



Toyota Industries Corporation President's Message

To everyone who works together in Toyota Industries Group

Toyota Industries Group, based on its founding philosophy of the Toyoda Precepts, constantly strives to develop products and services that contribute to the creation of a more livable planet and richer lives in a warmer society. In doing so, we also aim to achieve sustainable growth.

In the spirit of the Toyoda Precepts, in particular, “Always be faithful to your duties, thereby contributing to the Company and to the overall good,” everyone must comply with laws and regulations, company policies, ethics, and social norms and conduct business activities in good faith and with integrity.

In line with the Toyoda Precepts and other corporate values of Toyota Industries Group, this Code of Conduct provides how we should act. We all have a responsibility to conduct ourselves in accordance with this Code of Conduct on a daily basis and in a way that exemplifies a culture of ethics and compliance and upholds our Company's reputation.

If you suspect or become aware of any conduct or threat of a violation of this Code of Conduct, be sure to stop, and contact your supervisor, managers, the relevant Compliance group, the relevant departments, or the ethics and compliance helpline (whistleblowing system) for consultation. You will not be retaliated against as a result of asking questions or raising concerns.

Let us pledge that we will work together in good faith to protect the values and trust of Toyota Industries Group.



Koichi Ito

Toyota Industries Corporation President

TIEI Managing Director's Message

To everyone who works together in TIEI

TIEI since its inception in 1995, has continuously strived to contribute to the sustainable development of society and the earth through the manufacturing and provision of high-quality and innovative products.

We, as a company, are committed in our efforts in expanding our business and thereby create more opportunities for employment and also subsequent value creation for our stakeholders. To make this happen, we should, at all times, conduct our business in the most transparent, open & fair manner, and should hold in our heart, a feeling of appreciation and compassion for all our stakeholders.

In this booklet we present the Toyota Industries Group Code of Conduct which is based on our group founding philosophy “Toyoda Precepts” in line with our core “Management philosophy”. This Toyota Industries Group Code of Conduct serves as a valuable guide to help us navigate ethical and lawful decision-making in our day-to-day activities.

I request each one of you to go through the contents, understand it well and to fulfil your duties with passion, utmost integrity and ensure 100% adherence to this Toyota Industries Group Code of Conduct, in letter and spirit. Please remember that each one of you is our “Brand Ambassador” and your individual actions has a big impact on Toyota Industries group image.

If you ever encounter a situation that we violate laws, regulations, or ethical standards, I request each one of you to pause before proceeding and consult with your supervisor/manager, responsible departments, or the Compliance Ambassador. When receiving reports of potential issues, it is our responsibility to listen carefully, take the matter seriously, and respond with sincerity by thoroughly verifying the facts and working towards improvement. Together, we can address concerns in a constructive and professional manner.

I also want to emphasize that retaliation against individuals who report compliance issues or concerns in good faith will not be tolerated under any circumstances. We are committed to fostering an environment where everyone feels safe to speak out for what is right.

Let us work together to build an organization that honors its values and earns the trust of stakeholders.

I have full confidence in your commitment to uphold the highest standards of professionalism and ethics.



Yasuo Shiino

Managing Director, TIEI

Toyoda Precepts

- Always be faithful to your duties, thereby contributing to the Company and to the overall good.
- Always be studious and creative, striving to stay ahead of the times.
- Always be practical and avoid frivolousness.
- Always strive to build a homelike atmosphere at work that is warm and friendly.
- Always have respect for spiritual matters and remember to be grateful at all times.

Ethics & Compliance Declaration

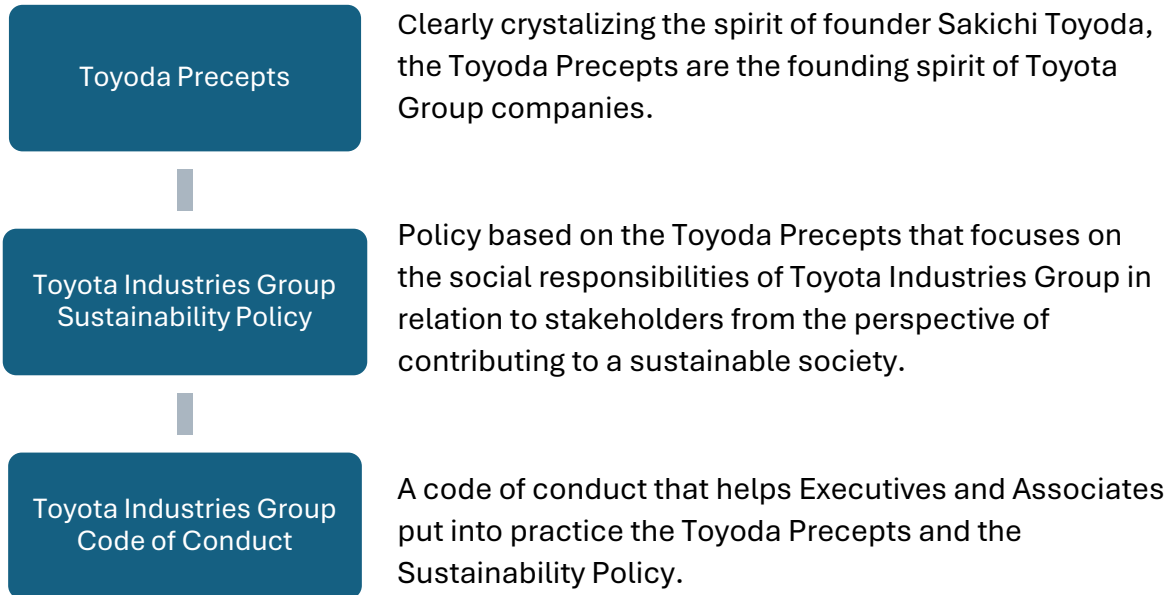
Each of us working for Toyota Industries Group,
guided by the spirit of Toyoda Precepts,
will conduct all of our business activities with integrity,
strive to create a workplace where everyone openly and
equally communicates, and do the right things in the right ways.

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1 Introduction

1.1. Positioning of this Code of Conduct



1.2. Intended Audience

This Code of Conduct is applicable to Toyota Industries Corporation and its consolidated subsidiaries (each as “Company” and jointly as “Toyota Industries Group”) and their Executives¹ and Associates². Additionally, we expect our Agents and Representatives³ worldwide to comply with the principles set out in this Code of Conduct.

There may be additional laws and requirements specific to regions, countries, and/or group companies. To the extent such requirements apply, they are listed in Appendix.

¹ “Executives” means directors, executive officers, audit & supervisory board, or equivalent person.

² “Associates” means all regular and contracted employees, all temporary staff and seconded employees or any other personnel working under the control and supervision of Company.

³ “Agents and Representatives” means third parties who interact with government officials and commercial partners on behalf of the Company.

1.3. Expectations

1.3.1. Your Responsibility

- We should be conscious of the role we play in Toyota Industries Group, be proud of our role, and actively fulfill our role based on high ethical standards.
- Please read this Code of Conduct carefully and put it into practice (including activating and living the Toyoda Precepts in all we do and all of our business activities).
- We must complete periodic training on this Code of Conduct in a timely manner in order to better understand our commitment to the principles set out herein and each of our roles in upholding them as well as additional required compliance training as applicable to our respective roles.
- We are expected and encouraged to ask questions about compliance with laws and Company policies and raise potential compliance concerns, even if we are not sure if there is an actual issue.

If you are a manager or supervisor, be sure to do the above as well as the following:

- Demonstrate your initiative, set a good example for your subordinates, and give them guidance.
- Listen actively to your team, and colleagues, and act sincerely if you hear something, see something, or believe someone may be struggling with a Company values or compliance issues.
- Consult the responsible department(s) (See Appendix at the end of this Code of Conduct), if necessary.
- Ensure your team(s) complete all trainings to help foster an environment that practices ethics, compliance, and integrity.
- Demonstrate commitment to ethical leadership by fostering an open culture, embracing team learning, and embodying the Toyoda Precepts to maintain compliance and integrity.

As we strive to integrate the principles of this Code of Conduct into our daily lives, here are three questions that we can ask ourselves when reflecting if our decisions and actions are aligned with our commitment to uphold the highest standards of ethics, integrity, and compliance:

1. Is what I am doing, or plan to do, consistent with laws and regulations, the Toyoda Precepts, Company policies, and this Code of Conduct?
2. Would I feel comfortable telling my family or friends about it?
3. Would it harm the trust others have in the Company?

If the answer is “no” or you are unsure, please stop and consult with your supervisor or manager to responsible compliance department and personnel⁴.

1.3.2. Ethical Behavior and Compliance with Laws

We comply with all applicable laws, regulations where we do business as well as the spirit thereof and our Company policies, and conduct our corporate activities with honesty, soundness, and integrity. We, also, respect the culture and history of each country and region and maintain the highest ethical standards.

- When carrying out our work, we always make sure that the relevant regional, national, and international laws, regulations, and standards, and our Company policies we refer to are up-to-date and accurate, and we comply with them.
- If necessary, we also consult with external experts and the authorities in charge to clarify what we should observe.
- We always think and act with a humble attitude. Referring to publicly available information about known cases from other companies and reflecting on the lessons learned, we ask ourselves whether our behavior is sufficiently sincere to earn the hope and trust of stakeholders.

1.3.3. Speaking Up and Listening Up (Reporting and Handling Concerns)

We are empowered to raise our hands and voices and call out those instances when we collectively or individually may not be at our best. We are encouraged and expected to speak up when we know or have reason to believe a law, regulation, policy, or Company values are not being met. We are encouraged and expected to listen actively and communicate openly and equally when a colleague or other stakeholder identifies or calls out an issue.

Within our culture, each of us is empowered to report and/or consult with managers, supervisors, responsible department or responsible compliance departments and personnel in the event there is a question or concern regarding how to interpret or understand applicable laws, regulations, and policies. Such a culture will help ensure that our Company follows proper procedures to maintain compliance and live the Toyota Precepts.

⁴ “Responsible compliance department and personnel” means Enterprise Risk and Compliance Management Department at Toyota Industries Corporation, Regional Compliance Officers (“RCCOs”), Compliance Leads or Compliance Ambassadors designated by Company. See Appendix at the end of this Code of Conduct.

We should all seek advice and raise concerns whenever we are uncertain as to whether our own conduct or the conduct of others around us may violate the standards in this Code of Conduct.

We will immediately raise any concerns or questions about unethical conduct or potential violations of laws, regulations, or Company policies, including this Code of Conduct. We encourage our business partners, including customers and suppliers, to report issues that relate to Toyota Industries Group business.

We should raise compliance questions and concerns to our manager/ supervisor, responsible department, responsible compliance organization and personnel, or the Helplines, which offer the ability to ask compliance questions and report compliance concerns anonymously where permitted by law (See Appendix at the end of this Code of Conduct).

Please refer to your local, responsible compliance department and personnel for detailed information on how to reach such channels within your region. Reports will be investigated as appropriate.

We do not tolerate any form of retaliation against those who report compliance concerns or issues, regardless of whether these issues are substantiated or not.

1.4. Violations of this Code of Conduct

Violators of this Code of Conduct may be subject to disciplinary action up to and including termination based on the nature of the conduct and subject to the Work Regulations or Company policies. Managers and supervisors who neglect violations or overlook it due to gross negligence may also be subject to disciplinary action up to and including immediate termination based on the nature of the conduct and subject to the Work Regulations or Company policies.

2 Compliance

2.1. Compliance with Competition Laws

Basic Stance

- We comply with all applicable competition laws and maintain fair and free trade.

<Our Code of Conduct>

- We minimize contact with competitors, such as at meetings, exhibitions, and trade association gatherings.
- We do not engage in communication or conduct that could be considered as cartel activity or bid rigging such as price fixing, market allocation or boycotts.
- If we come across an incident of cartel activity or bid rigging, we firmly refuse to join it, and we do not get involved in it.
- We do not exchange non-public information with competitors about prices, sales volumes, or production volumes of competing products, business plans, operating revenues, production capacity, production plans, or the development of new products.
- We do not exchange information or make arrangements with bidders about successful or winning bids.
- We do not engage in unfair trading prohibited by competition laws, such as telling dealers or business partners to sell our products to consumers at specific prices.

2.2. Prevention of Bribery

Basic Stance

- We are committed to complying with all applicable anti-bribery and anti-corruption laws and prohibit offering, promising, or making bribes, kickbacks, or other similar payments, including facilitation payments, to government officials or any other business partners, whether directly or indirectly (e.g., through third-party intermediaries, such as agents or representatives).

<Our Code of Conduct>

- We do not directly or indirectly through a third-party offer, give, solicit, or receive money, entertainment, or gifts to or from government officials. If public officials ask us for money, entertainment, or gifts, we never meet such requests.
- We do not give or receive money, entertainment, or gifts beyond the generally acceptable range to or from business partners.

- When we give or receive entertainment or gifts, we do so in accordance with Company policies within reasonable bounds in terms of the purpose and monetary value of the entertainment or gifts and our relationship with the other party.
- We only engage in business for commercial reasons. We never engage in transactions or business dealings with business partners in which remuneration is not based on commercial considerations and/or is unreasonably high for the work and/or service performed.
- In case of questions, we may consult our local Legal and/or compliance responsible organization and personnel for guidance and pre-approval requirements or limits, as applicable in the region or locally, to offering, giving, or receiving of gifts, meals, entertainment, travel and accommodation, and similar benefits.
- For more information, please refer to the [Toyota Industries Group Anti-Bribery Policy](#).

2.3. Trade Compliance/Import and Export Controls

Basic Stance

- We comply with all applicable laws and regulations on export as well as economic sanctions, and in accordance with the Global Export Control Guidelines on International Security implement security export control appropriately to ensure that our products or technologies do not go to countries or organizations that may threaten the peace or security of the international community.
- At the time of import, we duly pay import duties and consumption tax.

<Our Code of Conduct>

- When exporting, we comply with all applicable laws and regulations and Company policies on export.
- At the time of import, we duly make declarations in accordance with all applicable laws and regulations on customs duty.
- We comply with applicable trade compliance and economic sanctions laws, regulations, and Company policies and rules.
- We must not conduct any prohibited transactions under trade compliance laws, regulations, and Company policies, including transactions with any sanctioned or designated individual or entity.

2.4. Compliance with Environmental Laws

Basic Stance

- We comply with all applicable environmental laws, regulations, standards, and Company policies.

<Our Code of Conduct>

- We commit to complying with all applicable environmental laws, regulations, standards, and Company policies, including laws, regulations, and standards relating to emissions of environmentally hazardous substances.
- This commitment echoes our unwavering dedication to environmental sustainability and regulatory compliance. When we become aware of an environmental compliance issue or concern, we immediately report it to our supervisor/manager and responsible department or responsible compliance department and personnel.

2.5. Respect for Intellectual Property Rights

Basic Stance

- We encourage the creation of excellent inventions for the development of society.
- We respect the intellectual property rights of third parties and pay attention not to infringe upon such rights.
- We globally protect and utilize the results of our research and creation activities as our intellectual property.

<Our Code of Conduct>

- We apply for the registration of our inventions and ideas without delay so that we can protect them as intellectual property.
- We do not infringe upon the intellectual property rights of third parties.
- When utilizing intellectual property rights, we comply with all applicable laws and regulations, and contract conditions.

2.6. Protection of Personal Information

Basic Stance

- We acquire, manage, use, and provide personal information properly in accordance with all applicable laws, regulations, and Company policies.
- We take security measures to protect the acquired personal information from unauthorized access, leakage, loss, or falsification.

<Our Code of Conduct>

- Before acquiring personal information of an individual, we specify the purpose or use of the information and notify the individual of the acquisition or announce the acquisition. We do not use the said personal information for any other purpose.
- We do not give or disclose personal information of an individual to third parties without obtaining the consent of the individual (as required by law) or as permitted by law.
- When receiving inquiries or requests about the personal information of the individual, we sincerely respond to such inquiries and requests subject to applicable laws and regulations.

2.7. Record Retention

Basic Stance

- Data is a Company asset, and we will store, use, and dispose the data sincerely and appropriately in accordance with Company policies.

<Our Code of Conduct>

- We comply with applicable laws and regulations regarding document retention and recordkeeping.
- All records must be accurate and complete, and we are expected to comply with relevant document retention policies and requirements if relevant.

2.8. Protection of Confidential Information

Basic Stance

- We strive for appropriate protection and management of confidential information.
- We do not tolerate anyone's acquisition through illicit means of confidential information held by third parties.
- We understand and comply with our Company policies about information security and strive to prevent cyber incidents and unauthorized information leaks through education and training.

<Our Code of Conduct>

- We keep confidential information in a secure place and restrict unauthorized access.
- We take appropriate security measures, such as encrypting data, enhancing security measures, and using password protection.
- When receiving a suspicious email that seems to have nothing to do with us, we do not open it but report it to the responsible department."
- We do not send any inside information about the Company, whether confidential or not, to privately owned email addresses.
- When sending an email, we confirm the recipients in the "To," "Cc," and "Bcc" fields and any attachments so as not to send the email to the wrong recipients or send the wrong attachments.
- When taking confidential information out of the Company, we comply with our Company policies and manage the information properly to protect it from loss, leakage, and theft.
- If we take pictures on Company premises, we follow our Company policies.
- We do not discuss confidential information in the presence of outsiders. Also, we do not post confidential information online or on social media.
- We promptly return information devices and access rights to the Company once they are no longer needed.
- We encourage responsible use of mobile phones and other technology, including social media, with permission to use technology while in the office or factory (where applicable).
- Personal device use should not interfere with productivity or violate any applicable rules or Company policies, including Acceptable Use rules.

2.9. Prevention of Insider Trading

Basic Stance

- We comply with laws and regulations on the prevention of insider trading. We do not tolerate insider trading that hinders fair securities trading.

<Our Code of Conduct>

- If we overhear or otherwise become aware of insider information about the Company, we do not buy or sell stocks of the Company under the name of ourselves, our family members, or anyone else, or recommend buying or selling such stocks, until that information is made public.
- Except when necessary for business purposes, we do not reveal insider information about Toyota Industries Group or business partners to our family members, acquaintances, or anyone else.

2.10. Proper Accounting and Tax Payment

Basic Stance

- To provide our stakeholders with bona fide information regarding our business performance and financial position, we conduct proper accounting according to generally accepted corporate accounting standards and related laws and regulations.
- We strive to contribute to society and maintain and enhance corporate value by complying with the applicable tax laws and regulations of each country and region, as well as by paying the appropriate level of taxes.

<Our Code of Conduct>

- We believe that keeping accurate records at each workplace is the basis for providing stakeholders with correct information. With this belief in mind, we properly keep and store records of our daily business activities (including slips and inventory records) in accordance with laws and regulations, and Company policies.
- We familiarize ourselves with tax-related laws, regulations, and rules through face-to-face training and e-learning in accounting, and we pay taxes and respond to tax affairs appropriately.
- We uphold the highest standards in our accounting and tax practices. Fraudulent activities, such as falsifying records or evading taxes, are strictly prohibited. We emphasize honesty, integrity, and transparency in all our financial dealings.

- During audits, we have a responsibility to cooperate fully, providing accurate and complete information. Auditing plays a crucial role in maintaining our commitment to ethical accounting and tax practices.
- Confidentiality of financial information is of importance to us. We must ensure the confidentiality and security of such data at all times.

2.11. Protection of Company Assets

Basic Stance

- We efficiently and appropriately utilize and manage Company assets and will not use them for unfair or improper purposes.

<Our Code of Conduct>

- We use Company assets (all tangible and intangible items, including products, equipment, fixtures, information, and intellectual property) for Company matters only, not for private purposes. We do not engage in any illegal acts that may damage the value of Company assets (such as taking them out of the Company without permission).
- We pay close attention to risks, including fraud, theft, and loss, and strive for appropriate management of Company assets.

2.12. Avoidance of Conflicts of Interest

Basic Stance

- We do not engage in any act that would be detrimental to the Company for our own personal gain when performing our duties.

<Our Code of Conduct>

- We each have a duty in the performance of work to ensure that we act in the Company's best interest. We do not give priority to the interests of ourselves or others at the expense of the interests of the Company.
- We also draw a line between public and private matters so as to avoid conflicts between the personal interests of ourselves or our family members or acquaintances and the interests of the Company ("conflicts of interest").
- We should avoid any activities that create an actual or potential conflict of interest, or the appearance of one.
- We should not supervise, hire, or conduct business with people where we have a personal relationship, unless disclosed appropriately.

- We should not engage in outside activities with, or have a financial/professional interest in, organizations that are in the same industry or are customers / business partners of the Company.
- We should not use, leverage, or reference Company resources (including personnel, money, data any other assets) for personal gain.
- We should not give or receive gifts or business courtesies that could be perceived as for our own personal gain (and not in the best interest of the Company).

2.13. Providing Accurate Information to Government Authorities

Basic Stance

- We must provide accurate information to regulators and other government authorities as required by law. We strictly prohibit misrepresentation or omission in any event.

<Our Code of Conduct>

- We are timely and responsive in our correspondence with regulators and other government authorities as required by law.
- We are truthful and complete our responses to inquiries by regulators and other government authorities.
- We do not mislead regulators or government authorities, and we do not report false information to them.

2.14. Respect for Human Rights

Basic Stance

- We recognize that all corporate activities, from research and development, and procurement, to the provision of products and services, may directly or indirectly affect human rights. Accordingly, we respect internationally recognized human rights, including the prohibition of forced labor and child labor, right to freely associate or not associate, and the elimination of discrimination.
- We not only ensure that Executives and Associates of the Toyota Industries Group make efforts to respect human rights, but also encourage all our business partners to understand and cooperate with us in such efforts.
- We are committed to upholding fair wages and foster a supportive working environment.

<Our Code of Conduct>

- We review and commit to upholding Toyota Industries Group's Human Rights Policy, such that our collective effort helps maintain a respectful and inclusive work environment.
- If any misconduct is found, we will report it to our supervisor/manager and responsible department.
- We are considerate of others and respect their individualities and privacy.
- We do not tolerate any kind of harassment and will not permit our employees to engage in unlawful behavior that may violate Company policies.
- We do not tolerate discrimination or harassment of anyone for reasons of race, color, nationality, ethnicity, origin, creed, membership of political party, martial or veteran status, age, gender, sexual orientation, gender identity, pregnancy, physical or mental disability, or illness, genetic information or any other classification or status protected by applicable law.
- We have a zero-tolerance policy for human trafficking, slavery, or forced labor (including child labor). We expect our suppliers to act in accordance with these commitments.
- If we noticed any discrimination or violation of human rights in relation to our business, we will take action to stop such unlawful activities.
- For more information, please refer to [Toyota Industries Group Human Rights Policy](#).

2.15. Risk Management

Basic Stance

- We conduct thorough and organized risk management and prepare ourselves for threats to civil life and corporate activities, such as terrorism, cyber-attacks, natural disasters, pandemics, and supply-chain risks.

<Our Code of Conduct>

- We enhance our sensitivity to risks to the Company and our own workplace on a daily basis and strive to collect information thereof.
- We grasp the risks that may occur in our own workplace and in connection to the work we are in charge of, discuss measures against such risks with our colleagues, identify priority measures that we should take, and strive to prevent and minimize the risks.
- If a risk arises, we immediately report it to our supervisor/manager and relevant departments and take appropriate action in accordance with our Company policies.

3 Relationship with Stakeholder

3.1. Customers

3.1.1. Quality of Product Development and Production

Basic Stance

- Always keeping customer orientation in mind, we strive to be ahead of the times in research and value creation. We consider product quality and the environment, ranging from development and production to sale and services.

<Our Code of Conduct>

- From the development planning stage, we listen to the voices of our customers with sincerity under the motto of “*Genchi Genbutsu Gennin*” (“go and see for yourself and grasp the situation”) and proceed with research and development with the functionality and quality expected by customers in mind.
- In compliance with all applicable laws and regulations, standards and criteria, and the specifications agreed upon with our customers, including those related to products and the environment, we provide quality products and services which meet the expectations of our customers.
- It is critical that we provide truthful and accurate information and communications to regulators during all stages of product development, certification, and production. This commitment supports our standards of ethics and compliance and reinforces our customers' trust in our quality and integrity.
- Based on thorough understanding of the basics of quality assurance⁵, we use our collective wisdom to solve issues through customer-oriented design reviews.
- We evaluate, test, and inspect product quality and performance according to the methods agreed upon with our customers and specified rules, and we maintain records of such evaluations, tests, and inspections.
- We standardize our tasks, conduct them reliably without Muda (waste), Mura (unevenness), or Muri (overburden), and ensure quality in each process. In the event of a defective item or an operational error, we halt the project or the production line to prevent defective items from being sent to the post-process.

⁵ Quality assurance: Refers to guaranteeing the quality that enables customers to buy products with confidence and contentment, have peace of mind and satisfaction in using them, and use them for a long time.

3.1.2. Sincere Sales Activities

Basic Stance

- We conduct intensive product research and forward-looking development activities to create new value for our customers.
- We serve customers with sincerity, humility, and gratitude with a sense of representing the Company.

<Our Code of Conduct>

- We endeavor to identify what our customers are concerned with and what difficulties they may have through the repeated process of “*Genchi Genbutsu*” (“go and see for yourself”), observing, listening, and making recommendations.
- Regarding advertising and promotion activities, we comply with relevant laws and regulations, and thoroughly check in advance to make sure not to infringe upon the rights of third parties. Also, we do not use expressions that slander others or cause misunderstanding. We conduct advertising and promotion activities based on facts and with common sense.

3.2. Associates

3.2.1. Workplace of Mutual Trust and Mutual Responsibility

Basic Stance

- We are aware that we are responsible for creating a harmonious and lively work environment and act in accordance with the spirit of the Toyoda Precepts.

<Our Code of Conduct>

- We are conscious of our responsibilities as a member of Toyota Industries Group, understand the Company’s philosophy and values, work together as one with sincerity, and contribute to the betterment of society.
- We avidly learn from others, actively strive for self-growth, demonstrate our own ideas and abilities to the maximum, and work on continuous improvements (Kaizen) and quality enhancements on a daily basis.
- We must not waste any extra energy by “putting on a front,” merely for appearance’s sake. We must always deal with what is right in front of us and pursue the true nature of things. Once we find a problem, we must never let up, but stop and identify the root cause thoroughly, diligently, and courageously to carry out our practice of Kaizen.

- Based on mutual trust and equal partnership, we respect the diversity of our colleagues, treat each other in a considerate manner, and cooperate with each other to fulfill our individual roles.
- We create a psychologically safe work environment that fosters open, honest, and constructive communication across all levels of the organization. This includes an environment where we are empowered to ask questions, voice their opinions and concerns, feel safe, and treat each other with respect and dignity.
- We carry out our daily work with gratitude to all stakeholders, including customers, local residents, and shareholders, and everything around us for supporting us.

3.2.2. Safety and Health

Basic Stance

- Every associate in the Toyota Industries Group, guided by the spirit of the Toyoda Precepts, should aim to create a Company culture that prioritizes maintaining safety in all areas and focuses on mutual courtesy as well as creating workplaces where we work each day with a sense of happiness and pride.

<Our Code of Conduct>

- We aim to create a safe and healthy work environment.
- Recognizing that every action and task poses hazards, we strive to enhance our sensitivities to identify and minimize such hazards.
- If we see someone who is not practicing safe behavior or does not know the rules, we will warn them out of kindness.
- We always return to the Safety Vision and think and act according to it on a daily basis.
- We prioritize the physical and mental conditions of each person to enhance well-being.

3.3. Business Partners

3.3.1. Procurement

Basic Stance

- We respect our suppliers and other business partners, and work with them through long-term relationships to realize mutual growth based on mutual trust.
- Whenever we seek a new business partner, we are open to all candidates, regardless of nationality or size, and evaluate them based on their overall strengths.

<Our Code of Conduct>

- We make sincere negotiations to ensure that transaction prices, terms, and conditions reflect social changes, such as rising costs.
- When deciding on a supplier, we carefully evaluate and judge the candidates not only on quality, pricing, time of delivery, safety, management stability, and technology development capabilities, but also on whether the candidates fulfill their social responsibilities, including legal compliance, respect for human rights (including the prohibition of forced labor and child labor), and environmental conservation activities.
- We request the business partners working on behalf of our Company, such as agents, representatives, and other suppliers of services to uphold our Company's reputation and values by complying with applicable laws and regulations and the principles set out in this Code of Conduct.
- We promote "green procurement" and procure parts, materials, and equipment that have a low environmental impact.
- We promote procurement from local suppliers so that we can contribute to the local community.
- We support our suppliers in the promotion of business continuity plans ("BCPs"), so that in the event of an emergency, we can resume the supply of products and services to customers as quickly as possible.
- We actively encourage our suppliers to follow the Sustainability Guidelines for Suppliers, which cover the key points of this Code of Conduct, based on the understanding and endorsement of the Guidelines.
- We are committed to sustainable procurement practices. We consciously consider environmental, social, and economic impacts in our decision-making, which underlines our dedication to responsible business conduct.

3.4. Shareholders

3.4.1. Public Relations and Investor Relations (“IR”)

Basic Stance

- We disseminate information actively in a fair manner so that it can be widely known in society how we contribute to solving social issues through our Company activities. At the same time, we listen to the voices of society and maintain good relationships with our stakeholders through continuous communication.
- We collect feedback from the stock market and disclose information based on the principle of fair disclosure, in accordance with applicable laws and regulations.
- Through active dialogue with shareholders and investors, we also strive to promote understanding of Toyota Industries Group and enhance its corporate value.

<Our Code of Conduct>

- Each of us tries to act in moderation with a high sense of ethics and the consciousness that our behavior plays a role in the Company’s public relations activities.
- We strive for active and fair dissemination of information that is useful to society and covers all aspects of our corporate management, including financial condition, business performance, and business activity details.
- We respond to inquiries from stakeholders appropriately and promptly while paying attention to fairness.
- We do not disseminate incorrect or questionable information.
- We uphold our commitment to establishing and maintaining strong corporate governance to protect and promote shareholder interests.

3.5. Global Society and Local Communities

3.5.1. Environmental Conservation

Basic Stance

- We will strive for the preservation of the environment across all our business activities and will work to develop, establish, and promote technologies that are compatible with both the environment and economic activity. We aim to create a rich natural environment for future generations while establishing a sustainable society which enables the harmonious coexistence of nature with our daily lives.

<Our Code of Conduct>

- While working on energy efficiency and the reduction of waste in the workplace, we strive to develop products pursuing superior energy efficiency throughout the lifecycle of products.
- For waste reduction and the effective utilization of energy and other resources, we strive for product development and production activities that consider the 3Rs: Reduce, Reuse, and Recycle.
- We are conscious of the coexistence with nature in our business activities and strive to reduce impacts on biodiversity.
- We strive to take the initiative to conserve the environment and extend environmental awareness to our families and communities.

3.5.2. Social Contribution Activities

Basic Stance

- To contribute to the harmonious and sustainable development of society and the earth, we actively engage in social contribution activities while respecting the culture, customs, and history of each country.
- Through close communication with local communities and stakeholders, we engage in activities that meet the needs of the communities where we conduct business activities and the needs of the various parties involved.

<Our Code of Conduct>

- We retain an interest in social issues, think about what we can do, and actively participate in social contribution activities.

- With the consciousness that the Company is also a member of the local community, we fulfill our responsibilities as members of the community.
- We support our peers in their volunteer activities and strive to create a work climate in which each of us can casually participate in such activities.
- We encourage and celebrate the active roles we take in our communities as volunteers, mentors, and charity workers.
- All donations and sponsorships must comply with applicable laws and our internal Company policies on charitable contributions and sponsorships.

4 Toyota Industries Group Sustainability Policy

4.1. Introduction

We, Toyota Industries Corporation, and our subsidiaries, contribute to the harmonious and sustainable development of society and the earth through all corporate activities that we carry out in each country and region based on the Toyoda Precepts (Corporate Creed) and our Basic Philosophy.

In order to contribute to sustainable development, we believe that management interacting with its stakeholders is of considerable importance, and we endeavor to build and maintain sound relationships with our stakeholders through open and fair communication. We expect our business partners to support this policy and act in accordance with it.

4.2. Compliance

- We comply with local, national, and international laws, regulations, and rules as well as the spirit thereof, and conduct our corporate activities with honesty and integrity. We also respect the culture and history of each country and region and maintain the highest ethical standards.
- We do not violate any laws, including competition laws, anti-bribery laws, export control laws, intellectual property protection laws, and data protection laws covering personal information.

4.3. Respect for Human Rights

Based on international standards including the International Bill of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, we respect the human rights of all people.

4.4. Risk Management

We conduct thorough and organized risk management and prepare ourselves for threats to civil life and corporate activities, such as terrorism, cyber-attacks, natural disasters, pandemics, and supply-chain risks.

4.5. Role of Top Management

Our management recognize that it is their role to realize the spirit of this policy, build effective governance systems for the conduct of business, and strive to raise awareness of the policy's spirit within the corporation and the entire corporate group. If a violation of this policy occurs, our management proactively take responsibility to respond to the situation, including resolving the problem, investigating the causes, and preventing the problem from recurring.

4.6. Relationship with Stakeholders

4.6.1. Customers

Based on our philosophy of “Customer First,” we develop and provide innovative, safe, and high-quality products and services that meet a wide variety of customers’ demands to enrich the lives of people around the world.

4.6.2. Employees

- We respect our employees and encourage personal growth for our employees under our belief that the success of our corporate activities is led by nurturing each individual’s character and abilities, and realization of the corporate group’s full potential.
- We support equal employment opportunities and diversity for our employees and strive to enhance our team strength.
- We strive to provide fair working conditions and to maintain a safe and healthy working environment for our employees.
- Through communication and dialogue with our employees, we build and share the value of “Mutual Trust and Mutual responsibility” and work together for the success of our employees and the corporation.

4.6.3. Business Partners

- We respect our suppliers, dealers, and other business partners, and work with them through long-term relationships to realize mutual growth based on mutual trust.
- Whenever we seek a new business partner, we are open to any and all candidates, regardless of nationality or size, and evaluate them based on their overall strengths.

4.6.4. Shareholders

- We strive to enhance corporate value while achieving stable and long-term growth for the benefit of our shareholders.
- We provide our shareholders and investors with timely and fair disclosure of our corporate information through open and constructive dialogue.

4.6.5. Global Society and Local Communities

- Environment
 - We aim for growth that is in harmony with the environment by seeking to minimize the environmental impact of our corporate activities, such as by working to reduce the effect of our vehicles and operations on climate change and biodiversity. We strive to develop, establish, and promote technologies enabling the environment and economy to coexist harmoniously, and to build close and cooperative relationships with a wide spectrum of individuals and organizations involved in environmental preservation.
- Community
 - We operate our business so as to earn the trust of respective communities by honoring the cultures, customs, histories, and laws of each country.
 - We constantly search for safer, cleaner, and superior technologies that meet the evolving needs of society.
- Social Engagement and Contribution to Development
 - Wherever we do business, we actively engage in community involvement activities and contribute to community development, both individually and with partners for mutual prosperity with local communities.

Appendix 1 Additional Code of Conduct for Toyota Industries Engine India Private Limited

1.1. Relationship with Stakeholder (for TIEI)

1.1.1. Traffic Safety

Basic Stance

- Aiming for a society without traffic accidents, we actively strive to raise each individual's awareness of traffic safety.

<Our Code of Conduct>

- By being fully aware of the responsibility as drivers, we observe traffic laws, regulations, and manners, and follow the safe driving rules given below.

[Safe driving rules]

- Always follow traffic rules.
- Keep the speed limit.
- Leave early.
- Maintain safe distance from vehicles.
- Be considerate when driving.
- Drive friendly.
- Do not use mobile phones while driving.
- Make sure those in the backseat also wear a seatbelt.
- Never drink and drive (cars, motorcycles).
- In the spirit of giving way to each other, we strive to protect pedestrians and other vulnerable road users.
- We strive to raise awareness and foster a culture of traffic safety in the workplace.

1.1.2 Political and religious activities

Basic Stance

- We do not participate in political or religious activities under the name of Toyota Industries Engine India Private Limited without the prior consent of the Company.
- We must follow applicable laws and regulations on political lobbying.

<Our Code of Conduct>

- If we participate in political or religious activities in our personal time, we do not let them interfere with the performance of our work duties, and we draw a line between our public and private lives.
- We do not engage in political or religious activities on Company premises without permission.
- We must understand and follow the rules on political lobbying, including public disclosure, reporting, and registration requirements.

Appendix 2 List of Responsible Departments (for TIEI internal use only)

Responsible compliance department and personnel※	※"Responsible compliance department and personnel" is the point of contact for inquiries regarding the Code of Conduct in general. If you have any general questions or concerns other than the specific legal requirements, please contact.
Legal Department	

No.	Item	
1	Introduction	—
1.1.	Positioning of this Code of Conduct	Legal Department
1.2.	Intended Audience	Legal Department
1.3.	Expectations	—
1.3.1.	Your Responsibility	Legal Department
1.3.2.	Ethical Behavior and Compliance with Laws	Legal Department
1.3.3.	Speaking Up and Listening Up (Reporting and Handling Concerns)	Legal Department
1.4.	Violations of this Code of Conduct	Legal Department
2	Compliance	—
2.1.	Compliance with Competition Laws	Business Planning
2.2.	Prevention of Bribery	Legal Department
2.3.	Trade Compliance/Import and Export Controls	Finance and Accounts Department
2.4.	Compliance with Environmental Laws	EHS Department
2.5.	Respect for Intellectual Property Rights	Legal Department
2.6.	Protection of Personal Information	Human Resources Department
2.7.	Record Retention	Each department issues the relevant policies and rules / Legal Department
2.8.	Protection of Confidential Information	Human Resources Department
2.9.	Prevention of Insider Trading	Legal Department
2.10.	Proper Accounting and Tax Payment	Finance and Accounts Department
2.11.	Protection of Company Assets	Administration Department
2.12.	Avoidance of Conflicts of Interest	Legal Department
2.13.	Providing Accurate Information to Government Authorities	Each department issues the relevant policies and rules / Legal Department
2.14.	Respect for Human Rights	Human Resources Department
2.15.	Risk Management	Each Laws and Regulations competent department / Legal Department
3	Relationship with Stakeholder	—
3.1.	Customers	—
3.1.1.	Quality of Product Development and Production	Quality Department
3.1.2.	Sincere Sales Activities	Business Planning Department
3.2.	Associates	—
3.2.1.	Workplace of Mutual Trust and Mutual Responsibility	Human Resources Department
3.2.2.	Safety and Health	EHS Department
3.3.	Business Partners	—
3.3.1.	Procurement	Supply Chain Management Department / Purchase Department
3.4.	Shareholders	—
3.4.1.	Public Relations and Investor Relations ("IR")	External Affairs & CSR Department / Legal Department
3.5.	Global Society and Local Communities	—
3.5.1.	Environmental Conservation	EHS Department
3.5.2.	Social Contribution Activities	External Affairs & CSR Department
4	Toyota Industries Group Sustainability Policy	Legal Department
Appendix 1	Additional Code of Conduct for Toyota Industries Engine India Private Limited	—
1.1	Relationship with Stakeholder (for TIEI)	—
1.1.1.	Traffic safety	EHS Department
1.1.2.	Political and religious activities	External Affairs & CSR Department / IR Department

Helplines (whistleblowing system)
1. Whistle-blower Box (maintained at GD and TNGA canteen area) 2. Email: whistle.blower@tiei.toyota-industries.com

