

PARTNERING THE RIGHT WAY

Supplier Code of Conduct



THE TORO
COMPANY

Welcome to the Toro Company

Table of Contents



Every day at The Toro Company (TTC), we're breaking new ground—driving the innovative outdoor solutions that solve our customers' toughest challenges.

But we do so much more than create products—we're setting the standard for what comes next. Over a century of commitment and care has gone into building our Company, and we're determined to preserve our reputation far into the future. It's why we hold ourselves and everyone who contributes to our business to the highest ethical standards.

As a TTC supplier, consultant, vendor, contractor or other third-party provider, you share in our successes. You also share the responsibility to reflect our purpose and our values in your own work. This Supplier Code of Conduct is your daily guide to fulfilling your responsibilities as a TTC partner.

We ask you and everyone on your team to read this Code carefully. It's the best way to understand the many laws and regulations that apply to us and to navigate situations you could face during our partnership. Look to the Code whenever you have questions or need extra guidance.

Thank you for your commitment to **Partnering the Right Way**. We value your partnership and your commitment to conducting yourself and your business with integrity and pride.

Richard M. Olson
Chairman and Chief Executive Officer

| | | | |
|--|----------|---|-----------|
| Welcome to The Toro Company | 2 | We Do Business Responsibly | 11 |
| We Live Our Purpose, Vision and Mission | 3 | Safeguard TTC Assets | 11 |
| We Are Good Partners | 4 | Confidential Information | 11 |
| About Our Code | 4 | Financial Integrity | 11 |
| What We Expect From You | 5 | Antitrust and Fair Competition..... | 12 |
| How to Speak Up | 6 | Anti-Bribery and Anti-Corruption | 12 |
| We Respect People | 7 | Global Trade..... | 12 |
| Inclusion and Fair Employment Practices | 7 | Inside Information..... | 13 |
| A Respectful Workplace | 7 | Product Quality and Safety | 13 |
| Health, Safety and Security..... | 8 | Business Continuity..... | 13 |
| Data Privacy..... | 8 | We Care for Our Planet | 14 |
| We Interact Ethically | 9 | Human Rights | 14 |
| Suppliers and Business Partners | 9 | The Environment..... | 15 |
| Government Contracts | 9 | Responsible Sourcing | 15 |
| Conflicts of Interest | 10 | | |
| Hospitality and Gifts | 10 | | |



We Live Our Purpose, Vision and Mission

Every action and decision suppliers make on TTC's behalf must be made in a way that reflects the ideals that unite and inspire us.

TTC's values-based culture governs how we conduct business and interact with our partners. This is reflected in our "Pride in Excellence" [People and Performance Values](#).



OUR PURPOSE

To help our customers enrich the beauty, productivity and sustainability of the land.



OUR VISION

To be the most trusted leader in solutions for the outdoor environment. Every day. Everywhere.



OUR MISSION

To deliver superior innovation and to deliver superior customer care.

We Are Good Partners

About Our Code

TTC is all about doing things the right way. That includes Partnering the Right Way. We see our suppliers, consultants, vendors, contractors and other third-party providers (collectively, “partners”) as valued partners in our mission.

The products and services you provide help us continue to enrich the lives, land and communities we serve.

Our Supplier Code of Conduct is your guide to working with us—fulfilling our expectations and operating with honesty and integrity. The Code doesn’t take the place of our contract with you—it’s a powerful supplement. When you commit to this Code and our [Supplier Terms of Commerce Policy](#), you strengthen our bond and help us ensure a productive and lasting partnership.

**Your work
reflects on
us. Give us
your best.**



We Are Good Partners

(Continued)

What We Expect from You

Complying with Laws

We choose partners who share our commitment to doing what's right, including upholding the law. While much of your commitment is spelled out in your contract with us, we also expect you to follow the laws, regulations, guidelines and industry codes that apply to our business around the world.

We realize our business is complicated, and sometimes laws may conflict with our Supplier Code of Conduct. If this happens, we expect you to follow the more restrictive requirement. If you're still unsure which requirement to follow, seek guidance before you proceed.

Be aware that TTC takes violations seriously. For that reason, we may periodically audit your compliance with this Code and the law. Violations may lead to termination of our relationship or other legal remedies.



Fulfilling Your Responsibilities

TTC expects you to:

- Acknowledge your commitment to this Code and uphold it, along with our policies and the law.
- Adopt responsible and ethical business practices throughout your operations and supply chain.
- Keep your promises and protect TTC's name and reputation.
- Protect the human rights of workers and ensure a safe, healthy work environment.
- Minimize your environmental impact and help operate cleanly and sustainably.
- Speak up to a TTC resource when you have questions or concerns.
- Communicate these expectations to your employees and business partners.

As your partner, we are committed to upholding these same standards. We pledge to be good partners by treating you fairly and respectfully, communicating with you openly and protecting your confidential information and intellectual property.

Making Good Decisions

If you're not sure what to do in a certain situation, try asking yourself:

Is this action **legal**?

Does it align with TTC's **values, policies and Supplier Code of Conduct**?

Is it in the **best interests** of TTC?

Would it enhance **our reputation**?

Would I **feel good** about it if it was reported by the media or went viral on social media?

If the answer to any question is “no” or “I'm not sure,” **stop and ask for guidance before taking action.**

We Are Good Partners

(Continued)

How to Speak Up

Communication is essential to any relationship. That's why, if you ever have questions about our Code, policies or the law, we want to hear from you. We also expect you to come forward with any concerns of potential violations involving the work we do together.

While you can always reach out to your contact at TTC, you may also speak up anonymously and confidentially through the Ethics Helpline, which is available 24/7 and accessible via:

ONLINE

Visit www.thetorocompany.com/ethicshelpline



This icon in the toolbar above allows you to access the Ethics Helpline from any page in our Code.



PHONE

| | |
|----------------|---|
| Australia | 1-800-955-174 |
| Belgium | 0-800-100-10, followed by 1-800-850-7247 |
| China | 4006612175 |
| Germany | 0-800-225-5288, followed by 1-800-850-7247 |
| Italy | 800-797121 |
| Mexico | 001-844-237-4647 |
| Poland | 00-800-151-0270 |
| Romania | 0800477041 |
| United Kingdom | 0808-234-9109 |
| United States | 1-800-850-7247 |

DO THE RIGHT THING.

All concerns—no matter who they are directed to—will be promptly addressed and investigated. Coming forward isn't always easy, but it's always the right thing to do. There is no need to "solve" a concern before reporting it. TTC has a dedicated team of investigators.

The Ethics Helpline allows you to ask questions or share concerns 24 hours a day, seven days a week with an independent third party. Translators are available, and anyone who contacts the Helpline may do so anonymously, unless prohibited by law. Information provided through the Helpline is documented in detail and forwarded to TTC for investigation and resolution.

No matter how you speak up or how much detail you're able to provide, TTC will take your report seriously. We'll investigate it fairly, discreetly and promptly, sharing information only with those who need to know, and we expect anyone involved to cooperate fully and honestly with our investigation.

RETALIATION? NOT HERE.

We know it isn't easy to speak up. It's why we do not tolerate retaliation of any kind against anyone who speaks up sincerely and in good faith or helps with an investigation. That includes our suppliers.

We Respect People

Inclusion and Fair Employment Practices

At TTC, people are our greatest asset. We strive to ensure that every individual feels included and welcomed. We expect our suppliers to support our commitment by recognizing and honoring differences and making sure everyone can contribute. Follow applicable employment laws and prevent discrimination by making fair employment decisions based on job-related qualifications—not on characteristics protected by law, including race, religion, national origin, sexual orientation, disability, gender identity, public assistance status, color, sex, age or marital status. [Speak up](#) if you're aware of or suspect discrimination anywhere in TTC's supply chain.

DIG DEEPER

[Employees and Culture](#)

[Inclusion](#)



A Respectful Workplace

We believe in lifting people up—not tearing them down with harassing, intimidating or offensive conduct. We don't tolerate behavior like this at TTC, and we expect our suppliers to do the same by recognizing and standing up against harassment in all its forms, including physical, visual, verbal or sexual harassment. Encourage your team to watch for harassment and keep it out of your communications and interactions, whether they occur in the workplace or elsewhere. If approaching the harasser isn't possible, speak up to your TTC contact or to the [Ethics Helpline](#) if you see or experience this behavior.

DIG DEEPER

[Code of Conduct](#)

We Respect People

(Continued)

Health, Safety and Security

At TTC, our motto is “Safety First, Quality Always.” Keeping each other safe and injury-free is a top priority. It’s also a responsibility we all share. Promote safety and well-being throughout your operations and provide work environments that are clean, healthy and hazard-free. Also follow all applicable health and safety laws, regulations and policies. Make sure that your employees:

- Always follow safe work practices and policies, including TTC’s safety policies if you perform work at TTC facilities.
- Come to work ready to work—never under the influence of alcohol or illegal drugs, which are prohibited in TTC facilities.
- Watch for and report unsafe conditions, hazards, intimidation, weapons, or acts or threats of violence, which are also prohibited in our workplaces.

Data Privacy

When we collect or handle personal data belonging to employees, customers or business partners, we respect it and protect it. TTC expects our partners to help by following the data privacy laws of the countries where you operate and having policies in place to ensure you responsibly collect, store, use, share, transfer and dispose of personal data, which includes any information that could identify someone. Make sure your employees are good caretakers of personal data, learning to recognize it, never disclosing it to anyone who isn’t authorized to see it and immediately reporting potential data breaches.



We Interact Ethically

Suppliers and Business Partners

Every link in TTC’s supply chain is critical. We seek out partners we can rely on to uphold our high standards and follow the laws that apply to our business. We expect our partners to do likewise, by:

- Choosing suppliers wisely and fairly, basing your choice on factors such as price, quality, safety, reliability, service and delivery records, fair labor standards and reputation.
- Staying engaged with business partners and monitoring their performance to ensure they are keeping their promises and complying with our standards and with the law.
- Working with suppliers and business partners to improve safety, quality, delivery and service.
- Acting ethically with them—never engaging in or tolerating bribery, human rights abuses or other violations of law or our policies.

DIG DEEPER

[Supplier Terms of Commerce Policy](#)



Government Contracts

As a government contractor, TTC has special responsibilities we must fulfill. These duties extend to our suppliers as well. To help us be good, responsible government partners, make sure your employees understand and follow the laws and regulations that apply to our business. Verify that any cost and pricing data, proposals, quotes, invoices, reports or other certifications you submit are current, accurate and complete. Never provide anything of value to a government official and seek legal guidance before hiring current or former government employees. Also be honest and cooperative in any investigation.

We Interact Ethically

(Continued)

Conflicts of Interest

We act in the best interests of TTC and expect no less from our business partners. It means avoiding conflicts of interest—situations that could influence (or appear to influence) the decisions you make on our behalf. Conflicts can happen when your personal activities or relationships conflict with TTC’s interests. They often occur with employment, financial or business opportunities; inappropriate offers of gifts or entertainment; personal relationships and outside board or advisory memberships. If you are aware of an actual or potential conflict of interest, disclose it immediately to your TTC contact or the [Ethics Helpline](#) for help in addressing and managing it.

DIG DEEPER

[Code of Conduct](#)

Hospitality and Gifts

We are committed to conducting TTC’s business with integrity, and that includes avoiding improper offers of gifts or hospitality that could create real or perceived conflicts of interest. As our supplier, you must exercise care when giving or receiving anything of value. This means suppliers:

- Must not offer, solicit, or give anything of value in an attempt to influence a business decision or obtain an improper advantage
- Are expected to avoid offering TTC employees any gift or hospitality that isn’t nominal in value
- Must ensure any offers are customary and work-related, given transparently and documented, and not harmful to TTC’s reputation

Also remember the strict rules that apply to government interactions—get approval in advance before offering even the smallest gift or hospitality to a government official.

DIG DEEPER

[Anti-Bribery Policy for Business Partners](#)



We Do Business Responsibly

Safeguard TTC Assets

To keep our business and our relationship growing, we use TTC assets responsibly and protect them from damage, misuse and theft. If suppliers access or use our assets, they have the same responsibility. Whether it's our physical assets, like equipment, materials, facilities, vehicles and inventory, or technology assets, like computer hardware and software, networks and databases, follow our policies to protect them. Never borrow or dispose of TTC assets, and practice good physical security and cybersecurity. We expect our partners to maintain information security programs designed to mitigate cybersecurity risks and adequately protect their information from unauthorized access, destruction, use, modification and disclosure. Partners must promptly inform TTC of any unauthorized use of these assets or potential unauthorized access or compromise of its systems or data.

Confidential Information

Information is a critical asset for TTC. We recognize our responsibility to handle, manage and maintain confidential information in line with our policies. We also expect our suppliers to secure and protect confidential information by:

- Learning to recognize confidential information, including research, designs, intellectual property, copyrights, patents, business plans, financial forecasts, pricing information and personal data.
- Following contractual obligations and signing a confidentiality or non-disclosure agreement before accessing it.
- Using it only for legitimate business purposes and sharing it only with authorized individuals (never in public places or on unsecured networks).
- Using artificial intelligence ("AI") responsibly and legally and never feeding confidential information into public AI tools.

Financial Integrity

By making sure TTC's records remain accurate, we can make smart business decisions and stay accountable to customers, regulators and investors. Because our suppliers contribute to our records, you must be honest and accurate in every entry. Follow generally accepted accounting principles, assigning costs to the right period and the right account. Be ready to provide supporting documentation and never alter records. Store and dispose of records in line with our policies, report any irregularities and disclose financial information accurately and completely when requested.

We Do Business Responsibly

(Continued)

Antitrust and Fair Competition

TTC is committed to outperforming our competitors fairly and honestly and expects the same from our suppliers. That means competing vigorously but following antitrust and competition laws everywhere we do business. Never enter into agreements (formal or informal) that could restrict trade or keep others from competing. That includes setting prices, dividing territories, restricting production or interfering with the competitive bid process. And when researching the competition, never be deceptive—only seek lawful, ethical and public sources of information.



Anti-Bribery and Anti-Corruption

We only win business lawfully—based on our hard work and the superior quality of our products—and expect the same commitment from everyone working on our behalf. Comply fully with anti-bribery and anti-corruption laws everywhere we operate and never ask for, offer, accept or give anything of value (or anything that could appear like a bribe) in exchange for a favorable business decision or an unfair business advantage. Remember, bribes can include money, special gifts, favors, opportunities, charitable donations, paid travel or facilitating payments made to government officials. Use care with gift-giving. Follow the policies of those involved and ask for help if you're unsure whether an offer is appropriate.

DIG DEEPER

[Anti-Bribery Policy for Business Partners](#)

Global Trade

Doing business internationally is both an opportunity and a privilege for TTC. If you help us move products, services, information or technology across borders:

- Follow all trade compliance laws and regulations, including export controls and import laws and regulations, in the countries where you operate.
- Provide accurate documentation and classifications and obtain all required licenses and government approvals.
- Make sure you never do business with any sanctioned or embargoed countries or entities.
- Never participate in a boycott that the United States doesn't support.

DIG DEEPER

[Supplier Terms of Commerce Policy](#)

We Do Business Responsibly

(Continued)

Inside Information

Working as TTC partners can expose our suppliers to material, nonpublic (“inside”) information about our company, our customers, our vendors or other companies we work with. Basing trading decisions (either buying, selling or holding stocks or securities) on this information or passing (“tipping”) it to others is called insider trading. This activity is illegal and violates TTC’s policies. Recognize what kind of information is considered inside information and keep it secure.



Product Quality and Safety

At TTC, we live by the words “Safety First, Quality Always.” To preserve our reputation for excellence and continue giving customers our best, we—and you, our supplier—must maintain our high standards by:

- Adopting and following rigorous quality, safety and security standards, along with TTC’s manufacturing processes and requirements.
- Never putting other priorities ahead of quality and safety.
- Complying with all requirements, laws and standards that apply.
- Supporting TTC’s reporting requirements with documentation.
- Ensuring sustainable and responsible sourcing of materials.
- Completing required testing to ensure quality.

DIG DEEPER

[Supplier Quality Manual](#)

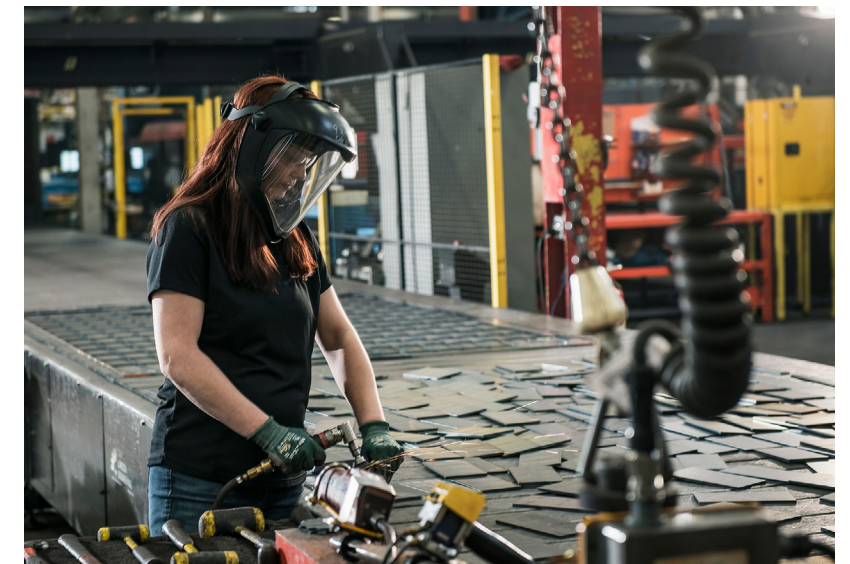
[Supplier Manual](#)

[TTC Wood Packaging Material Quality Standard](#)

[TTC Supplier Packaging and Label Requirements](#)

Business Continuity

Keeping our business running is critical. We need to be prepared for possible service disruptions and rely on our business partners to help by creating, implementing and regularly testing emergency response and disaster recovery plans. Make sure you’re able to notify and evacuate employees, protect data and intellectual property and ensure the continuity of services you provide to TTC. Your plans should account for weather emergencies, natural disasters, infectious diseases, cybersecurity breaches, labor and other resource challenges, and system, power, telecommunications or facilities outages.



We Care for Our Planet

Human Rights

TTC is committed to protecting the human rights and dignity of everyone who contributes to our business operations and global supply chain. We expect our business partners to help fulfill that commitment by:

- Following employment laws everywhere we operate and requiring your partners to do the same.
- Making sure every person has safe and healthy working conditions and receives a legal wage.
- Practicing transparency and responsible sourcing to ensure the use of conflict-free minerals.

Prohibit Child Labor

TTC is deeply committed to upholding human rights across our workplace and throughout our broader network of employees, business partners, suppliers and stakeholders. As part of this commitment, we strictly prohibit the use of child labor at any stage of our supply chain. We expect all partners to fully comply with applicable child labor laws and uphold the highest standards of ethical conduct.

Respect the Right to Freedom of Association and Collective Bargaining

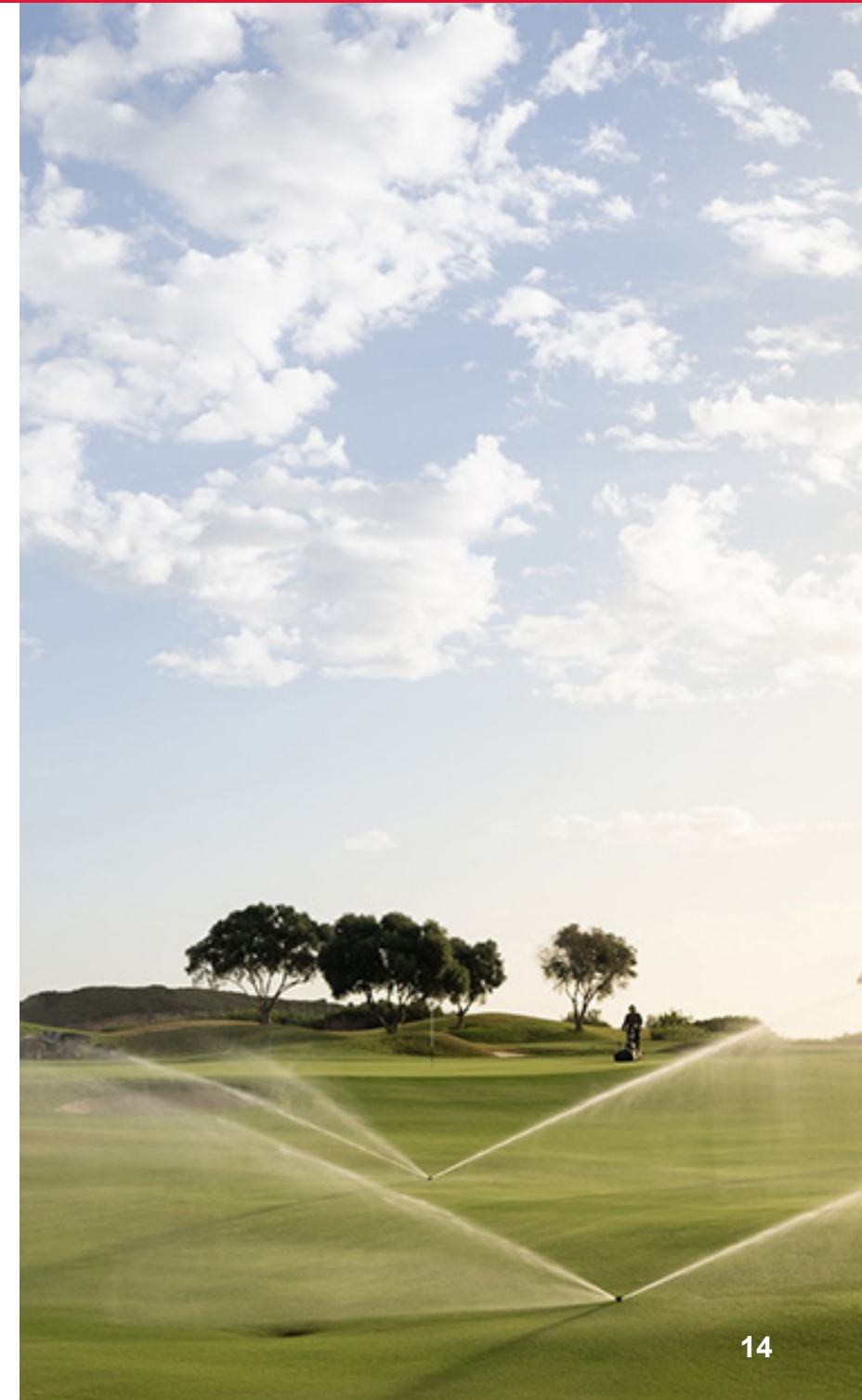
Our partners must recognize and respect the lawful rights of employees to free association and collective bargaining.

All Employment Must be Freely Chosen

All work must be voluntary. Our partners must not use any form of forced, bonded, indentured, enslaved or involuntary labor. Our partners must not participate in human trafficking, which includes the recruitment, transportation, transfer, harboring or receipt of people through force, fraud or deception with the aim of exploiting them for profit.

DIG DEEPER

[Statement on Modern Slavery](#)
[Human Rights Policy](#)



We Care for Our Planet

(Continued)

The Environment

We are proud to be known as good stewards of the land. Our customers and our planet rely on us and our suppliers to weave responsibility and sustainability into our daily operations to minimize our environmental impact. To keep us moving in the right direction:

- Follow all environmental requirements associated with our business, including laws, guidelines and industry codes.
- Obtain any required environmental permits, licenses or registrations.
- Work toward continuous improvement in all aspects of our business, including water stewardship, recycling and reduced energy consumption, waste and greenhouse gas emissions.
- Help us reach the United Nations Sustainability Development Goals to build a more sustainable future.

DIG DEEPER

[TTC's Sustainability Commitment](#)

[Sustainability Impact Report](#)

Responsible Sourcing

The demand for ethical and sustainable products is growing. TTC is committed to meeting that demand by ensuring that we and our suppliers commit to building our products in an environmentally and socially responsible manner. Understand the implications your operations have on people and the environment and take steps to source materials responsibly, including using legally logged wood and conflict-free minerals. Also work continually to improve labor standards, human rights, health and safety, ethics and environmental stewardship in everything you do.