

Toyota Tsusho Group Supply Chain Sustainability Behavioral Guidelines

【1】 Supply Chain Sustainability Behavioral Guidelines

1. Respect for human rights

We understand and support the "Toyota Tsusho Group Human Rights Policy," and will strive to put it into practice.

We will respect the human rights of employees and will never subject employees to inhumane treatment, such as abuse, physical punishment, or harassment.

We will endeavor to identify potential adverse impacts on human rights in business activities, and work to prevent or mitigate such impacts through a human rights due diligence framework.

2. Prevention of forced labor and child labor

We do not tolerate any form of modern slavery, we prohibit forced labor and we recognize that all work is voluntary. Additionally, we guarantee the right of employees to freely terminate their employment.

As part of the hiring process, we will provide all employees with an employment contract written in their native language that includes employment terms in full compliance with all applicable laws and regulations. When employing migrant workers, including foreign nationals, we will strive to prevent practices that may lead to forced labor, such as requiring the surrender of official identity documents or work permits, or charging recruitment fees and other expenses that are considered inappropriate under international norms. We do not tolerate child labor and do not allow children to work from a young age as it deprives them of educational opportunities and impedes their development.

The working age for employees shall be from 15 years old, or the minimum working age according to the relevant laws and regulations of each country, or the age at the end of compulsory education, whichever is the greatest, will apply.

For hazardous work, we do not utilize employees under the age of 18.

We allow labor in the form of vocational training and apprenticeships only within the scope permitted by the applicable laws and regulations of each country.

3. Prevention of Excessive Working Hours and Unfair Low Wages

We will appropriately manage employees' working hours (including overtime), holidays and leave, and strive to reduce excessively long working hours. In addition, we will pay wages that exceed the living wage in compliance with the labor laws of each country and will not reduce wages unreasonably.

We will ensure strict compliance with maximum working hours as defined by the company, in addition to observing statutory working hour limits in each country.

We will comply with all applicable wage-related laws and regulations in each country, including those governing overtime and legally mandated benefits. We will not engage in unfair wage deductions, and will strive to provide wages that exceed both the legal minimum wage and a living wage.

4. Elimination of Discrimination and Harassment

We will not engage in any form of discrimination or harassment based on gender, age, place of origin, nationality, race, color, ethnicity, religion, gender identity, sexual orientation, pregnancy, disability, political opinion, or any other status.

5. Respect for freedom of association

We recognize, support and respect the right of employees to freely associate or not to associate based on applicable laws and regulations of the countries in which we are engaged in business activities.

We guarantee the right of employees to communicate openly and directly with management without fear of retaliation, intimidation, or harassment.

6. Improvement of working environment

We will strive to provide a safe, hygienic and healthy work environment, especially by prioritizing employee health and safety.

We will utilize occupational healthy and safety management systems to maintain and further improve safety and hygiene standards.

We will provide all employees with the necessary and sufficient healthy and safety education and training in appropriate languages to promote a comfortable and healthy working environment.

We will conduct training and implement measures in appropriate languages to minimize harm to life, the environment, and property in emergencies, including the installation of proper fire alarms, fire extinguishing equipment, and emergency exits.

We will identify and assess physically demanding tasks and safety hazards related to production machinery and other equipment, and manage them appropriately by complying with relevant laws and regulations and implementing physical protective measures.

We will support employee health through initiatives such as providing opportunities for health promotion and raising awareness about disease prevention.

7. Consideration of the global environment

We understand and support the "Toyota Tsusho Group Environmental Policy" and will strive to put it into practice.

We will comply with international declarations, agreements, conventions related to environmental conservation, as well as environmental laws and regulations, and industry standards in the countries and regions where we operate.

We will address climate change and aim to achieve carbon-neutral society.

We will manage water resources to ensure their sustainable use.

We will balance biodiversity conservation with business activities and contribute to the realization of nature-positive outcomes.

We will work to control, reduce, and eliminate air pollution, water pollutants, and soil contamination.

We will respond appropriately to chemical substances by substituting or minimizing the use of hazardous materials.

We will contribute to building a sustainable society through resource recycling and effective waste management.

We will establish environmental management systems and pursue kaizen (continuous improvement).

We will promote environmental awareness among stakeholders through environmental education.

We will engage with society and collaborate with stakeholders to address environmental issues.

We will disclose environmental information proactively and share it widely with society.

We will strive to take a multifaceted approach to addressing complex environmental issues.

8. Fair trade and anti-corruption

We will ensure thorough adherence to applicable laws and international rules, and promote fair business practices and anti-corruption measures, including the prevention of conflicts of interest, anti-competitive behavior, and bribery, as well as compliance with export/import procedures and tax obligations.

9. Ensure quality and safety

We ensure quality and safety of products and services.

10. Contribution to local communities

We will protect the rights and lifestyles of local communities and contribute to those communities as a member thereof.

11. Responsible Procurement

We understand, support, and strive to implement the “Toyota Tsusho Group’s Approach to Responsible Procurement,” and conduct procurement activities that consider potential adverse impacts arising from the use of products associated with environmental and social issues.

12. Information Security

We will strictly manage confidential and personal information, ensure it is used appropriately within defined limits, and protect it accordingly.

We will protect intellectual property rights owned by or attributable to the company.

【2】 Establishing a Management System for Environmental and Social Responsibility

13. Responsibility of Management

Management shall approve the company’s policies on environmental and social responsibility, designate responsible personnel, and establish a management system to implement related activities.

Management shall regularly evaluate the effectiveness of activities conducted under the established management system.

14. Kaizen (continuous improvement) Objectives

We will set clear objectives and action plans related to environmental and social responsibility, and evaluate them on a regular basis.

15. Education and Training

We will provide ongoing training programs for employees to implement our policies, initiatives, and objectives in accordance with these Guidelines.

16. Grievance Mechanism

We will strive to establish mechanisms for reporting and handling concerns and grievances from all stakeholders regarding actual or suspected violations of international codes of conduct or relevant domestic standards.

17. Information disclosure

We will disclose information related to the matters listed above in a timely and appropriate manner.

18. Engagement with Stakeholders

We will promote mutual understanding and the development and maintenance of trust-based relationships with stakeholders.

【3】 Compliance with These Guidelines

19. Monitoring

We will work together with our suppliers to support the continuous improvement of their environmental and social responsibility initiatives and performance. We will deepen communication with our suppliers and conduct regular surveys of our suppliers in order to understand the status of compliance with these guidelines. Further, we will visit suppliers to confirm activities on site as we deem necessary based on the activity area and business content. If monitoring is conducted in the form of a third-party audit, we kindly ask for your cooperation.

20. Remedy

If any issues arise that are contrary to these Guidelines, please report them promptly and work together with

us to pursue kaizen (continuous improvement).

We may reconsider our transactions with your company if we do not observe appropriate efforts to make improvements.

Formulated in April 2012

Revised in July 2025

President & CEO

Toshimitsu Imai