



Toyodenso Group Code of Conduct

July 1, 2026

Toyodenso Group Code of Conduct

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In 2022, the year of the 75th anniversary of our founding, we defined our corporate philosophy. Along with reaffirming this corporate philosophy, we have decided to revise the Code of Conduct. This is the principle of the actions we should take as we carry out our daily work.

As a member of society, in order to fulfill our mission and achieve our corporate philosophy, all members of Toyodenso Group have to understand this “Toyodenso Group Code of Conduct” and act in a sincere and ethical manner in accordance with it.

1. Compliance

We shall ensure compliance (observance of laws, social norms, internal regulation, contracts, etc.). If we find a situation that violates compliance, we shall not ignore it or be complicit in it.

2. Human Rights

- (1) We shall understand international standards concerning human rights, accept and accommodate different values including sex, age, national origin, race, culture, and thought, and respect the character and personality of each individual, observe the right to privacy and human rights of each individual.
- (2) We shall avoid any discrimination, any harassment.
- (3) We shall not condone use of either child labor or forced labor.

3. Respect customers through our products and services

- (1) We shall give first priority to the quality and safety of the products and the services we provide and observe all applicable laws and regulations.
- (2) We shall provide our products and services from customers' perspective.

4. Safety Driving

Recognizing that we are a company involved in the automobile industry, we shall develop reliable technologies and observe traffic rules and manners, strive to drive safely.

5. Health and Safety

- (1) We shall comply with laws, regulations and company policies related to safety and health, strive to maintain a safe and healthy workplace, as well as prevent and minimize accidents.
- (2) We shall strive to keep safe and healthy workplace which can bring us a pleasant work environment.

6. Health Enhancement

We recognize that our health is the basis for the sound continuation and development of our business activities, and we shall actively take measures to maintain and improve our mental and physical health.

7. Environmental Protection

- (1) We understand the current situation of the global environment, and shall strive to conserve water, soil, air, etc. and biodiversity and strive to create a sustainable society.
- (2) We shall strive to conserve energy and reduce greenhouse gas emissions through measures such as the introduction of renewable energy, contributing to the achievement of a carbon neutral society.
- (3) We shall manage chemical substances that may pollute the environment, and shall not use chemical substances that are prohibited in each country or region in our products.
- (4) We shall strive to reduce the environmental burden in the execution of our business, in accordance with the necessary standards such as environmental protection laws , customer requests, and internal regulations.

8. Contribution to Society

We shall respect the culture and customs of the local community, cooperate with the local community, contribute to society, and fulfill the role expected of the local community at all bases of our business activities.

9. Information Control

- (1) We shall properly handle internal information, customer and business partner information, including personal information, in accordance with laws and regulations, internal regulations ,etc.
- (2) We shall not engage in insider trading or other illegal use of information obtained in connection with our work.
- (3) We shall appropriately manage security by following industry best practice.

10. Fair Transaction and Procurement

We shall comply with the following in order to maintain fair and sound relationships with our business partners.

- To decide business partners, we shall fairly compare and evaluate various conditions from among multiple business partners, and proceed according to the company's policies and procedures.
- We shall not accept or provide benefits such as money, goods, entertainment, etc. from business partners that exceed socially accepted norms.
- We shall not use our position or authority to receive or give unfair advantage from interested parties.
- We shall comply with competition laws (the Antimonopoly Act, other relevant laws and

regulations and government guidelines, etc.)

- We shall not use minerals that may lead to human rights violations and environmental pollution, which are a source of funding for armed groups in conflict areas.

1 1. Criminal enterprises

We shall not have any relationships, including business transaction, with criminal enterprises.

1 2. Relationships with Political and Administrative Entities

We shall comply with laws and regulations, internal regulations, etc., and maintain sound contract with politics and administration, and shall not provide politicians or public officials with money, goods, entertainment, or other benefits that are prohibited by laws, regulations, internal regulations, etc.

1 3. Company Assets and Conflict of Interests

- (1) We shall properly maintain, manage and protect company assets, and shall not misappropriate or embezzle them.
- (2) We shall not act against the interests of the company.

1 4. Protection and Respect of Intellectual Property Rights

- (1) We shall actively protect and utilize intellectual property rights that are the result of our company's intellectual activities.
- (2) We shall respect intellectual property rights of third parties.

1 5. Timely and Appropriate Disclosure of Information

In order to have appropriate communication with various stakeholders, we shall appropriately disclose necessary information in accordance with laws, regulations, internal regulations, etc.

1 6. Reporting non-compliance incidents

- (1) If we know an act that violates or may violate this Code of Conduct, we shall report and consult with our manager, the compliance department, or the corporate ethics improvement proposal desk, and work to resolve the matter.
- (2) We shall not retaliate against associates for any protected activities.
- (3) In the event of a violation of this Code of Conduct, we shall investigate the cause, establish measures to prevent recurrence, and implement them.

1 7. Prevention of Fraud and Misconduct

Toyodenso Co., Ltd.

- (1) We shall conduct our business with honesty and transparency and not engage in any form of fraud and misconduct.
- (2) We shall prohibit the misappropriation of company assets, accounting fraud, fraudulent expense claims, falsification of documents and data, offering or accepting kickbacks, and any other form of misconduct.
- (3) We shall promptly report any actual or suspected misconduct to the head of our department, the Compliance Department, or the Business Ethics Improvement Proposal Line and consult with them as necessary.