



# Anti-Human Trafficking and Slavery Disclosure Statement

Apex Tool Group is headquartered with existing laws pertaining to human trafficking and forced labor including the "California Transparency in Supply Chains" Act and the U.K. Modern Slavery Act of 2015. In addition, Apex's standard contract terms and conditions of purchase require suppliers to comply with all applicable laws and regulations. In the event that the suppliers commit any material violation of law relating to basic working conditions and human rights in their performance of work with Apex, Apex has the right to terminate those suppliers for default.

## **Verification**

Apex and its business units engage in verification of product supply chains to evaluate and address the risk of human trafficking and forced labor as described herein. Suppliers are subject to selection processes and criteria, including for example, verification against



## **Accountability**

Apex maintains internal accountability standards and procedures for employees or contractors failing to meet company standards regarding human trafficking and forced labor. These include, as described above, Apex's Standards of Conduct Code and Apex's Supplier Standards of Conduct. Apex requires its employees to annually certify that they will honor the Standards of Conduct. Compliance with the requirements of the Standards of Conduct is expected behavior for all Apex employees and suppliers. Violation of these requirements will result-11.3 (a) [ ( w)13.5A yds oulion