



UK Tax Strategy

This statement sets forth the global tax policy of Apex Tool Group LLC and its group members (“ATG”). This policy complies with Section 161 and Part 2 of Schedule 19 of the UK Finance Act 2016 and the UK Tax Strategy Publication requirement set out therein. This tax strategy statement applies to the Company’s group member(s) in the UK for financial year 2023.

Tax Strategy

ATG is committed to complying globally with all applicable tax laws, treaties, and regulations, and to ensuring we disclose relevant facts to tax authorities. Our UK tax strategy likewise is guided in accordance with this principle.

Risk Management and Governance

ATG’s CFO is ultimately responsible for the overall tax risk of the Company, while the day-to-day management of tax risk is overseen by the Vice President, Global Tax and further supported through its global tax department. Additionally, the Company engages with reputable external tax advisors with specialized knowledge in local tax laws and regulations where appropriate, particularly in areas with there is significant uncertainty or complexity in relation to understanding and assessing local tax laws and regulations.

Attitude towards Tax Planning

In structuring and managing our commercial operations, we consider all appropriate tax laws of the countries in which we operate with the aim to ensure compliance, to meet our tax payment obligations in a timely manner, and to maximize value for our owners. All business transactions undertaken will have adequate commercial and economic substance in alignment with relevant guidance issued by the Organization for Economic Cooperation and Development (OECD) for international tax matters.

Level of Tax Risk

Given the global scale of our business operations and the volume of tax obligations, tax risk will inevitably arise from time to time in relation to interpretation of complex tax laws. ATG applies a responsible and prudent standard to minimize tax risk.

Engagement with Tax Authorities

ATG is committed to developing and maintaining a positive and collaborative working relationship with all tax authorities including HMRC. We believe it’s critical to work closely with the tax authorities to ensure full understanding and alignment of our business operations and to quickly resolve any open tax matters. ATG ensures that all compliance requirements including with HMRC are met to minimize tax risk. Where the tax authority may disagree with a position taken by ATG, we will proactively seek to resolve the issue through open and collaborative dialogue but may choose to further defend the Company’s position through alternative avenues as available in the relevant jurisdiction.

Dated as of: January 1, 2023