

## **The Toro Company Slavery and Human Trafficking Statement**

The Toro Company and its subsidiaries (collectively “TTC”) strongly oppose modern slavery by any person or organization, including its business partners. Furthermore, as a manufacturer doing business globally, TTC is committed to compliance with all applicable modern slavery transparency laws. As used in this Statement, “modern slavery” encompasses forced labor, prison labor, indentured labor, bonded labor, debt servitude, state imposed forced labor, human trafficking, child labor and other similar conduct commonly thought of as modern slavery.

This consolidated Statement describes TTC’s efforts to mitigate the risks of modern slavery in its business and supply chains and relates to Toro’s fiscal year beginning November 1, 2019, and ended October 31, 2020. This Statement has been prepared pursuant to California’s Transparency in Supply Chains Act, the United Kingdom’s Modern Slavery Act and Australia’s Commonwealth Modern Slavery Act. We have common policies and compliance procedures relating to modern slavery across our businesses. However, not all of our group companies are subject to the Acts referred to above.

On March 2, 2020, TTC completed our acquisition of Venture Products, Inc. (“Venture Products”), a privately held Ohio corporation, and Venture Products is now a wholly-owned subsidiary of TTC. TTC is still in the process of integrating Venture Products into our modern slavery compliance program. Therefore, not all of the statements in this consolidated Statement applied to Venture Products for 2020.

### ***Our Business and Supply Chains***

TTC designs, manufactures, and markets professional turf maintenance equipment and services, turf irrigation systems, landscaping equipment and lighting products, snow and ice management products, agricultural irrigation systems (“ag-irrigation”), rental, specialty and underground construction equipment, and residential yard and snow thrower products. Our products are advertised and sold worldwide through a network of distributors, dealers, mass retailers, hardware retailers, equipment rental centers, home centers, as well as online (direct to end-users), under the primary trademarks of Toro®, eXmark®, BOSS®, Ventrac®, Ditch Witch®, American Augers®, Subsite®, HammerHead®, Trenchor®, Radius®, Irritrol®, Unique Lighting Systems®, Rain Master®, Pope®, PERROT®, Hayter®, and Lawn-Boy®, most of which are registered in the United States (“U.S.”) and/or in the primary countries outside the U.S. where we market our products branded under such trademarks.

In addition to most final assembly, we have strategically identified specific core manufacturing competencies for vertical integration, such as injection molding, extrusion, welding, stamping, fabrication, laser cutting, painting, machining, and aluminum die casting, and have chosen outside vendors to provide other services, where applicable. We design component parts in cooperation with our vendors, contract with them for the development of tooling, and subsequently enter into agreements with such vendors to purchase component parts manufactured using the tooling. We also have some agreements with third-party manufacturers to manufacture certain standalone end-products on our behalf.

TTC purchases commodities, components, parts, and accessories for use in our manufacturing process and end-products or to be sold as stand-alone end-products. Our largest spend for commodities, components, parts, and accessories are generally for steel, aluminum, petroleum and natural gas-based

resins, copper, lead, rubber, linerboard, engines, transmissions, transaxles, hydraulics, electric motors, and others, all of which we purchase from several suppliers around the world.

### ***Policies and Contractual Terms***

TTC's **Code of Conduct (Code)**, available in multiple languages at [www.thetorocompany.com/ethics](http://www.thetorocompany.com/ethics), requires all employees to conduct business with high moral, ethical and legal standards, and to comply with both the letter and spirit of the law, wherever and whenever we conduct business.

Among other things, the Code describes our commitment to complying with recognized health and safety standards, respecting diversity and inclusion, and maintaining a work environment that is free from intimidating, hostile and offensive behavior. The Code does not explicitly mention modern slavery. However, as noted in our most recent Code training, the Code is intended to provide a framework for ethical decision-making. Failure to comply with the Code and related TTC policies may result in disciplinary action up to and including termination of employment.

Our **Supplier Terms of Commerce (STOC)**, available at [www.thetorocompany.com/sustainability/people](http://www.thetorocompany.com/sustainability/people), affirms that TTC is committed to complying with all U.S. and international laws and regulations and expects its suppliers to support that commitment. Our suppliers are required to respect the basic human rights of their own workforce and to certify that their employment practices and work conditions are non-discriminatory and not detrimental to the health and well-being of their employees. Moreover, TTC will not accept parts, components or products from any supplier that utilizes illegal child labor or convict, forced or indentured labor in any stage of the mining, production, manufacturing, contracting or subcontracting of the merchandise or any component thereof. The purchase agreements that TTC enters into with suppliers incorporate by reference the terms, requirements, protocols and processes in our STOC.

In accordance with the North Korea Sanctions Act of 2016, as amended by CAATSA Section 321(b), our STOC states that TTC expects our suppliers to implement policies and procedures to ensure that no North Korean labor is used anywhere in the supply chain of merchandise, or any component thereof, supplied to TTC. In addition, we are supplementing our STOC in 2021 to take into account the U.S. Customs and Border Protection Withhold Release Order regarding cotton products produced in China's Xinjiang Uyghur Autonomous Region.

TTC suppliers are required to sign the STOC before they can become approved suppliers. In 2020, TTC began transitioning our suppliers to a new vendor management system. As part of this transition process, new and legacy TTC suppliers are required to agree to the terms, requirements, protocols and processes set forth in the current version of our STOC. Suppliers that do not comply with the expectations and requirements set forth in the STOC may be reviewed and evaluated accordingly for future business and sourcing decisions.

TTC's **Human Rights Policy (Policy)**, available at [www.thetorocompany.com/sustainability/people](http://www.thetorocompany.com/sustainability/people), is informed by the principles of the United Nations' Universal Declaration of Rights and reflects our values and commitments towards all human rights. Regarding involuntary labor, the Policy affirms our belief that all labor must be voluntary. The Policy emphasizes that we stand against all forms of child labor and forced labor including indentured labor, bonded labor, military labor, slave labor and any form of human trafficking. The Policy further states that we will not tolerate within our business or supply chain any act of recruiting, harboring, transporting, providing or obtaining a human being for compelled labor

or other unlawful purposes and that we expect all of our business partners to comply with local labor and employment laws wherever they operate.

***Training***

TTC conducts annual Code of Conduct training and requires all employees to complete such training.

***Right of Inspection***

Our STOC gives TTC or its designated representative the right to conduct an on-site inspection of its supplier's production facilities, scheduled in advance by agreement of the parties during regular business hours and conducted in a non-disruptive manner. Failure to comply or refusal of the TTC employee or designated representative to inspect may subject all outstanding orders to cancellation.

***Reporting Violations***

TTC provides multiple ways for its employees to ask for help regarding ethical concerns and to report any misconduct or suspected violation of the Code without fear of retaliation. TTC also has reporting mechanisms that can be used by suppliers, their workers and other third parties. Concerns or suspected violations of TTC's Supplier Terms of Commerce or Employee Code of Conduct can be reported anonymously to Toro's Ethics helpline website at <http://www.thetorocompany.com/ethicshelpline> or by making a confidential call to our ethics helpline, where the operators speak the local language, at:

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

Solely for purposes of compliance with the UK Modern Slavery Act, this Statement has been approved by the Toro Principal Manufacturing Limited Board of Directors, on March 22, 2021, and signed by a director of that entity on the date indicated below.

**TORO PRINCIPAL MANUFACTURING LIMITED**


By: Bradley W. Dolan  
Director

Date: March 22, 2021

Solely for purposes of compliance with Australia's Commonwealth Modern Slavery Act, this Statement has been approved by the Toro Australia Group Sales Pty. Limited ("Toro Australia") Board of Directors, on March 22, 2021, and signed by a director of that entity on the date indicated below.

Toro Australia is a wholly-owned subsidiary of The Toro Company with its headquarters located in Adelaide, South Australia.

**TORO AUSTRALIA GROUP SALES PTY. LIMITED**

By:   
Director

Date: March 22, 2021