

Sustainable Purchasing Guidelines

Toyota Motor Europe



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Note to Reader

- ・ In the context of this document, ‘Toyota’ refers to both Toyota brand and Lexus brand
- ・ These Guidelines replace the 2016 Sustainable Purchasing Guidelines

Introduction

Dear Toyota suppliers and business partners,

Toyota Motor Corporation (TMC) and Toyota Motor Europe (TME) have continuously strived to play their part in the sustainable development of society by manufacturing and distributing high-quality and innovative products and services.

As Toyota's business operations have expanded globally, we are focusing more and more on sustainable development, sustainability, and environmental protection, including climate change issues.

We would like our suppliers and business partners to gain full understanding of our expectations when it comes to sustainable development and good corporate citizenship. This includes ensuring legal compliance at all times and working together with TME in the spirit expressed in these Sustainable Purchasing Guidelines (SPGs).

Our Purchasing team's mission is to procure the highest quality, best value and most technologically advanced goods and services from the leading global suppliers, and to build a supply chain that operates ethically and responsibly.

We are setting out to improve the sustainability of our supply chain by strengthening our SPGs. These updates aim to ensure that our direct suppliers and others in the supply chain understand our approach to environmental, social and governance issues. This document clearly sets out Toyota's requirements for our business partners and supports suppliers with legal compliance.

The following sections have been added to the 2016 version: Toyota's Human Rights Policy, Cross OEM Approach, Anti-bribery and Conflict of Interests Procedure for Handling Reports, Carbon Neutrality, Animal Welfare, Land Use & Avoid Deforestation, Conflict Minerals, EU Regulation concerning Batteries and Waste, Carbon Border Adjustment Mechanism and Due Diligence, Environmental Compliance, and Compliance with Sustainable Purchasing Guidelines.

Our expectation is that our business partners/suppliers will not only implement the necessary policies and procedures in their own company, but they will also promote and ensure the same responsible behaviour in their own supply chains.



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Overview

Toyota expects its suppliers and business partners to ensure ‘long-term and stable procurement of the best products at the most competitive prices, in the most speedy and timely manner’, based on thorough compliance with all applicable laws, regulations and social norms, and with full consideration for the environment.

Toyota asks you to always engage in the development and manufacture of products from the perspective of the customers who purchase Toyota products. Toyota further requests you to undertake initiatives such as those described below.

For details of Toyota Motor Europe’s expectations, please refer to the relevant pages in these Sustainable Purchasing Guidelines.

	Parts (OE, service and accessories)	Materials		Equipment, construction, and services	Packaging materials	Logistics
		Direct	Indirect			
A Toyota Motor Europe – Sustainability	•	•	•	•	•	•
B Toyota Motor Europe – Anti-bribery and Conflict of Interest	•	•	•	•	•	•
C Toyota Motor Europe – Environment						
1. Establishment of Environmental Management System	•	•	•	•	•	•
2. Carbon Neutrality	•	•	•	•	•	•
3. Reduction of impact on water environment	•	•	•	•	•	
4. Promotion of resource recycling	•	•	•	•	•	•
5. Establishing a society in harmony with nature	•	•	•	•	•	
6. Environmental Compliance	•	•	•	•	•	•
D Toyota Motor Europe – Compliance with Sustainable Purchasing Guidelines	•	•	•	•	•	•



Toyota Motor Europe – Sustainability

Guiding Principles at Toyota

1. Honour the language and spirit of the law of every nation and undertake open and fair corporate activities to be a good corporate citizen of the world.
2. Respect the culture and customs of every nation and contribute to economic and social development through corporate activities in the communities.
3. Dedicate ourselves to providing clean and safe products and to enhancing the quality of life everywhere through all our activities.
4. Create and develop advanced technologies and provide outstanding products and services that fulfil the needs of customers worldwide.
5. Foster a corporate culture that enhances individual creativity and teamwork value, while honouring mutual trust and respect between labour and management.
6. Pursue growth in harmony with the global community through innovative management.
7. Work with business partners in research and creation to achieve stable, long-term growth and mutual benefits, while keeping ourselves open to new partnerships.

Toyota Sustainability Policy: Contribution towards Sustainable Development

TOYOTA MOTOR EUROPE and its subsidiaries take the initiative in contributing to the harmonious and sustainable development of society and the earth through all business activities that TME carries out in each country and region, based on Guiding Principles.

TME complies with local, national and international laws and regulations, in letter and in spirit, and conducts its business operations with honesty and integrity.

TME believes it is vital for management to engage with stakeholders as described below to work towards sustainable development, and endeavour to build and maintain sound relationships with stakeholders through open and fair communication.

TME expects its business partners to support this initiative and to act in accordance with it.



Customers

- Based on Toyota's philosophy of Customer First, TME develops and provides innovative, safe and outstanding high- quality products and services that meet a wide variety of customers' demands to enrich the lives of people around the world. (Guiding Principles 3 and 4)
- Toyota endeavours to protect the personal information of customers and everyone else Toyota is engaged in business with, in accordance with the letter and spirit of each country's privacy laws. (Guiding Principle 1)



Employees

- Toyota respects its employees and believe that the success of its business is led by each individual's creativity and good teamwork. Toyota stimulates its employees' personal growth. (Guiding Principle 5)
- Toyota supports equal employment opportunities, diversity and inclusion for its employees and does not discriminate against them. (Guiding Principle 5)
- Toyota strives to provide fair working conditions and to maintain a safe and healthy working environment for all its employees. (Guiding Principle 5)
- Toyota respects and honours the human rights of people involved in business and does not use or tolerate any form of forced or child labour. (Guiding Principle 1)
- Through communication and dialogue with its employees, Toyota builds and shares the value of Mutual Trust and Mutual Responsibility and work together for the success of its employees and the company.
- Toyota recognises its employees' right to freely associate or not to associate, in compliance with the laws of the countries in which Toyota operates. (Guiding Principle 5)
- Each company's management takes leadership in fostering a corporate culture and implementing policies that promote ethical behaviour. (Guiding Principles 1 and 5)



Business Partners

- Toyota respects its business partners such as suppliers and dealers and works with them through long-term relationships to achieve mutual growth based on mutual trust. (Guiding Principle 7)
- Whenever Toyota seeks a new business partner, Toyota is open to all candidates, regardless of nationality or size, and evaluates them based on their overall strengths. (Guiding Principle 7)
- Toyota maintains fair and free competition in accordance with the letter and spirit of each country's competition laws. (Guiding Principles 1 and 7)



Shareholders

- Toyota strives to enhance corporate value while achieving stable and long-term growth for the benefit of its shareholders. (Guiding Principle 6)
- Toyota provides its shareholders and investors with timely and fair disclosure on operating results, financial condition and non-financial information. (Guiding Principles 1 and 6)

Global Society / Local Communities



Environment

- Toyota aims for growth that is in harmony with the environment by seeking to minimize the environmental impact of its business operations, such as by working to reduce the effect of its vehicles and operations on climate change and biodiversity. Toyota strives to develop, establish and promote technologies enabling the environment and economy to coexist harmoniously, and to build close and cooperative relationships with a wide spectrum of individuals and organizations involved in environmental protection. (Guiding Principle 3)



Community

- Toyota practices its philosophy of Respect for People by honouring the culture, customs, history and laws of each country. (Guiding Principle 2)
- Toyota constantly searches for safer, cleaner and superior technology that satisfies the evolving needs of society for sustainable mobility. (Guiding Principles 3 and 4)
- Toyota does not tolerate bribery of or by any business partner, government agency or public authority, and we maintain honest and fair relationships with government agencies and public authorities. (Guiding Principle 1)



Social Contribution

- Wherever Toyota does business, it actively promotes and engages, itself and with partners, in social contribution activities that help strengthen communities and help enrich society. (Guiding Principle 2)

Basic Policies at Toyota Purchasing

All purchasing at Toyota is orientated towards creating vehicles that will earn customers' satisfaction. Toyota does this in accordance with the following three policies:

1. Fair competition based on an open-door policy

Toyota is open to any and all suppliers – regardless of nationality, size or whether they have done business with us before. Its choice of suppliers is based purely on business considerations. Toyota evaluates the overall strengths of prospective suppliers, including their quality, technological capabilities and reliability in delivering the required quantities on time.

Toyota also evaluates their potential strengths, as evidenced in ways such as their amenability to continuing, kaizen improvements. In addition, Toyota evaluates suppliers' commitment to addressing social expectations, especially regarding environmental issues.

2. Mutual benefit based on mutual trust

Toyota believes in developing mutually beneficial, long-term relationships based on mutual trust. To foster that trust, Toyota pursues close and wide-ranging communication with suppliers.

3. Contributing to local economic vitality through localization: good corporate citizenship

Toyota's production outside Japan is increasing rapidly as Toyota globalises its operations. Toyota works to make an economic and industrial contribution that is fully commensurate with its market presence in each region. That includes purchasing parts, materials, tools, equipment, etc. from local suppliers.

Supplier Sustainability Guidelines

Toyota remains committed to advancing the quality of life through the products and services it offers. Therefore, Toyota hopes to play its part in a sustainable society through the following philosophy and activities, in addition to environmental management:

1. Share Basic Management Philosophy

Toyota strives to pursue the following philosophy together with its suppliers:

- **Work Environment based on Respect for our Employees**
Structure the environment to foster trust between workers and management and promote human development.
- **Monozukuri based on Genchi Genbutsu**
Genchi Genbutsu means focusing all corporate activity on the actual needs in the marketplace and on conditions in the workplace. Toyota practices Genchi Genbutsu by going to the source to find the facts so we can make correct decisions, build consensus, and achieve goals efficiently.
- **Relentless Kaizen Efforts**
Toyota improves its business operations continuously, always driving innovation and evolution.
- **Two-way Communication**
Automobile manufacturing at Toyota is a joint endeavour between Toyota and its suppliers.

To succeed in that endeavour, Toyota and its suppliers need to work together as a single entity. We must maintain close communication, exchanging ideas frankly and building consensus with each other on all matters of importance.

2. Toyota's Expectations of Suppliers on Providing Products and Services

Toyota expects suppliers to provide the best possible products at the lowest possible cost. This includes providing them in the timeliest manner, on a stable and long-term basis.

Suppliers need to undertake product development and deploy manufacturing processes that address customers' needs and wants of today and tomorrow.

Therefore, five main expectations are as follows:



1. Safety

Manufacturing is carried out by people, so it is most important to secure a safe environment for people to work without worry. In a safe working environment, workers can concentrate their efforts on manufacturing and make products of high quality.



2. Quality

Toyota's highest priority is quality. Consistently high quality is the biggest reason for the excellent reputation of its products around the world and for the trust it enjoys from customers. Toyota needs to keep up with customers' increasing expectations of vehicle quality. Toyota appreciates suppliers' understanding that quality is an absolute prerequisite for its business and expects all Toyota suppliers to devote themselves to quality in development and production.



3. Delivery and Production

Toyota maximises efficiency through lean manufacturing, producing only what is needed, only when it is needed and only in the amount that is needed. Toyota expects suppliers to contribute to this lean efficiency through flexible, error-free execution in preparation for mass production, in mass production itself and in delivery.



4. Cost

Toyota expects suppliers to offer the most competitive price in the world. Suppliers need to develop new technologies and innovative production technologies to support continuing cost reduction.



5. Technological Capabilities

Customer and social expectations are mounting in three main areas: technologies for environmental protection, safety and comfort. Toyota's suppliers need to grasp these expectations and address them a step ahead of their competition through innovative products and technologies. Toyota's suppliers also need to broaden the marketability of their products through dramatic cost reduction.

3. Toyota's Expectations of Suppliers in the Process of Developing Products and Services

Toyota expects suppliers to comply with the below to integrate sustainability into their activities.

Toyota also expects suppliers to deepen and expand sustainability initiatives with business partners by developing and deploying individual sustainability policies and guidelines, incorporating the following items:

3.1. Legal Compliance



Compliance with Laws in Letter and Spirit

- Comply with applicable laws and regulations of each country and region, both specifically and in their general spirit.
- Establish and implement policies, structures and mechanisms for ensuring and verifying legal compliance, including a code of conduct, confidential compliance hotline and training.



Management and Protection of Confidential Information

- Manage and protect the company's confidential information, such as trade secrets, and use such information in an appropriate manner.
- Obtain confidential information concerning other companies only from authorized personnel by legitimate means. Verify the permissible scope of use and other conditions concerning such confidential information, and use it only within the scope allowed, while maintaining its confidentiality and not infringing upon the rights of the other companies.
- Obtain personal information concerning employees, customers and business partners only by legitimate means. Manage and protect such information in a secure manner and use the information only within the scope allowed.



Protection of Intellectual Property

- Continually monitor and protect all intellectual property of the company against any infringement by others.
- Do not infringe the intellectual property (such as patents, utilities, designs and trademarks) of others, illegally use such intellectual property or make illegal copies of software or publications.



Compliance with Competition Laws

- Do not engage in illegal acts against the competition laws and regulations of each country and region, including private monopolies, unreasonable restraint of trade (cartel, collusive bidding, etc.) or unfair trade practices.
- Business partners must promptly and in good faith inform TME of any facts or suspicions regarding actual or suspected infringement of competition law committed by the employees of TME or the business partner's employees, sub-contractors, consultants, etc., or in any way involving the above-mentioned persons, in the conduct of business.

Please use the reporting method explained in Chapter B: TME'S Anti-Bribery & Conflict of Interest Guidelines.



Export Controls

- Comply with laws and regulations concerning export controls, thoroughly implement such controls and establish a management system to confirm whether products, technology or other exports are subject to regulations, and prepare and provide documentation of such confirmation.



Anticorruption Measures

(SEE CHAPTER B: TME'S ANTI-BRIBERY AND CONFLICT OF INTEREST GUIDELINES)

- Comply with applicable laws and regulations concerning political donations or contributions and strive to build transparent and fair relationships with political parties or administrative bodies.
- Do not engage in giving or receiving presents, entertainment or money with customers, suppliers and other business partners in order to acquire or maintain unjust interest or wrongful preferential treatment.
- Do not conduct off-the-book, fictitious or otherwise falsified transactions, or any other similar acts prone to be misconstrued as such. Make and keep books, records and accounts (ledger sheets and account ledgers, etc.), which accurately and fairly reflect the transactions and disposition of assets in reasonable detail.

3.2. Labour & Human Rights



Toyota's Human Rights Policy

- Understand and agree to [Toyota's Human Rights Policy](#)
- Respect and refer to international norms such as the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights (UNGP) and promote activities related to human rights based on the UNGP.
- Establish and continuously implement a Human Rights Due Diligence* system in order to fulfil the responsibility to respect human rights. (*The process which is implemented for the identification, prevention, and mitigation of negative human rights impacts).
- Strive to disclose the actions taken to ensure human rights are respected, together with the appropriate measures.
- Develop and operate a practical remediation mechanism or expand the function of existing grievance mechanisms.



Diversity, Inclusion & Anti-discrimination

- Do not tolerate any form of discrimination of persons protected by local applicable laws and regulations relating to gender, age, nationality, race, ethnicity, creed, religion, sexual orientation, gender identity, disability, marital status or whether they have children, with regard to all aspects of employment, including in the application process, hiring, promotion, compensation, access to training, job assignment, wages, benefits, discipline, termination and/or retirement.
- Do not tolerate any form of discrimination relating to gender, age, nationality, race, ethnicity, creed, religion, sexual orientation, gender identity, disability, marital status, whether they have children or any other protected characteristics.
- Foster an inclusive culture in the workplace where all employees feel safe, respected, engaged, valued and able to contribute their capabilities to the fullest.
- Consider diversity and inclusion to be one of the key elements of the business framework and promote activities accordingly.



Harassment

- Do not condone any form of workplace bullying, harassment or intimidation. This includes sexual harassment, power harassment (abuse of authority), peer pressure and any form of harassment that can impact a person's dignity and respect.

- Harassment may involve verbal, visual or physical conduct that negatively interferes with work performance, diminishes the dignity of any employee or creates an intimidating, hostile or otherwise offensive work environment.
- Implement procedures for swiftly reporting, escalating and resolving concerns. Investigate any harassment complaints sensitively (i.e. taking account of the impact on the victim), objectively and thoroughly. Enable employees to report any instances of harassment without fear of reprisal, intimidation or harassment.



Child Labour

- Do not tolerate child labour, which deprives children of a childhood, access to education and restricts their development.
- The minimum age for employment is either 15 years of age, the legal minimum age for employment or the age for completing compulsory education, whichever is greatest under the local applicable laws and regulations, etc.
- Do not engage employees under 18 years of age in hazardous work.
- Bona fide job training or apprenticeship programmes permitted under the local applicable laws and regulations, etc. are allowed.



Migrant Labour - Forced Labour

- Do not tolerate forced labour, which is often extracted through violent and threatful means or by entrapment of debt, or any other form of modern slavery, including human trafficking.
- Ensure that all work is voluntary, and employees are free to leave work or terminate their employment.
- Do not require employees to surrender passports, government-issued identification or work permits as a condition of employment.
- Do not exploit employees by applying high recruitment fees and other costs that are considered unreasonable by international norms.



Wages and Benefits

- Pay wages in compliance with local applicable laws and regulations, including those relating to minimum wages, overtime hours, deduction from wages, piece rates and other elements of compensation.
- Provide legally mandated benefits.
- Ensure wages, other compensation, benefits and deductions are detailed and explained, in compliance with local applicable laws and regulations, clearly and regularly to employees.



Working Hours

- Comply with local applicable laws and regulations governing employees' working hours, including overtime work.



Freedom of Association

- Recognize employees' right to freely associate or not to associate, complying with local applicable laws and regulations, etc. in the jurisdictions in which Toyota operates.
- Encourage employees to communicate openly and directly with management without fear of reprisal, intimidation, or harassment.



Safe and Healthy Working Environment

- Place the highest priority on safety and health programmes and policies at work, so that each employee is able to work without undue concerns. Strive to prevent accidents and injuries from happening at work.
- Support efforts to improve the health of employees through health promotion activities at work, guidance for preventing illness and other means.

3.3. Local/Global Community



Environment

(SEE CHAPTER F: ENVIRONMENT)

- Pursue growth in harmony with the environment and aim for Carbon Neutrality in your business activities.
- Establish an Environmental Management System (EMS) that can promote environmental protection activities and continuously improve them, in addition to complying with applicable environmental laws and regulations in each company.
- Promote proper management for chemical substances with a focus on Substances of Very High Concern (SVHC) and ensure that prohibited substances are not used in products, production and any other processes.
- Take the water environment of each country and region into consideration. Continuously evaluate the environmental impact and take initiatives to thoroughly reduce water usage and manage wastewater.
- When designing and developing products, reduce consumption of exhaustible resources and use recycled materials, while considering their appropriate disposal measures and recyclability. If requested, report the actual use of recycled materials.
- Take initiatives to reduce and recycle waste at your operation bases and in logistics.
- Take initiatives that will help achieve a sustainable society in harmony with the nature, based on the recognition that biodiversity is the premise of continued business operations.



Responsible Material Procurement

- Obtain materials with full deliberation and care to avoid the procurement or use of materials which are unlawful, or which are obtained through unethical or otherwise unacceptable means. Materials currently known at risk are conflict minerals*, as well as potentially cobalt, natural rubber, natural graphite, lithium, nickel. Toyota expects suppliers to take appropriate steps to discontinue procurement and use of such problematic materials if detected.

*In politically unstable areas, the minerals trade can be used to finance armed groups, fuel forced labour and other human rights abuses, and support corruption and money laundering. These so-called 'conflict minerals' such as tin, tungsten, tantalum, and gold, are also referred to as 3TG. The European Commission has tasked a group to provide & regularly update an indicative, non-exhaustive list of conflict affected and high risk areas (CAHRAs) under the EU Regulation. TME expects suppliers to comply with the list of CAHRAs of the EU regulation.



Social Contribution

- Strive to pay attention to the societal challenges of each community in order to promote their prosperity and development, and to conduct social contribution activities leading to the solution of such challenges in cooperation with the local communities.



Disclosure of Information to Stakeholders

- Strive to disclose to stakeholders information that is pertinent to them, including management, financial condition, environmental protection, community and social contribution, in a timely and fair manner and to build and maintain positive relationships with stakeholders through open and fair communication.



Developing and Deploying Policies and Guidelines for Business Partners

- Seek to deepen and expand sustainability initiatives with business partners (e.g. Tier 2 level) by developing and deploying individual sustainability policies and guidelines incorporating the guidelines outlined above.
- Promote the above activities in consideration of the whole supply chain and conduct the necessary countermeasures to help business partners follow up and improve.

Documents to be submitted	When & how to submit
Self-Assessment Questionnaire on CSR/Sustainability for Automotive Sector Suppliers	Potential suppliers: to be submitted together with the quote directly to your Toyota Purchasing contact
	Existing suppliers: Updated questionnaire to be provided every two years either via the platform defined by Toyota Purchasing or via email to the Business Planning team csr.purchasing@toyota-europe.com



Cross-OEM Approach

- Toyota Motor Europe is also involved in Drive Sustainability, the initiative of 11 leading automotive companies driving sustainability throughout the automotive supply chain. We collaborate to promote a common approach (methodology, tools, etc.) to sustainability within the industry and to leverage a common voice on ESG topics throughout the supply chain.
- In 2020, we, as Drive Sustainability, launched our common strategy, formalising our ambition to tackle four sustainability challenges together with our suppliers: carbon neutrality, sustainable raw materials, workforce wellbeing and circular value chain. Drive Sustainability's approach to these topics is threefold: we seek to endorse and develop common standards, apply common compliance tools, such as the raw material risk assessment, and complement these with classroom/online training and e-learning to support suppliers in improving their performance on ESG topics.
- Drive+ is Drive Sustainability's associated partnership model for Tier 1 suppliers and supplier associations, allowing the OEMs and suppliers to collaborate systematically towards a sustainable automotive supply chain. CSR Europe, the secretariat of Drive Sustainability, facilitates the Drive+ group.
- Drive+ is an opportunity for suppliers to get engaged in a systematic dialogue about common sustainability challenges and to collaborate on joint solutions. By becoming an associated partner in Drive+, suppliers will get first-hand information from and access to Drive Sustainability. Drive Sustainability regularly consults with Drive+ suppliers about its activities and strategic ESG topics, for example regarding the update to our Self-Assessment Questionnaire (SAQ), activities on carbon neutrality or about our work on sustainable raw materials. At the same time, Drive+ suppliers will get opportunities to learn and exchange with the OEMs about upcoming policies and best practices, i.e. on due diligence and how to create impact on the ground. Your Drive+ engagement will put you in direct dialogue with Drive Sustainability and its members, help you to meet the OEM's expectations and support you to cascade them in your own supply chain.
- If you are interested in becoming a member of Drive+, please contact info@drivesustainability.org, and CSR Europe will follow up with you on the next steps.

Toyota Motor Europe – Anti-bribery and conflict of interest guidelines

For the purposes of these Guidelines, ‘TOYOTA entity’ means any company within the TOYOTA group of companies worldwide which controls, is controlled by, or is under common control with TME (‘control’ means the direct ownership of fifty per cent (50%) or more of the voting rights or other rights to direct management in such company).

Request by TME to its Business Partners

TME request all third parties (persons or entities) involved in any dealings / relationships / business activities with TME and/or any TOYOTA entity (hereinafter referred to as “business partners”) to comply with the guidelines set out below (hereinafter referred to as these “Guidelines”).

A business partner is any individual not employed by TME and/or any TOYOTA entity, or any entity not owned or controlled by TME and/or any TOYOTA entity, who/that provides services to or engages in business activities with TME. Business partners include a wide range of different individuals and entities; these could be (non-exhaustive list):

- Suppliers of goods/software;
- Service providers;
- Distributors;
- Commercial agents;
- Sales representatives;
- External consultants, legal representatives or advisors (including tax and financial advisors, accountants and lawyers);
- Investigation agencies or agents;
- Trading houses;
- Joint-venture partners;
- Contractors or subcontractors; and
- Intermediaries.

For the purposes of these Guidelines, when the business partner is an entity, the reference to ‘business partner’ includes the entity itself, its employees, affiliated companies, sub-contractors and consultants.

For the purposes of these Guidelines, ‘employee’ or ‘employees’ means employees, managers and officers.

These Guidelines were compiled to reflect global standards of anti-corruption/anti-bribery-related laws and regulations as applicable when business partners are dealing with TME and/or any TOYOTA entity. In certain countries or regions, there may be applicable laws and regulations which are stricter than these Guidelines and would then supplement these Guidelines.

Anti-bribery

Corruption/bribery is illegal in many countries and regions. Therefore, in their dealings with TME and/or any TOYOTA entity, all business partners are expected to comply with these Guidelines or guidelines which are substantially similar to these Guidelines, as well as with all applicable laws and regulations.

Business partners must never be involved in corruption/bribery acts, whether directly or through third parties, such as advisors, consultants, agents or intermediaries.

Certain conduct that may be tolerated in a particular country may not be permitted in view of global standards. Equally, conduct that was formerly lawful and tolerated may subsequently become illegal or no longer tolerated.

1. Principles

TME will not seek to make any profits in a way that would require resorting to improper means, including acts of corruption/bribery. TME does not tolerate any act of corruption/bribery (as defined below), including but not limited to:

- i. offering, promising or giving bribes (active bribery);
- ii. requesting, agreeing to receive or accepting bribes (passive bribery);
- iii. bribing others on behalf of TME and/or any TOYOTA entity, with or without knowledge of TME and/or any TOYOTA entity; or
- iv. extortion, abuse of power, embezzlement, money laundering or any similar criminal activity.

TME does not do business with any person or entity which initiates, is involved in or authorises acts of corruption/bribery. TME shall therefore refrain from pursuing or initiating any dealings or relationships with such persons or entities.

2. Prohibition of Acts of Corruption / Bribery

2.1. Acts of corruption/bribery

- i. The business partner shall comply with all applicable anti-bribery/anti-corruption laws and regulations, including but not limited to any relevant foreign laws and regulations which would be applicable, as well as all other similar applicable laws and regulations.
- ii. **The business partner must not offer, promise or give any money or other financial advantage or anything of value** (herein referred to as a 'bribe'; see more detailed definition below), whether directly or through any third party, irrespective of in which country, for the purpose of obtaining or retaining business or an advantage in the conduct of business with, for or in connection with TME and/or any TOYOTA entity, to:
 - a. a public official, an employee of a public organisation or any person having a similar function (herein referred to as a 'public official'; see more detailed definition below); and/or
 - b. any third party other than a public official (including but not limited to TME and/or any TOYOTA entity, or any employee of TME and/or of any TOYOTA entity), with the intention of influencing any act by such public official (in their official capacity) or such third party or to induce such public official or such third party to improperly perform a relevant (official) duty, function or activity or to reward such public official or other third party for the improper performance of such (official) duty, function or activity; nor shall the business partner authorise any of the above-mentioned acts.
- iii. The business partner shall not, in the conduct of business with, for or in connection with TME and/or any TOYOTA entity, request, agree to receive or accept a bribe, directly or through a third party, irrespective of in which country, in connection with any improper performance of a relevant function or activity for any third party. The active and passive acts mentioned under (a) and (b) above are herein referred to as 'acts of corruption/bribery'.

2.2. Consequences of Acts of corruption/bribery

Acts of corruption/bribery undertaken by the business partner may expose TME and/or any TOYOTA entity, as well as the business partner itself, to severe legal/criminal liability. The criminal penalties for acts of corruption/bribery imposed on individuals may include imprisonment in addition to fines. Acts of corruption/bribery targeting private individuals or entities constitute a criminal offence in many jurisdictions and carry severe criminal penalties for the individual(s) involved and generally also for the corporate entity/ies involved. Acts of corruption/bribery targeting public officials constitute a criminal offence in virtually all jurisdictions and carry often more severe criminal penalties for the individual(s) involved and generally also for the corporate entity/ies involved.

Furthermore, acts of corruption/bribery may cause considerable damage to the reputation of TME and TOYOTA entities, the Toyota group worldwide and the brands of the Toyota group. The business partner, therefore, has an obligation to avoid any acts, practices or conduct which may be considered or misconstrued as acts of corruption/bribery when the business partner is dealing with a public official or any other third party in the framework of its activities or conduct of business for, with or in connection with TME and/or any TOYOTA entity.

The following acts of corruption/bribery may also result in TME's and/or any TOYOTA entity's legal/criminal liability:

- acts of corruption/bribery committed using third parties such as agents, consultants, distributors, suppliers, affiliated companies of the business partner, etc. for or on behalf of TME and/or any TOYOTA entity
- awareness or tolerance by the business partner of such acts of corruption/bribery committed by such third parties for or on behalf of TME and/or any TOYOTA entity
- if the business partner neglects or omits to take actions when it becomes aware of facts or suspicions related to such acts of corruption/bribery.

In such situations, the business partner may also face legal/criminal liability, which may be as severe as if such acts of corruption/bribery had been committed directly by the business partner itself.

The business partner may face legal/criminal liability for acts of corruption/bribery even if neither TME/any TOYOTA entity nor the business partner benefit from the act of corruption/bribery, even when the bribed person (public official or other third party) did not accept any bribe, and even if no conduct of such person is influenced or no relevant function or activity is performed improperly.

The request or acceptance of a bribe by a business partner in the conduct of business with, for or in connection with TME and/or any TOYOTA entity, directly or through a third party, irrespective of in which country, in connection with any improper performance of a relevant function or activity for any third party may result in legal/criminal liability for the business partner involved for being bribed.

2.3. Who is to be considered a public official?

The following are examples of public officials, irrespective of the relevant country (non-exhaustive list):

- members of (local, regional or national) governments/parliaments
- officials of public authorities or governmental bodies (such as tax inspectors, customs officials, police officers and competition authorities)
- officers and employees/representatives of companies or bodies controlled or subsidised by governments/public authorities (including organisations effectively controlled by a government, government agency or a local government, etc. through the appointment of principal directors, etc., irrespective of the government's shareholding ratio in such organisation; examples include state-run or semi-public entities engaging in public services such as electricity, gas, railways, universities, hospitals and research institutes)
- officials/employees of public international organisations (such as institutions, agencies or other bodies of the European Union)
- representatives/members of political parties
- candidates for political/public office

- persons who belong to private international organisations and are considered public officials in the concerned countries (such as the International Olympic Committee and the International Red Cross)
- persons performing public functions on behalf of the aforementioned persons (for example, an inspection agency or examination institution designated by a government)
- any other individuals or entities involved in public functions/activities.

What constitutes 'obtaining or retaining business or an advantage in the conduct of business'?

The following are examples of 'obtaining or retaining business or an advantage in the conduct of business' (non-exhaustive list):

- a. simplification or facilitation (expedition) of procedures
- b. total or partial tax exemptions
- c. obtaining a licence, permission or approval
- d. obtaining commercial transactions/contracts
- e. obtaining a favourable evaluation or recommendation
- f. obtaining confidential information
- g. requesting not to disclose misconducts or scandals
- h. overlooking a breach of the law
- i. avoidance or mitigation of a penalty (fine or administrative fee).

2.4. What constitutes a bribe?

A bribe is a contribution (financial or other) that is directly or indirectly offered, promised or given to another person (whether a public official or a private person or entity) in order to persuade them to act improperly or to perform their duties improperly, or to reward them for acting improperly or for performing their duties improperly, or with the intention of influencing them in the performance of their duties, so as to gain (i) a personal advantage (such as cash or employment opportunities), (ii) a business-related advantage (such as a commercial advantage (e.g. favourable prices/discounts, a favourable change to a supplier selection procedure or access to confidential business information), a contractual advantage (e.g. favourable terms and conditions in a supply contract)), or (iii) a regulatory or administrative advantage (e.g. a favourable decision by an authority or favourable terms in a new regulation or a favourable result of an inspection).

A bribe may be anything of value, not just money, such as (non-exhaustive list) gifts, gift vouchers, (corporate) hospitality, entertainment, rebates, discounts, payment or reimbursement of travel expenses, contributions, donations and sponsorship, shares, loans, guarantees, access to or offer of employment, facilitation payments (see below), etc.

2.5. Facilitation payments

A facilitation or grease payment is a payment or a gift, usually of small value, without any legal basis, made to a public official to speed up or secure the performance of a routine, governmental action which the official is already obliged to perform. Examples of such actions: processing governmental papers (e.g. issuing/extending visas and work permits), scheduling inspections associated with contract performance or the shipment of goods or loading and unloading cargo, customs clearance and issuing building permits. In some countries, facilitation or grease payments may even be requested by a public official.

TME does not make or allow facilitation payments of any kind. Facilitation or grease payments are considered bribes and are therefore strictly prohibited. Facilitation payments made by a business partner for the purpose of obtaining a favour or advantage in the conduct of business for TME and/or any TOYOTA entity may expose TME and/or such TOYOTA entity, as well as such business partner involved in such act, to legal/criminal liability.

3. Gifts and hospitality

The tradition of giving and receiving gifts and hospitality is recognised as an established part of doing business. However, this is a delicate area and in order to avoid the risk of misconduct in this matter, certain principles and rules must be complied with:

- As a general rule, TME does not encourage its employees to accept gifts and hospitality from any business partner. Therefore, TME does not encourage its business partners to offer gifts and hospitality to employees of TME;
- Employees of TME must comply with certain rules and guidelines as regards receiving gifts and hospitality. Therefore, if a business partner wishes to offer a gift or hospitality to any employee of TME, it must always pro-actively verify that such offering is in line with TME's above-mentioned rules and guidelines before actually offering such gift or hospitality (for example, by pro-actively requesting an explanation about the rules and guidelines from the management of the division within TME which the business partner is dealing with), even if such offering would be compliant with the business partner's own rules and guidelines; and
- The same principles, as specified above, apply with respect to the acceptance by a business partner of any gift or hospitality from an employee of TME.

4. Implementing these guidelines

The business partner should raise awareness of the applicable anti-corruption/anti-bribery laws and regulations, as well as these Guidelines, among its employees in an appropriate manner, i.e. by:

- a. having a proper anti-bribery policy or guidelines;
- b. raising awareness through training programmes;
- c. instructing its employees to internally report any facts, suspicions, doubts or concerns about acts of corruption /bribery or any involvement in any act of corruption/bribery, etc.) immediately.

In addition, the business partner should raise awareness of the prohibitions and obligations in these Guidelines among the business partner's own business partners in the conduct of business with, for or in connection with TME and/or any TOYOTA entity.

The business partner shall also provide, when so requested by TME, any relevant information and documentation to enable TME to verify the business partner's compliance with these Guidelines and any applicable anti-corruption/anti-bribery laws and regulations. Should the business partner's employees, consultants, sub-contractors, affiliated companies, etc. become involved in any actual or suspected act of corruption/bribery, the business partner shall fully cooperate with any investigation conducted by TME or by the relevant authorities in relation thereto.

TME shall ensure that the agreements with its business partners contain appropriate references concerning compliance with these Guidelines or other guidelines which are substantially similar to these Guidelines, as well as with anti-corruption/anti-bribery laws and regulations. TME shall also ensure that such contracts contain appropriate clauses, such as, but not limited to, hold harmless and indemnification clauses, concerning the consequences, for TME and/or any TOYOTA entity, of any and all acts of corruption/bribery which the business partner would have committed.

If a business partner is involved in an act of corruption/bribery, TME may terminate any contractual relationship with such business partner with immediate effect and without being liable for any compensation to such business partner.

5. Reporting

The business partner must report to TME promptly and in good faith any facts or suspicions regarding actual or suspected acts of corruption/bribery committed by the business partner's employees, sub-contractors, consultants, etc., or involving, in any way, the above-mentioned persons, in the conduct of business.

The business partner must also report to TME any act of (active or passive) corruption/bribery committed by, or involving, any employee, sub-contractor, consultant, etc. of TME or any TOYOTA entity, which they become aware of, or any serious suspicions or concerns related thereto.

Any report as mentioned above should be made to the Compliance Officer of TME by email to Karel.De.Wilde@toyota-europe.com.

You can also report issues to TME's whistleblower hotline (operated by an external provider and available 24/7, 365 days a year; you can report by phone in seven different languages or online).

Calling from Belgium: 00800 72 33 22 55

Calling from outside Belgium: <https://www.safecall.co.uk/en/file-a-report/telephone-numbers/>

Report on-line: <https://www.safecall.co.uk/report/>

You can raise a concern anonymously. If you choose to do so, TME asks you to provide sufficient detail and factual information so that TME can investigate and follow up effectively.

Conflict of interest

In the event that any employee of TME and/or any TOYOTA entity has a personal interest in any business partner, with which TME or any TOYOTA entity has or envisages to have business transactions or dealings (such as discussions, negotiations, actual transactions, partnerships, (verbal or written) contractual relationships, etc.), this may give rise to situations where a conflict of interest – real or perceived – could arise, whereby such employee of TME may not be in a position to remain independent (and seen to be independent) from such business partner. Such situations are not allowed.

For the purposes of these Guidelines, 'personal interest' means (non-exhaustive list of examples): investing in or acquiring any direct or indirect financial or other interest (whatever the nature, value or form) in a business partner or any company affiliated to such business partner, as well as the existence of a special or close (including, but not limited to, family) relationship between any employee of such business partner and an employee of TME who is involved in dealings with such business partner. The latter includes any type of relationship that exceeds the 'at arm's length' professional business relationship and is of such nature that it influences or may influence the relevant persons in the performance of their duties or activities.

As regards the situations of conflict of interest, as described above, TME will promptly inform a business partner of any such situation which TME has become aware of.

Furthermore, the business partner should:

- refrain from creating, contributing to or participating in any situation whereby any employee of TME receives, obtains or has any personal interest (as specified above) in or with the business partner; and
- report to TME promptly and in good faith any personal interest (as specified above) of any employee of TME in or with the business partner which business partner has become aware of; such report shall mention the name of such employee of TME and the nature of the personal interest in such business partner and should be made to the Compliance Officer of TME by email to Karel.De.Wilde@toyota-europe.com. You can also report issues to TME's whistleblower hotline (operated by an external provider and available 24/7, 365 days a year; you can report by phone in seven different languages or online).

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You can raise a concern anonymously. If you choose to do so, TME asks you to provide sufficient detail and Factual information so that TME can investigate and follow up effectively.

In the event that a business partner and/or TME becomes aware of a situation of conflict of interest, they must promptly implement the appropriate measures to put an end to such a situation where feasible.

In the event that the business partner concerned has been creating, contributing to or participating to a situation of conflict of interest and/or there was no possibility to put an end to such a situation, TME may terminate any contractual relationship which TME may have with such business partner, with immediate effect and without being liable for any compensation to such business partner.

Review of these guidelines

These Guidelines are subject to applicable anti-corruption/anti-bribery laws and regulations and can be adjusted or modified from time to time based on changes to such applicable laws and regulations, to TME's policies and/or improvement activities. Any changes to these Guidelines or procedures mentioned below will be published on TME's public corporate website, which should be regularly consulted by the business partners for the up-to-date version of these Guidelines.

Procedure for handling reports

TME encourages employees and business partners to speak up and raise any concerns, in a safe and confidential environment.

Please speak up!

TME strives to conduct business with the highest standards of integrity. It is important that you speak up if you are confronted with unacceptable behaviour, so that TME can take appropriate action.

When a business partner reports an instance or suspicion of bribery, conflict of interest or a breach of law, TME will handle the concern with care. A report will always be taken seriously and investigated properly.

TME has a specific handling procedure, which is outlined below.

- i. The Compliance Officer will send an acknowledgment of receipt of the report to the person reporting it within seven days.
- ii. The Compliance Officer may interview employees and/or third parties, access IT systems and review documents and records relating to the reported matter.
- iii. The Compliance Officer may form an ad hoc Compliance Committee that will decide on the matter.
- iv. After the investigation, TME will take the appropriate action to address the identified concerns. TME may implement the necessary and systemic corrective actions. In other cases, it may be appropriate to discipline an individual employee, which may include termination of employment or disciplinary measures.
- v. The Compliance Officer will provide feedback to the person who reported the matter within a reasonable period of time, not exceeding three months from the acknowledgement of receipt.

TME will fully respect the right of any persons involved in an investigation about an actual or suspected breach to defend themselves. They will receive information about the facts or concerns and have an opportunity to give their account.

TME may disclose any information about facts or concerns to file an official complaint in the framework of a legal action or an investigation or any other procedure initiated by an authority.

1. Compliance with privacy and personal data protection laws and regulations

The handling of actual or suspected breaches involves the processing of personal data. All personal data will be processed in strict compliance with applicable privacy laws and regulations.

2. Confidentiality

TME will apply the appropriate confidentiality level to any report including the identity of the reporting employee and of others involved.

3. Protection against retaliation

TME will not retaliate against any employee or business partner who reports in good faith facts or concerns even if, following an investigation, the facts or concerns turn out not to constitute a breach of the law or applicable regulations. TME will not tolerate any act or attempt of any manager or employee to penalise (in whatever way), harass, discriminate, disadvantage or in any other way victimise or retaliate against any employee or business partner who has, in good faith, reported a matter or concern.

4. Whistleblowing

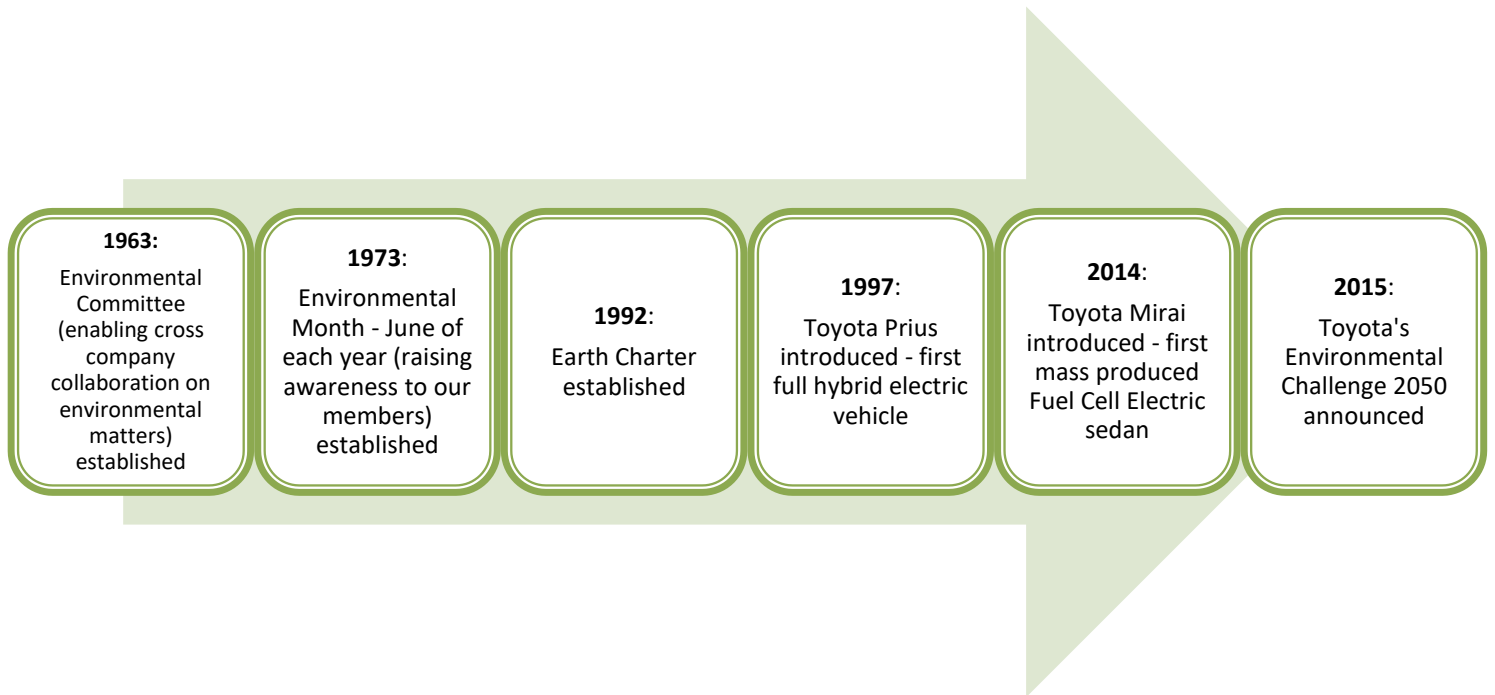
In the EU, the protection of whistle-blowers is provided in EU law and the law of Member States. The persons reporting are encouraged to first use internal TME reporting channels. The persons reporting are also able to report externally to the competent authorities or make a public disclosure, and will enjoy the protection against retaliation provided by applicable laws.

- i. The Compliance Officer will provide feedback to the person reporting within a reasonable period of time, not exceeding three months from the acknowledgement of receipt.
- ii. The external reporting channel can be used when TME internal channels cannot reasonably be expected to function properly. This is most notably the case where persons reporting have valid reasons to believe that they would suffer retaliation in connection with the reporting. The external reporting channel can also be used after TME's internal reporting channels were used but did not function properly.
- iii. Persons making a public disclosure (for instance, directly to the public through online platforms or social media, or to the media, elected officials, civil society organisations, trade unions or professional and business organisations) should qualify for protection in cases where:
 - a. despite internal and external reporting, the breach remains unaddressed or no appropriate remedial action was taken. The appropriateness of the follow-up will depend on the circumstances of each case and of the nature of the rules that have been breached;
 - b. they have reasonable grounds to believe that there is an imminent or manifest danger to the public interest or in the case of external reporting, there is a risk of retaliation.
- iv. Persons making a report qualify for protection under EU law provided that:
 - a. they had reasonable grounds to believe that the information on breaches reported was true at the time of reporting and that such information fell within the scope of the EU Whistleblowing Directive;
 - b. they reported internally or externally or made a public disclosure in accordance with the law.



Toyota Motor Europe – Environment

Toyota regards protecting the environment as a top priority. Our commitment extends to all our operations and has been embedded in our long-term business planning.



Toyota's Global Vision defines our spirit of 'Contributing to society through manufacturing cars' with the focus on providing high-quality products and services that bring a smile to the face of our customers in an environmentally conscious manner. Toyota is continuously working to improve environmental performance throughout its own operations and counts on suppliers to take a similar approach. To this end, TME asks suppliers to take an active approach in environmental initiatives in their business activities as well as ensuring mandatory legal compliance. Such environmental initiatives include reducing energy consumption and greenhouse gas emissions, minimising water usage, reducing waste and eliminating the use of Substances of Very High Concern (SVHC).

Toyota Environmental Challenges (TEC2050)

In 2015, Toyota launched six ambitious challenges to address key global environmental issues, such as climate change, water shortages, resource depletion and degradation of biodiversity. By setting these challenges, Toyota globally is committed to the sustainable development of our society, with steady initiatives towards the year 2050.

TME will cooperate closely with suppliers and provide support during both production preparation and mass production stages, consolidating new ideas, dynamism and technology to achieve a truly sustainable society together.

Discover more on TEC2050 at [Toyota Environmental Challenges](#)



Relationship between Toyota Environmental Challenge 2050 and SDG:



Environmental Initiatives Related to Supplier Business Activities

1. Enhancing and Reinforcing Environmental Management

1.1. Establishing an Environmental Management System

For over 20 years, Toyota Motor Europe has maintained an Environmental Management System (EMS) to improve environmental performance. TME requests that suppliers maintain or develop their own Environmental Management System, certified & verified by a third party.

An EMS provides a framework for managing environmental responsibilities efficiently in a way that is integrated into the overall operations. ISO 14001 or EMAS are two common EMS standards designed to address the balance between maintaining profitability and reducing environmental impact.

Convinced about the benefit of such an approach, Toyota itself ensures that all its European sites – production plants, parts and vehicle logistics sites, national marketing and sales companies, Head Office and R&D Centre – are ISO 14001 certified.

Toyota expects its suppliers to implement a certified Environmental Management System (for example, ISO 14001 or EMAS). TME expects suppliers to provide their latest valid certificates. TME also recommends suppliers to systematically review and promote environmental protection activities.

Finally, in order to manage the entire supply chain, TME recommends its suppliers advise and direct on Environmental Management System towards their upstream suppliers.

Documents to be submitted	When & how to submit
Proof of ISO14001, EMAS or other Environmental Management System	Potential suppliers: to be submitted together with the quote directly to your Toyota Purchasing contact
	Existing suppliers: new proof (when previous certification expired) to be provided immediately either via platform defined by Toyota Purchasing or by email to Business Planning team csr.purchasing@toyota-europe.com or to your Purchasing contact

1.2. Management of Products and Materials delivered to Toyota

REACH and other Chemical Regulations

REACH is a European Regulation that came into force in 2007, aiming to ensure manufacturing, placing on the market and use of chemicals do not affect human health and the environment. For Toyota Motor Europe, all substances – on their own, in mixtures or in certain articles – which are produced, imported or used in quantities totalling over one tonne per year shall be classified and registered with the ECHA (European Chemicals Agency).

Other REACH requirements may also apply, depending on the type of chemicals (whether they contain SVHC or not) and quantities that are placed on the market. Such requirements are, for example, communication to downstream users about SVHC content, notification, authorisation or restriction.

EU REACH is often taken as an example and copied or adapted in non-EU countries as well. Therefore, Turkish REACH or UK REACH or any other relevant local chemical regulation should be considered.

Please be aware that the general rules for producing, importing and using chemicals within the EU are laid down in REACH. However, REACH is complemented by other EU legislation such as CLP (Classifying, Labelling and Packaging), BPR (Biocidal Products Regulation) and those on nano-materials. In addition to the European Regulations on Chemicals and the Japanese Chemical Substances Control Law, North America and Asia are introducing their own regulations. Therefore, it is important to cooperate in order to collect information on the chemical content of our products and manage our supply chain.

Material Safety Data Sheets, Labelling and IMDS data

TME and EMC operations are committed to complying with all the applicable rules and regulations – including REACH (1907/2006 EC) and CLP (1272/2008 EC) – relating to the provisions and use of Safety Data Sheets (SDS) & safety labelling. All articles and materials that are classified as hazardous have to be packaged, marked, labelled and documented in accordance with all applicable regulations to ensure clear hazard communication.

SDSs shall be provided by the supplier and prepared/updated in line with changes in legal requirements and material composition. SDS approval is required before the launch of a new part or material.

TME and EMCs will ensure that all Toyota employees involved in the handling of parts and materials with an SDS are trained in order to perform their job safely.

Key points for SDS and labelling:

- The product label and SDS data must include consistent information in accordance with current European, UK, Turkish and Russian legal requirements, and be in the local language.
- SDS must be updated each time there are changes in legal requirements or in material composition, and it must be supplied with the first delivery of the product.
- A copy of any revised SDS shall also be sent to the relevant purchasing contact (as well as Production Engineering in case of Toyota manufacturing plant).

In order to comply with legislation, all suppliers are requested to deliver parts and raw materials in compliance with laws, Toyota standards and Quality Management Manuals, as described in the table below:

	Measures to eliminate/reduce use of Substances of Concern	Business partners							Documents to be submitted		
		OE Parts	Direct Materials	Indirect Materials (Including Equipment, Design & construction, cleaning, landscaping)	Vehicle	Service Parts	Accessories	Packaging materials	Documents required	Who to submit to	Due date
OE parts, service parts, accessories and direct materials (including packaging materials for these items)	Development/Design/Mass production stage ・ Follow Toyota Technical Standard TSZ0001G 'Control Method for Substances of Environmental Concern', when managing information on the use of Substances of Concern and reducing or eliminating their use. Please use the latest version of TSZ0001G as it is revised in accordance with regulation developments in any region. TME may check the status of your products with regard to substances in all stages. In case of request (i.e survey), please adhere to the due date.	•	•		•	•	•				
	・ Toyota uses IMDS-based material data management globally as a tool for controlling chemical substances as well as vehicle recyclability rates. The flow of data must reflect the flow of materials and components, so the material data must pass along the supply chain. Suppliers should proactively provide IMDS data for new parts and part changes which require resubmittal according to their required timing. The IMDS reporting requirement for new parts does not supersede other TMC/TME requirements such as those for recyclability/SOC compliance. ・ For data entry into IMDS, please refer to the following documents: - TME IMDS manual - IMDS User Manual - IMDS manual for Toyota options - IMDS FAQ document for Toyota option ・ Additionally, Toyota may also ask IMDS data or other evidence (i.e analyse report) for supplementary articles. ・ TME may ask you for an overview of your chemical management process internally and through the supply chain. Please be aware that TME may perform a process audit on business partners where necessary.	•	•			•	•		Material data (IMDS)	IMDS	Recyclability rates activity: requested due date New part or change that affect IMDS content: Three months after the release
	・ Control and prevent use of Substances of Concern: expectations on suppliers are described in the Supplier Quality Assurance Manual (SQAM) Chapter 10 and are accessible through the Quality Information System (QIS)	•	•			•	•		Please consult SQAM, Ch. 10		
	Packaging materials at supplier ・ Please follow the Packaging Manual issued by your Toyota contact. ・ When introducing new packaging material, select materials that do not contain any of the prohibited or restricted substances specified in TSZ0001G. ・ When delivering the initial version of newly adopted packaging material, ensure elimination of use of the 10 SoCs mentioned in SQAM Ch.10, but also of any other product prohibited by relevant regional and local regulation (REACH, CLP, etc.). ・ Please consider the use of environmentally friendly Rust Preventive Material (†VCI): Toyota Motor Europe may provide contacts of current business partners which have received prior approval by Toyota. Reason: Packaging material from current business partners are already submitted to the European Chemical Agency.	•	•		•	•	•		Declaration of nouse of banned SoC Report of conten ts Packaging specification sheet (if you have connection, input via "Supplier Portal")	For Parts & Accessories: to TME FHSEP-PQ contact	When delivering newly adopted packaging materials
	†VCI = Volatile Corrosion Inhibitor										

	Measures to eliminate/reduce use of Substances of Concern	Business partners							Documents to be submitted		
		OE Parts	Direct Materials	Indirect Materials (including Equipment, Design & construction, cleaning, landscaping)	Vehicle	Service Parts	Accessories	Packaging materials	Documents required	Who to submit to	Due date
Direct materials, indirect materials and packaging materials delivered/brought to plants or logistic centres	Heavy metal ban ・ Please make parts containing heavy metals identifiable, according to the ELV Directive 2000/53/EC art. 4.2.(b)(iv) and Annex II, in order to avoid contamination of recycled materials	・			・	・	・				
	Management of chemicals that are to be delivered/brought to Toyota ・ The introduction of any new or changed direct material needs to be approved by Production Engineering through the Chemical Change Procedure and at European Manufacturing Centres through local procedures. ・ Any materials that are used by contractors (construction, cleaning and landscaping companies as well as equipment suppliers) must not contain any of the banned substances found in Toyota Standard TMR SAS0126n and must comply with REACH, CLP and any other European and local regulation.		・	・				・	- Safety Data Sheet (SDS) for chemical	TME Materials Engineering	At least four weeks before any trials
	Management of chemicals in direct and indirect materials ・ When planning to adopt a new direct or indirect material, deliver the Safety Data Sheet (SDS) – in local language and English version – for chemical substances and the Declaration of no use of Toyota Banned substance. ・ Please update the SDS in case of any change and send the updated version to your relevant purchasing contact		・	・					- Safety Data Sheet (SDS) for chemical substances - Declaration of no use of banned SoC	To your Purchasing or engineer contact	At least four weeks before any trials
	Management of chemicals in packaging materials ・ Please follow the Packaging Manual issued by your Toyota contact. ・ When delivering the initial version of newly adopted packaging material, ensure elimination and reduction of use of the 10 SoCs mentioned in SQAM Ch.10, but also of any other product prohibited by relevant regional and local regulation (REACH, CLP, etc.). ・ Please consider the use of environmentally friendly Rust Preventive Material (†VCI): Toyota Motor Europe may provide contacts of current business partners which have received prior approval by Toyota. Reason: Packaging material from current business partners are already submitted to the European Chemical Agency.							・	- Declaration of no use of banned SoCs - Safety Data Sheet (SDS) for chemical Substances - Report of contents - Packaging specification sheet	For packaging materials for logistics centres: to TME WH ops packaging contact	When delivering a newly adopted packaging material
†VCI = Volatile Corrosion Inhibitor											

 Not applicable

 Applicable

Annual Chemical Management Process Self-Assessment

Applicable to suppliers of parts, direct material, accessories & components raw materials

- i. Toyota is committed to continuously improving product chemical management practices. Toyota suppliers are required to complete a survey on their chemical management initiatives annually for each supplier code location that has a different chemical management process. All survey questions are mandatory.
- ii. The survey is used to collect information on how Toyota suppliers practice chemical management. This information presents the opportunity to share best practices and collectively work together to make improvements.
- iii. The survey results will be analysed by a scoring system. The individual supplier score will be compared with the maximum possible score and the average score of all European suppliers in Process, Implementation, and Overall.
 - a. The supplier ranking zones are used to compare a single supplier's overall score with the average total score of all European suppliers.
 - b. Each supplier is given a score in each survey category based on how the supplier answers each question. The scores are based on the supplier's process and implementation of product chemical management.
- iv. A feedback sheet will be provided to each supplier with their individual survey results. Each supplier is required to review the feedback sheet for areas of improvement and create an improvement plan.
- v. TME will select a limited number of suppliers to meet with and review their self-assessment results and improvement plan.

Ad-Hoc Surveys

Applicable to suppliers of parts, direct material, accessories & components raw materials

Toyota may periodically survey suppliers to determine substance use in parts, raw materials, their respective packaging or manufacturing. Suppliers must respond to ad hoc substance use surveys in the requested format by the due date for all applicable supplier codes.

Conflict Minerals

To eliminate the sources of funding for armed groups violating human rights in the Democratic Republic of the Congo (DRC) and its surrounding countries, Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502 was passed in United States in July 2010 to track the supply chain to confirm use of tin, tungsten, tantalum & gold (3TG). Moreover, the European Union Mineral Regulation that took effect on 1 January 2021 requires all EU importers of 3TG & metals to provide sourcing and chain of custody of conflict minerals.

Suppliers should support Toyota to meet legislative requirements. TME requires Tier 1 suppliers who are using 3TG in their supply chain to complete the Conflict Minerals Reporting Template (CMRT) for parts and raw materials supplied to TME every year. To ensure compliance with reporting requirements, each manufacturer in the supply chain must request information from all relevant direct suppliers, who, in turn, must obtain that information from the next tier of suppliers.

TME recommends that suppliers follow OECD five-step framework for risk-based due diligence for responsible supply chains of minerals from conflict-affected and high-risk areas:

Step 1: Establish strong company management systems. In particular, companies should: adopt a company policy and clearly communicate it to suppliers; structure internal management to support supply chain due diligence; establish a system of controls and transparency over the mineral supply chain; strengthen company engagement with suppliers; and establish a grievance mechanism as an early-warning risk-awareness system.

Step 2: Identify and assess risk in the supply chain.

Step 3: Design and implement a strategy to respond to identified risks. In particular, this includes: reporting findings of the supply chain risk assessment to senior management; devising and adopting a risk management plan; implementing the risk management plan and monitoring and tracking performance; and undertaking additional fact and risk assessments for risks requiring mitigation, or after a change of circumstances.

Step 4: Carry out independent third-party audit of supply chain due diligence at identified points in the supply chain.

Step 5: Report on supply chain due diligence.

The following three items summarize key EU legislation that will have to be taken into account by EU importers/suppliers, but will also have an indirect impact on non-EU suppliers due to their business in Europe with TME:

EU Regulation concerning Batteries & Waste Batteries

The new EU Battery Regulation will lay down requirements for more sustainable batteries throughout their entire life cycle, from sourcing of raw materials to performance and durability aspects as well as end of life management. TME expect suppliers to be aware of and, once the legislation is adopted, comply with the relevant requirements of the EU regulation on batteries and waste batteries. Special attention needs to be given to supply chain due diligence policies and transparency in the supply chain for items such as carbon footprint or usage of recycled materials.

EU Regulation concerning Carbon Border Adjustment Mechanism

With the Green Deal and the Fit for 55 package, the European Union is accelerating towards climate neutrality. Several regulations targeting the CO₂ content/footprint of goods are being drafted that might impact the operations of suppliers, e.g., the Carbon Border Adjustment Mechanism (CBAM).

The CBAM aims to equalise the price of carbon between EU products and imports. Once it is in effect, EU importers will have to buy carbon certificates corresponding to the carbon price that would have been paid, had the goods been produced under the EU's carbon pricing rules. The price of the certificates is planned to mirror the EU ETS price. Details of the regulations are not finalised yet.

TME expect suppliers to be aware of and, once the legislation is adopted, comply with the relevant requirements of the CBAM. Special attention needs to be given to the reporting of the carbon content of the products to be imported into the EU.

EU Regulation concerning Due Diligence

The EU is currently discussing new rules for companies to respect human rights and environment in global value chains. Companies are expected to identify and, where necessary, take action to mitigate adverse impacts of their activities. TME expect suppliers to be aware of and, once the legislation comes into force, comply with the relevant requirements of the EU regulation on due diligence. Special attention needs to be given to supply chain due diligence policies and transparency in the supply chain for items such as child labour and exploitation of workers, and on the environment, for example pollution and biodiversity loss.

2. Carbon Neutrality

Europe wants to become the first climate-neutral continent in the world by 2050. This objective is at the heart of the European Green Deal and in line with the EU's commitment to global climate action under the Paris Agreement. To get there, all EU27 member states pledged to reduce emissions by at least 55% by 2030, compared with 1990 levels. All parts of society and all economic sectors will play a role, including the automotive industry.

Toyota embraces the Carbon Neutrality Challenge and has set a global target to become carbon-zero by 2050. This is reflected in the Toyota goal to remove carbon emissions from the manufacturing of the materials and parts Toyota uses, from its logistics activities and from the disposal and recycling methods employed when vehicles reach the end of their life cycle, under Toyota Environmental Challenge number 2. In Europe, TME has committed to become carbon neutral by latest 2040. Suppliers are therefore expected to work towards reducing the CO₂ emissions of the parts and materials supplied to TME by 50% by 2030 (compared to 2019 level) on the way to make them Carbon Neutral by latest 2040.

Currently, there are two reporting standards to quantify the carbon footprint: Greenhouse Gas Emissions (GHG) Protocol & Life Cycle Assessment (LCA) Protocol. Both protocols will help Toyota to measure and identify hotspots and to reduce our CO₂ emissions. TME will continue its activities for GHG Protocol, which will help to see the carbon footprint & reduction efforts at a plant level. In parallel, TME has started work on the LCA Protocol, which will help break down the plant level emissions to part level emissions, highlighting the opportunities for change to the design/process or CO₂ reduction. Please see the detailed explanation in below chapters.

2.1. Reduction of Greenhouse Gas Emissions

Toyota evaluates greenhouse gas (GHG) emissions throughout the product life cycle and strives to significantly reduce them in order to contribute to a low-carbon society.

TME expects suppliers to take an active approach to reduce GHG emissions of the products they deliver.

Reduction of GHG emissions by materials purchased

TME recommends suppliers to implement initiatives to reduce GHG emissions of the materials they purchase, such as by:

- ・ Reducing their use of raw materials by reducing the weight of parts;
- ・ Promoting low GHG emission raw materials during production;
- ・ Promoting the use of recycled materials;
- ・ Promoting the use of biomass-based materials.

Reduction of GHG Emissions in Suppliers' Operations

TME requests that its suppliers manage and reduce actual GHG emissions in all operations (including plants, R&D, offices, sales and logistics).

Reduction of GHG Emissions by Toyota's Logistics Partners

Suppliers who are contracted to carry out the logistics of complete vehicles, production parts and service parts must fully understand Toyota's initiatives to reduce GHG emissions. Such suppliers are further requested to work with Toyota and cooperate with Toyota's efforts to implement GHG emissions reduction measures.

In order to make steady improvements, suppliers are requested to maintain data on fuel consumption, distance travelled, fuel efficiency and other items that indicate annual performance and GHG emissions per unit transported, and to report periodically on the status of their activities.

Reduction of GHG Emissions from Development through to Disposal and Recycling

At design and development stage of the delivered products, Toyota suppliers are requested to take GHG emissions reduction into consideration. In addition, suppliers must consider proper treatment, reuse and recycling at disposal stage of end-of life products.

Reduction of Packaging Materials

Suppliers which develop and deliver parts or packaging equipment to Toyota are requested to take efforts to reduce their use of packaging and wrapping materials which are associated with high GHG emissions. During packaging design, the impact on the environment at each step of the packaging life cycle should be taken into account. Suppliers shall aim for an optimal balance between parts quality, material use and logistics handling.

In any case, applicable regulations on packaging must be complied with including Directive (EU) 2018/852.

2.2. Promotion of Environmental Management throughout the Whole Life Cycle Thinking

It is important to consider the full environmental impact of our vehicles during their lifetime – known as Life Cycle Assessment (LCA) – being CO₂ emissions or other ways of impact such as acidification. To achieve the objective of our Life Cycle Zero CO₂ Emissions Challenge, TME is working on more environmentally friendly vehicles by using raw materials with lower amounts of CO₂, designing vehicles with fewer parts, using biomaterials from renewable sources and making our vehicles easier to dismantle and recycle.

TME suppliers will play an important role in reducing the LCA impacts of future-generation vehicles compared with their predecessors. TME is currently working on developing an LCA data gathering tool and will share further information when the tool is ready. TME welcomes your ideas and suggestions on the design of parts, choice of material or new manufacturing technologies that will reduce the LCA impact of our vehicles.

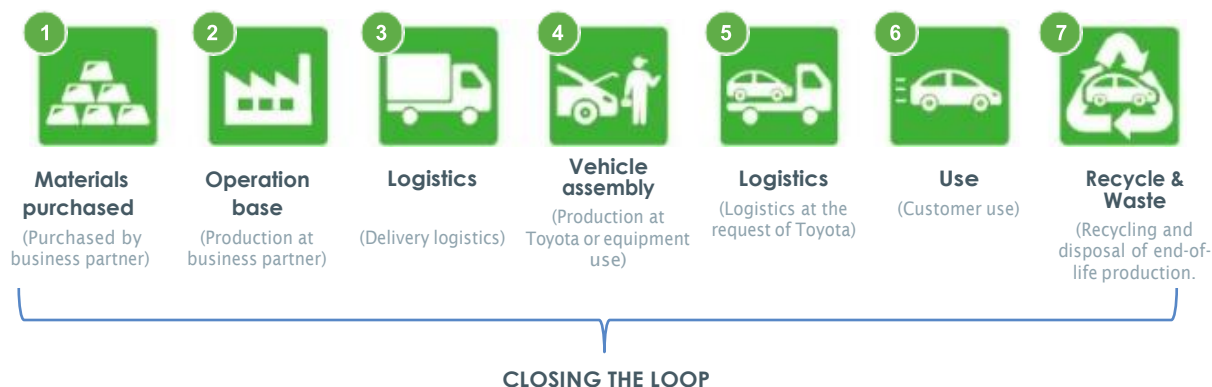


Life Cycle Thinking (LCT) is the process of taking into account both resources consumed, and the environmental and health pressures associated with the full life cycle of a product, from design stage to the final recycling, when making decisions.

LCA is an internationally standardised methodology (ISO 14040 series) that supports LCT and helps to quantify the resources consumed and the potential environmental impact of the product.

In order to promote LCT and LCA, Toyota requests its suppliers to implement initiatives to reduce the CO2 footprint throughout the product life cycle of the delivered products.

Product Life Cycle Thinking Scheme



Documents to be submitted	When & how to submit
Parts environmental performance data	Potential and existing suppliers: to be submitted upon request to your Toyota Purchasing contact

3. Reduction of Impact on Water Environment

Conscious that the world's water needs are growing fast, Toyota is making efforts to promote the reduction and efficiency of water use by taking into account the conditions in each country and region.

Examples of Toyota-specific initiatives are reducing water consumption in existing manufacturing processes and improving water reuse rates.

As the water environment differs greatly across the global regions where Toyota operates, TME will take care to introduce measures that are sensitive to local needs.

Moving forward, TME asks suppliers to reduce the impact of their operations on water usage as much as possible.

Reduction of Impact on Water in Operations

Suppliers should implement efforts within all their operations (production plants, logistics, offices, R&D, sales, etc.) that reduce the negative impact on water. These could be:

- Reducing the amount of water used
- Using rainwater
- Recycling water at plants
- Improving water quality of discharged water
- Conserving at the intake source.

For this purpose, if any chemicals are released in your wastewater process, please ensure that these do not cause any hazard to aquatic environment and are easily treatable in the standard chemico-physical treatment process.

4. Promotion of Resource Recycling

Re-usability, Recoverability, Recyclability (RRR)

In March 2020, the European Commission adopted the new circular economy action plan. This is one of the main building blocks of the European Green Deal. This new circular economy action plan announces initiatives along the entire life cycle of products. It targets how products are designed, promotes circular economy processes, encourages sustainable consumption, and aims to ensure that waste is prevented, and the resources used are kept in the EU economy for as long as possible.

In particular, this circular economy approach is reflected in the increasing recycled content in products, while ensuring their performance and safety, enabling remanufacturing and high-quality recycling.

TME supports this circular economy mindset that enables the LCA reduction of future vehicle production and is setting internal targets for recycled materials, being plastics, metals, or other materials.

TME encourages suppliers to collaborate with TME from the design stage to propose how to increase the recycled content of some material or to propose recycled material as alternatives from virgin material. TME is also considering design for recycling for future closed loop production system. Toyota is working on improving the re-usability, recoverability and recyclability rate and reducing the volume of automotive shredder residue (ASR), in line with the EU End of Life Vehicle (ELV) Directive 2000/53/EC.

Since December 2008, the '3R' certificate (Directive 2005/64/EC on the type-approval of motor vehicles with regard to their re-usability, recoverability and recyclability) is mandatory for new vehicle types under Whole Vehicle Type Approval (Directive 2007/46/EC).

In order to calculate the re-usability, recoverability and recyclability rate of a vehicle, material data is collected through the supply chain. To this end, Toyota's suppliers are requested to input the data for their parts into the IMDS (International Material Data System).

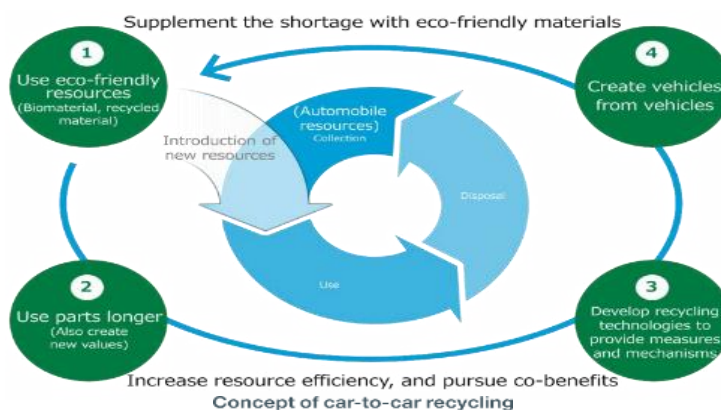
	Weight	Mandatory/ Voluntary	Requirements
Rubber parts	>200 g	Mandatory	Follow material labelling system for plastic/rubber parts
Plastic parts	>100 g	Mandatory	
	<100 g	Voluntary	Label as much as possible

Documents to be submitted	Types of products	When to submit	Who to submit to
IMDS data	OE parts	Upon request	Material Engineering Division

In addition, in order to facilitate the identification of plastic/rubber parts that are suitable for reuse or recovery, TME requests that suppliers label those parts by indicating that the material is in compliance with the relevant laws and regulations in Europe, Japan, Korea and the USA. Labelling must be carried out in line with the material labelling guidelines of the European Automobile Manufacturers Association (ACEA).

Promotion of the Use of Renewable and Recycled Materials

With the aim to promote car-to-car recycling toward an ideal resource recycling-based society, Toyota is making efforts to expand the use of renewable resources and recycled materials. To this end, Toyota suppliers are requested to implement resource recycling initiatives



Documents to be submitted	Types of products	When to submit	Who to submit to
Declaration of Renewable and Recycled Materials	OE parts	Upon request	Material Engineering Division

Promote resource recycling of the delivered products (including service), resource recycling at all operations and in logistics

In order to promote car-to-car recycling, suppliers are requested to reduce resource use in the products they supply, to implement recycling activities within operations, and to reduce the use of packaging materials in logistics and process packaging properly after use. In addition, suppliers are requested to liaise with the department in charge at Toyota for the material usage and must submit the declaration of renewable resources and recycled materials upon request.

5. Establishing a Society in Harmony with Nature

TME requests that suppliers give a maximum consideration to biodiversity and implement initiatives in order to establish a society in harmony with nature. Products and services supplied as well as suppliers' operations should contribute to the preservation and enhancement of biodiversity and promote harmony with nature. Toyota requests that suppliers deliver products and implement activities within their operations that focus on biodiversity and minimize the negative effects on nature. Furthermore, Toyota encourages collaboration and requests that suppliers proactively propose products that contribute to biodiversity.

Deliver Products that Contribute to Biodiversity

Toyota requests that suppliers develop products that minimise the effect on biodiversity, especially in case of using plant-derived raw materials. TME will check whether there is any effect on biodiversity during raw material production where necessary.

Activities at Suppliers' Operations that Contribute to Biodiversity

Toyota requests suppliers to minimise the effect on nature during production. In addition, TME recommends suppliers to collaborate with local stakeholders and NGOs which promote nature conservation and develop such partnerships as much as possible in order to conserve biodiversity.

Activities at Suppliers' Operations that Contribute to Animal Welfare

Suppliers should respect the five animal freedoms laid down by the World Organization for Animal Health (OIE) concerning animal welfare, which include: freedom from hunger and thirst; freedom from discomfort; freedom from pain, injury, and disease; freedom to express normal and natural behaviour; and freedom from fear and distress.

No animal should be raised and killed for the sole purpose of being used in an automotive product.

Suppliers should adhere to the 3Rs principles for animal testing within their operations. The 3Rs are:

- Replace: Replace animals with non-animal methods where possible.
- Reduce: Reduce the number of animals used, using only enough to obtain scientifically valid results.
- Refine: Refine animal use and care practices to minimise pain, suffering, distress or lasting harm to the animals.

Suppliers should not cruelly or unnecessarily cause injury to an animal and should take all the reasonable steps to avoid animal suffering in their operations.

Activities at Suppliers' Operations that Contribute to Land Use and Avoid Deforestation

Suppliers should confirm that the leather products that they supply directly to TME and/or to a TME-nominated supplier do not contain raw material (i.e. hides) originating from the farms or the ranches on or using illegally deforested land.

Harmony with Nature by Promoting Activities from Initiatives 1 to 4

TME would like to request suppliers to promote activities under initiatives 1. Enhancing and Reinforcing Environmental Management, 2. Carbon Neutrality, 3. Reduction of Impact on Water Environment and 4. Promotion of Resource Recycling, considering a society in harmony with nature.

6. Environmental Compliance

Toyota's compliance record and reputation depends on our actions, as well as the actions of our business partners. Therefore, TME requires suppliers to support and fully comply with all applicable environmental and hazardous materials/dangerous goods laws and regulations.

Many of Toyota's activities as well as those of our business partners are subject to local, state, provincial and federal laws that regulate, among other things, chemical management, air emissions, water discharges, greenhouse gas emissions, and waste treatment and disposal. These regulations vary by facility based on the type of equipment operated and the functions performed. Toyota requires our business partners to stay up to date and in compliance with all applicable environmental laws and regulations.



Toyota Motor Europe – Compliance with Sustainable Purchasing Guidelines

Compliance with Sustainable Purchasing Guidelines

Toyota will address compliance with these Guidelines throughout the entire supply chain which supports our manufacturing efforts. It is our policy to ask all our suppliers to carefully read and understand these Guidelines and take the initiatives necessary to ensure that they penetrate down through your supply chain.

To confirm compliance status with these Guidelines and for mutual communication, there may be times when TME visits your plant(s) or other facilities. There may be some cases where TME accomplishes this by having a third party carry out an audit. If any breach of these Guidelines occurs, TME will ask that you report it immediately and take steps to make the necessary improvements.

Glossary

ASR

Automotive Shredder Residue.

ACCESORRIES

Genuine Toyota accessories installed by Toyota in order to give an added attribute to the vehicle

Examples: floor mats and navigation systems.

CLP

Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances (CLP Regulation) is a European Union regulation which aligns the European Union system of classification, labelling and packaging chemical substances and mixtures to the Globally Harmonized System (GHS). It is expected to facilitate global trade and the harmonized communication of hazard information of chemicals and to promote regulatory efficiency. It complements the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) Regulation and replaces the current system contained in the Dangerous Substances Directive 67/548/EEC and the Dangerous Preparations Directive 1999/45/EC.

ESG

Environmental, Social & Governance.

ELV

End-of-life Vehicle.

Any vehicle that has come to the end of its life under the Automobile Recycling Law.

EMAS

The Eco-Management and Audit Scheme (EMAS) is the EU voluntary instrument which acknowledges organisations that improve their environmental performance on a continuous basis.

EMC

European Manufacturing Company.

IMDS

International Material Data System.

Standardised system to collect material data in the automotive industry. Suppliers are requested to enter data on product materials and contained chemicals using a standardized format and process.

ISO 14001

This ISO standard outlines the requirements for an environmental management system to enable an organisation to develop and implement a policy and objectives which take into account legal requirements and information about significant environmental aspects.

LCA

Life Cycle Assessment

A method of evaluating a product's environmental impact throughout its entire life cycle, from production to disposal.

MATERIALS (SUBSTANCES AND MIXTURES)

1. Substance: a chemical element and its compounds in the natural state or obtained by any manufacturing process, including additives necessary to preserve its stability and any impurity deriving from the process used, but excluding any solvent which may be separated without affecting the stability of the substance or changing its composition.
2. Mixture: a mixture or solution composed of two or more substances.

DIRECT MATERIALS

Used in Toyota plants and that become part of the vehicle or unit.

Examples: steel, paint and automotive fluids.

INDIRECT MATERIALS

Used in Toyota plants but will not become part of the vehicle or unit.

Examples: cleaning solvents and cutting oil.

SDS

Safety Data Sheet, in accordance with EU Commission Directives 2001/58/EC, 1999/45/EC, 1967/548/EC and changes as published in the Official Journal of the European Union.

It describes necessary information to safely handle chemical substances.

SVHC

Substance of Very High Concern.

PARTS (ARTICLES)

1. An object which during production is given a special shape, surface or design which determines its function to a greater degree than its chemical composition.
2. Parts that were developed for the vehicle and are delivered to Toyota plants.
3. Service parts and accessories.

Examples: bumper, engine, seat, wiper, windscreen and screen.

PACKAGING MATERIALS

Materials delivered directly to Toyota and those used for shipment/transportation of automotive parts.

REACH

Regulation (EC) No 1907/2006 on the Registration, Evaluation, Authorization and Restriction of Chemicals.

SOC

Substances of Concern.

SERVICE PARTS

Toyota Genuine parts mounted on a vehicle in order to replace parts.

Example: side visors, navigation systems and audio equipment.

Email	When to contact
csr.purchasing@toyota-europe.com	CSR Self-Assessment Questionnaire
	Proof of ISO4001, EMAS or other Environmental Management System
Karel.De.Wilde@toyota-europe.com	Anti-bribery reporting
	Conflict of interest reporting