



GLOBAL ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Toyota Industries Group (“We” or “our”, each as “Company”) including Toyota Industries Corporation (“TICO”) is committed to conducting business with integrity and in compliance with all applicable laws, including those related to anti-bribery and anti-corruption (“Anti-Corruption Laws”). This commitment is reflected in and required by our Code of Conduct and in our values – the Toyoda Precepts. This Global Anti-Bribery and Anti-Corruption Policy (“**Policy**”) is based on the Code of Conduct and establishes globally uniform rules to ensure that the entire Toyota Industries Group adheres to ethics and the Anti-Corruption Laws.

1. Purpose

This Policy is intended to reflect and demonstrate our commitment to conducting business activities with integrity, in alignment with our values -the Toyoda Precepts, and in compliance with all applicable anti-bribery and anti-corruption laws in all jurisdictions in which Toyota Industries Group operates and/or transacts business, including but not limited to the US Foreign Corrupt Practices Act of 1977, as enacted and amended, UK Bribery Act of 2010, as enacted and amended, and Criminal Law and Unfair Competition Prevention Act of Japan, as enacted and amended. This Policy provides basic rules for preventing bribery and corruption.

2. Applicability

This Policy is applicable to Toyota Industries Group, its Executives and Associates. In order to comply with this Policy, each Regional Chief Compliance Officer shall establish Regional Policy for the operation and applicability of this Policy to their specific region. For other companies not managed by RCCO, when they need to establish Company Rules for the operation and applicability of this Policy, they shall respectively make prior consultation with TICO.

Each Regional Policy and Company Rules shall not conflict with this Policy and shall be approved by TICO. If such conflict does exist, this Policy shall prevail.

In addition, we expect third parties to comply with this Policy as long as they are acting in the interests of and/or on behalf of the Toyota Industries Group.

3. Policy Principles, Requirements, and Expectations

We do not provide, offer, receive, promise, request, or accept, directly or indirectly, including through any third parties, to or from a Public/Government Officials or any other person Anything of Value, for the purpose of improperly influencing the recipient’s actions and/or decisions, obtaining or retaining business, securing any improper advantages, and/or for any other illegal or improper purposes.

3.1 Prohibition on any Cash or Cash Equivalents

We do not provide, offer, receive, promise, request, or accept, directly or indirectly, including through a third parties, any Cash or Cash Equivalents in violation of any applicable laws, regulations, rules, and/or Company Regulation.

3.1.1 Facilitation Payments: We never make any facilitation payments. Before making any payment to Public/Government Officials, regardless of whether it is based on an officially



disclosed and/or operated legitimate system, we always consult with the Legal Function and Compliance Function.

3.1.2 Payments Made in Response to Threats, Duress, or Health Emergency: If you have no choice but to give money to avoid situations which threaten your health, safety, life, body, and/or freedom (e.g., illness, assault, intimidation, arrest, imprisonment, etc.), or that of a co-worker, give the highest priority to safety and/or health. Even in such situations, if money has been paid, or must be paid, immediately report the date/time, location, the specific circumstances, the amount, etc. to the Legal Function and Compliance Function.

3.2 Prohibition of Bribery with Public/ Government Officials

We do not provide, offer, receive, promise, request, or accept, directly or indirectly, including through a third parties, Anything of Value to and/or from a Public/Government Official(s) in violation of applicable law(s) or regulation(s).

We have established Company Regulation to ensure compliance with applicable law(s) and regulation(s). Providing, offering, receiving, promising, requesting, or accepting Anything of Value to or from Public/Government Official(s) that deviates from or violates our Company Regulation requires written pre-approval from the Legal Function and Compliance Function.

3.3 Prohibition of Bribery with third Parties other than Public/Government Officials

3.3.1 We do not provide, offer, receive, promise, request, or accept, directly or indirectly, including through a third party, Anything of Value to or from Third Parties for the purpose of receiving improper benefits, intending to make such third parties other than Public/Government Officials act outside of their authority, and/or commit wrongful acts or omissions.

3.3.2 Any provision, offer, or acceptance of anything of value involving third parties other than Public/Government Officials must:

- i) Comply with all applicable laws and regulations;
- ii) Be based on commercial terms and conditions properly negotiated;
- iii) Be reasonable and proportionate in nature and frequency (e.g., modest hospitality, no lavish or inappropriate gifts);
- iv) Avoid creating any appearance of impropriety, conflict of interest, or reputational risk;
- iv) not have the intention to improperly influence a decision or official act/action; and
- vi) Adhere to Company Regulation.

3.3.3 Any potential deviation from Company Regulation requires written pre-approval from Legal Function and Compliance Function.

3.3.4 We do not engage in transactions where:

- i) Compensation or benefits are not based on legitimate commercial terms;
- ii) Payments exceed agreed contractual prices, costs, or terms; or
- iii) The arrangement lacks clear and lawful business purpose.



3.4 Truthful, Accurate, and Complete Company Records and Prohibition of Embezzlement

3.4.1 We never conduct off-the-book, fictitious, or otherwise falsified transactions on the books and records of the Company, nor any other similar acts prone to be misconstrued as such.

3.4.2 All accounting records, expenditures records, expense reports, invoices, vouchers, gifts, business entertainment and any other business records must be accurately and completely reported and recorded in the Company's records.

3.4.3 We will keep and maintain accurate, complete, and reasonably detailed books and financial records, including, but not limited to gift registries, general ledgers, and audit records showing activities involving the giving and/or receiving of Anything of Value.

3.4.4 Personal funds must not be used for any payment or activity prohibited under this Policy except for the payment made in response to a threats, duress, or health emergency set out in 3.1.2 above.

3.4.5 We use the Company's assets (all tangible and intangible items, including products, equipment, fixtures, information, and intellectual property) for our Company's business only, not for private purposes. We never embezzle the Company's assets, even valuable waste.

3.5 Avoidance of Conflicts of Interest

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

We must avoid any situation in which our personal interests – or those of our family members or close associates – could interfere with, our responsibilities to the Company. We do not engage in conflicts of interest, including but not limited to the following:

- i) Improperly supervise or assist in hiring a family member or close associates in Toyota Industries Group ;
- ii) Competing with Toyota Industries Group.
- iii) Using company resources, property, information, or position for personal gain.
- iv) Having a substantial investment in a company doing business with Toyota Industries Group; and
- v) Overseeing the relationship between Toyota Industries Group and a Public/Government Official or a Third Party in which a family member or close associate is the key decision maker.

3.6 Political Contributions

Political contributions refer to any donations or support—monetary or non-monetary—provided to public officials, candidates for public office or the public trust, political parties, party officials, political initiatives, referenda, or any form of political campaign. These contributions are not limited to financial donations; they also include the use of Company property, equipment, funds, or other assets, as well as the time and efforts of Associate(s).

No political contribution may be made, directly or indirectly, at the request, suggestion, or direction of any government official or other individual, if the intent is to secure business, gain an unfair advantage, or otherwise benefit the Company improperly.

Any contributions to the Public/Government Officials requires written pre-approval from the Legal Function, Compliance Function.

Otherwise, in the following cases, prior written approval from the Legal Function, Compliance Function, or the department or person in charge of political contributions is required:



- i) When making a political contribution in the name of the Company; or
- ii) When making a personal political contribution that could reasonably be perceived as being connected to the Company.

3.7 Donations

We may, from time to time, provide financial or non-financial support to legitimate third-party charitable organizations. These contributions must be made in good faith and for genuine charitable purposes.

Under no circumstances shall charitable contributions be made at the request, suggestion, or direction of any government official or any other third party if the intent is to gain an improper business advantage or to influence a business decision.

In the following cases, prior written approval from the Legal Function, Compliance Function, or the department or person in charge of donations is required:

- i) when contributing to organizations that are owned, operated, or affiliated with government officials or entities.
- ii) when a personal donation could be perceived as being made on behalf of the Company because of the donor's title or position within the company.

All charitable contributions must be approved in writing, properly accounted for in accordance with applicable finance and accounting provisions of the Company, and written acknowledgment shall be obtained.

4. Due Diligence

4.1 Third Parties

We perform due diligence before and when engaging third parties such as agents, consultants, suppliers, vendors, distributors, customers, lawyers, accountants, appraisers or lobbyists who may act on behalf of us or interact with government officials on our behalf. This includes reviewing their background, ownership structure, reputation, and compliance history to ensure alignment with the Company Regulation.

4.2 Mergers, Acquisitions, Joint Ventures, and Partnerships

Prior to entering into any merger, acquisition, joint venture, or similar strategic partnership (collectively a "Target Entity"), we conduct thorough due diligence to assess the Target Entity's compliance with anti-bribery and anti-corruption laws and practices. This includes, but is not limited to, evaluating their internal controls, any past anti-corruption violations, and exposure to government interactions.

If the due diligence findings and results identify bribery and/or corruption risks, adverse media findings including negative reputational information, legal issues or concerns, or other ethics and compliance related risks under this Policy, we will take appropriate actions, including but not limited to requiring remediation measures, postponing the transaction, modifying the transaction terms, discontinuing the transaction, and, as may be applicable, discontinuing or terminating any existing business relationship and/or strategic partnership.

The goal is to prevent the integration of unethical and/or unlawful practices into our operations and to ensure full compliance with applicable laws and this Policy.



5. Consultation

5.1 Report and Consult

If you have any questions, concerns, or suspicions related to potential bribery, corruption, or violations of this Policy, you must immediately report and consult with the Legal Function and Compliance Function.

5.1.1 Compliance Ambassador

When a group company directly supervised by GCCO or Compliance Lead of China reports or consults with TICO, such report or consultation shall be conducted through each company's Compliance Ambassador.

This subsection 5.1.1 is not applicable to the NA and Europe regions.

5.2 Cooperation

All Associates are expected to fully cooperate with any internal or external investigations into suspected bribery or corruption. Cooperation includes providing accurate information, preserving relevant records, and maintaining confidentiality as required.

6. Training and Distribution:

We, regardless of rank, seniority, duties, and/or responsibilities, and regardless of specific Company, affiliate, and/or subsidiary employment or relationship, are responsible for familiarizing ourselves with this Policy, as well as any additional Company anti-bribery/anti-corruption policies, rules, procedures, or controls including participation in all required training sessions and/or educational programs.

7. Failure to Comply:

Failure to comply with or adhere to Code of Conduct, and/or Company Regulation will result in appropriate disciplinary action, up to and including termination. In addition, failure to comply with and/or adhere to this Policy can result in civil and/or criminal consequences that may arise from violating the anti-bribery/anti-corruption laws and regulations of all applicable jurisdictions.

8. No Retaliation

We encourage all Associates to raise questions, concerns, or suspicions related to bribery, corruption, or any violation of this Policy without fear of retaliation.

Those questions and concerns may raise to our manager/supervisor, Legal Function, Compliance Function, or the helplines, which offer the ability to ask compliance questions and report compliance concerns anonymously where permitted by law.

Please refer to the Regional Chief Compliance Officer, Compliance Lead of China, Regional/Local legal counsel, or leadership within the organization for reporting channels.

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



9. Definitions & Key Terms:

Term	Definition
Anything of Value	Goods or services that have a certain utility to the recipient that is real and is not ordinarily given away for free but is purchased. Anything of Value includes gifts, meals, entertainment and hospitality (such as golf outings or concerts), travel (such as airfare and lodging), discounts, sponsorships, donations, charitable contributions, employment offers (including internships), loans, and Other Benefits (as defined below), including those of nominal value.
Associates	All regular and contracted employees, all temporary staff and seconded employees or any other personnel working under the control and supervision of Company
Cash or Cash equivalents	Cash or Cash Equivalents includes, but is not limited to, cash, money, gift cards, prepaid card, voucher, gift certificates, checks, money orders, cash vouchers, provision of collateral, guarantees, private stocks, other securities, payment of expenses.
Company Regulation	A collective reference to this Policy, Regional Policies and Company Rules.
Company Rule (s)	Each company policies, standards, guidelines, and procedures established by each company’s Responsible Person or Department to ensure compliance with this Policy.
Compliance Function	As applicable based on your geographic location, Compliance Function is defined as the Global Chief Compliance Officer, including TICO’s Enterprise Risk and Compliance Management Department your Regional Chief Compliance Officer (RCCO) including the Regional Ethics and Compliance team, and the Compliance Lead (CL) of China.
Executives	Directors, executive officers, audit & supervisory board, or equivalent person
Facilitation Payment(s)	A facilitating payment(s) is a payment(s) made to further routine governmental action that involves non-discretionary acts of the public/government official, agency, or instrumentality thereof.
Legal Function	Legal Function is defined as TICO Legal and the Legal Department that exists at each Company or group of companies.
Other Benefits	Any benefit or convenience that has a certain degree of usefulness for the recipient, including but not limited to the following: unfair reductions in customs duties, taxes, or fines; obtaining unfairly favorable rulings or appraisals; improperly obtaining or maintaining licenses or permits; overlooking non-compliance with applicable rules or regulations; entering into contracts on unfairly favorable terms; employment, education, medical care, and other opportunities; and goods or services that are not normally provided free of charge but are purchased
Public/Government Officials –	1) An officer, employee, or agent of a Government Entity (i.e., an agency, department, bureau, state-owned entity, or instrumentality thereof as well as companies in which a government agency, department, bureau, state-owned entity, or instrumentality thereof has any ownership interest or can or does exercise management power (i.e., influence in decision-making)); 2) an officer, employee, or agent of a public international organization such as the United Nations, World Bank, etc.; 3) a person acting in an official capacity for or on behalf of a Government Entity; 4) a political party, political party official, or a candidate for political office; and 5) a Politically Exposed Person (i.e., an individual who is or has been entrusted with a prominent public function, including any family members of such a person). An official does not need to be considered high-ranking. For purposes of this Code, a Government Official includes the family member of a Government Official such as, spouse, domestic



	partner, child, step-child, step-parent, grandparent, aunt, uncle, niece, nephew, and/or other person living with the Government Official as part of the Government Official's immediate family. 6) Persons equivalent to those specified in 1) to 4) above.
Regional Chief Compliance Officers	Regional chief compliance officer appointed by TICO for North America and Europe, respectively.
Regional Policy (ies)	This Policy is comprehensively established by the RCCO for the regions they designate and is defined under their own responsibility, serving as a superior regulation to the Company Rules established by each Company.
Toyota Industries Group	TICO and affiliated companies in which TICO directly or indirectly holds more than 50% of controlling interest.

10. Approval

Role	Name
CLO	Taeko Kojima
GCCO	Hiroshi Fukagawa

11. Revision History

First Edition: April 1st, 2026