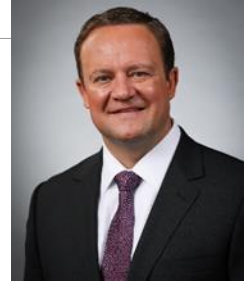


THIRD PARTY CODE OF CONDUCT

OREGON TOOL

INTEGRITY | RESPONSIBILITY | RESPECT



Dear Valued Partner,

At Oregon Tool, our vision is to become the undisputed global leader of professional grade cutting tools while making the world a better place. Our commitment to this vision is reflected in our Core Values: Leading with Humility, Global Stewardship, Pioneering Spirit, and Owning It. These values guide every aspect of our business, including how we engage with our partners and suppliers.

Leading with Humility

We believe that humility is the foundation of strong, respectful relationships. We expect our partners to approach their work with the same humility, valuing collaboration and mutual respect. By listening to and learning from each other, we can achieve greater success together.

Global Stewardship

As stewards of our planet, we are committed to sustainable practices that protect the environment and benefit the communities we serve. We expect our partners to share this commitment by adhering to environmentally responsible practices, reducing waste, and conserving resources. Together, we can make a significant positive impact on our world.

Pioneering Spirit

Innovation drives us forward, and we are always seeking new ways to improve and excel. We encourage our partners to embrace a pioneering spirit, fostering creativity and seeking out innovative solutions. By pushing the boundaries of what is possible, we can achieve extraordinary results.

Owning It

Accountability is key to our success. We expect our partners to take ownership of their actions, demonstrating reliability and integrity in all dealings. This includes complying with all applicable laws and regulations, upholding human rights, and ensuring fair labor practices.

We believe that by adhering to these principles, we can build strong, lasting partnerships that benefit not only our businesses but also our communities and the world at large.

Thank you for your commitment to upholding these standards and for your continued partnership. Together, we will achieve great things!

Sincerely,

A handwritten signature in black ink, appearing to read 'E. Zimmer'.

Elliot Zimmer
Chief Executive Officer

OREGON TOOL

THIRD PARTY CODE OF CONDUCT

1. Purpose

Oregon Tool expects the companies and individuals with whom we do business to embrace our commitment to ethical business practices and regulatory compliance. To that end, this Third Party Code of Conduct (the “Code”) sets out Oregon Tool’s specific expectations for anyone conducting business with, or on behalf of, Oregon Tool. All of Oregon Tool’s Third Parties are expected to adhere to—and train their workers on—this Code.

2. Scope

The Code applies to all (i) individuals and (ii) entities, including their employees, personnel, agents, representatives, and subcontractors, who provide goods or services to Oregon Tool or purchase goods or services from Oregon Tool or otherwise act on Oregon Tool’s behalf (collectively referred to as “Third Parties”). Third Parties include, but are not limited to, distributors, dealers, retailers, suppliers, vendors, , lawyers, lobbyists, and consultants.

3. Compliance with all Laws

Oregon Tool expects all Third Parties to comply fully with all national, local, and other laws applicable in any country or region in which the Third Party does business with, or on behalf of, Oregon Tool. If local laws or other regulations in a particular country or region in which Oregon Tool does business are more restrictive than any of the rules set forth in this Code, then any Third Party acting on behalf of Oregon Tool in that country or region must comply fully with the more restrictive requirements.

4. Business Integrity and Ethics

Bribery and Corruption. Oregon Tool strictly prohibits the (i) receipt, offer, or payment of bribes, (ii) kickbacks, (iii) facilitation payments by or to any person on Oregon Tool’s behalf, or (iv) the corrupt exchange of anything of value intended to advance Oregon Tool’s business interests. In the conduct of business with, or on behalf of, Oregon Tool, Third Parties shall comply with any and all applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act and the United Kingdom Bribery Act. Third Parties shall receive pre-approval from Oregon Tool Legal prior to incurring costs for any gifts, travel, or entertainment expenses involving Government Officials that are incurred in relation to Oregon Tool business. “Government Officials” refers to all of the following: (i) any employee of a government entity, agency, committee, or subdivision, including elected and appointed officials; (ii) any private person acting on behalf of a government entity, even if just temporarily; (iii) officers and employees of companies that are owned or controlled by the government; (iv) candidates for political office; (v) political party officials; and (vi) officers, employees and representatives of public international organizations, such as the World Bank and United Nations.

Lobbying & Political Contributions. Third Parties engaged by Oregon Tool to provide lobbying services shall comply with all laws, rules, and regulations governing lobbying, gifts, and payments to public officials, political campaign contribution laws, and other related regulations in all countries where they do business with, or on behalf of, Oregon Tool. Third Parties shall receive

pre-approval from Oregon Tool Compliance in relation to any political or charitable contributions that are incurred in relation to Oregon Tool business.

Economic Sanctions and International Trade. Third Parties must comply with, and not engage in any conduct that would result in penalties under, or cause Oregon Tool to violate or be exposed to penalties under, all sanctions, export control, import control, and anti-boycott laws of the United States and all countries where they do business with, or on behalf of, Oregon Tool. Third Parties are responsible for understanding how global trade laws and regulations apply to their business and adopting appropriate policies, procedures, and controls to comply with these laws in the conduct of business with, or on behalf of, Oregon Tool.

Money Laundering & Terrorism Financing. Oregon Tool expects Third Parties to take affirmative steps to prohibit and actively prevent money laundering or any activity that facilitates money laundering or the funding of terrorism or other criminal activities in relation to business with, or on behalf of, Oregon Tool. Third Parties shall only make payments from, and request payments be made to, the authorized bank accounts designated in their written agreements with Oregon Tool unless another account is otherwise approved in writing by Oregon Tool's Chief Compliance Officer.

Fraud. We expect our Third Parties to be truthful and act honestly and with integrity. Seeking to gain an advantage of any kind by acting fraudulently, stealing, deceiving people or making false claims, or allowing anyone else to do so in relation to business with, or on behalf of, Oregon Tool is prohibited.

Conflicts of Interest. Third Parties must avoid all conflicts of interest or even the appearance of conflicts of interest. Third Parties are expected to promptly disclose actual or potential conflicts of interest regarding their business activities with Oregon Tool. Conflicts of interest may include undisclosed ownership or control of or personal relationship with Third Parties by an Oregon Tool employee or their family member.

Business Courtesies & Gifts. Third Parties are not permitted to provide gifts or other business courtesies in the conduct of business on behalf of Oregon Tool unless they receive pre-approval from Oregon Tool Legal prior to incurring the expense.

Antitrust and Competition Laws. Oregon Tool is committed to fairly competing and following applicable antitrust and competition laws in the United States and internationally. We expect Third Parties to do the same.

5. Environmental Management

Protecting the Environment. Oregon Tool seeks to avoid, minimize, and/or remediate negative impacts on the environment. Third Parties conducting business with, or on behalf of, Oregon Tool shall conduct activities in an environmentally responsible manner, including by satisfying all applicable environmental laws, rules, and regulations, including those regarding air emissions, water discharges, toxic substances, recycling, and hazardous waste disposal. Third Parties shall also work to reduce or eliminate waste of all types.

Environmental Permits. Third Parties shall obtain, keep current, and comply with all applicable environmental permits, registrations, and reporting requirements.

6. Health & Safety

Oregon Tool values the well-being of everyone doing business with, or on behalf of, our company. Third Parties doing business with, or on behalf of, Oregon Tool must comply with all applicable laws, rules, and regulations regarding health and safety. Third Parties shall also take proactive measures to minimize accidents, injuries, and health risks.

Hygiene. Third Parties must provide a hygienic work environment for their employees, including adequate and clean toilet and hand-washing facilities with basic hygiene amenities.

Health & Safety Permits. Third Parties shall obtain, keep current, and comply with all applicable health and safety permits, registrations, and reporting requirements.

Emergencies. Third Parties shall establish and maintain emergency response procedures.

7. Human Rights & Labor

Ensuring people are treated with dignity and respect is fundamental to Oregon Tool's business and the sustainability of the communities in which we operate. All Third Parties must complete the Oregon Tool Third Party Ethics & Compliance Certification and comply with the following:

Conflict Minerals, Forced Labor and Responsible Sourcing. Third Parties must maintain appropriate policies, procedures, and controls to reasonably ensure that materials and components were obtained from permissible sources in compliance with all relevant laws, rules, and regulations and free from conflict minerals or materials or components produced or procured through forced labor. Third Parties must make reasonable efforts to supply materials to Oregon Tool that are "conflict-free" and free of forced labor and must be prepared to provide certification of this designation and documentation of compliance upon request.

Non-Discrimination. Third Parties shall provide workplaces free of discrimination. Third Parties shall not discriminate against any worker in hiring or employment practices based on age, disability, ethnicity, gender, gender identity, marital status, medical condition, national origin, military service status, political affiliation, pregnancy, religion, sexual orientation, union membership, or any other status protected by law.

Harassment & Abuse. Third Parties shall commit to a workplace that is free of harassment and abuse, including sexual harassment, corporal punishment, or any other behavior that creates an intimidating, offensive, abusive, or hostile work environment.

Protection of Human Rights. Oregon Tool is committed to complying with human rights law. Third Parties shall likewise comply with applicable human rights law and shall otherwise uphold the human rights of workers, including by treating them with dignity and respect.

Grievances. Third Parties should address any complaints or grievances in their companies or supply chains and comply with the reporting obligations set out in this Code. Third Parties should also cultivate a culture of compliance, including by protecting whistleblower confidentiality and prohibiting retaliation.

Oregon Tool is committed to building and maintaining relationships based on inclusion, transparency, and integrity with all stakeholders in the communities in which we do business. We expect the same commitment from Third Parties.

8. Data & Intellectual Property

Third Parties are expected to respect the intellectual property ownership rights of Oregon Tool and others, including but not limited to copyrights, patents, trademarks, and trade secrets, protect confidential information, and comply with any and all applicable data privacy rules and regulations in the conduct of business with, or on behalf of, Oregon Tool.

Third Parties who collect, receive, store, or otherwise process personal data in connection with the products or services they provide to Oregon Tool must appropriately handle and protect such data and comply with all applicable laws, rules, and regulations as well as any contractual obligations applicable to the handling of such data. Third Parties are expected to adopt appropriate measures to safeguard all Oregon Tool confidential information, electronic data, intellectual property, know-how, and technologies.

All data stored or transmitted on Oregon Tool-owned or leased equipment should be regarded as property of Oregon Tool. Third Parties are expected to use Oregon Tool-provided information technology and systems (including email) only for authorized Oregon Tool business-related purposes. Oregon Tool strictly prohibits Third Parties from using Oregon Tool-provided technology and systems to (i) create, access, store, print, solicit, or send any material that is intimidating, harassing, threatening, abusive, sexually explicit, or otherwise offensive or inappropriate, or (ii) send any false, derogatory, or malicious communications. Oregon Tool may monitor all use of the corporate network and all systems (including email) and may access all data stored or transmitted using the Oregon Tool network.

9. Media

Third Parties shall not speak publicly or otherwise to the media on behalf of Oregon Tool except under circumstances where expressly authorized in writing to do so by an Oregon Tool communications representative.

10. Subcontractors

Third Parties must obtain written consent from Oregon Tool prior to engaging a subcontractor to fulfill Third Party's obligations to Oregon Tool in addition to meeting any other obligations contained in any agreement a Third Party may have with Oregon Tool.

11. Training

Oregon Tool may require Third Party representatives to attend training on this Code and/or any aspect of Oregon Tool's expectations in relation to Third Party conduct. Third Parties must participate in such training, as required, which will be scheduled with reasonable advance notice and in consultation between Third Party and Oregon Tool.

Moreover, Third Parties are expected to ensure that all employees and agents supporting business with, or acting on behalf of, Oregon Tool fully understand Third Party's obligations under this Code and have received appropriate guidance and training from Third Party to ensure compliance with the expectations set out herein as well as all applicable laws, rules, and regulations.

12. Accounting & Recordkeeping

Third Parties are required to keep and maintain accurate books and records of all business dealings with, and on behalf of, Oregon Tool in accordance with applicable standard accounting practices.

13. Audits

At any time, with reasonable advanced notice, Oregon Tool reserves the right to audit and/or authorize another party to audit Third Parties’ facilities and books and records. Such audits may include human rights and environmental audits. Third Parties shall allow unfettered access to facilities and books and records, including the opportunity for confidential interviews with any workers. Third Parties shall not retaliate against any auditors or workers.

Upon review of any audit results indicating a violation of this Code, Oregon Tool, in its sole discretion, reserves the right to terminate relationships with Third Parties, cancel purchase orders, return or revoke acceptance of affected goods, and/or require corrective action to be taken. Third Parties shall be liable for all related damages incurred by Oregon Tool, including lost profits.

14. Reporting

If Third Party becomes aware of any red flags, suspicion, allegation, investigation, action, suit, or proceeding regarding violation of this Code or of applicable laws, rules, or regulations in relation to business with, or on behalf of, Oregon Tool, Third Party shall promptly notify Oregon Tool.

Third Parties may raise reports directly to their primary point of contact at Oregon Tool or anonymously via Oregon Tool’s Speak Up! Hotline. Oregon Tool’s Speak Up! Hotline is managed by an independent third-party provider of corporate compliance services.. Third Parties can access the Speak Up! Hotline online at <https://oregontool.integrityline.com/> .

Oregon Tool strictly prohibits retaliation, threats of retaliation, or other adverse action against any Third Party who (i) reports suspected misconduct in good faith or (ii) cooperates in good faith with any Oregon Tool internal or other investigation into potential misconduct. Anyone who retaliates against any Third Party for engaging in any of these activities is subject to disciplinary action. If you have a concern regarding retaliation, please report it to Oregon Tool Compliance.

15. Code Violations

Oregon Tool takes compliance with this Code very seriously and reserves the right to assess and monitor Third Parties’ compliance with this Code. Violations of the Code will result in a review of our business relationship, up to and including termination of the relationship.

16. Document Management

This Code will be reviewed annually and revised as needed.

Revision Date	Description	Policy Owner
6.19.2024	Final version of Third-Party Code of Conduct	Chief Compliance Officer