

# **CODE OF CONDUCT**

## **OREGON TOOL**

**INTEGRITY | RESPONSIBILITY | RESPECT**

Dear Team Members,

At Oregon Tool, our journey to become the undisputed global leader of professional grade cutting tools begins with our people. We are building a high-performing, people-first culture – one where every Team Member feels empowered, valued, and supported to do their best work. Our commitment to integrity, responsibility, and respect shapes how we operate and how we lead. Our actions, both big and small, shape the legacy we leave behind and the impact we have.

The Oregon Tool Code of Conduct, grounded in our Core Values, is here to guide us as we navigate challenges, support one another, uphold the highest ethical and legal standards and strive for excellence in everything we do. Our Core Values are defined by the following principles:

- Global Stewardship – we serve a higher purpose than the products we make and are devoted to positively impacting people, communities, and landscapes around the world.
- Lead with Humility – we believe in inspiring, listening, learning, and rolling up our sleeves to “get to work” together.
- Pioneering Spirit – born from our heritage story, we have a deep-rooted desire to innovate and grow.
- Own It – we are accountable for every action, so we do what we say we’re going to do.

While our Code of Conduct and Core Values provide important guidance, they cannot address every situation we might face. That’s why we rely on each other to lead with integrity, use sound judgment, and speak up when something doesn’t feel right. When questions arise, don’t hesitate to reach out—to a leader, a colleague, or one of the resources outlined in this Code. Together, we create a culture of trust, support, and shared accountability.

If, for any reason, you should have questions or concerns regarding the terms of this Code of Conduct, please contact Emily Lyle, our Senior Vice President, HR and ESG at +1 503.905.5103 or [emily.lyle@oregontool.com](mailto:emily.lyle@oregontool.com) or Nicole Keen, our General Counsel and Chief Compliance Officer at +1 503.653.4446 or [nicole.keen@oregontool.com](mailto:nicole.keen@oregontool.com).

As your CEO, I am committed to leading with transparency and authenticity—and to creating an environment where every voice is heard, and every Team Member can thrive. Alongside our Executive Leadership Team and Board of Directors, I ask each of you to embrace the principles in this Code, act with purpose, and continue building a culture that delivers for our customers, our teams, and the communities we serve. Together, we can uphold the highest standards of integrity and ethics and continue to drive the success of our company.

Thank you for your commitment to Oregon Tool and for your dedication to our Core Values.



Terry Hames  
Chief Executive Officer

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# OREGON TOOL

## CODE OF CONDUCT

[ July 2025 ]

### INTRODUCTION

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Oregon Tool, Inc., including all its subsidiaries, affiliates, divisions, and other business units (“Oregon Tool”), is committed to achieving the highest standards of legal and ethical conduct for itself and its Board of Directors (“Directors”), officers, and employees. For purposes of this Code of Conduct (the “Code”), references to “Team Members” include employees, officers, and Directors.

The Code sets forth appropriate legal and ethical principles by which all Team Members are expected to abide. The Code is designed to provide each Team Member with guidance on how to proceed when legal or business ethics issues arise. While covering a wide range of business practices and procedures, the Code cannot and does not cover every specific issue that may arise or every specific situation in which ethical decisions must be made. Instead, the Code illustrates and sets forth key guiding principles of business conduct that Oregon Tool expects of its Team Members in order for Oregon Tool to conduct its business in compliance with all applicable laws and regulations and with the highest ethical standards. These key guiding principles should direct Team Members to an ethical resolution of the issue at hand.

### I. ACCOUNTABILITY

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It is the personal responsibility of all Team Members to acquaint themselves with the legal and policy standards applicable to their assigned duties and responsibilities and to conduct themselves accordingly. Team Members should always be guided by the following basic principles when performing their assigned duties and responsibilities:

- Avoid any conduct that could damage Oregon Tool or its reputation.
- Put Oregon Tool’s interests ahead of personal or others’ interests.

A Team Member who is unsure about the right thing to do is encouraged and expected to ask someone on his or her management team. Lack of knowledge is not an excuse for making poor ethical decisions. If a Team Member becomes aware of a violation of the Code, the Team Member must report the violation to the appropriate personnel, and any such report, made in good faith, will not subject the Team Member to retaliation by Oregon Tool.

### II. OBLIGATIONS

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Team Members will be required to certify, in writing, on a periodic basis that they are familiar with the Code, that they have conducted Oregon Tool’s business in compliance with the Code and applicable law, and that they have reported any known violation of the Code or any law.

### III. PROTECTION AGAINST RETALIATION

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Team Members may report a violation of the Code without fear of retaliation. No retaliatory action of any kind will be permitted against anyone making such a report in good faith. Good faith reporting of violations or possible violations will not result in adverse consequences to the person reporting them, even if the perceived violations are ultimately proved not to have occurred. Retaliation by any Team Member is grounds for discipline up to and including termination. Any retaliatory behavior should be promptly reported.

The duties and obligations set forth in the Code may not be waived for any executive officer or Director without prior approval of the Board of Directors.

### IV. CORPORATE AND TEAM MEMBER OBLIGATIONS TO OREGON TOOL

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#### **A. Confidentiality**

Much of the information that Team Members use for internal processes or create at work each day is confidential. Confidential Information is not generally known to competitors and others outside Oregon Tool and may include financial information (including but not limited to information about sales, earnings, expenses, and investments); pricing information; vendor or supplier lists; business development materials; cost of goods; personnel files; Oregon Tool manuals, guidelines, and procedures; computer software; design documents; specifications; and internal memorandums. Information collected from customers, suppliers or even fellow Team Members can also contain Confidential Information that may require protection.

Maintaining the confidentiality of Confidential Information is critical to Oregon Tool's competitive advantage and compliance with certain regulations or agreements. Confidential Information must not be disclosed, except as specifically authorized or legally required. Information that has been made public by Oregon Tool, such as press releases, news articles or advertisements, and public filings, is not considered confidential and does not require protection.

It is the responsibility of each Team Member to use discretion in handling Oregon Tool's Confidential Information so that it is not inadvertently revealed to competitors, vendors, suppliers, friends, or family members. If there is any question whether the information is confidential, assume it is and seek guidance from your supervisor/manager, the Information Security team at [informationsecurity@oregontool.com](mailto:informationsecurity@oregontool.com) or the Legal department.

#### **B. Public Statements**

Disclosing information, either orally or in writing, regarding our competitors, suppliers, products, advertising/marketing strategies, branding, etc., should be reviewed by Marketing and/or Corporate Communications to ensure the information is accurate, not misleading and that confidential information is not inadvertently disclosed.

Team Members should also avoid making statements on the behalf of or in the name of Oregon Tool. Only designated representatives, in collaboration with or through Oregon Tool's Corporate Communications team may make official statements either orally or in writing.

#### **C. Conflicts of Interest**

All Team Members must recognize and avoid any situation that might involve a conflict of interest. The term "conflict of interest" describes any circumstance in which a Team Member's personal interests, relationships, or activities, or those of a member of the Team Member's family, either interfere or conflict or appear to interfere or conflict with the interests of Oregon Tool. Activities that result in improper personal benefits as a result of the Team Member's

position with Oregon Tool, that involve the unauthorized use of Oregon Tool time, equipment, or information, that significantly interfere with job performance, that could damage the Team Member's or Oregon Tool's good reputation, or that otherwise conflict with Oregon Tool's business interests are conflicts of interest. In essence, a Team Member should always act in the best interests of Oregon Tool and not use his or her position or influence at Oregon Tool or Oregon Tool's assets for the advantage of the Team Member or his or her family, including but not limited to obtaining improper gifts, loans, or guarantees of obligations.

Team Members should not take or create for themselves, their family or friends, opportunities that are discovered through the use of Oregon Tool property, information, or position. Each Team Member should always avoid conflicts of interest, and should discuss any material transaction, situation, or relationship that could give rise to a conflict of interest, or appearance thereof, with the Corporate Attorney.

#### **D. Third-Party Arrangements**

Team Members should not, orally or in writing, enter into arrangements with third parties on behalf of Oregon Tool unless Team Members have the authority to do so. It is the responsibility of Team Members to understand their authority and to not enter into such arrangements on Oregon Tool's behalf without sufficient review and/or approval.

#### **E. Financial Controls**

All of Oregon Tool's assets, liabilities, revenues, and expenses must be properly recorded in appropriate Oregon Tool books and records. No false or fictitious entries may be made in, and no information that should be recorded may be omitted from, the books and records of Oregon Tool for any reason. All entries in Oregon Tool's books and records must properly reflect the nature of the transactions in full compliance with accounting rules.

#### **F. Intellectual Property Rights and Usage**

Oregon Tool's intellectual property is a valuable asset that must be used properly and protected from infringement by others. The intellectual property and confidential information of other parties must also be respected. "Intellectual property" is a term that describes creative works whose authors and inventors have legal rights to them. Copyrights, patents, trade secrets, and trademarks all belong to this category.

**Software Use.** The unauthorized copying of computer software is prohibited. Original computer software is protected by copyright law. The money paid for a software product generally represents a license fee for the use of one copy. Reproducing software without authorization may violate copyright laws (backup copies are usually permitted by license agreement).

**Trademarked/Copyrighted/Patented Materials.** The intentional unlicensed duplication of copyrighted material for the purpose of commercial gain or competitive advantage is unlawful and, in certain circumstances, constitutes a violation of criminal law. Team Members may not use or copy a trademark, copyrighted material, trade secret, or patented invention of another or allow others to use or copy an Oregon Tool trademark, copyrighted material, trade secret, or patented invention without written permission.

**Computer Espionage.** It is a violation of the Code and, in many cases, local or national law to use a Oregon Tool computer to gain unauthorized access to another computer system with the intent of (1) obtaining trade secrets or other confidential information, (2) destroying, impairing, or otherwise injecting a "virus" into the other system, or (3) committing any other type of computer fraud or theft.

## **G. Loans**

Oregon Tool is prohibited from directly or indirectly extending, maintaining, or guaranteeing credit (or arranging for an extension of credit) in the form of a personal loan to any Oregon Tool officer or Director.

## **H. Proper Use of Oregon Tool Property**

Protecting Oregon Tool's assets, both tangible and intangible, against loss, theft, fraud, waste, and misuse is the responsibility of all Team Members. These assets were acquired solely for the purpose of conducting Oregon Tool's business. They may not be used for personal benefit, sold, loaned, given away, or disposed of except with proper authorization. Further, all Team Members must protect Oregon Tool's assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on Oregon Tool's profitability.

Any suspected incident of fraud or theft should be immediately reported for investigation.

# **V. OBLIGATIONS TO THIRD PARTIES**

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## **A. Advertising**

Oregon Tool is committed to providing consumers with accurate, fair, and lawful information that is intended to help them make informed buying decisions.

Deliberately misleading messages, omissions of important facts or false claims about our products, individuals, competitors or their products, services, or Team Members are inconsistent with our Core Values. Sometimes it is necessary to make comparisons between our products and our competitors. When we do, we will make factual and accurate statements that can be easily verified or reasonably relied upon.

## **B. Antitrust Laws/Competitive Practices**

The objective of antitrust laws of the United States and similar laws addressing competitive practices in other jurisdictions in which Oregon Tool operates is to promote competition in open markets. Generally speaking, these laws prohibit activities or agreements that unreasonably restrain trade. It is Oregon Tool's policy to comply with all governmental antitrust laws and regulations, including but not limited to those laws related to price-fixing, bid-rigging, territorial or customer allocation, and refusal to deal.

For example, collaboration on prices or terms and conditions of sale with competitors is illegal under most circumstances and discussions with competitors concerning certain topics that could lead, or appear to lead, to such collaboration must be avoided. Oregon Tool will not share confidential and proprietary business information with competitors or customers that could unreasonably restrict its competitors' access to the market.

Antitrust laws are complex and can be difficult to understand. Team Members must seek the advice of the Corporate Attorney when dealing with antitrust issues. Any attempt to sell or otherwise disclose Oregon Tool's or anyone else's confidential information should immediately be reported to a manager or supervisor.

## **C. Business Entertainment, Gifts, and Political Contributions**

Business entertainment and, at times, the giving and receiving of gifts are a normal part of doing business. Oregon Tool has policies and guidelines regarding business entertainment and the giving and receipt of gifts to avoid having its integrity called into question. Further, to prevent damage to Team Members' or Oregon Tool's reputation, and to preserve Oregon Tool's integrity, a Team Member may not ask, directly or indirectly, for gifts or loans from Oregon Tool's current or prospective suppliers or customers or from government officials.

Team Members may accept unsolicited, inexpensive gifts from existing or potential suppliers or customers. But if a Team Member is unsure whether a gift's value exceeds the standards established by Oregon Tool, the Team Member should review Oregon Tool's policies and guidelines or seek guidance from Oregon Tool's Legal department. Gift baskets may be accepted if shared with others in the office. A Team Member may never give or accept a cash gift (including gift cards) or loan under any circumstance.

If a vendor, supplier, or customer invites an Oregon Tool Team Member for a reasonable and customary business meal or entertainment event at its expense, the Team Member may accept the invitation. If the Team Member is uncertain as to what is reasonable and customary, the Team Member should seek advice.

When giving gifts, the same principles apply. A Team Member may provide gifts, meals, or entertainment that is reasonable in value and customary in nature, is unsolicited, and is not intended to obtain an unfair advantage or improperly influence.

Governments in many parts of the world have stringent requirements regarding gifts, loans, and entertainment, and violations of these rules can be serious offenses. For example, giving gifts, loans, or entertainment to U.S. government employees is strictly prohibited. If a Team Member deals with government bodies in or outside the United States, the Team Member should ensure that he or she knows the rules that apply and seek advice from Oregon Tool's Legal department to address any uncertainty.

#### **D. Anti-Corruption**

Various laws, including the Foreign Corrupt Practices Act, prohibit Oregon Tool from making payment to or offering anything of value to any foreign government officials, government agencies, political parties, or political candidates in exchange for business favors or when such a payment or offering would otherwise be intended to influence the action taken by any such individual or agency to gain a competitive or improper business advantage. These prohibitions apply to actions taken by all Team Members and by all outside parties engaged directly or indirectly by Oregon Tool (e.g., consultants, professional advisers, and agents). Given the complexity of the regulations and laws, as well as the severe penalties associated with violations, all Team Members must contact the Corporate Attorney with any questions concerning potential noncompliance with this section.

A Team Member may not promise or make any contribution, directly or indirectly, on behalf of Oregon Tool to any political party or candidate for public office.

#### **E. Insider Information**

Team Members are not permitted to divulge material, non-public information pertaining to Oregon Tool or its subsidiaries or affiliated companies (e.g., information relating to acquisitions, dispositions, business plans, earnings, financial or business forecasts, or competitive information) to outside entities or to other individuals within Oregon Tool if they do not have a direct and authorized need to know such information. Material information is any information that a reasonable investor would consider important in making a decision to buy, hold, or sell securities or information that could be expected to affect (either positively or negatively) stock prices of customers, suppliers, or competitors. Team Members should maintain the confidentiality of information entrusted to them by Oregon Tool or its customers, except when disclosure is authorized or legally mandated.

In addition, Team Members may not seek to obtain any material, non-public information of customers, suppliers, or competitors in an illegal or unethical manner. No information obtained by a Team Member as the result of his or her employment may be used for personal profit or as the basis for a "tip" to others, unless Oregon Tool has made such information



generally available to the public. This requirement relates not only to transactions with respect to stock and other securities, but also to any situation in which undisclosed information may be used as the basis for inequitable bargaining with an outsider.

## **F. Export and Import Regulations**

It is Oregon Tool's policy to comply with the export and import regulations of the countries in which Oregon Tool conducts business. Each country has its own laws and regulations governing business dealings, purchases, and transportation of products and goods. There may also exist significant cultural and social differences between the United States and international sources that could potentially impact the performance and standards of operation of the global supply chain. These laws and regulations regulate and limit Oregon Tool's ability to import and export goods and materials and control or restrict the export of certain goods and technology to countries identified by applicable government authorities. Oregon Tool's specific policies concerning trade regulations are detailed in its policy statements issued from time to time.

**Office of Foreign Asset Control Compliance and Screening.** The regulations communicated by the Office of Foreign Asset Control ("OFAC") of the U.S. Department of the Treasury prohibit any U.S. person, including employees of U.S. companies located outside the United States, from transferring, paying, receiving, or otherwise dealing in property or an interest in property belonging to or under the control of a large number of specially designated individuals and entities. OFAC maintains a list of entities that Oregon Tool must screen against for all transactions of business either directly or indirectly. See also Oregon Tool's Supplier Code of Conduct regarding International Business.

**Economic Sanctions and Embargoes.** It is illegal under the law of the United States for Oregon Tool (including through Oregon Tool's companies located outside the United States) to engage in direct transactions with certain U.S.-sanctioned or embargoed countries or with sanctioned parties anywhere in the world. All Team Members have the responsibility to ensure that Oregon Tool is meeting its obligations with regard to sanctions and embargoes.

**Antiboycott Laws.** Oregon Tool and all its operations, including foreign subsidiaries, must comply with U.S. antiboycott laws, which prohibit the participation in unsanctioned boycotts. A "boycott" occurs when one person, group, or country refuses to do business with certain other persons, groups, or countries. A variety of activities are prohibited under antiboycott laws, including but not limited to:

- Furnishing information about Oregon Tool's or any person's past, present, or prospective relationship with boycotted countries or blacklisted companies.
- Paying, honoring, or confirming letters of credit containing boycott provisions.

Violations of U.S. antiboycott laws can result in civil and criminal penalties. All Team Members are required to immediately report to Oregon Tool's Corporate Attorney any suspected requests to participate in an illegal boycott. Simply ignoring or refusing a request to participate in an illegal boycott is insufficient and can be treated as a violation of antiboycott laws upon a failure to report. Antiboycott legislation is complicated, and Team Members should seek guidance from the Corporate Attorney if there is uncertainty regarding whether such a request has been made.

## **G. Fair Dealing**

Each Team Member should always deal fairly with Oregon Tool's customers, suppliers, competitors, and associates. Team Members should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair practice. But Team Members owe a duty to Oregon Tool to

advance its legitimate interests when the opportunity to do so arises. Team Members should seek advice if questions arise regarding Oregon Tool's legitimate business interests and potential conflicts with fair dealing.

## **H. Anti-Money Laundering**

Individuals involved in criminal activity such as terrorism financing, drug trafficking, bribery, or fraud may attempt to hide income generated from their crimes or make their income appear to be legitimate. This activity of concealing or disguising the existence, illegal origins, and/or illegal application of income generated through criminal activity is known as "Money Laundering". Many countries have Anti-Money Laundering ("AML") or Counter Terrorism Financing ("CTF") laws in place that make it a crime to accept or process money derived from these criminal activities. Individuals or entities can be held liable for knowingly accepting money generated from criminal activities or failing to take action to address possible high-risk activities.

Oregon Tool is committed to complying fully with all applicable AML as well as CTF laws, rules and regulations. Money laundering, including accepting criminal proceeds, is a criminal offense. Participation in such activities can damage Oregon Tool's reputation and result in financial penalties for the Company and imprisonment of individuals involved.

AML/CTF concerns can arise in a variety of ways with respect to our business. If an Oregon Tool Team Member or Third Party pays a bribe to a foreign public official and then helps that official hide the bribe, that act of concealment can result in a violation of AML laws. In addition, AML concerns can arise if a distributor pays the Company with funds derived from criminal sources and uses its relationship with the Company to conceal the illegal origin of the funds.

Oregon Tool prohibits Team Members from engaging in money laundering and/or terrorist financing in relation to the Company's business, including receipt of payments from customers/distributors, suppliers, or any other party that may be derived from or include the proceeds from any kind of criminal activity.

## **VI. OBLIGATIONS TO FELLOW TEAM MEMBERS**

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Oregon Tool is committed to providing a safe, secure, and drug-free work environment, free from unlawful harassment and violence. Oregon Tool's goal is to provide Team Members with a workplace that supports honesty, integrity, respect, trust, responsibility, citizenship, and customer service.

### **A. Equal Employment Opportunity**

Oregon Tool is an equal-opportunity employer that complies with all federal, state, provincial, and local employment laws. In all employment decisions, including recruitment, hiring, placement, promotion, reassignment, compensation, training, discipline, and dismissal, Oregon Tool must afford equal opportunity to all individuals, without regard to race, color, religion, national origin, sex, age, sexual orientation, gender identity or expression, veteran status, marital status, physical challenges or any other classification declared to be impermissible by law. Reasonable accommodations for individuals with physical handicaps or disabilities will be made.

### **B. Harassment**

Oregon Tool is committed to maintaining a professional and collegial work environment in which all individuals are treated with respect and dignity. Oregon Tool is committed to the principle that all its Team Members should be able to enjoy a work environment free from all forms of discrimination and harassment, including but not limited to sexual harassment and

harassment based on race, color, religion, national origin, sex, age, sexual orientation, gender identity or expression, veteran status, marital status or physical challenges. Such harassment is a violation of law and Oregon Tool policy, is strictly prohibited and will not be tolerated.

Harassing or bullying behavior by Oregon Tool Team Members is unacceptable, whether in the workplace or in any business-related setting outside the workplace, including but not limited to business trips, business-related social events, and interaction with clients, vendors, or customers.

Oregon Tool will investigate all allegations of discrimination and harassment in as prompt and confidential a manner as possible and will take appropriate corrective action when warranted. Any person who is determined by Oregon Tool, as a result of such an investigation, to have engaged in discrimination or harassment in violation of the Code will be subject to appropriate disciplinary action, up to and including termination of employment.

Retaliation in any form against a Team Member or applicant who in good faith complains of discrimination or harassment is strictly prohibited, and is itself cause for appropriate disciplinary action, up to and including termination.

### **C. Immigration Laws**

It is Oregon Tool's policy to comply with the immigration laws and employment regulations of the countries where it employs Team Members.

## **D. Diversity & Respect**

Our Company believes diversity and inclusivity make our teams and Company better. We believe that we best serve and enrich our own culture through the diverse skills, experiences, and backgrounds that each of us brings to the Company. This is why we maintain a safe and inclusive work environment where all dimensions of differences are acknowledged, valued and respected. We want everyone to feel welcome and able to be their authentic self to create value and drive growth. All employment-related decisions must be based on Company needs, job requirements, and individual qualifications.

## **VII. ENVIRONMENTAL HEALTH AND SAFETY RESPONSIBILITY**

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Oregon Tool strives to implement safe and environmentally responsible business practices. Each Team Member is charged with and responsible for identifying, reporting, and resolving environmental, health, and safety concerns.

In addition, all Team Members are to accomplish their duties in compliance with environmental, health and safety rules, laws, and regulations applicable to the local jurisdictions in which they work. Any Team Member violating environmental, health, and safety requirements may be subject to disciplinary action, up to and including termination of employment.

## **VIII. HUMAN RIGHTS & FAIR LABOR**

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We are committed to upholding fundamental human rights and believe that all human beings around the world should be treated with dignity, fairness, and respect. Practices such as child labor or forced labor as well as other acts that deceive or deny workers access to identity documents such as passports or visas are prohibited. We ask and whenever possible contractually obligate our suppliers, direct contractors, etc., to demonstrate a serious commitment to the health and safety of their workers and operate in compliance with human rights laws.

## **IX. COMPLIANCE AND REPORTING**

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Each Team Member must report without delay any unethical, dishonest, or illegal conduct engaged in by him or her or by other Oregon Tool Team Members. Oregon Tool will take reasonable efforts to protect the identity of any Team Member making such a report, but under no circumstances will a Team Member making a report in good faith be subjected to retaliation. Team Members should make reports of such activities by one of the following methods:

1. Discussing your concern with your manager;
2. Contacting a member of HR or Legal;
3. Calling Oregon Tool's global Speak Up! Hotline at +1 (628) 262-4028 in the United States (see page 10 for international numbers); or
4. Accessing the Speak Up! Hotline reporting portal at <https://oregontool.integrityline.com>, or from our SharePoint Intranet homepage under Quick Links.

Whether making a report through the Hotline or in writing, a Team Member should give sufficient, specific information in the message so that a full investigation can be conducted.

It is a serious violation of the Code, and under certain circumstances a violation of federal or local law, for any Oregon Tool manager or supervisor to initiate or encourage reprisal against a Team Member or other person who in good faith reports a known or suspected violation of criminal law or the Code.

## CONCLUSION

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Oregon Tool recognizes that it is sometimes difficult to delineate proper standards of ethical conduct. In such instances, a Team Member should not rely on his or her own personal judgment but should fully and openly discuss the matter with the Team Member's manager or supervisor. All managers and supervisors must comply with their responsibilities set forth in Oregon Tool's open-door/open-communication policy with regard to Team Members' Code or ethics questions. Oregon Tool's management may bring any further questions concerning the ethics or legality of a particular situation to the attention of the Chief Executive Officer of Oregon Tool, or the Chief Human Resources Officer. Any violation of the Code will form the basis for appropriate disciplinary action, up to and potentially including termination.

## INTERNATIONAL REPORTING TOLL-FREE PHONE NUMBERS:

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<b>Country</b>	<b>Phone Number</b>
Belgium .....	+32 80070110
Brazil .....	08000000105
Canada.....	1-833-666-4256
China.....	+86 4008427727
France .....	+33 800945790
Germany .....	+49 8001819065
Japan .....	+81 120925464
Sweden .....	+46 200880174
United Kingdom.....	+44 3332423759
United States.....	+1-628-262-4028

## HOW TO FILE A REPORT USING SPEAK UP!

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**What is the Speak Up! Hotline?** Speak Up! is a reporting system to communicate misconduct and promote a positive work environment.

**What to Report.** Report situations, events, or actions by individuals or groups that you believe are violations of law, the Oregon Tool Code of Conduct, Oregon Tool policies, or other matters of a serious nature. Frivolous or unfounded reports do not help to foster a positive workplace.

The Speak Up! Hotline should not be used for immediate threats to life or property. Make these types of reports by calling your local emergency phone number (e.g., 911 in the United States).

**Example scenario of how Speak Up! reports are handled:** After your concern is reported through the Speak Up! Hotline, it is promptly reviewed and investigated by personnel who are most appropriate, depending on the nature of the concern. For example, concerns best handled by human resource personnel (such as pay, work hours, alleged unfair treatment, etc.) will be given to the Human Resource department to address and resolve, unless the subject matter requires that it be elevated to a higher level of management or to Oregon Tool's Legal department (such as fraudulent or criminal conduct). It is important to use Oregon Tool's resources that are best suited to address Team Member concerns for proper and prompt resolution.

**No Retaliation for Raising Concerns.** Oregon Tool strictly prohibits retaliation against anyone for raising or helping to address a suspected violation of the Code or any Oregon Tool policy in good faith. Retaliation by any Team Member is grounds for discipline, up to and including termination.

## HOW TO FILE A REPORT – REPORTING IS AS EASY AS 1-2-3.

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1. Access the Speak Up! Hotline to report;
2. Complete a report;
3. Follow-up 2-3 business days later.

The Speak Up! Hotline is carefully designed to maintain your confidentiality and anonymity at every step. Step-by-step instructions guide you to help ensure that you do not inadvertently compromise its safeguards.

### Step 1:

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**Access the Speak Up! Hotline to Report:** Use any one of these three convenient channels of communication.

1. **Oregon Tool's Network**  
Click on the Speak Up! Hotline link on your intranet site. You will automatically be linked to the Speak Up! Hotline secure portal. Once there, click on "Make a report."
2. **Public Internet**  
From any computer having Internet access (home, public library, neighbor, etc.), go to <http://oregontool.integrityline.com> and click on "Make a report."
3. **Toll-Free Phone**  
Call Oregon Tool's toll-free Speak Up! Hotline at +1-628-262-4028 in the United States. A call center specialist will assist you with your report (see page 10 for international numbers).

## Step 2:

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**Complete a Report:** Following the on-screen or call center specialist's instructions, please complete a report, being as thorough as you can.

1. Complete the report, providing information about the incident, including:
  - **Who:** Persons engaged in the incident, including titles;
  - **What:** What specifically occurred;
  - **Where:** The location of the incident; and
  - **When:** The date, time, and duration of the incident.
2. Next, enter your contact information. If you wish to remain anonymous, make sure you tick the "Stay anonymous" box.
3. Under "Secure Inbox", create a PIN code. Write down your PIN and keep it in a safe place. You will need your PIN to follow up later, or if you ever want to review or update your report.
4. Click "Submit" and answer the "Security validation" problem. The purpose of the Security validation problem is to confirm your report is legitimate and is not generated by a robot.
5. Write down your Case ID and keep it in a safe place with your PIN code. If you submitted your case anonymously, please regularly log in to the postbox to see whether you received any new mail. If you provided your email address, you will be notified via email of any new messages.

## Step 3:

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**Follow Up 2-3 Business Days Later:** Two business days after you complete your report, please return to the Speak Up! Hotline portal to check for any follow-up questions or requests.

1. Reconnect with the Speak Up! Hotline using any of the three channels of communication:
  - Oregon Tool Intranet;
  - Public Internet;
  - Toll-Free Phone Number (+1-628-262-4028 in the United States or the appropriate international number on page 10).
2. Provide your PIN code and Case ID (if you are using a different computer).
3. You can now elect to review report details, respond to questions, and add information or attachments.
  - To review your report, just click "Case" at the top of the screen or ask the call center specialist.
  - To review any messages or submit additional details, just click on "Correspondence." At the bottom of the screen, you can begin typing or use the microphone icon to record a message. If you record a message, your voice will be altered to protect your identity.
4. You may return regularly to review your report, answer questions, and add information.



# TEAM MEMBER CODE OF CONDUCT STATEMENT

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*(Please sign the statement below and return it to your Human Resources department.)*

[ 2025 ]

I have read Oregon Tool's Code of Conduct issued to me. If I had any questions or did not understand any part of these policies, I consulted with an Oregon Tool manager or supervisor and had these issues satisfactorily addressed. Based on my reading and any such consultation, I understand these principles and will observe them.

Further, I certify that (1) I have conducted Oregon Tool's business in compliance with the Code and applicable law, (2) I have reported any known violation of the Code or any law, and (3) I will report without delay through normal reporting channels any unethical, dishonest, or illegal conduct engaged in at Oregon Tool that becomes known to me.

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Location Printed Name

\_\_\_\_\_  
Employee ID

\_\_\_\_\_  
Date

## OREGON TOOL

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