

TOYOTA

THE WAY WE WORK

CODE OF CONDUCT

FEBRUARY 2024





TABLE OF CONTENTS

The purpose of this Code of Conduct.....	4
Relation to Global Toyota Code of Conduct.....	5
Please Speak Up!.....	5
Chapter 1.	
We care about People.....	6
Diverse and Inclusive Work Environment.....	8
Health, safety and wellbeing.....	10
Human Rights.....	12
Personal Information.....	14
Chapter 2.	
We care about Society.....	16
Environment.....	18
Government Relations and Political Activities.....	20
Communication, Confidentiality and Intellectual Property.....	22
Chapter 3.	
Integrity in everything we do.....	24
Product Safety and Quality.....	26
Procurement Activities.....	28
Sales Activities and Fair Competition.....	30
Inside information and insider trading.....	32
Chapter 4.	
Fairness as a driving force.....	34
Anti-Bribery and Anti-Corruption	
Money Laundering, International Sanctions.....	36
Conflict of Interests.....	40
Please Speak Up!.....	42
How do I speak up?.....	42
Non-Retaliation Commitment.....	42

\ THE PURPOSE OF THIS CODE OF CONDUCT

Toyota's values, methods and corporate philosophy were developed through years of effort and passed down from generation to generation to support our daily business operations. This code of conduct ("Code of Conduct") serves as an important guiding tool when implementing these philosophies at Toyota and describes our commitment to adhere to the highest standards of professional and ethical behaviour.

This Code of Conduct applies to Toyota Motor Europe NV/SA (in this Code of Conduct referred to as "Toyota Europe", "we" or "our"), its management, and all its team members –including employees, contingent workforce, and contractors. Toyota also expects its business partners, such as suppliers, dealers and agents, to respect the Code of Conduct and conduct business in line with the same principles.

The Code of Conduct covers several important topics, but does not specifically address every situation. If you encounter a situation where the right answer is not clear, try asking a few important questions:

- 1 *Is this decision consistent with this Code of Conduct, our policies, and our Toyota values?*
- 2 *Would I be proud of this choice if my co-workers learned about it?*
- 3 *If the whole world learned about this decision, would I still feel good about it?*

If you answer yes to all three, the decision is likely to be a good one. If the answer to any of the questions is no, stop and ask for help before acting.

When you have questions or need more information about Toyota's policies, you can contact a team leader, an internal resource such as human resources, legal & compliance function, the Compliance Officer or the division of your company that is most related to the topic.

RELATION TO GLOBAL TOYOTA CODE OF CONDUCT

This Code of Conduct incorporates the principles of the Global Toyota Code of Conduct. Where the Global Toyota Code of Conduct sets the Toyota standard and minimum expectations of all Toyota team members and provides guidance for doing the right thing, this Code of Conduct further expands on the global Global Toyota Code of Conduct (and its Global policies) addressing Toyota Europe regional business procedures and local laws and regulations. In other words, this Code of Conduct is consistent with the Global Toyota Code of Conduct, with additional region-specific guidance. We recommend to refer to Toyota Europe's Code of Conduct and policies since they address all specific requirements of the European region.

PLEASE SPEAK UP!

Toyota creates a safe and confidential environment and encourages members to speak up about alleged improper or illegal activities, and we protect those who report them (the "whistle-blowers"). We ask you to report promptly any violation or suspected violation of the Code of Conduct, laws or regulations to avoid further harm to our colleagues, business or the company. We will thoroughly investigate the reported matter and, where necessary, take appropriate action. Further information on how to do this can be found at page 42 of this Code of Conduct.





WE CARE ABOUT PEOPLE



\ DIVERSE AND INCLUSIVE WORK ENVIRONMENT

Toyota is a global company which builds on the strengths and talent of members from many different countries, cultures and backgrounds. Toyota values diversity and is committed to equal opportunities, independent from nationality, gender, religion, ethnicity or age. Our human resource decisions are based on competence and performance, free from any form of discrimination. We aim to be the most inclusive and diverse workplace where all members feel safe and valued.



Guiding Principles

- We value every member, irrespective of background or identity and work to foster an environment of trust and belonging where all members feel appreciated.
- We strive to build a diverse and inclusive workplace that is free from any kind of violence, harassment, bullying or discrimination.
- We actively promote equal opportunities and treat all members fairly and equally.
- We promote an environment where members can openly and safely share their opinions and ideas to cultivate a culture of collaboration and innovation.
- We comply with all labour and employment laws and provide safe, stable and good working conditions.



Your Role

- Create and sustain a safe, diverse, equitable and inclusive workplace where members feel valued, respected and safe.
- Embrace different perspectives and experiences which help us to effectively innovate and improve.
- Make your decision with regard to people (recruitment, promotion, evaluation) based on competence and performance.
- Take a zero-tolerance stance towards any kind of violence, harassment, bullying or discrimination. This includes sexual harassment, power harassment (abuse of authority), and any form of behavior that lowers the dignity of an individual.
- Never discriminate based on gender identity, age, nationality, country of origin, race, ethnicity, disability, sexual orientation, socio-economic background, religion or faith, marital status or having children.
- Speak up and inform your management immediately if you observe or become victim of any form of harassment, discrimination or intimidation, or report it to TME's Compliance Officer or the Whistleblower Hotline.

Diversity and inclusion let people thrive and make Toyota a stronger company

HEALTH, SAFETY AND WELL-BEING

We are committed to fostering a work environment that promotes physical, mental and emotional well-being. In all our workplaces and offices, we have implemented high health and safety standards. All members are expected to promote these high standards and care about their own and their colleagues' health, safety and wellbeing.

Guiding Principles

- We provide safe and appropriate working conditions.
- We care about the health, safety and wellbeing of our members and welcome ideas to improve working conditions. We comply with all health and safety, labour and employment laws and regulations.
- We recognise the importance of maintaining a healthy work-life balance. Employees are encouraged to manage their workload effectively, take breaks when needed, disconnect outside of working time and use available flexible work arrangements.
- All employees are expected to support and to treat each other with dignity, respect and professionalism. Creating a psychologically safe, respectful and inclusive workplace is integral to well-being.

Your Role

- Make health, safety and managing wellbeing a priority in your work. Report any unsafe, unhealthy or risky situation to management, P&I (wellbeing concerns) or Safety & Health (safety concerns).
- Comply with Toyota's health and safety standards and procedures, as well as the relevant laws and regulations.
- It is prohibited to work under influence of alcohol or illegal drugs. Legal drugs are equally prohibited if they impact the safe performance of your tasks.
- Present any ideas to improve health, safety or wellbeing at work to your management.



We care about the well-being of all people working at Toyota, and their health and safety is our top priority.

\ HUMAN RIGHTS

We are committed to respecting the fundamental human rights of all individuals and groups who may be impacted by our activities or business, including members, local communities, customers and business partners. Human rights are rights which everyone enjoys, irrespective of nationality, race, sexual orientation, gender or religion. They include fair and equal employment opportunities, non-discrimination, prohibition of child labour, forced labour or modern slavery, freedom of association, the right to join trade unions, fair wages and healthy and safe working conditions.

Human rights are specified in the European Convention on Human Rights, the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

Guiding Principles

- We respect and promote human rights, including fair and equal opportunities, safe and healthy working conditions and freedom to join a trade union. All members, suppliers and other business partners are required to respect human rights and abide by the same standards.
- We screen potential business partners using appropriate processes to identify, prevent and stop human rights violations. We expect our business partners to respect all human rights and will take appropriate action if we observe any infringement.
- We respect the International Labour Organization (ILO) Core Conventions on Labour Standards and other applicable laws.





Your Role

- Treat other people with respect and dignity in your daily interactions with colleagues, business partners or customers. Never discriminate against anyone.
- When dealing with business partners, ensure that they comply with Toyota Europe Supplier Sustainability Guidelines and make human rights part of your regular dialogue and business review meetings.
- Familiarise yourself and comply with Toyota Europe Human Rights Policy and Supplier Sustainability Guidelines.
- Immediately report any potential human rights violation, at the workplace or a business partner, to your management, the Whistleblower Hotline or TME's Compliance Officer.

Our Resources

- Toyota Global Human Rights Policy
- Toyota Europe Human Rights Policy
- Toyota Europe Supplier Sustainability Guidelines

We honor the human rights of all members, customers and individuals that are impacted by our business



PERSONAL INFORMATION

In a world of connected cars, social media and data-driven research or marketing, we handle data relating to our customers, members and business partners. We inform them transparently about what data we collect and how we will use it. We keep data secure and confidential and protect the privacy of personal information. We process the data in strict compliance with all applicable laws, in particular the General Data Protection Regulation (GDPR) and the e-Privacy Directive.

All data relating to an identifiable person is considered personal data and requires special protection. Common examples are a person's name, personal characteristics such as gender, occupation, age, phone number, address, email address, bank details, photos and video or voice recordings. Geolocation data is personal data, as is any information which can be linked to a particular vehicle or VIN, even if that is mere technical car data.

Guiding Principles

- We care about the privacy of our customers, members and business partners. It is a core value of Toyota's corporate culture and we promote the respect of privacy through Toyota Europe's Personal Data Protection Policy, appropriate internal processes and continuous training.
- We only collect data that is necessary for business purposes and transparently communicate about the data collection and its purposes. We ensure that data is safely stored and cannot be accessed by unauthorised persons.
- We take privacy considerations into account early in the development of products and services, so-called 'Privacy by Design'. We ensure that all data processing fully complies with the relevant laws, including the GDPR and the e-Privacy Directive.
- We respect the rights of the persons whose data we collect, including the right to information, access and rectification, portability, objection to collection or use of their data and the right to be forgotten.



Your Role

- Be familiar and comply with GDPR and Toyota Europe's Personal Data Protection Policy, as well as the relevant security and data-protection policies and procedures.
- Before collecting personal data, ensure that a proper data impact assessment has been conducted and identify the appropriate legal ground, purpose and retention period.
- Inform the persons whose data you are collecting or handling transparently about the data collection. They must be made aware that we use their personal data, for which purposes, how and for how long this data will be used and with whom it might be shared. Communicate in a simple and understandable way, using clear and plain language.
- Ensure that proper procedures for processing, maintaining and secure storage of personal data are followed in strict compliance with GDPR.
- Only collect and use personal data for purposes communicated to the persons concerned. For example, if we collect data for selling a car to a customer, we may not use this data for marketing campaigns, unless the person has explicitly agreed to it.
- Limit the collection of personal data to what is strictly required for the specified purpose. Personal data which is not strictly needed for the purposes communicated may not be collected.
- Keep personal data only for as long as strictly necessary. Once the information is no longer necessary for the purposes for which it was collected, we must erase or anonymise it. We may never keep personal data for an unlimited period.

- Report immediately any data incident such as a hack, loss of data, unauthorised access, theft or misuse of data, to TME's Data Protection Coordinators. Immediate reporting is essential because Toyota must report certain data incidents within 72 hours to the relevant authorities.

Our Resources

- Toyota Europe's Personal Data Protection Policy

Respecting the privacy rights is key to keeping trust of customers, members and business partners



WE CARE ABOUT SOCIETY



\ ENVIRONMENT

We are committed to protecting and preserving the environment for current and future generations. By 2030, all necessary investments will be made for all Toyota Corporate facilities to reach carbon neutrality. In addition to our European Manufacturing Companies, this also includes Toyota Motor Europe headquarters, all vehicle parts and logistics centres. Our ecological commitment also applies to our products. As a leader in hybrid and hydrogen technology, Toyota continuously invests in improving the environmental performance. This includes the reduction of CO₂ and NO_x emissions. We promote recycling, repair and re-use. In our production process, Toyota sets up programmes to reduce greenhouse gas emissions, improve water and energy usage, increase the use of recycled materials and limit waste.



Guiding Principles

- We are dedicated to continuously reducing the environmental impact of our products throughout their entire life-cycle. We design and manufacture our products with a view to improving their environmental performance and promoting repair, re-use and recycling.
- We aim to develop a society where people, mobility and nature can coexist in harmony. Toyota Earth Charter and the Toyota Environmental Challenge 2050 are the basis of a comprehensive environmental management programme of the entire supply chain.
- Towards carbon neutrality by 2040, we take initiatives to reduce the carbon footprint of our logistics in close in cooperation with our suppliers, retailers and other business partners.
- We promote recycling of used materials aiming to prevent waste as much as possible in our operations.



Your Role

- Anticipate and evaluate the impact of your activities on the environment. Comply with all environmental laws and take positive action to reduce the environmental impact of your projects. Be attentive to the local community's environmental concerns.
- Familiarise yourself and comply with Toyota's environmental policies, goals and objectives, including the reduction of greenhouse gas emissions, water and energy usage, resources conservation, recycling, re-use and repair.
- Immediately report incidents or situations which present a risk to the environment.

Our Resources

- Toyota Earth Charter
- Toyota Environmental Challenge 2050
- Toyota Sustainable Purchasing Guidelines

We are dedicated to continuously reducing the environmental impact of our products towards carbon neutrality by 2040

GOVERNMENT RELATIONS AND POLITICAL ACTIVITIES

The automotive and mobility business sector is going through a major transformation driven by new technologies, changes in consumer preferences, climate and energy priorities and an evolving regulatory framework. We strive to create a trustful relation with institutions, governments, officials and state-owned enterprises. In our contacts with public stakeholders, we always act with high standards of integrity, transparency and in full compliance with laws and regulations.

Guiding Principles

- We maintain proper and transparent relationships with institutions, governments, officials and state-owned enterprises. Our members act with high standards of integrity, transparency and in full compliance with laws and regulations.
- In our advocacy, we always maintain a politically neutral approach and ensure that our requests are reasonable and justified.
- Our funds, property or services are never used to make political donations or support any candidate for political office.

Your Role

- Always act with high standards of integrity in a transparent way and in full compliance with laws and regulations in your relationships with governments, public institutions and state-owned enterprises.
- Governments, ministries institutions and state-owned enterprises have specific rules governing procurement and tender processes. Familiarise yourself and ensure we fully comply with these rules.
- Familiarise yourself and comply with the TME's Gifts and Hospitality Policy, TME's Anti-Bribery & Anti-Corruption Policy as well as the Global Anti-Bribery & Anti-Corruption Policy.

Our Resources

- TME's Anti-Bribery & Anti-Corruption Policy
- Global Anti-Bribery and Anti-Corruption Policy
- Toyota Europe Gifts and Hospitality Policy

¹ Anti-Bribery & Anti-Corruption policy covers other types of donations, contributions, etc. beyond political contributions.

A photograph of two Black women sitting at a table, smiling and looking at a document. The woman on the left is wearing a blue and orange patterned top and has her hand raised as if pointing at the document. The woman on the right is wearing a black top and is holding the document. In the foreground, there is a blue cup of coffee on a saucer. The background is dark with some blue light accents.

Toyota aims to be recognized as a trustworthy European partner through fair, transparent, and principled engagement with government and political stakeholders.

\ COMMUNICATION, CONFIDENTIALITY AND INTELLECTUAL PROPERTY

We communicate in a respectful, transparent and professional manner. Our communications support Toyota's strategy and brand reputation as a leading automotive company. We protect confidential and business information, including Toyota's intellectual property rights, and take appropriate measures to keep it safe.

Guiding Principles

- We build positive relationships with stakeholders and the community by communicating in a respectful, transparent and professional manner. We share information about our activities, products and services fairly and listen to all stakeholders.
- We ensure that our communications are accurate, reliable and truthful. Financial communication, including annual accounts, must be transparent, reliable and not misleading. Our reporting and records comply with all applicable laws, international accounting standards and tax obligations.
- We protect our physical assets, such as facilities and equipment, as well as our intangible assets, such as intellectual property (patents, trademarks, designs, know-how). We do not share confidential or internal business information, such as know-how, trade secrets, organisational charts, business plans, information about our strategy and we take appropriate measures to keep this information safe.





Your Role

- When communicating, ensure that all information provided is accurate, reliable and truthful. Misleading statements, exaggeration, omissions or false information damage Toyota's credibility and reputation.
- Public statements on Toyota's behalf or provide comments to the press or on social media can only be made with the prior authorisation of your management and in alignment with Corporate Communication. If you are contacted by a member of the media about Toyota, always refer that person to the Corporate Communications colleagues.
- Take appropriate measures to protect confidential or business information such as know-how, trade secrets, organisational charts, business plans or information about our strategy.
- Protect Toyota's assets and intellectual property rights. Intellectual property rights include patents, designs, trademarks, copyrights, trade secrets, know-how and any other rights which were created or developed through our research and development activities.
- Respect the intellectual property rights of others.
- External communication must be made in accordance with Toyota's internal guidelines and policies on communication
- Familiarise yourself with TME's Social Media Policy. Make clear that any opinions expressed using social media are your own – and not those of Toyota. Maintain high standards of ethics and courtesy.

Our Resources

- TME's Information Security Policy
- TME's Internal IT Security Policy
- TME's Social Media Policy
- Toyota Corporate Identity
- Toyota Brand Visual Identity
- Lexus Brand Visual Identity
- GR Brand Visual Identity
- KINTO Brand Visual Identity





INTEGRITY IN EVERYTHING WE DO



\ PRODUCT SAFETY AND QUALITY

Everyday, countless people drive and enjoy our vehicles. Our commitment to first class safety and quality standards ensures that they feel safe and limit any risks and hazards.



Our approach to quality is based on the Ji Kotei Kanketsu philosophy: Built-in quality at every process step with full ownership and “to ensure that defects are never passed on”. It means that all members take ownership for the quality of their job. If anyone, not only our plant members, identifies a problem he or she can raise an alert and potentially stop production. This results in consistent quality at every stage of every process.

Guiding Principles

- Safety and quality are key drivers of all our processes, from R&D, car design to production, sales and after-sales services. They ensure that we deliver safe, high-quality products and services.
- We listen and reach out to our customers to understand their needs and exceed their expectations. Their independent views and experiences are essential to our quality goals.
- We provide customers with adequate information on safety-related equipment and instructions on the safe use of vehicles.



Your Role

- Take ownership of the quality of your job and ensure that defects are never passed on to the next step of a process.
- Understand your customer's needs and deliver a quality job exceeding their expectations on our products and services.
- Immediately report any product or process that could present a safety or quality risk to your management.

*Toyota cars
stand out
thanks to the
dedication
and daily
efforts of all
its members*

\ PROCUREMENT ACTIVITIES

We conduct our business with the highest ethical standards and integrity. Our procurement practices and relationships with suppliers play a crucial role in upholding these values. We select our suppliers and business partners in a fair, transparent and competitive way. We require our suppliers to adhere to high standards with respect to human rights, environmental responsibility, legal compliance, quality and safety.

Guiding Principles

- We treat all suppliers with fairness, equality and respect. We promote fair competition and select suppliers based on transparent and objective criteria, such as quality, price and capability.
- Our procurement processes are transparent, ensuring that all suppliers have equal opportunities. We maintain clear and documented procedures for supplier selection and evaluation.
- Members involved in supplier selection or evaluation must disclose any potential conflict of interest, whether direct or indirect. Any form of bribery, kickback or facilitating payment is strictly prohibited. Gifts and hospitality shall be rejected unless authorised in accordance with TME's Gift and Hospitality Policy.
- We foster mutually respectful relationships with our suppliers, built on trust, open communication and professionalism.

Your Role

- Select and evaluate suppliers in an objective, fair and transparent way in strict compliance with the applicable laws and TME's Sustainable Purchasing Guidelines.
- Avoid conflicts of interest, or situations, which could raise questions about your ability to exercise independent judgment. Report to your management any potential conflict of interest.
- Report to TME's Compliance Officer any breach of TME's Sustainable Purchasing Guidelines or any improper situation, such as not following the appropriate selection and evaluation procedures or any other improper influence or pressure.
- Accept any gift or hospitality only if it is permitted under TME's Gift and Hospitality Policy. Immediately report any attempt at bribery, kick-back or improper influence regarding supplier selection or evaluation.

Our Resources

- TME's Sustainable Purchasing Guidelines
- Toyota Europe's Gift and Hospitality Policy
- Toyota Europe' Anti-Bribery and Anti-Corruption policy

A close-up photograph of several people's hands stacked together in a circle, symbolizing teamwork and ethical standards. The hands are of various skin tones and are adorned with various accessories like a watch, bracelets, and a ring. The background is blurred, showing what appears to be an office or meeting room setting with a window and some papers.

*We prioritize
ethical standards
and legal
compliance in
our supplier
relationships*

\ SALES ACTIVITIES AND FAIR COMPETITION

We strongly believe in free and fair competition. It ensures that consumers have access to the best products and services at the best price and conditions. It sets a level playing field for all companies to compete fairly without undue restrictions.

The proper functioning of the market and free competition are protected by a set of rules known as antitrust or competition law. They provide specific rules on how companies should compete and behave. We operate in strict compliance with these rules and expect every member to be familiar and comply with them.

Guiding Principles

- We develop and sell products and services through free and fair competition in strict adherence to the law.
- Toyota does not enter into agreements or arrangements with competitors which restrict competition. It is illegal to have any discussion, make an agreement or have an understanding with a competitor on prices, discounts, bonuses, costs, allocating markets or customers, investments or production capacity, commercial strategy or product launch, marketing plans or other sensitive business topics.
- We shall not exchange sensitive business information with competitors, nor try to obtain such information from them. Sensitive business information refers to any information that is important to competition between companies and reduces their uncertainty in the market. It includes information on prices, discounts, bonuses or other pricing conditions, customers or suppliers, production capacity or costs, turnover, marketing plans, product launches, market or product strategy, investments, R&D programmes or their results.
- We select retailers and repairers based on objective and qualitative criteria. In the European Economic Area (EEA), Toyota does not restrict where or to which customer they may sell. We never set a minimum resale price or ask to apply a minimum margin.
- We value the importance of free and fair competition in the aftersales market. Customers can have their vehicles serviced and repaired by repairers from inside or outside our network. We will never suggest that the use of an independent repairer will invalidate a warranty.
- We market our products and services in a manner which is truthful and not misleading. We ensure that every claim in our advertisements and marketing materials is adequately substantiated and does not mislead consumers.



Your Role

- Familiarise yourself and always comply with TME's Competition Law Compliance Policy and the relevant competition laws. Contact your legal department if you have any question about dealing with competitors, our sales network or any other business partner, or if you have suspicion about any potentially anti-competitive agreement or practice.
- Always seek legal support before negotiating or entering into any agreement with a competitor which includes competition or law aspects, such as non-compete clauses, benchmarking or competing suppliers.
- Never discuss, exchange information or make agreements with competitors about pricing, costs, bids, markets, territories, customers, suppliers, investments or contract terms and conditions.
- Never seek commercially sensitive information from your competitors. Always seek legal support before engaging in any benchmarking activity.
- Always exercise extreme caution when participating in any trade union meeting. If competitors discuss or provide commercially sensitive information, distance yourself, leave the meeting immediately and contact your legal department.
- Do not impose the price or margin at which independent distributors or retailers should resell our products.

- Do not restrict competition in the aftersales market or suggest that the customers' warranty would be affected by having their car serviced by an independent repairer.

Our Resources

- TME's Competition Law Compliance Policy

*We believe
in fair
competition*

INSIDE INFORMATION AND INSIDER TRADING

Insider trading refers to the buying, selling or trading of securities, such as shares or bonds, based on non-public information. People who have access to confidential, non-public information are known as insiders. They typically include the company's management, directors, employees, contractors and any other member of Toyota who have access to confidential information about the company's business, financial performance, upcoming announcements, product launches, mergers, acquisitions or other significant events that can impact the share price.

Engaging in insider trading is illegal, as it undermines the principles of fairness and equal opportunity in the financial markets. It gives those with inside information an unfair advantage over other investors who do not have access to the same information.

Toyota Motor Corporation is listed on the London Stock Exchange, Nagoya Stock Exchange, New York Stock Exchange and on the Tokyo Stock Exchange. We may not disclose confidential, non-public information to third parties and will not trade in shares or other securities on this information.

'Material non-public information' includes, for example, projections of future earnings or losses, major investments or restructuring, business acquisitions or divestments, unpublished information about new products or services or any other non-public information that, if disclosed, could influence a person's decision to buy, sell or hold a company's shares or other securities.





Guiding Principles

- Any kind of trading in securities of any company while in possession of material non-public information is unethical and illegal.
- It is illegal to provide trading “tips” or share material non-public information with other people, such as family members or friends.
- Material non-public information must be safeguarded from improper disclosure or use.

Your Role

- When you receive non-public information about Toyota or other companies, such as customers, suppliers or other business partners, do not buy or sell shares or other securities, such as bonds, of Toyota or the relevant companies.
- Do not suggest or recommend anyone else to sell, purchase or retain securities of Toyota or another company while you have material non-public information about Toyota or that company, even if you do not communicate or disclose the information itself.
- Keep non-public information secure. Never disclose non-public information to anyone outside the company, including family members, friends and social media communities. Within the company, share material non-public information only with those who need to know and for legitimate purposes.

We do not trade on, or communicate, non-public information





FAIRNESS
AS A
DRIVING
FORCE

ANTI-BRIBERY AND ANTI-CORRUPTION, MONEY LAUNDERING, INTERNATIONAL SANCTIONS

We compete for business on the strength of our products and services and operate with integrity according to high ethical standards. Our reputation is built upon the trust of our customers, partners and stakeholders and we recognise that improper business practices, such as bribery and corruption or money laundering, undermine our fundamental values. We expect our partners and business relationships to abide by the same ethical standards.

We conduct business at an international level and comply with all applicable laws and regulations where we operate. We monitor and strictly comply with international sanctions and strictly prohibit any circumvention of international sanctions.

We compete on the basis of the strength of our products and services and do not try to influence business or other decisions through gifts or facility payments.



‘Bribe’ refers to offering anything of value to improperly influence the actions of a government official, supplier or customer or improperly obtain a business or personal advantage, even if offered or given indirectly bribes can take many forms and include gifts, travel and hospitality or other advantages. Bribes are not acceptable, irrespective whether they are made directly or through business partners, third parties or donations to organisations.

‘Corruption’ refers to any dishonest conduct or wrongful misuse of authority by people in positions of power.

Guiding Principles

- We compete for business on the strength of our products and services and never offer, pay, solicit or accept a bribe of any kind.
- Toyota does not permit or make facilitation payments to induce a government official to perform a routine, nondiscretionary task that the company is already entitled to.
- Gifts, travel and hospitality can be offered or accepted only in strict compliance with TME's Gifts and Hospitality Policy, and Toyota Europe's Anti-Bribery and Anti-Corruption Policy. Gifts of cash or cash equivalents are strictly prohibited.
- Toyota does not engage in or facilitate any form of money laundering. If we become aware of any situation or transaction which might be part of a money laundering scheme, we will immediately cease the transaction and report any suspicious transactions to the company.
- We provide and accept only appropriate gifts and hospitality within reasonable amounts for legitimate business purposes and ensure that they comply with applicable local laws, rules and our policies.
- We have strict export control mechanisms in place to ensure that we comply with export regulations, including international sanctions. Any circumvention of international sanctions will not be tolerated.



*We do not
tolerate
bribery or any
other form of
corruption*

Your Role

- Be familiar and fully comply with Toyota Europe's Anti-Bribery and Anti-Corruption Policy, the Global Anti-Bribery and Anti-Corruption Policy and TME's Gifts and Hospitality Policy. Do not offer, pay, solicit or accept bribes or facilitation payments of any kind.
- Comply with the local human resources hiring practices and any applicable regulations and local rules and policies before hiring any candidate referred by a government official or who recently worked for a government entity.
- Know your business partners by ensuring they are screened according to applicable risk-based due diligence processes and avoid doing business with any person or entity which engages in corruption or bribery practices of any kind.
- Immediately contact TME's Compliance Officer, Legal & Compliance Division, People & Innovation, your line manager or Toyota Europe Whistleblower Hotline if you see any unusual or improper business transaction or any warning sign that might suggest any form of bribery or corruption.
- If you become aware of any money laundering scheme or a transaction which might be used for such a scheme, immediately contact TME's Compliance Officer, Legal & Compliance Division, People & Innovation, your line manager or Toyota Europe Whistleblower Hotline. Any participation in or discussion about such a transaction must immediately put on hold.
- When exporting vehicles, parts or other goods or services, check all relevant export legislation and ensure that all international sanctions are strictly complied with. If you become aware of any breach of international sanctions by Toyota, a business partner or customer, or

any risky situation which could lead to such a breach, please contact TME's Compliance Officer, Legal & Compliance Division, People & Innovation, your line manager or Toyota Europe Whistleblower Hotline.

- Only offer gifts or hospitality that are reasonable in value and only for a legitimate business purpose, and accurately record all related expenses. Do not request gifts or hospitality from anyone doing business with Toyota.
- Only accept gifts or hospitality from third parties that are appropriate, reasonable in value and permitted and approved in accordance with applicable local laws, rules and our policies (including any value limitations). Refuse them if gifts or hospitality may risk the appearance of an improper influence over Toyota's decision making.

Our Resources

- Toyota Europe's Anti-Bribery & Anti-Corruption Policy
- Global Anti-Bribery and Anti-Corruption Policy
- TME's Gift and Hospitality Matrix





\ CONFLICT OF INTERESTS

Conflicts of interest undermine the integrity and trust within an organisation. Members must act in the best interest of the company and avoid situations that can compromise, their objectivity, loyalty or decision making. We use the company's assets only for legitimate business purposes in the best interest of Toyota.

Guiding Principles

- A conflict of interest arises when an individual's personal, financial or other interests could influence, or be perceived to influence, its judgement, actions or decision in a way which is detrimental to Toyota's best interests.
- All members are required to promptly disclose any potential, actual or perceived conflict of interest to their immediate manager or TME's Compliance Officer. This includes financial interests, relationships, other professional activities and interests in a company.
- Failure to disclose a conflict of interest may result in disciplinary action, up to and including termination of employment or contractual relationships. We take conflicts of interest seriously and expects everyone to uphold the highest standards of ethics and integrity.





Your Role

- Disclose to your management in a timely and preventative manner any situation, transaction, relationship or interest that may give rise to a conflict of interest.
- Avoid putting yourself into a situation which could give rise to a conflict of interest. These include:
 - » Improperly supervising or assisting in hiring of a family member, romantic partner or close friend.
 - » Having interest in a business which competes or does business with Toyota.
 - » Using Toyota property, information or position for personal gain.
 - » Having a substantial investment in a company doing business with Toyota.
 - » Overseeing the relationship with a third party in which a family member, partner or close friend is the key decision maker.
 - » Receiving a gift from a third party while negotiating a contractual relationship on Toyota's behalf.
- Familiarize yourself and comply with TME's Anti-Bribery & Anti-Corruption Policy as well as the Global Anti-Bribery and Anti-Corruption Policy.

Our Resources

- TME's Anti-Bribery & Anti-Corruption Policy
- Global Anti-Bribery and Anti-Corruption Policy

*We will never
let personal
interests
influence
our business
decisions*

\ PLEASE SPEAK UP!

This Code of Conduct covers the policies and ways of thinking that we should keep in mind while working at Toyota. Whenever you are not sure about the right action to take, consult with your supervisor or company's internal resources. You can also raise questions or concerns by contacting the local Whistleblower Hotline or the Global Speak Up Line.

When raising a concern, you do not need to have all the details or proof, or to be certain that wrongdoing has occurred. It is important to raise the issue, so that the company can address it in a timely manner.

We take violations of the Code of Conduct seriously and review concerns in a fair and consistent manner. If the results of an investigation warrant further action, we will take those actions and will work to prevent similar problems from happening again.

How do I speak up?

There are multiple ways for you to report any violation or suspected violation. You can choose the reporting channel which you feel most comfortable with:

- Toyota Europe Whistleblower Hotline, which can be accessed online ([link](#)), or via phone ([link](#)), or via the number 00800 72 33 22 55 (calling from Belgium).
- Global speak up line accessed online à [Global Speak Up Line \(convercent.com\)](#) or via email (SpeakUp@Toyota.com).
- People & Innovation (P&I).
- TME's Compliance Officer.
- Your line manager.
- Any other member of management.

Non-Retaliation Commitment

We prohibit retaliation (such as dismissal, demotion, or other similar employment actions) against members for reporting concerns in good faith or for participating in an investigation. Any retaliation - whether direct or indirect - against those members, or any attempt to learn the identity of a member who reported a concern, is considered retaliation and will not be tolerated.

We encourage you to report any retaliation to the Compliance Officer.





*Speaking up
is crucial for
efficient and
effective problem
resolution*

TOYOTA