and service providers. Land, forests, and water are legitimate rights that must not be illegally taken away as they secure the livelihoods of people. Our business partners are therefore obliged not to undertake any activities that endanger people's livelihoods.

Harmful soil changes, water and air pollution and excessive water consumption are unacceptable to us. We demand that our vendors and service providers take measures to prevent damage to the health of the

population. In particular, their activities must not significantly impair the natural basis for food production. This is of central importance to ensure the safety and nutrition of all people.

We also attach great importance to our partners ensuring that their activities do not impair the population's access to safe drinking water or adequate sanitary facilities. The responsible use of resources is essential in order to promote sustainable development and ensure the quality of life of all people.

Overall, the preservation of natural resources is at the heart of ToolsGroup B.V.'s business philosophy. We expect our vendors and service providers not only to comply with these principles, but also to actively contribute to sustainable solutions. Together, we can have a positive impact on the environment and ensure that our business practices are in harmony with the protection of natural resources.

B. Dealing with conflict minerals

Our company is firmly committed to ensuring that no conflict minerals from illegal or dubious sources are used in our supply chain. ToolsGroup B.V. hereby requires all vendors and service providers to assume the same ethical responsibility and to ensure that their supply chains are free of illegally sourced conflict minerals. This applies in particular to minerals such as tin, tungsten, tantalum, gold, and cobalt, which are often mined in conflict and high-risk areas.

Our corporate policy and processes are strictly based on the guidelines of the Organization for Economic Cooperation and Development (OECD). These guidelines promote responsible supply chains and ensure that companies fulfill their due diligence obligations. This also means that we expect our vendors and service providers to carefully review their supply chains and apply the same high standards that we have imposed on ourselves.

We attach great importance to ensuring that every stage of our supply chain is transparent and based on ethical principles. By consistently implementing these guidelines, our aim is to help prevent conflicts and human rights violations that are often associated with the mining and trading of conflict minerals.

Through our commitment to ethical business practices and strict adherence to international standards, we aim to have a positive impact on global supply chains and play our part in making trade and industry more responsible and sustainable.

C. Management of water resources

ToolsGroup B.V. is committed to the responsible use of water resources and does not tolerate unlawful water pollution in its supply chain. We require our vendors and service providers to apply the same strict standards in their own supply chains and to ensure that any form of unlawful water pollution is avoided.

The treatment and discharge of industrial wastewater is a critical area of our environmental strategy. We expect wastewater from operations, manufacturing processes and sanitary facilities to be carefully typed,

monitored, checked and, if necessary, treated before it is disposed of or discharged into the environment. These measures are essential to ensure compliance with all relevant wastewater regulations and laws.

In addition, we strive to reduce the generation of wastewater. We achieve this by implementing efficient processes and technologies and by promoting awareness of water resources among our employees, vendors, and service providers. We are convinced that a significant contribution to environmental protection can be made by reducing the amount of wastewater and improving its quality.

Our vendors and service providers are required to implement and maintain similar standards and practices in their operations. It is of utmost importance to us that they actively participate in the prevention of any form of unlawful water pollution. By working together throughout the supply chain, we can have a positive impact on the environment and fulfill our responsibility to society and the planet.

D. Dealing with air emissions and noise emissions

ToolsGroup B.V. takes its responsibility for environmental protection very seriously and does not tolerate any unlawful air pollution or noise emissions in its supply chain. We hereby oblige our vendors and service providers to carry out strict controls in their own supply chains to ensure that air and noise emissions comply with applicable legal regulations and are minimized.

Dealing with air and noise emissions is an integral part of our environmental policy. We expect our vendors to carefully identify, monitor and regularly review all emissions from their operations, including air and noise emissions as well as greenhouse gas emissions, and, if necessary, take appropriate measures to reduce or treat them. This also includes the regular maintenance and monitoring of exhaust gas purification systems and the search for efficient and economical solutions to reduce emissions.

We are aware that air and noise pollution can have a significant impact on the environment and people's health. It is therefore essential for us that our vendors and service providers actively contribute to minimizing these emissions and continuously strive for improvements in their operations. Only through joint efforts and compliance with high standards can we have a positive impact on the environment and make our contribution to preserving the quality of life for future generations.

E. Handling waste and hazardous substances

It is a particularly important principle of our corporate philosophy not to tolerate any illegal handling of waste and hazardous substances in our supply chain. ToolsGroup B.V. requires all vendors, and service providers to carry out strict controls in their own supply chains and to ensure that waste and hazardous substances are handled in accordance with all relevant laws and regulations.

Our vendors must take a systematic approach to identifying, handling, reducing and responsibly disposing of or recycling waste. This includes compliance with international agreements such as the Basel Convention

on the Control of Transboundary Movements of Hazardous Wastes and their Disposal, the Minamata Convention on Mercury, and the Stockholm Convention on Persistent Organic Pollutants.

Chemicals and other materials that may pose a risk to the environment if released must be carefully identified and managed to ensure safety at every step - from handling, transportation, storage, use, recycling or reuse and disposal.

We expect our business partners not only to comply with these standards, but also to actively participate in their further development. By complying with these guidelines and promoting best practices throughout the supply chain, we are working together to reduce environmental impact and protect human health.

F. Handling chemical products

Responsible handling of chemical products is at the forefront of our corporate culture. ToolsGroup B.V. does not tolerate any unlawful handling of chemicals in the supply chain, and we expect our vendors, and service providers to check their own supply chains accordingly and ensure that all chemical products are handled in accordance with applicable safety and environmental laws.

Our approach focuses on reducing the use of hazardous chemicals that can have a negative impact on people and the environment or, where possible, replacing them with safer alternatives. This process includes the monitoring and identification of hazardous substances and the implementation of safety measures at all stages - from procurement, transportation, storage and use to recycling, reuse and ultimate disposal.

We place great importance on ensuring that all our supply chain partners follow strict safety guidelines and continuously work to improve their chemical handling practices. Compliance with these standards is not only a legal obligation, but also reflects our commitment to environmental protection and the health and safety of the communities in which we operate.

By promoting the responsible use of chemical products throughout the supply chain, we help to minimize risks and create a more sustainable and safer environment.

G. Reducing the consumption of raw materials and natural resources

ToolsGroup B.V. aims to minimize the consumption of raw materials and natural resources throughout our supply chain. We believe that sustainable business practices not only reflect our responsibility towards the environment, but also towards future generations. We therefore require our vendors and service providers to take measures to reduce the consumption of resources in their own supply chains.

We attach great importance to reducing use and consumption of resources during production and minimizing the generation of waste of all kinds, including the consumption of water and energy. This can be achieved directly at the point of origin or by implementing more efficient processes and measures. This

includes changing production and maintenance processes, optimizing company procedures, using alternative, more environmentally friendly materials and taking measures to conserve resources. Equally important are the recycling and reuse of materials in order to close the resource utilization cycle.

By requiring our vendors and service providers to implement these principles in their own operations, we are increasing the scope of our commitment to sustainability. Together with our partners, we are continuously working to reduce our ecological footprint and make a positive contribution to environmental protection.

H. Reduction of energy consumption

ToolsGroup B.V. is committed to reducing energy consumption throughout our supply chain and we expect our vendors and service providers to commit to this goal as well. Reducing energy consumption is a key part of our sustainability strategy and helps to reduce our environmental footprint.

We attach great importance to continuously monitoring, documenting, and analyzing energy consumption at all stages of production and delivery. Our partners are encouraged to develop efficient and economical solutions to increase their energy efficiency and minimize energy consumption. This can be achieved through the use of innovative technologies, the optimization of production processes, the use of renewable energy sources or other energy-saving measures.

By making a concerted effort to reduce energy consumption throughout the supply chain, we are actively contributing to climate protection and promoting a more sustainable economy. Our aim is not only to reduce our own energy consumption, but also to encourage our partners to implement similar measures in their operations.

IX. Fair working conditions

In our supply chain, we attach great importance to fair and legally compliant remuneration. This includes both regular working hours and overtime, which must be paid at least the national statutory minimum wage or in accordance with the minimum standards customary in the industry or the framework collective agreements of the respective country.

It is essential that employees of ToolsGroup B.V.'s vendors and service providers receive all legally prescribed benefits. Maintaining transparency with regard to the pay structure is another key aspect. Our vendors and service providers are obliged to ensure that employees receive clear, detailed, and regular written information on the composition of their remuneration.

We rely on our contractual partners to scrupulously comply with all labor laws and actively work to protect the rights and dignity of employees. Not only does financial remuneration play a role here, but also compliance with social standards. This includes ensuring safe and healthy working conditions.

Our demand for fair and legally compliant remuneration is an expression of our responsibility towards the people in the entire supply chain. We are convinced that sustainable and ethical cooperation is only possible under these conditions.

We are strongly committed to fair working hours in our supply chain. We attach great importance to ensuring that working hours comply with applicable laws, industry standards or framework collective agreements in the respective country.

Overtime is only permissible if it is worked on a voluntary basis and the statutory overtime regulations are complied with. It is of the utmost importance to ensure that overtime is voluntary and that employees are not put under pressure to work it. Compliance with weekly working hours is another crucial aspect, and we stipulate that these must not exceed 48 hours.

We rely on our vendors and service providers to actively promote compliance with these working time requirements and to ensure that employees receive adequate rest periods. This also includes breaks and rest periods to promote the health and well-being of employees. This demand for fair working hours throughout the supply chain underlines our commitment to decent working conditions.

X. Fair competition

Compliance with fair competition is of central importance to ToolsGroup B.V.. We are fully committed to a market environment characterized by transparency, integrity, and fair competitive practices. In this context, it is a top priority for us not only to respect applicable competition and antitrust laws, but also to strictly adhere to our own compliance guidelines.

A. Competition laws and antitrust laws

Respecting and complying with competition and antitrust laws is not just a legal obligation for us, but also reflects our basic ethical principles. These laws serve to protect competition, promote efficiency and innovation, and ensure fair market conditions. ToolsGroup B.V. is aware of the scope of these laws and commits itself and, with this Code of Conduct, our vendors and service providers to strictly comply with all competition and antitrust laws.

B. No unlawful agreements with competitors

ToolsGroup B.V. is clearly committed to ensuring that we do not enter into any illegal agreements or arrangements with our competitors. This includes any form of cartel agreements, price fixing, market sharing or other anti-competitive practices. Our commitment to fair competition extends to all business areas and business practices.

C. No exchange of confidential information and prices

A key principle of our competition policy is to refrain from sharing confidential information and prices with competitors. ToolsGroup B.V. recognizes that the protection of sensitive data and fair pricing is critical to maintaining a healthy and competitive marketplace. In accordance with our policies and legal requirements, we avoid any communication that could adversely affect competition.

D. Promoting innovation and transparency

The management of ToolsGroup B.V. firmly believes that fair competition is the driving force for innovation and progress in business. By adhering to the principles of integrity and transparency, we create an environment that fosters creativity and competition. These principles are not only in the interest of our company, but also contribute to the overall development of prosperity and a healthy market economy.

E. Internal controls and monitoring

Our efforts to ensure fair competition also include internal control mechanisms and monitoring systems. ToolsGroup B.V. has established clear processes to ensure that all business practices meet the highest standards. Regular reviews, audits and internal investigations serve to uncover possible violations and take effective measures to remedy them.

F. Consequences for violations

Violations of our competition policy and compliance guidelines are punished seriously. ToolsGroup B.V. has established clear sanction mechanisms that can range from disciplinary measures to legal action. The consequences not only serve to ensure compliance with our own standards, but also send a clear signal to all employees, competitors, vendors, and service providers that fair competitive practices are non-negotiable.

XI. Conflicts of interest

At ToolsGroup B.V., we consider the avoidance of conflicts of interest to be a key pillar of integrity and professional ethics. Ensuring that personal interests do not conflict with business interests is not just an obligation, but a fundamental expectation of everyone who is part of our organization.

A. Importance of avoiding conflicts of interest

Conflicts of interest can significantly impair the integrity, credibility, and efficiency of a company. ToolsGroup B.V. recognizes that the clear separation of personal and professional interests is not only in the interest of the company, but also of each individual employee, vendor, and service provider. Therefore, avoiding conflicts of interest is not only a company policy, but a fundamental expectation of our employees, vendors, and service providers.

B. Duty of all employees

It is the duty of every employee, as well as vendors, and service providers, to ensure that personal interests do not conflict in any way with the business interests of ToolsGroup B.V.. This responsibility extends across all hierarchical levels and business areas. Whether in management positions or operational functions, every employee, vendor, and service provider have the responsibility to recognize potential conflicts of interest and take appropriate measures to prevent them.

C. Definition of conflicts of interest

A conflict of interest arises when the personal interests of an employee, vendor, or service provider conflict with the interests of ToolsGroup B.V. and could impair a person's ability to make objective decisions in the best interests of ToolsGroup B.V.. This can be caused by personal connections, partnership relationships, financial interests or other circumstances.

D. Personal connections and relationships

Employees, vendors, and service providers are obliged to ensure that personal connections and partnership relationships do not compromise their loyalty and objectivity in a professional context. This may include, for example, relationships with family members, friends, or business partners. It is crucial that professional decisions are made without being influenced by personal relationships.

E. Financial interests and investments

Financial interests and investments that are directly or indirectly related to the business activities of ToolsGroup B.V. must be made transparent. Employees, vendors, and service providers must ensure that their financial interests do not conflict with their professional duties and do not involve any prejudice or impairment of professional judgment.

F. Disclosure of conflicts of interest

Employees, vendors, and service providers are obliged to disclose potential conflicts of interest. This disclosure enables ToolsGroup B.V. to take appropriate steps to prevent or resolve potential conflicts. Openness and honesty are of crucial importance in order to promote a trusting and transparent corporate culture.

G. Measures to avoid conflicts of interest

To avoid potential conflicts of interest, employees, vendors, and service providers must take proactive measures. This may include recusing themselves from decisions or business activities that could present a conflict. In some cases, it may be necessary to seek approval from supervisors or Human Resources to ensure that appropriate steps are taken.

H. Role of managers

Managers play a crucial role in promoting a corporate culture that effectively prevents conflicts of interest. They must act as role models and ensure that their decisions are transparent. Managers must encourage employees to report potential conflicts and take appropriate steps to ensure that decision-making and objectivity are not compromised.

I. Consequences of violating the guidelines

Non-compliance with the guidelines for avoiding conflicts of interest can have serious consequences. These range from disciplinary measures to consequences under labor law and termination of contracts, depending on the severity of the violation. ToolsGroup B.V. takes violations of these guidelines seriously and is determined to protect the integrity and credibility of the company.

J. Training and awareness-raising

To ensure that all employees, vendors, and service providers have a keen awareness of conflicts of interest, we conduct regular training and awareness programs. These training sessions provide not only a basic overview of policies and laws, but also practical examples and case studies to enable employees, vendors, and service providers to identify potential conflicts and act appropriately.

K. Trust as a basis

Avoiding conflicts of interest is based on a foundation of trust between employees, managers, vendors, and service providers and the company. We are convinced that open dialog and a willingness to disclose conflicts of interest help to build trust and promote a corporate culture based on integrity and ethics.

XII. Accounting and documentation

ToolsGroup B.V. attaches great importance to the conscientious, accurate, timely and comprehensive treatment of financial information. The careful recording and proper maintenance of our books and records are essential to ensure the integrity of our financial data and to guarantee transparent and accurate reporting. Our employees play a key role in this, as they must ensure that all business transactions are recorded accurately and that our financial practices comply with applicable laws, auditing standards and accounting principles.

A. Importance of financial integrity

The importance of financial integrity in a company cannot be overemphasized. Financial information is the backbone of every business decision, and the accuracy of this information is critical to business success. Therefore, it is the duty of the responsible employees to ensure that all financial data is handled conscientiously and accurately in order to provide a reliable basis for decision-making.

B. Conscientious treatment of financial information

The conscientious handling of financial information requires the precise and accurate recording of all business transactions. The responsible employees of ToolsGroup B.V. are obliged to exercise the utmost care in every transaction to ensure that no errors or discrepancies occur. This includes timely and comprehensive documentation of all relevant financial details.

C. Timely and comprehensive recording of business transactions

The prompt recording of business transactions is of great importance in order to be able to make an up-to-date and accurate statement about the company's financial situation at all times. The responsible employees of ToolsGroup B.V. are obliged to record all financial transactions promptly in order to ensure that the information in the books and records is always up to date. Comprehensive recording means that all relevant details and interrelationships are considered in order to obtain a holistic picture of our company's financial situation.

D. Proper keeping of books and records

The proper keeping of books and records is not only a legal requirement, but also a cornerstone of our corporate governance. The responsible employees of ToolsGroup B.V. are required to comply with applicable laws, auditing standards and accounting principles to ensure legal compliance. This includes the application of best accounting practices and the use of modern financial systems to ensure the accuracy and integrity of financial data.

E. Integrity of our financial data

Our primary objective is to ensure the integrity of our financial data. This means that all financial information must be free from errors, inconsistencies, or manipulation. Integrity extends to all aspects of financial reporting, from data collection to auditing. The responsible employees of ToolsGroup B.V. are responsible for helping to ensure that the company's financial data is trustworthy and always correct.

F. Transparent and accurate reporting

Transparent and accurate reporting is not only a legal requirement for us as a company, but also a promise to our stakeholders and shareholders. Our customers, partners and employees rely on our financial reports to reflect a true and fair view of the company's financial position and performance. Transparent reporting creates trust and promotes a positive public perception of the company.

G. Employee responsibility

The responsible employees of ToolsGroup B.V. bear considerable responsibility for the conscientious documentation of financial information. Everyone who has access to financial data or is involved in business activities must ensure that all transactions are accurately recorded and properly documented. This requires

not only professional competence, but also an awareness of the importance of one's own role in the overall process.

H. Review and audit

The regular review and auditing of our financial processes is another safeguard to ensure the accuracy and integrity of our financial data. Internal and external audits help to uncover potential errors or discrepancies and ensure that the financial practices of ToolsGroup B.V. meet the highest standards.

I. Legal compliance

Compliance with all applicable laws, auditing standards and accounting principles is of crucial importance. The responsible employees of ToolsGroup B.V. are required to keep abreast of relevant legal requirements and ensure that their actions comply with applicable regulations. This includes cooperating with external auditors and tax advisors to ensure that we always adhere to the highest compliance standards.

J. Consequences of violations

Violations of our financial integrity policies are unacceptable. Regardless of position in the company, violations may result in disciplinary action ranging from training to consequences under labor law. The management of ToolsGroup B.V. takes the integrity of our financial information very seriously and is determined to take appropriate action for any breach.

K. Joint pursuit of financial integrity

The conscientious, accurate, timely and comprehensive handling of financial information is a shared commitment to which all employees of our company are committed. It requires a shared commitment to accuracy and transparency in order to maintain the integrity of our financial data. Each individual plays a critical role in ensuring that the financial reporting of ToolsGroup B.V. meets the highest standards.

XIII. Quality and product safety

ToolsGroup B.V. places the highest importance on the safety of our products and services and on strict compliance with all relevant laws and regulations. Ensuring product safety, quality and ethical marketing practices is not only a legal requirement, but also a fundamental obligation to our customers and society as a whole.

A. Product safety as the top priority

The safety of our products and services is a top priority for the management of ToolsGroup B.V.. We recognize our responsibility to our customers and are determined to offer products and services that meet the highest security standards. This includes not only physical security aspects, but also digital security and data protection. Our products and services should not only be effective and innovative, but also pose no risk to the health or safety of individuals.

B. Compliance with all applicable laws and regulations

Compliance with all applicable laws and regulations is not only a legal obligation, but also a central component of our corporate ethics. We strive to comply with all local, national, and international regulations that affect our industry and the markets in which we operate. This includes not only product standards, but also environmental protection, labor law, data protection and other relevant areas.

C. High quality standards in products, services, and marketing practices

Our own high-quality standards serve as a guide for the development, production and marketing of our products and services. ToolsGroup B.V. is committed to providing products and services that not only meet our customers' expectations but exceed them. Quality assurance covers the entire product life cycle, from conception to disposal. Similarly, our quality standards apply to all marketing practices to ensure that we act fairly, honestly, and ethically towards our customers.

D. Product development with a focus on safety

Security is the top priority in product development. We integrate safety considerations right from the early stages of the development process. Risk assessments and continuous safety checks are integral parts of our development practices. Our aim is to offer products and services that pose no risk to third parties.

E. Continuous monitoring and improvement

The safety of our products and services does not end when we enter the market. ToolsGroup B.V. is committed to continuous monitoring and improvement. This includes evaluating customer feedback, security alerts and new technological developments. Our aim is to react proactively to potential security risks and to continuously improve our products and services.

F. Responsible marketing

ToolsGroup B.V.'s commitment to high quality standards also extends to our marketing practices. We are committed to responsible marketing that is fair, honest, and transparent. Our advertising messages are designed to provide clear and accurate information without being misleading. We are committed to not only meeting our customers' expectations but exceeding them.

G. Traceability and response in the event of security risks

The traceability of our products and services and a rapid response in the event of safety risks are key components of our safety approach. ToolsGroup B.V. implements mechanisms for efficient traceability of products and services in the market and develops clear processes for rapid response to any safety issues. The safety of our customers is at the center of every decision and action.

H. Commitment to ethical principles

Our commitment to safety and quality integrity goes hand in hand with our ethical principles. The management of ToolsGroup B.V. recognizes that trust and credibility are fundamental to the long-term success of our company. Therefore, we not only strive to comply with laws and standards but are actively committed to ethical decision-making and responsible behavior.

I. Customer feedback as an incentive for improvement

Customer feedback is invaluable to us. ToolsGroup B.V. encourages all customers to share their experiences and concerns with us. Customer feedback not only serves as an indicator of satisfaction, but also as an incentive for continuous improvement. We take all feedback seriously and are committed to optimizing our products and services based on the needs and expectations of our customers.

XIV. Correct selection of business partners

ToolsGroup B.V. attaches great importance to care and transparency when selecting our business partners. For us, our business partners are not just vendors or service providers, but important players in our network who have a significant influence on our corporate goals. To ensure that our partnerships are in line with our principles, we have established clear guidelines and standards that not only define our expectations of cooperation, but also ensure that our partners share our values and comply with legal requirements.

A. Careful selection of business partners

We select our business partners with the utmost care. ToolsGroup B.V. relies on a transparent selection process to ensure that potential business partners not only offer high-quality products or services, but also meet our ethical and legal standards. This selection process includes a thorough check of references, compliance practices and an assessment of the financial stability and reputation of our business partners.

B. Transparent communication with business partners

Transparency is a cornerstone of our business relationships. ToolsGroup B.V. strives for open and honest communication with business partners. This begins in the early stages of collaboration and continues throughout the partnership. We share clear expectations, goals, and values to ensure that both sides have a common understanding of how to work together. Open communication not only fosters mutual trust, but also enables effective problem solving and efficient collaboration.

C. Code of Conduct and compliance with legal standards

Our Code of Conduct forms the foundation for our actions and applies not only internally, but also to all external business relationships. We expect our business partners to commit to the same ethical principles that we have established for ourselves. This includes compliance with all applicable laws and regulations, both nationally and internationally. Our partners are encouraged to implement their own codes of conduct that align with our values and ensure that their business practices are ethical and legal.

D. Compliance standards for vendors, and service providers

Adherence to compliance standards is a crucial aspect of our business partnerships. ToolsGroup B.V. expects vendors and service providers not only to respect our standards of conduct, but also to ensure that their own processes and practices meet the highest compliance requirements. This includes aspects such as labor law, environmental protection, data protection and ethical business practices. ToolsGroup B.V. may regularly audit its vendors and service providers to ensure that they consistently adhere to these standards.

E. Implementation of appropriate compliance standards

ToolsGroup B.V. requires that vendors and service providers have implemented appropriate compliance standards. This means not only the existence of policies and procedures, but also the active implementation of these standards in daily business processes. We expect our vendors and service providers to provide training and take measures to ensure that their employees understand the importance of compliance and are able to act ethically and in accordance with the law.

F. Cooperation for sustainable development

Cooperation with our business partners goes beyond mere transactions. ToolsGroup B.V. strives for long-term partnerships based on trust, respect, and shared values. Together with our partners, we want to contribute to sustainable development and assume social responsibility. This includes promoting environmental protection measures, social initiatives, and ethical business practices in order to have a positive impact on the community and the world around us.

G. Zero tolerance for non-compliance

ToolsGroup B.V. has a zero-tolerance policy towards non-adherence to compliance standards and ethical principles. If violations are identified, we immediately take appropriate action, which can range from training and counseling to contract termination and legal action. This consistent approach underlines our determination to ensure that our business partners adhere to the same standards that we expect of ourselves.

XV. Trade secrets

The protection of trade secrets is of central importance to ToolsGroup B.V.. Our commitment to the responsible handling of trade secrets extends across all levels and departments of our company. We regard trade secrets not only as a valuable asset, but also as an obligation to our customers, business partners and employees.

Compliance with applicable laws and regulations is a matter of course for us and forms the basis of our actions when dealing with trade secrets. We respect and strictly adhere to national and international regulations governing the protection of trade secrets.

The employees of ToolsGroup B.V. receive comprehensive training in order to develop an in-depth understanding of the importance of trade secrets. They are aware that the protection of trade secrets is not only a legal obligation, but also makes a decisive contribution to the competitive advantage and long-term security of our company.

Confidential information classified as business secrets is only made accessible to those persons who require this information for their professional duties. Access to such information is on a need-to-know basis, with strict access controls and authentication mechanisms implemented. Business secrets are only disclosed to third parties with the consent of the relevant parties and in compliance with legal requirements.

ToolsGroup B.V. has established clear policies and procedures to ensure that trade secrets are adequately protected in physical and digital form. This includes measures such as secure data transmission, encryption technologies, access authorizations and physical security measures. Our IT infrastructure is regularly reviewed and updated to ensure that it meets the highest security standards.

In cases of employee resignation or termination of business relationships with third parties, we ensure that all relevant information that is considered a trade secret is appropriately protected, returned, or deleted. We implement clear processes for returning documents and maintaining confidentiality to prevent unauthorized disclosure.

Violations of our trade secret protection policy will be dealt with seriously. Disciplinary action, legal action and claims for damages may be the consequences for those who violate these guidelines. We promote a culture of accountability and transparency in which every employee has an obligation to treat the protection of trade secrets as a personal and company-wide responsibility.

Our obligation to protect trade secrets does not end at the company's boundaries. ToolsGroup B.V. expects its business partners, vendors, and service providers to maintain similarly high standards with regard to the protection of trade secrets. We establish clear agreements and contractual clauses to ensure that confidentiality is also maintained in our business relationships.

Overall, the responsible handling of trade secrets is at the heart of our business practices. This protection is crucial not only for our company, but also for the trust of our customers and the stability of competition. Through clear guidelines, training, and proactive monitoring, we are committed to ensuring that trade secrets are protected and that our company remains based on integrity, innovation, and sustainable success.

XVI. Data protection

Data protection is of paramount importance to ToolsGroup B.V.. We attach great importance to protecting the privacy and rights of our employees, customers, and business partners. Our commitment to data

protection extends to all aspects of our business operations and reflects our efforts to set the highest standards in this area.

To emphasize our efforts towards transparency, we have created a global transparency document that has been published in numerous languages. The purpose of this document is to provide comprehensive information to data subjects and give them a clear understanding of how we process and protect personal data.

The transparency document explains in easy-to-understand language the principles and procedures that we follow in relation to data protection and data processing. It provides information about the purposes for which personal data is used and explains what rights data subjects have in relation to their data.

Our intention is not only to fulfill legal requirements through our transparency document, but also to create an atmosphere of trust and openness. We believe that protecting privacy is not only a legal obligation, but also an integral part of our commitment to ethical business practices and the satisfaction of our customers and employees. We encourage all data subjects to read the transparency document to gain a full understanding of how we handle their data and are happy to answer any questions or concerns they may have. Data protection is a dynamic process, and we strive to continuously ensure that our data protection practices meet the highest standards.

XVII. Whistleblower hotline and protection of whistleblowers

Our company is strongly committed to a culture of integrity, ethics, and transparency. As part of our efforts to promote responsible business conduct, we have established a whistleblower hotline that allows employees and other stakeholders to report violations of the law or our Code of Conduct safely and anonymously. This initiative is a key part of our commitment to maintaining the highest standards in all areas of our business operations.

The whistleblower hotline provides a protected channel through which employees and others can report concerns or suspicions about unlawful or unethical practices within the company. The establishment of such a hotline underscores our commitment to creating an environment in which integrity and compliance are promoted and violations are properly investigated.

The management of ToolsGroup B.V. recognizes that reporting misconduct is a courageous act and acknowledges the importance of protecting whistleblowers. Therefore, the management of ToolsGroup B.V. guarantees that appropriate whistleblower protections are in place in accordance with applicable laws and regulations. The anonymity of the reporting person will be preserved upon request and there are clear guidelines to ensure that no reprisals are taken against whistleblowers.

The ability to report violations anonymously creates a safe environment for those who wish to expose ethical misconduct without fear of negative consequences. This anonymity extends not only to the identity of the

whistleblower, but also to the specific details of the reported matter. This protective mechanism encourages openness and helps to ensure that violations can be detected and remedied effectively and at an early stage.

Our Code of Conduct forms the ethical foundation of ToolsGroup B.V., and we take violations of this Code of Conduct extremely seriously. The whistleblower hotline is not only a tool for reporting wrongdoing, but also a tool for upholding our ethical standards. Every report is thoroughly, and objectively investigated and appropriate action is taken to correct any misconduct.

It is important to emphasize that whistleblowers are protected by ToolsGroup B.V. and need not to fear any reprisals. The laws that protect whistleblowers are an integral part of our company policy and we are committed to taking all necessary steps to ensure the safety and well-being of those who report.

The whistleblower hotline helps to promote a culture of accountability and enables us to take consistent action against violations. By identifying misconduct at an early stage, we can improve processes, strengthen compliance measures, and ensure that our actions are based on ethical principles.

Overall, ToolsGroup B.V. sees the whistleblower hotline as a tool to strengthen our corporate values and promote open and transparent communication. We encourage all employees and stakeholders to make use of the whistleblower hotline if they have concerns or observations of misconduct.

We encourage anyone who interacts with our company in any way to report their observations and concerns about unlawful or unethical practices via the Whistleblower Hotline. The decision to report is anyone's to make and we are committed to ensuring that open communication and awareness of ethical behavior are embedded in our corporate culture.

In particular, the hotline is open to all employees of ToolsGroup B.V., regardless of their position in the company. Whether they are managers, team members or employees at other levels, everyone has the right and responsibility to draw attention to possible misconduct. This diversity of perspectives helps to ensure a comprehensive and objective assessment of reported matters.

Customers, vendors, service providers and others are also encouraged to make reports via the whistleblower hotline. Our openness towards external partners underlines our commitment to transparency and fairness in all our business relationships. By enabling external stakeholders to be involved in the reporting process, we promote comprehensive compliance and help to create a trustworthy and ethical business environment.

We understand that breaches of ethical standards can affect not only the internal environment, but also the trust of our stakeholders. We therefore regard reports via the whistleblower hotline as a contribution to safeguarding our corporate integrity and our relationships with customers, vendors, service providers and society as a whole.

All reports will be investigated seriously and objectively, and appropriate action will be taken to correct any wrongdoing. We are committed to ensuring that the Whistleblower Hotline is operated effectively and efficiently to ensure a smooth process for the submission, investigation and reporting of reports.

Our whistleblower hotline is not only a tool for reporting misconduct, but also a tool for upholding our shared values. By disclosing and addressing violations, we help to promote a culture of accountability and integrity. The management of ToolsGroup B.V. is convinced that the whistleblower hotline will make a significant contribution to building our company on ethical foundations and managing it successfully in the long term. Our stakeholders are key partners in this journey and their participation in this process is invaluable.

XVIII. Intellectual property, patents, trademark rights, copyrights

The protection of intangible assets is of crucial importance for the long-term success of ToolsGroup B.V..

In the area of intellectual property, we set clear guidelines to ensure that no infringements of patents, trademark rights, copyrights or other intangible assets occur. Any use or exploitation of third-party intellectual property may only take place with express permission and in accordance with applicable laws and agreements.

Trademark rights are essential components of the company's success. We recognize the importance of protecting our trademarks and logos to prevent confusion and misuse. All use of our brands is carried out in accordance with our company guidelines and the applicable trademark regulations. This also includes measures to prevent counterfeiting and brand misuse.

Copyrights protect creative works. Our company is committed to respecting the copyrights of others and ensuring that our own creative works are adequately protected. We promote a culture of originality and recognition of intellectual creations, and employees are encouraged to report creative developments to us to ensure the protection of copyrights.

Product specifications and expertise are essential elements of our competitiveness. Our duty of care also extends to ensuring that this information is not misused or disclosed without authorization.

ToolsGroup B.V. recognizes that the protection of intellectual assets is not only a legal obligation, but also reflects a moral and ethical responsibility to our business partners and the community. We use technical and organizational measures to protect physical assets such as buildings, equipment, and inventory. At the same time, we invest in digital security to ensure that intellectual property is protected from unauthorized access, data loss or cyber-attacks. We respect the rights and intellectual assets of our business partners and expect the same with regard to our own intangible assets.

Violations of these principles will be taken seriously by ToolsGroup B.V.. Disciplinary action and legal action may be the consequences for those who violate our intellectual property policies. We encourage our

employees, vendors, and service providers to bring violations to our attention and promote a culture of accountability and respectful treatment of all assets.

Overall, the protection of intangible assets is an integral part of our business. This obligation goes beyond mere compliance with legal standards and is an expression of our commitment to integrity, trust, and sustainable corporate success.

Our employees, vendors, and service providers are obliged to protect our and third-party intangible assets and not to use them unlawfully.

XIX. Respectful treatment of property

Our employees are obliged to treat both our company property and the property of customers, vendors, and service providers with the utmost care. This is not only a business necessity, but also an expression of our ethical understanding.

Customer property deserves our special attention. We understand that customers place their trust in ToolsGroup B.V. by entrusting us with resources. Our employees, vendors, and service providers are obliged to treat customer property with the utmost care, to protect it from damage and to ensure that all relevant requirements and agreements with our customers are met.

Vendor ownership is another key component of our value chain. Responsible handling of vendor resources is not only ethical, but also strengthens the basis of trust in our business relationships. Our employees are obliged to respect the terms of supply agreements and ensure that vendor materials and third-party resources are used and protected appropriately.

These guidelines not only reflect our commitment to maintaining business relationships, but also underline the value we place on sustainability and social responsibility. By treating company property, customer property and vendor property with care, we not only set ethical standards, but also promote a corporate culture characterized by respect, responsibility, and reliability. Every employee plays a key role in putting these principles into practice in their daily work and thus contributing to a responsible and successful company.

XX. Insider trading and market abuse

The management of ToolsGroup B.V. places the highest value on integrity, transparency, and compliance with legal regulations. In the area of insider trading in particular, we would like to make it clear that we have zero tolerance for such illegal practices among our employees, vendors, and service providers.

Our actions are based on the European Commission's Market Abuse Regulation and other relevant international laws, which all employees, vendors, and service providers must comply with. Insider trading is in clear conflict with legal requirements and has serious legal consequences. We are therefore

determined to ensure that every employee and business partner is aware of their obligations and act accordingly.

Insider information covered by this Code of Conduct includes various types of non-public information. This includes all information that relates directly or indirectly to one or more stocks or financial instruments. Such information, if it becomes publicly known, could have a significant impact on the price of financial instruments.

For employees, vendors, and service providers of ToolsGroup B.V., the term "insider information" refers in particular to all information disclosed by a customer. This information may, for example, relate to a customer's orders.

It is crucial that our vendors, and service providers are also aware of the definition of insider information and take all necessary steps to ensure that their own employees do not engage in insider trading and do not disclose or misuse insider information.

The employees of ToolsGroup B.V., vendors, and service providers are obliged to keep insider information secret and not to use it for illegal purposes.

XXI. No violations of general laws

In our company, we attach great importance to compliance with all legal provisions and regulations. This applies not only to our internal processes, but also to our vendors, and service providers. ToolsGroup B.V. would like to emphasize that we do not tolerate any violations of the law. This includes, in particular, relevant criminal law and regulations from other countries that are subject to fines.

For ToolsGroup B.V. integrity and legality of our business practices are paramount. Our employees are obliged to comply with the applicable laws and regulations in their professional activities at all times. This includes not only the obligation to familiarize themselves with the relevant regulations, but also to observe them in their daily work. Every employee is responsible for his or her own actions and contributes to ensuring that our company enjoys an ethically impeccable reputation.

Our vendors and service providers are also part of this ethical standard. ToolsGroup B.V. expects them to observe and comply with all legal requirements in the countries in which or for which they operate. This includes not only compliance with criminal law, but also in particular compliance with all regulations that are subject to fines. We are aware that the legal framework can vary from region to region and therefore expect our employees and business partners to inform themselves and act accordingly.

It is essential that all those associated with our company share the same high standards of legal compliance and ethics. We do not tolerate any deviation from these principles. If employees, vendors, or service

providers violate applicable laws, they may face severe consequences. These can range from disciplinary measures to legal action.

In the case of employees, this can range from internal sanctions to consequences under employment law such as dismissal or recourse claims. We are aware of our responsibility to create an environment in which ethical and legally compliant behavior is encouraged and rewarded. At the same time, however, we are determined to act against any misconduct and uphold the integrity of our company.

Vendors and service providers who violate laws and regulations must also expect serious consequences. This can range from termination of cooperation to legal action and claims for damages. We take the selection of our business partners very seriously and expect them to adhere to the same high standards of legality and ethics as we do.

Our commitment to legal compliance extends beyond national borders. We respect the diversity of the legal systems in which we operate and adapt our business practices accordingly. However, this does not mean that we will be lenient in the event of violations of laws in any country. We will act consistently to uphold the integrity of our company and ensure that we fulfill all aspects of our ethical and legal obligations.

Overall, ToolsGroup B.V. stands for a culture of legality, transparency, and ethical responsibility. We are proud to embed these values in all our business activities and will continue to do everything in our power to ensure that our employees, vendors, and service providers share, respect, and adhere to these principles.

XXII. Export regulations and sanctions laws

The Code of Conduct of ToolsGroup B.V. forms the foundation of our business practices and obliges us as a company as well as our customers and business partners to act responsibly. All business partners, including our customers, are obliged to strictly comply with all applicable export regulations and sanctions laws.

Compliance with export regulations and sanctions laws is critical to ensure that our business activities are conducted ethically and in accordance with international laws and standards. With this in mind, we are committed to ensuring that none of our actions lead to violations of applicable regulations. This explicitly includes that neither we as a company nor our customers and business partners may supply products or services to sanctioned countries, customers, or other market participants.

It is imperative that our customers and business partners also require their own customers and buyers to comply with all relevant export regulations and sanctions laws. We expect our partners to actively cooperate to ensure that our products and services do not end up in the hands of individuals or organizations that have been sanctioned. By making a collective effort, we help to ensure that our business activities are not misused for illegal purposes.

Our commitment to compliance with export regulations and sanctions laws extends to all business areas and transactions. We require our employees, customers, and business partners to inform themselves about the applicable regulations and ensure that their actions comply with them. In the event of uncertainties or questions regarding the applicability of laws and regulations, lawyers and authorities must be consulted where necessary.

We do not tolerate violations of our principles of conduct with regard to export regulations and sanctions laws. If violations are identified, we reserve the right to take appropriate legal action and terminate business relationships. We are determined to maintain a corporate culture based on integrity and responsibility and expect all our stakeholders to commit to these principles.

XXIII. Conduct in the event of ambiguities or missing regulations

In the event of ambiguities or missing regulations, all employees of ToolsGroup B.V., vendors, and service providers are requested to ask themselves the following questions and to reflect self-critically on their own answers:

Does my behavior comply with the principles of this Code of Conduct?

Employees, vendors, and service providers must evaluate their actions in the context of the Code of Conduct and ensure that they are in line with the values and obligations set out therein.

Am I acting ethically and in accordance with all applicable laws and regulations?

Compliance with ethical standards and legal regulations is of central importance. Employees, vendors, and service providers must ensure that their actions respect not only the Code of Conduct, but also all relevant laws and regulations.

Would my behavior be considered appropriate by the public (press, social media, politics, etc.)?

Public perception is an extremely important aspect for our company. Employees, vendors, and service providers must ask themselves whether their behavior would stand up to public expectations, particularly in relation to social media, press coverage and political debates.

Does my behavior contribute to protecting the reputation of our company and its integrity?

The reputation and integrity of the company are shared responsibilities of all employees, vendors, and service providers. Actions must contribute to preserving and protecting the positive image and integrity of the company.

If there are still uncertainties, employees, vendors, and service providers are obliged to consult the management of ToolsGroup B.V. .

XXIV. Obligation to comply with this Code of Conduct

Compliance with our Code of Conduct is crucial to the integrity and success of ToolsGroup B.V.. This commitment extends not only to our employees, but also to our vendors and service providers. We attach great importance to ensuring that all parties associated with our company respect and integrate common ethical standards.

Our employees are the driving force behind the success of our company. They are therefore obliged to follow the principles and values of our Code of Conduct in all their professional activities. This includes treating each other with respect, complying with legal regulations, avoiding conflicts of interest, and promoting a positive working environment. By consistently adhering to this Code of Conduct, our employees not only contribute to the company's reputation, but also to the creation of a corporate culture characterized by trust and integrity.

At the same time, the management of ToolsGroup B.V. expects all vendors, and service providers to commit to the same high standards. Working with vendors, and service providers who share our values is of central importance to us. Compliance with our Code of Conduct is therefore not only a condition for business relationships, but also a benchmark for the selection and maintenance of partnerships. We are actively committed to identifying vendors and service providers who not only deliver high-quality products and services but have also embedded ethical business practices and social responsibility in their corporate culture.

The obligation to comply with this Code of Conduct is a general business condition that applies to all vendors and service providers of ToolsGroup B.V.. Compliance with this Code of Conduct will become part of the employment contract of all employees as a secondary contractual obligation. These agreements clarify our expectations regarding ethical business conduct, the quality of the products and services supplied and compliance with all applicable laws and regulations. We see our vendors and service providers as an extension of our company and are committed to ensuring that they are an integral part of our values and principles.

To ensure that these obligations are met, we maintain open and transparent communication with our vendors and service providers. Regular audits and reviews may be conducted to ensure that our vendors and service providers comply with the standards set. We encourage dialog and the sharing of best practices to ensure that the values of our Code of Conduct are not only formally fulfilled, but also actively integrated into the corporate culture of our vendors and service providers.

This comprehensive commitment to compliance with the Code of Conduct extends beyond mere business cooperation. We see it as a shared responsibility to create a sustainable and ethical business environment that protects and promotes not only the interests of our company, but also those of our employees, customers, vendors, and service providers and the community at large. We believe that a commitment to

integrity and ethics is a fundamental requirement for successful and sustainable business and we are actively committed to embedding these principles in all our business activities.