

TOYOTA TSUSHO CORPORATION

Compliance & Crisis Management Dept.
Compliance Management Group

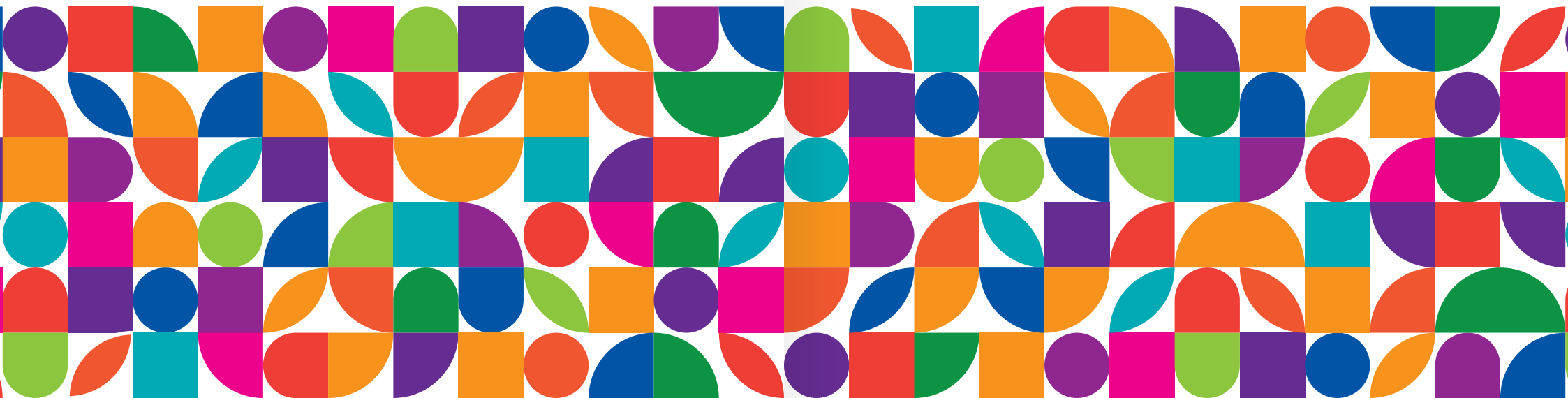
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 TOYOTA TSUSHO GROUP

 TOYOTA TSUSHO GROUP



COCE
Global Code of Conduct and Ethics



Message from the President & CEO

Hello everyone,

We, the Toyota Tsusho Group, uphold the Corporate Philosophy of “Living and prospering together with people, society, and the planet, we aim to be a value-generating corporation that contributes to the creation of prosperous societies.”

The Toyota Tsusho Group is a unique organization of 70,000 individuals from diverse backgrounds, nationalities, ages, and genders, operating in over 130 countries worldwide. Despite our diversity, this Corporate Philosophy unites us all. The Behavioral Guidelines are the principles of action established to realize this Corporate Philosophy, and the Global Code of Conduct and Ethics (COCE) provides a more detailed and concrete framework for these guidelines.

To continue growing as a company, it is essential for us to embody the spirit of “Be the Right ONE”—earning trust and consistently being chosen by society and our customers. Trust is not something that can be earned overnight. It is built gradually through consistent, genuine actions and thoughtful decisions made by each of us every day. The COCE serves as our “compass,” guiding us to act with integrity and to remain on the right path.

As our business continues to expand globally into diverse fields, we find ourselves operating in an increasingly complex world where there is rarely a single “right” answer. Even in such times, we must not fear change; instead, we must embrace it and boldly take on new challenges. To do so, it is more important than ever that we remain anchored by strong and unwavering core values.

As members of the Toyota Tsusho Group, I urge each of you to thoroughly understand the COCE and apply it as a foundation for your daily actions and decisions. Always ask yourself: “Can I proudly share the work I do and the business I’m involved in with my family and friends?”

We are the team creating the future of the Toyota Tsusho Group. Let’s continue moving forward, guided by the COCE as our compass, to pass on a better Earth to the children of the future.

Toshimitsu Imai
President & CEO
Toyota Tsusho Corporation



About This Booklet

When making decisions or facing uncertainties, this booklet provides an easy-to-understand explanation of the Global Code of Conduct and Ethics, which serves as the values and standards of judgement for all members of the Toyota Tsusho Group. Please keep it handy so you can refer to it anytime.



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What is the Global Code of Conduct and Ethics (COCE)?



The Global Code of Conduct and Ethics (COCE) is a globally applicable set of standards and ethical principles that clearly and specifically embody the Behavioral Guidelines supporting the Corporate Philosophy of the Toyota Tsusho Group. Each member of the Toyota Tsusho Group must cherish the COCE as their standard of values and judgment when carrying out their daily work, striving towards our Corporate Philosophy.

Fundamental Philosophy of Toyota Tsusho Group

Corporate Philosophy

Living and prospering together with people, society, and the planet, we aim to be a value-generating corporation that contributes to the creation of prosperous societies.

Behavioral Guidelines

As a good corporate citizen,

- We will strive for open and fair corporate activities;
- We will be socially responsible and strive for conservation of the natural environment;
- We will be creative and strive to provide added value;
- We will respect people and strive to create an engaging workplace.

The COCE is composed of the following principles

• Safety and compliance are the gateway to all work



• Disclose accurate financial information as a listed company



• Comply not only with laws but also with internal rules and corporate ethics



• For the sustainable development of society, providing added value through creativity and improvement while considering the environment.



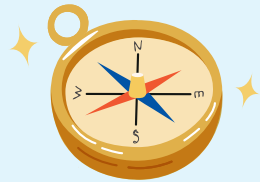
• Respect human rights and embrace diversity



MVV and COCE



COCE, for the Future



The COCE serves as a compass for realizing our Mission, Vision, and Values (MVV).



* Gembality: Combination of "Gemba" [Gemba = "Genchi" (on-site) + "Genbutsu" (hands-on)] + "reality"



Global Code of Conduct and Ethics



Global Code of Conduct and Ethics

10 creeds

- 1 We are committed to “ANZEN” to create a safe and healthy work environment.
- 2 We will comply with all applicable laws and regulations; including anti-corruption, anti-trust and competition law, and trade laws and regulations.
- 3 We are committed to accurate financial reporting.
- 4 We are accountable for compliance with all company rules.
- 5 We will act with integrity, honesty and transparency, and protect and develop trust among all stakeholders.
- 6 We will contribute to the sustainable development of society.
- 7 We will promote and pursue environmentally friendly corporate activities
- 8 We will add value through innovation and “Kaizen” (continuous improvement).
- 9 We will respect human rights.
- 10 We will embrace diversity and inclusion within our company and society.

1

We are committed to “ANZEN” to create a safe and healthy work environment.



The safety and health of all of our members is the foundation of our corporate activities.



- We must take appropriate measures to protect the safety and health of each other and any person affected by us in the course of our corporate activities.
- We must comply with all safety and health related laws, regulations and internal standards.
- We will enthusiastically participate in training and initiatives for safety and health.
- We will utilize and develop our safety and health management system.



2

We will comply with all applicable laws and regulations; including anti-corruption, anti-trust and competition law, and trade laws and regulations.



Compliance is a must in all of our corporate activities. A single non-compliant act may severely harm and damage our reputation and corporate value.

Therefore,

- We must become familiar with all laws and regulations (including international rules) that govern our area of responsibility and strictly comply with them at all times.
- We must seek the advice of our legal department or qualified legal counsel in instances where we are unsure.
- We must report any non-compliance through the appropriate channels provided.

A single violation of any anti-corruption, anti-trust and competition law or trade law and regulation may lead to severe penalties, as well as criminal charges and unrecoverable reputational damage to both the individual and the company.

Therefore,

- We must fully educate ourselves on all applicable anti-corruption, anti-trust and competition law, and trade laws and regulations, and strictly comply with them at all times.
- We must not offer, give or receive gifts, meals, entertainment, donations or contributions for any illegal or unethical purposes.
- We must compete fairly in the market and avoid any activities which may lead to the violation of anti-trust/competition laws and regulations.
- We must exercise extra caution whenever we meet with competitors and especially avoid any discussions on sensitive information including market share, marketing, price and pricing strategies.
- We must acknowledge that certain items or destinations or parties might be embargoed or prohibited and shall take extra care to assure that all international transactions are conducted in accordance with applicable laws and regulations.

3

We are committed to accurate financial reporting.



As a member of a publicly listed company, the accuracy of our financial information is essential both for us and for our stakeholders.

Therefore,

- We must take extra care to verify the numbers we provide or submit.
- We must follow applicable accounting principles.
- We must disclose our financial information in a timely, accurate and non-misleading manner.
- We must keep reliable, accurate and verifiable records of all transactions.



4

We are accountable for compliance with all company rules.



- We must understand and follow all company rules.
- We must account for any breach of company rules, and understand that such breach may lead to disciplinary action.

5

We will act with integrity, honesty and transparency, and protect and develop trust among all stakeholders.



As a good corporate citizen, we commit to honesty, integrity, and transparency beyond the laws and rules. By this commitment, we believe that trust will be fostered with all stakeholders and will serve as the foundation of our corporate activities.

Therefore,

- We will not only pursue our profit. We will take into consideration the interest of diverse stakeholders and strive to win trust from them.
- We will undertake only those corporate activities that will withstand local and international ethical scrutiny.
- We must respect and protect confidential information, personal data, intellectual property and trade secrets of ours and others.
- We must not deal with any person that engages in or is connected to any organized crime or unlawful activity.
- We must not make false or misleading statements and will not make derogatory behaviors and remarks about others. If there is a mistake, we will correct it immediately.
- We must disclose any conflict of interest regarding our responsibilities to the company and must not prioritize personal interests over the company's interests.
- We must not use the company's property for purposes other than that of the company.
- We will not engage or be involved in insider trading.

6

We will contribute to the sustainable development of society.



We deeply believe that the key to our sustainable success is harmonizing and developing together with the people, the society and the earth.

Therefore,

- Working together with local business, community and governmental authorities around the world, we will keep ourselves aware of the local and global needs and contribute to building a sustainable foundation for industrial and economic development.
- We will vigorously promote social contribution activities around the world, particularly in education, social welfare and environment.

7

We will promote and pursue environmentally friendly corporate activities.



Harmonizing our corporate activities with the environment is rooted deeply in our fundamental philosophy.

Therefore,

- We must strictly comply with local and global environmental laws and standards.
- We will develop environmentally friendly technologies, services, products and business models.
- We will reduce waste, re-use products and recycle resources in conducting our corporate activities.
- We will duly consider environmental impact in conducting our corporate activities.
- We will cautiously monitor and assess the impact of our corporate activities on the environment through our environmental management system.

8

We will add value through innovation and “Kaizen” (continuous improvement).



To grow in a sustainable way and contribute to the changing society, it is essential for us to commit to creating new ideas and value for the society and continuously improve our corporate activities.

Therefore,

- We will interconnect and share different ideas, technologies and expertise, through our global network and value chains.
- We will continuously improve our business models and processes through PDCA and Kaizen activities.
- We will enthusiastically expand our innovation and Kaizen throughout our value chain and in new business fields.

9

We will respect human rights.



Respecting people is rooted deeply in our fundamental philosophy. We have no tolerance for any human rights abuses.

Especially:

- We must not engage or be involved in any business that is against human dignity.
- We must not discriminate based on race, color, gender, religion or national origin.
- We must not be involved in any child labor, human trafficking or any other kind of forced or involuntary labor.
- We must not tolerate any form of harassment.
- We must not deal with any person that engages in or is involved with any human rights abuses.

10

We will embrace diversity and inclusion within our company and society.



We believe that diversity and inclusion are the source of innovation and growth. Our diversity enables us to leverage different perspectives in order to respond to the increasing dynamics of the business environment and customer needs worldwide.

Therefore,

- We will promote a diverse workplace where people from different races, national origins, genders and ages actively work together.
- We will promote equal opportunity to all members regardless of their race, national origin or gender.
- We will promote open communication throughout and between all levels of our members and organizations.
- We will enhance our post-merger integration expertise to gain a competitive advantage.



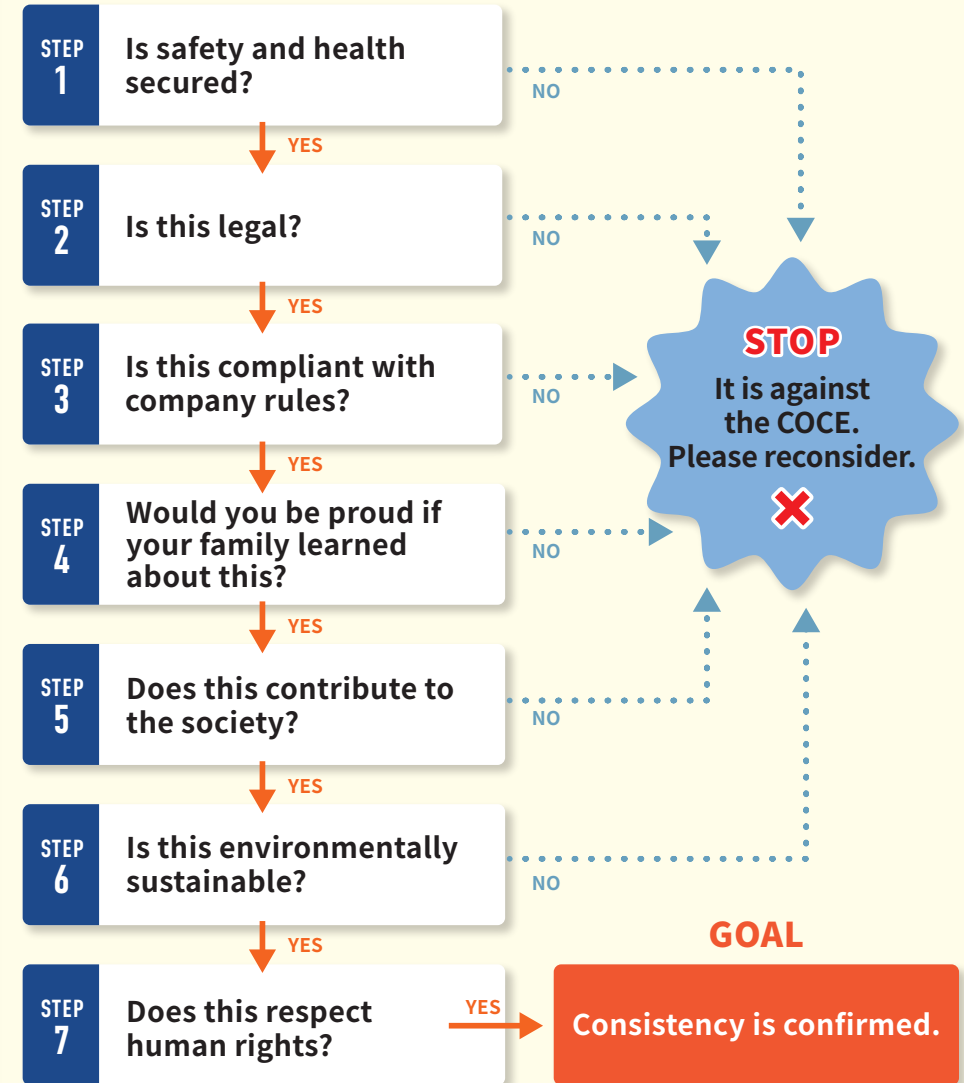


COCE Confirmation Chart



Is this consistent with the COCE?

START



Immediately report any COCE violations!

To build a better culture based on COCE, it is important to immediately report any potential COCE violations you become aware of.



- All employees and executives must promptly report any concerns about COCE violations through the appropriate channels*.
- All employees and executives must fully cooperate with the company's investigation regarding COCE violations.
- TTC Group strictly prohibits any retaliatory actions or unfair treatment against those who, in good faith, report COCE violations or cooperate with investigations.

*Appropriate Channels

- ① Organizational reporting line (supervisors, etc.)
- ② Appropriate Corporate Divisions

If you have difficulty reporting through the appropriate channels, please report to your company's internal whistleblowing hotline.

\\ SPEAK UP //

Toyota Tsusho Group has established a global internal whistleblowing hotline called "SPEAK UP". Please use this hotline if you have difficulty reporting through the appropriate channels or to your company's internal whistleblowing hotline.



For details, please refer to the "Toyota Tsusho Group Whistleblowing System" on G-TWINS.

https://ttc-g-twins.toyotsu.co.jp/compliance_kikikanri/page_000008.html

