



# CODE OF CONDUCT

The code of conduct of toolcraft AG

**toolcraft**

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## FOREWORD


At toolcraft AG, we take responsibility for the legal, economic, technological, social and environmental consequences of our business decisions and activities to the greatest extent possible within our scope of action.

We want to contribute to the social and economic development of the countries and regions with which our company has ties. Our activities are in line with the relevant legal regulations.

We are guided by ethical values and principles, in particular integrity and honesty as well as respect for the dignity of human beings as set out in the principles of the Universal Declaration of Human Rights of the United Nations, the OECD Guidelines for Multinational Enterprises, the Core Labour Standards of the International Labour Organization (ILO) and the Guiding Principles on Business and Human Rights of the United Nations.


This Code of Conduct lays down the basic principles to be followed within our areas of activity. We actively call for it to be observed by all our employees\*. Its contents apply to all our company's locations and divisions. We expect the same basic understanding from our business partners. The Code of Conduct is not intended to constitute the basis for the creation of third-party rights.



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## **1. COMPLIANCE WITH LEGISLATION**

It goes without saying that we comply with the current laws and other legal provisions in the countries in which we operate. In the event that the local laws and provisions are less restrictive, our actions are guided by the principles outlined in this Code of Conduct. In cases where there is a direct conflict between mandatory local law and the principles laid down in this Code of Conduct, the local law takes precedence. Nevertheless, we strive to comply with the contents of this Code of Conduct.

## **2. INTEGRITY AND COMPLIANCE**

We have taken appropriate compliance measures to ensure that the following areas are covered appropriately:

### **2.1 CORRUPTION**

We do not tolerate corruption, bribery or blackmail; they impede fair competitive conditions. Gifts given with the intention of influencing business decisions or of obtaining another undue advantage or that could give the appearance of having such an intention are not promised, offered, given, requested or accepted in our business relationships; we also do not allow such gifts to be promised to us. Especially strict standards must be followed when dealing with people for whom particular rules apply under criminal and liability law (e.g. public officials).

### **2.2 FAIR COMPETITION**

We operate in compliance with national and international competition and antitrust law and do not participate in price fixing, the sharing of markets or collusion in relation to customers, markets and bids. Each of our employees is requested to actively contribute to the implementation of this fair competition policy within their area of responsibility.

### **2.3 PREVENTION OF MONEY LAUNDERING**

We comply with our legal obligations to prevent money laundering and do not participate in transactions that serve to conceal or integrate criminal or illegally acquired assets.

## **2.4 PROTECTION OF INFORMATION AND INTELLECTUAL PROPERTY**

We protect confidential information and respect intellectual property; technology and expertise must be transferred in such a way that protects intellectual property rights, customer information, business secrets and information that is not in the public domain. We observe the current laws on the protection of business secrets and treat our business partners' confidential information accordingly.

## **2.5 DATA PROTECTION**

We observe the current laws and regulations on the collection, processing, storage and transfer of personal data belonging to our employees, customers, suppliers, prospective customers and partners.

## **2.6 EXPORT CONTROL**

We undertake to comply with the legal standards relevant to export control – in particular licensing requirements, export bans and support bans – while transporting and exporting our goods.

## **2.7 AVOIDANCE OF CONFLICTS OF INTEREST**

At toolcraft, we only make business decisions on the basis of objective criteria and in the company's best interest. We avoid internal and external conflicts of interest that could illegitimately influence business relationships.

## **2.8 AVOIDANCE OF FRAUDULENT ACTIVITY**

We stand for integrity, fairness, and transparency. Therefore, we strictly distance ourselves from all forms of deceit, trickery, dishonest practice, or breach of confidence, intentionally perpetrated for profit or to gain some unfair or dishonest advantage. This includes but is not limited to falsification of information, intentional omission, false pretenses, and deliberate misuse of qualified resources or certification/qualification/authorization.

## **2.9 DONATIONS**

We see ourselves as an active member of society and are committed to supporting society in various ways. We only make donations and participate in other forms of social engagement in line with our company's interests. We do not make any financial donations to political parties, similar political organisations, individual elected officials or candidates for political offices.

### **3 HEALTH AND SAFETY**

We protect our employees' health by taking appropriate measures for ensuring health and safety in the workplace (e.g. by analysing health in the workplace). These measures adequately cover the following areas:

- + Compliance with current laws and a focus on international standards relating to health and safety in the workplace;
- + Appropriate workplace design, safety regulations and the provision of suitable personal protective equipment;
- + The implementation of preventive checks, emergency measures, an accident reporting system and other appropriate measures for continuous improvement;
- + Provision of access to a sufficient quantity of drinking water as well as access to clean sanitary facilities for employees.

We make sure that all our employees receive adequate training.

### **4 REMUNERATION AND WORKING HOURS**

Our employees receive fair and adequate remuneration in observance of the legal requirements on the minimum wage.

Employees are given clear, detailed and regular information on the composition of their pay.

We comply with current laws and (international) labour standards on the maximum permissible working hours.

### **5 OBSERVANCE OF HUMAN RIGHTS**

We ensure and support observance of internationally recognised human rights and

- + respect the personal dignity, privacy and personal rights of each individual;
- + protect and uphold the right to the freedom of speech and freedom of expression;
- + do not tolerate the unacceptable treatment of employees, including physical and psychological hardship, sexual and personal harassment or discrimination.

## **5.1 PROHIBITION OF CHILD LABOUR**

We do not tolerate child labour. We do not employ anyone who cannot prove that they are at least 15 years of age and we ask to see proof of age to verify this. We do not employ anyone for hazardous work who cannot prove that they are at least 18 years of age pursuant to ILO Convention No. 182.

## **5.2 PROHIBITION OF FORCED LABOUR**

Forced labour, modern slavery or comparable acts that deprive individuals of their liberty are prohibited. All work must be performed at the individual's own free will and each employee must be in a position to terminate their employment relationship.

## **5.3 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING**

We respect the right of employees to freedom of association and freedom of assembly as well as their right to engage in collective bargaining and pay negotiations, insofar as this is legally permissible and possible.

## **5.4 PROMOTION OF DIVERSITY AND EQUAL OPPORTUNITIES**

We promote equal opportunities and do not tolerate discrimination. We treat all people equally, regardless of their gender, age, skin colour, ethnic origin, sexual identity and orientation, disability, religious affiliation, world view and other personal characteristics.

## **5.5 TRANSPARENCY, TRUST AND COOPERATION**

Transparency is crucial for building trust and ensuring successful cooperation. We place great emphasis on creating an open environment in which our employees can turn to their team leader, the head of their division or the Executive Board without hesitation and with confidence even if they wish to discuss a critical matter.

## 6 ENVIRONMENT, ENERGY AND CLIMATE ACTION

We act in compliance with current laws and are guided by international standards to minimise negative impacts on the environment and to continuously improve our efforts to protect the environment and climate.

All our employees are made aware of the importance of protecting the environment and we offer the necessary training in this area.

We have taken appropriate measures to protect the environment (e.g. the implementation of an

operational environmental management system). These measures adequately cover the following environmental matters:

- + reduction of carbon emissions,
- + increase in energy efficiency and the use of renewable energy,
- + reduction of water consumption,
- + encouragement of resource efficiency,
- + reduction of waste and proper waste disposal, and
- + responsible handling of substances that are hazardous to humans and the environment.

## 7 DEALING WITH CONFLICT MINERALS

We take the necessary care to implement measures to avoid the use of conflict minerals in our products so as to prevent related human rights violations, corruption and the financing of armed groups or similar.

## 8 SUPPLY CHAIN

We expect our suppliers to observe the principles of this Code of Conduct or to apply comparable codes of conduct. We also encourage them to ensure that the contents of this Code of Conduct are applied in their own supply chains.

We reserve the right to verify systematically and as warranted whether this Code of Conduct is being applied by our suppliers. This verification may, for example, take the form of questionnaires, assessments or audits.

If this verification process causes doubts to arise as to whether a supplier is observing this Code of Conduct, the supplier will be requested to take appropriate countermeasures and to inform the responsible point of contact within our company of the steps taken. If necessary, the working relationship with the supplier will be terminated.

## 9 IMPLEMENTATION AND ENFORCEMENT

We take appropriate and reasonable efforts to continuously implement, document and apply the principles and values laid down in this Code of Conduct. All our employees are made aware of the contents of the Code of Conduct. Violations of the Code of Conduct are not tolerated and may have consequences under employment law.

### 9.1 COMMUNICATION

When communicating about the requirements and implementation of this Code of Conduct with our employees, customers, suppliers and other stakeholders and interest groups, we do so openly and engage in dialogue with them.

## 10 REPORTING OF VIOLATIONS AGAINST THIS CODE OF CONDUCT

We provide our employees and business partners with access to a protected mechanism on our website that allows them to confidentially report violations against the principles of this Code of Conduct. This mechanism can be accessed, for example, through the keyword "Reporting".

Within the company, violations can also be reported at any time to the employee representative committee and discussed in confidence.

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