

CODE OF CONDUCT

For Employees of
TTS TOOLTECHNIC SYSTEMS AG & CO. KG
and all its affiliated companies ("TTS")

INTRODUCTION

TTS is synonymous with outstanding performance, excellence, and a strong capacity for innovation. We aim to manufacture the best and most effective tools, accessories and consumables for specific target groups.

The principles of benefit-oriented, responsible, innovative and flexible guide our actions. According to these principles, the core strategic goal of TTS is to improve the company's competitiveness by

- making professional tradespeople successful and proud,
- enabling passionate individuals to meet ambitious goals,
- growing profitably and securing our independence as a family-owned company.

In doing so, TTS commits to adhere to the law and do business honestly, transparently, openly and fairly. As a third-generation family business, these values are particularly important to us.

In order to ensure compliance with these basic principles at TTS, this TTS Code of Conduct was developed for all employees of the Group, including executives, managing directors of affiliated companies, and the Management Board. It provides the ethical and legal framework for our actions. The rules in the Code of Conduct must be followed when performing our jobs.

As a global company, TTS is aware of its social and societal responsibility. To ensure that our business partners are also committed to these values, we have summarized these principles in a separate Code of Conduct for Business Partners.

I CORPORATE SOCIAL RESPONSIBILITY

TTS accepts its responsibility for people, nature, and the community. Priorities are:

- environmental responsibility and sustainability, and
- mutual trust and respect.

1. Health and Occupational Safety, Environmental Protection

TTS considers it a key responsibility to pursue technical progress in harmony with the environment and to avoid hazards to people and nature. This necessitates compliance with all applicable health, labor, and environmental protection standards as well as with all other internal guidelines regarding health and occupational safety, and sustainable environmental protection.

2. Product Quality and Safety

TTS products are manufactured under strict compliance with quality standards. We attain the highest degree of product safety with an optimal quality management system and a systematic "zero defect" strategy. All statutory and company rules concerning product safety must be followed to the letter. Compliance with these rules is an expression of our comprehensive responsibility for our products. When necessary, employees are required to inform the responsible departments immediately about possible safety concerns and do everything necessary to protect our customers.

3. Trust

We treat our employees as entrepreneurs within the company and expect them to act independently when fulfilling the responsibilities assigned to them. From a risk management perspective, however, we generally apply the dual-control principle to our activities.

4. Diversity, Non-discrimination and Mutual Respect

Respectful treatment of others at the company and business partners is a fundamental element of corporate governance.

We want to actively cultivate and demand diversity. TTS follows the principle of equal opportunity in selecting and promoting employees. Discrimination of any kind against our employees based on age, disability, ethnic heritage, skin color, gender, sexual orientation, citizenship, religion, marital status, or other characteristics is prohibited.

Discriminatory behavior or sexual harassment among TTS employees will not be tolerated. Employees of TTS are assessed solely based on their performance.

TTS complies with the applicable minimum wage, occupational safety and labour standards of the International Labour Organization (ILO).

II COMPLIANCE WITH THE LAW AND RESPONSIBILITY

TTS expects all its employees to be familiar with and comply with the laws and other mandatory regulations applicable in the workplace. In addition, all employees must strictly adhere to internal guidelines.

Involvement in violations of the law or deviation from internal guidelines may not only tarnish the good reputation of TTS but also endanger every employee's job.

Moreover, all employees are expected to uphold and promote the reputation of TTS in the public sphere. TTS expects all activities to be conducted such that they could be made public or withstand public scrutiny at any time.

When TTS employees express their private opinions in public, they must ensure that the impression is not given that these are positions taken by the company.

III FAIR COMPETITION

Free and fair competition is the fundamental requirement for a functioning market economy. TTS therefore always acts fairly in pursuing its corporate goals. The rules of fair competition vary between the countries and markets in which TTS conducts its business. Therefore, TTS is committed to comply with the applicable anti-trust regulations and gives employees guidance based on the applicable jurisdiction.

In general, any agreements with competitors or coordinated activities that aim to or serve to impede, or limit competition in an unlawful manner are prohibited. These prohibitions refer not only to contractual agreements but also to other coordinated actions that aim to or serve to limit competition in an unlawful manner, and to the announcement of or invitation to undertake any unlawful anti-competitive market activities.

With respect to any TTS business partners, distributors, resellers and dealers (collectively, "Customers"), agreements or concerted practices which unlawfully influence a Customer's right to determine their selling price is prohibited. However, TTS is entitled and reserves the right to protect its brands and to choose to do business with Customers who do not damage any TTS brand. TTS also has the right to give Customers qualitative brand and advertising policies as to how TTS products are to be presented, demonstrated and sold in a brand-compliant manner.

IV COMBATING CORRUPTION

TTS is committed to high ethical standards in its business transactions. Dishonest actions by employees or business partners will not be tolerated.

To this end, TTS has issued anti-corruption guidelines in which these requirements are described in detail.

1. No Improper Granting of Perks

In acquiring orders, TTS depends solely on the company's own performance and quality of its products and services. This applies equally to competition for public-sector as well as private-sector orders. Employees are therefore not permitted to attempt, either in Germany or abroad, to unlawfully influence others while doing business by exchanging gifts or offering or granting other perks.

2. No Improper Acceptance of Perks

Employees are not permitted to request invitations, gifts, or other personal perks from business partners. Accepting such perks is subject to the rules in the TTS anti-corruption guidelines.

In cases of doubt, approval must be obtained from the employee's supervisor or the Compliance Officer.

3. Hiring of Third Parties and Investment Decisions

In hiring third parties (for example, consultants, brokers, representatives, or other business partners), care must be taken to ensure that these third parties do not follow any improper or dishonest business practices or violate the values of TTS.

Third parties may not be used by employees to bypass the rules.

V Foreign Trade

In our international activities, we comply with the provisions of foreign trade, tax, and customs law of the countries in which we do business. All employees must adhere to these control regulations when products are purchased, manufactured, or distributed. As a rule, export controls apply not only to delivering goods but also to providing services and transferring technologies.

All employees involved in goods import and export or other cross-border transactions must comply with the applicable trade control laws. In line with the applicable regulations in each case, employees must always guarantee that the required approvals are obtained from government agencies.

VI DONATIONS AND SPONSORSHIPS

Donations to charitable and social causes are an important aspect of corporate social responsibility. TTS has defined processes and approvals to ensure transparency about the receiver and planned use of donations.

Sponsorships within the scope of our businesses is part of regular business decisions in marketing. The amounts must be in reasonable proportion to the advantages gained from the sponsorship, i.e. particularly the anticipated advertising impact. Sponsorships outside of our normal business scope (i.e. Sports) require special approvals.

Donations and sponsorships may not be misused for unlawful purposes. Third parties may not be granted any perks under the cover of donations or sponsorships.

VII CONFIDENTIALITY

Trade and business secrets and all other confidential information of which employees become aware while performing their jobs must be kept secret. Such information must be suitably protected from access by third parties and non-involved employees. This applies particularly to development work and research results as well as to information about suppliers, customers, employees, business partners and other third parties, and to internal company information. The non-disclosure obligation continues to apply even after employment has ended.

VIII DATA PROTECTION AND SECURITY

The protection of personal data and the right to self-determination with respect to personal information is an important issue for TTS. When using personal data in business activities, we therefore protect the private lives of individuals and comply with data protection regulations.

Guaranteeing the security of data, particularly from unauthorized access by third parties, is our top priority. Personal data and all business data are therefore protected with suitable technical means from access by unauthorized parties.

IX CORRECT REPORTING

All forms of corporate communications intended for publication must comply with the law and adhere to international standards. Generally accepted bookkeeping and accounting standards must be followed for financial reports and similar publications.

X CONFLICTS OF INTEREST

The business interests of TTS and private interests must be kept strictly separate. Situations in which private interests' conflict with those of TTS must be avoided.

Possible conflicts of interest may arise in business relationships with third parties. It is of the utmost importance that TTS employees make business decisions only based on objective criteria such as quality, price, or product suitability and document these accordingly, so that the decisions are transparent.

Conflicts of interest can also arise in human resources decisions. In this case, assurance must be given that these are not influenced by private interests or personal relationships.

If conflicts of interest were to arise nonetheless, these must be resolved with the involvement of a supervisor.

XI COMPANY PROPERTY AND FACILITIES

All TTS employees are responsible for the maintenance and proper use of company property. Objects owned by TTS may not be used for private purposes without the prior written approval. Approval is also required if property is removed from the company's premises or copied.

XII MONITORING AND DOCUMENTATION OF RISKS

Running a business means constantly taking risks. TTS actively manages the risks it faces within the framework of ethical and legal standards.

TTS operates a risk management system for two reasons: to avoid threats that would endanger the continued existence of the company and react to macroeconomic changes early as well as to transparently report the risk situation to parties including the owners and supervisory bodies.

XIII MONITORING AND PURSUING VIOLATIONS

All employees are responsible for their own personal actions.

TTS executives bear a special responsibility. They must ensure by suitable means that in their sphere of responsibility:

- no violations of statutory regulations, internal guidelines or standards occur that could have been prevented or made more difficult by proper performance of supervisory or organizational duties, and
- any violations are identified, pursued and remedied.

Open conversations are the foundation of trust. All employees are encouraged to report irregularities of which they become aware to the Compliance Officer:

E-mail: compliance@tts-company.com

Phone: +49 7024-804-20256

Mail: Compliance Officer (HV-Z)
Confidential/Vertraulich
Wertstraße 20
73240 Wendlingen
Germany

All reports will be treated as confidential upon request. TTS will immediately follow up on such reports in order to clear up and remedy possible violations and prevent them from occurring in the future.

If you have any questions about the interpretation or application of these or any other rules or regulations, please contact your supervisor or the Compliance Officer.

Compliance with the TTS Code of Conduct is verified through regular audits by the internal audit department. TTS reserves the right to take disciplinary action in the event of violations of statutory regulations or internal guidelines.

Wendlingen, March 2022

TTS Tooltechnic Systems AG & Co. KG

The Management Board



Sascha Menges



Dr. Wolfgang Knorr



Oliver Neubrand



Christian Oltzsch