



Global **C**ode **o**f **C**onduct & **E**thics

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1. Message from the President

Hello everyone!

As I, newly appointed President & CEO, reflect on the Global Code of Conduct & Ethics (“COCE”) implemented 2 years ago, I feel a considerable responsibility to uphold TTC Group managements consistent emphasis on adhering to the highest possible standards of safety and corporate ethics.

As our business domains rapidly expand globally, we have more opportunities in diverse markets and with new partners. Since this will increase the complexity of decision-making and we must make these decisions swiftly, it is more and more important to uphold and implement the shared core values of our Group, derived from the COCE.

I value the Toyota Tsusho Group Way, which is the “DNA” of our company, “On-site, hands-on, in-touch”, “Teamwork” and “A passion for business”, and aspire for Toyota Tsusho Group to provide solutions to the issues of our customers and the society, create new value and contribute to the building of a prosperous future for all with our unique “Toyota Tsusho like work”.

I appeal to all members of Toyota Tsusho Group to ensure that each of you deeply understands these 10 Creeds of the COCE yourself, and to all managers to engage with your staff more frequently to ensure there is a shared, common understanding of why COCE is important.

We all must consistently put the COCE first, with integrity, and ingrain the COCE into our daily work.

Let us take up this challenge together!

July 2, 2018

TOYOTA TSUSHO CORPORATION
President & CEO
Ichiro Kashitan



1. Umlayezo ovela kuMongameli

Sanibonani nonke!

Mina, njengoMongameli Kanye noCEO osanda kubekwa, kade ngicabanga ngeGlobal Code of Conduct & Ethics ("COCE") eyasungulwa eminyakeni emibili edlule. Ngizwa kuyijoka lami ukuthi kumele ngizibophezele ekugcineni nasekuphakamiseni izinga lokuphepha kanye neqophelelo lokuziphatha komsebenzi elabekwa iTTC Group.

Njengoba izizinzathu zohwebo zanda ngelikhulu inani emhlabeni wonke jikelele, sesinamathuba kwezokuhweba kanye nokubambisana nabanye abahwebi. Lokhu kuzokwenza kube lukhunyana ukwenza izinqumo, kanti lezi zinqumo kumele zenzeke ngokuphazima kweso. Sekubaluleke kakhulu kunakuqala ukuqikelela lokhu okusingathwe kwiCOCE.

Mina ngiyithathela eqophelweni eliphezulu indlela kaToyota Tsusho Group yokwenza izinto, iyona eyinsika (DNA) yenkampani yethu. Indlela kaToyota Tsusho Group ithi; "kufanele sibe esayithini lokusebenza, sizibambele ngezandla zethu futhi besesiyaxhumana. Siphinde sisebenzisane, sithande ukuhweba, futhi njenge Toyota Tsusho Group siqikelele ekuxazululeni izinkinga zamakhasimende kanye nomphakathi yethu. Yikho lokhu okwakha ama-values amasha futhi kwenze abasebenzi babe nentshisekelo ekwakheni ikusasa eliqhakazile lawowonke umuntu ngendlela engajwayelekile "ye- Toyota Tsusho".

Ngiyinxusa kubo bonke abangaphansi kwe Toyota Tsusho Group ukuthi niziqondisise kahle izimiso ezilishumi zeCOCE ngokwenu, futhi bonke abaphathi bajwayele ukuhlanganyela nabasebenza ngaphansi kwabo ukuze baqikelele ukuthi kunom'bono ofanayo, nokuqonda ukuthi yini iCOCE ibaluleke kangaka.

Kumele sibeke iCOCEphambili, ngokuthembeka, siyifake emsebenzini yethu yemihla ngemihla.

Ake silithwale lelijoka sonke!

July 2, 2018

TOYOTA TSUSHO CORPORATION
President & CEO
Ichiro Kashitan



2. Our core Philosophy

Corporate Philosophy

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

Behavioral Guideline

As a good corporate citizen, we will:

- Implement open and fair corporate activities
- Fulfill our social responsibilities and conserve the global environment
- Offer creativity and provide added value
- Respect people and create a responsive workplace striving to achieve job satisfaction



2. Ifilosofi yethu

Indlela esiyilandelayo

Ukuphila nomphakathi,ukuphumelela kanye nokuhlonipha umhlaba esiphila kuwo kuzokwenza isizwe esiphumelelayo.

Indlela yokuziphatha

Njengabasebenzi abahle,sizokwenzalokhu:

- Sizokwenza umsebenzi onganazo izimfihlo futhi oneqiniso
- Sizogcina isibopho sokusiza umphakathi kanye nokulondoloza imvelo emhlabeni wonke.
- Sizodala amacebo azosithuthukisa.
- Sizohlonipha abantu futhi senze indawo yokusebenza esabelayo ezolwela ukuzuza ukwaneliseka emsebenzini wethu.



3. 10 Principles of the COCE

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

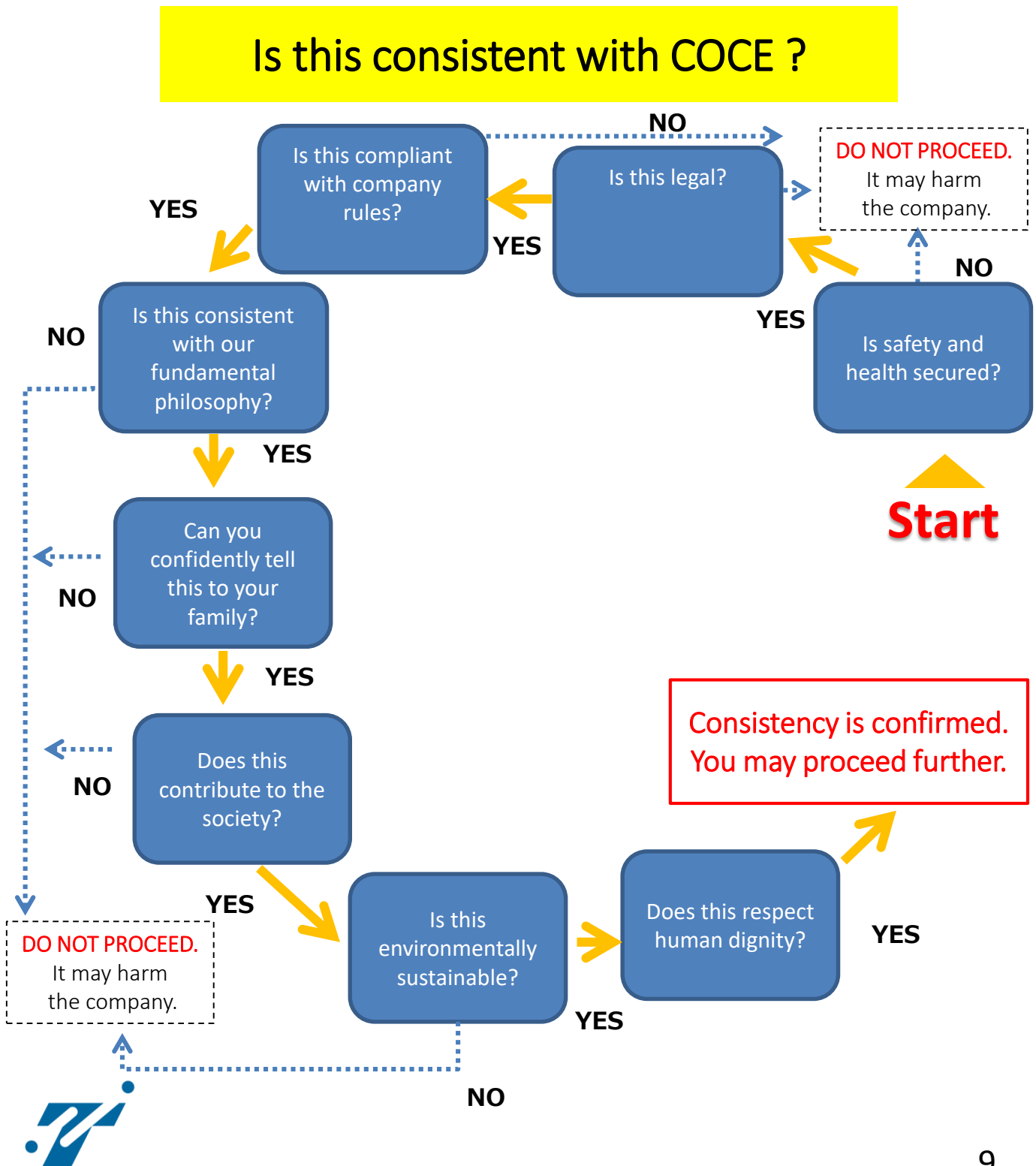


3. Izimiso eziyishumi -10 ze-COCE

- 1) Sizibophezele ku “Anzen” ekwenzeni indawo yokusebenza ephephile nehlanzekile.
- 2) Sihambelana nayo yonke imithetho kanye nezinqubomgomo sibala ukungakhwabanisi, ukuthembeka, imithetho wokuncintisanisa kanye nomthetho wokusebenza.
- 3) Sizibophezela ukubika imibiko eqondile yezezimali.
- 4) Sizimisele ngokuhambiselana nayo yonke imithetho yenkampani.
- 5) Sizokwenza izinto ngobuqotho, ngeqiniso nagokusobala, sivikele futhi sithuthukise ukuthembeka kulabo esibambisene nabo.
- 6) Sizofaka uxhaso emphakathini othuthukayo ngokwanele.
- 7) Sizokhuthaza izenzo ezinhle nokulondoloza ezemvelo.
- 8) Sizothuthukisa ngokuba nemibono emisha njalo-njalo “Kaizen”.
- 9) Sizohlonipha amalungelo abantu.
- 10) Sizokwamukela ukwahluka kwenzinhlanga zabantu ngaphakathi enkampanini nasemphakathini esiphila kuwo.

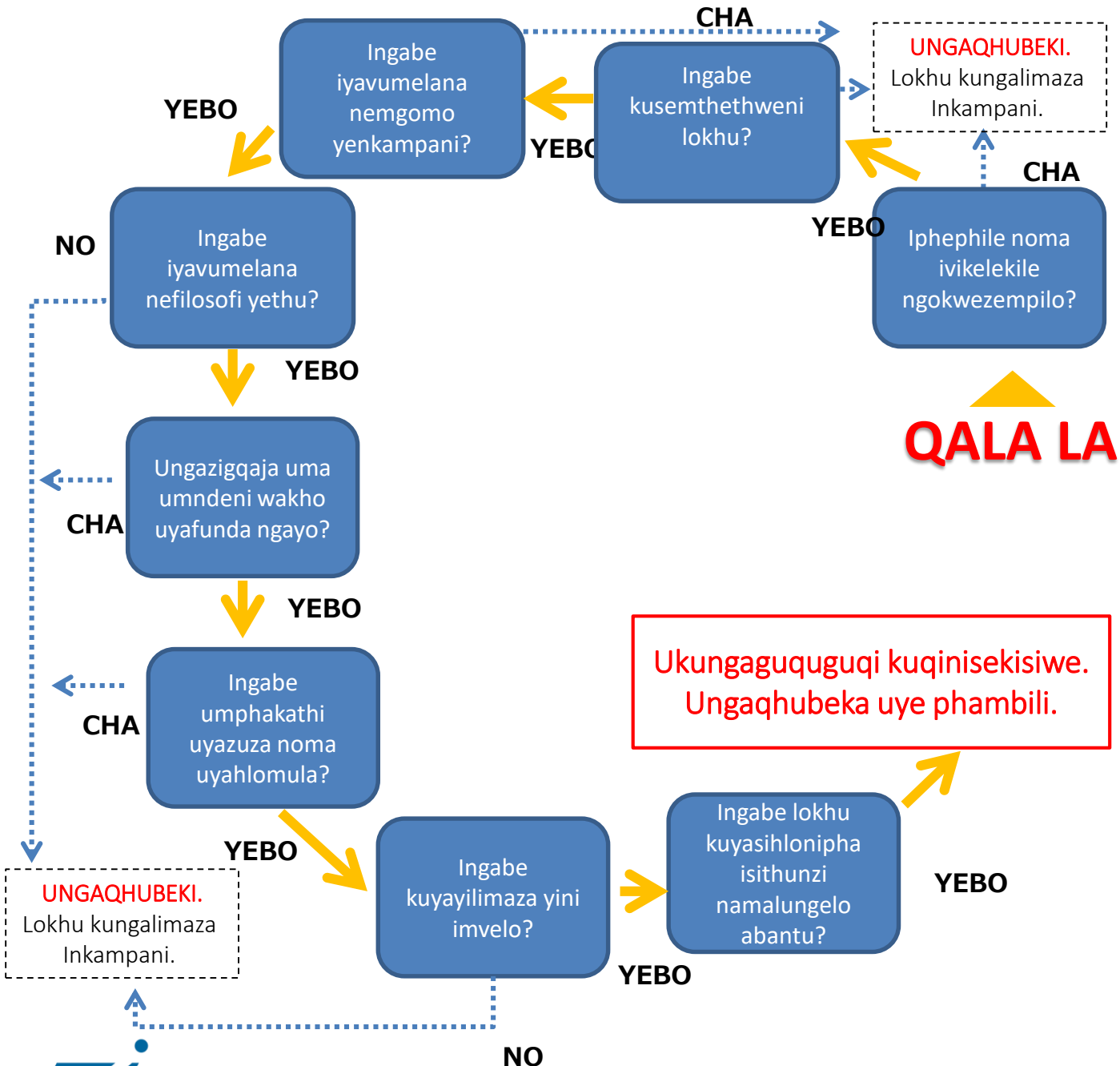


4. COCE Confirmation Chart



4. Ishadi le-COCE

Ingabe kuyambisana ne-COCE ?



QALA LA



5. 10 Principles of COCE (explanations)

Izimiso eziyishumi

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

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

Therefore,

- We must protect the health and safety of each other.
- We must comply with all health and safety regulations
- We must participate in health and safety training.

1) Sizibophezele ku “Anzen” ekwenzeni indawo yokusebenzela ephephile nehlanzekile.

Ezenhlalakahle nezokuphepha zabantu bethu kuyisisekelo senkampani.

Ngakhoke,

- Kumele sivikele ezenhlalakahle nezokuphepha kwethu.
- Kumele silandele yonke imigomo yezokuphepha nezenhlalakahle.
- Kumele sibambe iqhaza kwezempilo nezokuphepha ngokuqeqesha.



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

Compliance is a requirement in all of our actions.

Therefore,

- We must become familiar with all laws and regulations (including international rules) that govern our area of responsibility and strictly comply with them at all times.
- We must ask for advice if we are unsure of anything.
- We must report any non-compliance through the appropriate channels provided.

A single violation of any law or regulation may lead to severe penalties, as well as criminal charges and huge reputational damage.

Therefore,

- We must not offer, give or receive gifts, meals or entertainment for any illegal or unethical purposes.
- We must always act fairly in our duties.
- We must be careful about discussing sensitive information like market share, pricing, stock levels, customers details etc.



2) Sihambelana nayo yonke imithetho kanye nezinqubomgomo sibala ukungakhwabanisi, ukuthembeka, imithetho wokuncintisanisa kanye nomthetho wokusebenza.

Ukulandela imigomo kufuneka kuzo zonke izenzo zethu .

Ingakhoke,

- Kumele sizijwayeze nayo yonke imithetho kanye nezinqubomgobo (okubalwa kukho imithetho yaphesheya kwezilwandle) ohola umthwalo esiwubambile sikhathi zonke.
- Kumele sicele usizo lapho esingaboni kahle khona.
- Kumele sibike into engahambi ngohlelo siyibike ebantwini abafanele.

Ukungalandeli imithetho kungaholela ezinyathelweni ezingqala ongazithathelwa.

Ingakhoke,

- Akumele siphe noma sithathe izipho, ukudla, noma ezokuncebeleka ukufezekisa izimfuno eziphula umthetho.
- Kumele senze umsebenzi wethu ngendlela efanelekile nenobulungiswa.
- Kufanele siqhaphеле ukuthi kungaxoxwa izinto ezizwelayo.



3) We are committed to accurate financial reporting.

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

Therefore,

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

3) Sizibophezela ukubika imibiko eqondile yezezimali.

Njengelunga elibhalisiwe kuhla ezinkampanini zomphakathi, ukuqonda kwemibiko yethu yezezimali kubalulekile kuthina nalaba esisebenzisana nabo.

Ngakhoke,

- Kumele siqikelele ngezinombolo ezivezayo.
- Kumele silandele imigomo yakwa-accounting.
- Kumele siveze ulwazi ngesizikhathi zonke, oluqondile nangendlela engadukisi.
- Kumele sigcine imilando ethembekile, eqondile Kanye nefakazelayo



4) We are accountable for compliance with all company rules.

Therefore,

- We must ask about and read and understand all company rules.
- We must follow all company rules and understand that any violation of the company rules may lead to disciplinary action being taken against me.

4) Sizimisele ekuhambisaneni nayo yonke imithetho yenkampani.

Ngakhoke,

- Kumele sibuze futhi sifunde yonke imithetho yenkampani ukuze sizokwazi ukuyiqondisisa.
- Kumele sigcine imithetho yenkampani, siyiqonde ukuthi ukuphampana nomthetho wenkampani kungaholela ezinyathelweni ezingqala



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

As a good corporate citizen, and employee of the Tsusho group, we commit to honesty, integrity, and transparency beyond the laws and rules.

Therefore,

- We will be honest at all times.
- We must respect and protect all information.
- We must not deal with anyone who is connected to criminal activity.
- We must disclose any conflict of interest regarding our responsibilities to the company and must not prioritize personal interests over the company's interests.
- We must not use the company's property for purposes other than that of the company.

5) Sizokwenza izinto ngobuqotho, ngeqiniso nangokusobala, sivikele futhi sithuthukise ukuthembeka kulabo esibambisene nabo.

Ngengomsebenzi omuhle wase “Tsusho group”, siyazibophezela eqinisweni,ubuqotho kanye nokuthembeka okumsulwa ngaphezu kwemithetho ebekiwe.

Ngakhoke,

- Sizosebenza ngeqiniso ngasosonke isikhathi..
- Sizohlonipha bese sivikele lonke ulwazi .
- Kumele singazihlanganisi nabantu abanobugebengu.
- Kufanele siveze konke kubesobala, singabeki izinto zentu ngaphambi kwenkampani
- Singasebenzisi amathuluzi enkampani ngaphandle kokwenza umsebenzi wenkampani kuphela.



6) We will contribute to the sustainable development of society.

We believe that the key to our continued success in the future is to work closely with people, the communities and always considering the earth.

Therefore,

- We should work together with local business, community and governmental authorities to make sure we are meeting the needs of these stakeholders in order to build a strong foundation for future success.
- We will always promote social contribution activities around the world, particularly in education, social welfare and the environment.

6) Sizofaka uxhaso emphakathini oluzosekela intuthuko.

Siyakholelwa ukuthi ukhiye wokuphumelela njalo kanye nesikhathi esizayo ukuthi sisebenze eduzane nabantu kanye nomphathi njalo siphinde sivikele nomhlaba wethu.

Ingakhoke,

- Kumele sisebenze namabhizinisi asendaweni yethu, umphakathi wethu kanye namalunga ka –hulumeni ukuze siqinisekise ukuthi izidingo zabantu esisebenzisana nabo ziyafezeka. Lokhu kuzowakha ifawundeshi yokuphumelela ngesikhathi esizayo.
- Sizohlala sikhuthaza imisebenzi enesandla esihle emphakathini ikakhulukazi imfundo, ezenhlala-kahle, kanye nemvelo.



7) We will promote and pursue environmentally friendly corporate activities.

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

Therefore,

- We must strictly comply with environmental laws.
- We must reduce waste, re-use products and recycle.
- We will always consider the impact on our environment when conducting our business.

7) Sizokhuthaza izenzo ezinhle zokulondoloza ezemvelo.

Umsebenzi ovumelana nemvelo umsuka wayo ukufilosofi yethu.

Ingakhoke,

- Kumele sihambisane nemithetho yezemvelo.
- Kumele sinciphise udoti bese sisebenzise kabusha imikhiqizo.
- Sizohlala sicabanga umthelela esinawo kwimvelo yethu umasiqhuba ibhizinisi lethu.



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

To keep growing as a company and to contribute to the changing society, it is important for us to create new ideas and continuously improve our corporate activities.

Therefore,

- We must share our different ideas and expertise so that we can continue to improve our business
- Through Kaizen, we must always look for ways to improve on our safety systems and processes.

8) Sizothuthukisa ngokuba nemibono emisha njalo-njalo “Kaizen”.

Ukuze sikwazi ukuqhubeka nokukhula njengenkampani kumele sakhe amacebo amasha ukuze sikwazi ukufaka isandla emphakathini kanye nokushintshashintsha kwawo.

Ingakhoke,

- Kumele sabelane amacebo ethu kanye nobuchwepheshe ukuze sikwazi ukuqhubeka sithuthukise ibhizinisi lethu.
- Ngokusebenzisa u-Kaizen, kumele sifune izindlela zokukwenzakangcono ikakhulukazi izindlela zokuphepha kanye nezindlela zokukhiqiza.



9) We will respect human rights.

Respecting people is rooted deeply in our core philosophy. We have Zero tolerance towards any human rights abuses.

Especially:

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

9) Sizohlonipha amalungelo abantu.

Inhlonipho isuka kwifilosofi yethu ingakho singakubekezeleli ukuhlukumezwa kwamalungelo abantu.

Ikakhulukazi:

- Kumele singazihlanganisi namabhizinisi angahambiselani namalungelo Kanye nesithunzi sabantu..
- Kumele singabandlululi abantu ngokwebala, ngobulili noma ngokwemvelaphi yabo.
- Kumele singahlangani nokusebenzisa izingane okungekho emthethweni, ukudayiswa kwabantu noma ukusebenzisa abantu ngaphandle kwemvumo yabo.
- Kumele singakubekezeleli noma yikuphi ukuhlukumezwa emsebenzini.
- Kumele singahlangani nabantu abahlukumeza amalungelo abantu.



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

We believe that diversity and inclusion are the key to innovation and growth of our company. Our diversity enables us to use different opinions in order to respond to the changing dynamics of the business environment and customer needs worldwide.

Therefore,

- We will promote a diverse workplace where people from different races, national origins, genders and ages actively work together.
- We will promote equal opportunity to all members.
- We will promote open communication throughout and between all levels of our members and organizations.

10) Sizokwamukela ukwahluka kwenzinhlanga zabantu ngaphakathi enkampanini nasemphakathini esiphila kuwo.

Siyakholelwa ukuthi ukuhlungana kwezinhlanga nokubandakanyeka kwawo wonke umuntu kuwukhiye wokuthuthuka enkampanini yethu. Ukuhlukahlukana kwezinhlanga kusenza sikwazi ukuthi sisebenzise imibono ehlukehlukene ukuze sikwazi ukubhekana nezimo ezihlukahlukene endaweni yebhizinisi nezidingo zamakhasimende.

Ingakhoke,

- Zizokhuthaza ukuhlukahlukana kwezinhlanga endaweni yokusebenza lapho abantu bobulili, bobuzwe, iminyaka Kanye nebala, okungafani besebenza bonkana.
- Sizokhuthaza amathuba ngokulinganayo.
- Sikhuthaza ukuxhumana okuvulelekile kuwowonke amazinga amalunga ethu.



IMPORTANT NOTICE:

- All employees must report any violation of this COCE through the appropriate channels provided
- All employees are entitled to report a violation anonymously
- The company will protect your identity and no retaliation will be taken against any employee who reports such a violation

ISAZISO ESIBALULEKILE:

- Bonke abasebenzi babike ukwephulwa kwemithetho ka- COCE ezindaweni nakubantu abafanele.
- Wonke umsebenzi unelungelo lokungazibiki igama lakhe.
- Inkampani izovikela ukuthi umuntu akavezwa futhi ngeke kube khona ukuziphindiselela.



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