



# CODE of CONDUCT

—  TOYOTA MOTOR SALES  —

TOYOTA MOTOR SALES  
**CODE of CONDUCT**

© 2005-2006 Toyota Motor Sales, U.S.A., Inc. All rights reserved.

## TO ALL ASSOCIATES

As Toyota continues to grow, it is essential that we also continue to honor the high standards of business conduct that have earned us the trust of our customers. Central to Toyota's vision of becoming the most successful and respected car company in America is for all associates to adhere to high ethical business standards. This applies to the conduct of Company affairs as well as to relationships with customers, dealers, business partners and fellow associates.

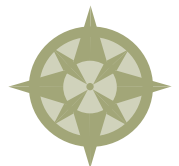
Over two years ago, Toyota Motor Sales launched the Ethics and Conflict of Interest Policy and introduced the Ethics Office to support associates in meeting these goals. The program continues to be very successful and associate participation remains high. The next step in our commitment to uphold a high standard of ethical behavior is to publish a Code of Conduct.

This Code of Conduct, based on Toyota's values of respect and integrity, provides an overview of the expectations Toyota has for all associates. It is a resource for guiding your actions and answering your questions. Additional details can be found in Company policies.

The final component of our program is the launch of the Toyota Concern Line. The Concern Line will enable any associate to report—anon-ymously if they wish—concerns, suspected violations of the Code of Conduct or potentially illegal or unethical matters in the workplace.

Associates who are aware of any such matter are encouraged to report it to any member of management, the Ethics Officer or a Human Resource Consultant. Associates may also call the Toyota Concern Line at 1-800-963-6401 or visit [www.toyota.ethicspoint.com](http://www.toyota.ethicspoint.com).

We want all associates to be proud of their work and for being a member of our team. All associates should end every day knowing that they have done their part to earn and maintain Toyota's reputation for high ethical standards.



# TABLE OF CONTENTS

➤ Introduction .....	5
➤ Work Environment and Respect for People .....	6
— Core Values	
— Diversity & Inclusion	
— Interactions with Others	
➤ Procurement and Business Partner Relationships .....	6
➤ Protecting Information and Assets of Other Companies .....	6
➤ Information Security and Company Assets .....	7
➤ Confidential and Protected Information .....	7
➤ Insider Trading and Stock Tipping .....	8
➤ Corporate Social Responsibility .....	9
— Supporting the Community	
— Protecting the Environment	
— Promoting a Safe and Healthy Work Environment	
➤ Fair Competition/Antitrust .....	10
➤ Business Records and Communications .....	10
➤ Software and Copyright Compliance .....	11
➤ Political, Public and Governmental Activities .....	11
— Personal Political Activities	
— Corporate Political and Governmental Activities	
— Communicating to the Public	
— Regulatory Investigations and Inquiries	
➤ International Business .....	13
— Transacting International Business	
— Foreign Corrupt Practices Act	
— Money Laundering	
➤ What to Do If You Have a Legal or Ethical Concern .....	14
— Whom to Contact .....	15
— Penalties for Violations .....	15
➤ Resource Guide .....	16



**T**he Toyota name is synonymous with quality, integrity and high standards of conduct. It is our policy to deal ethically with our associates, customers, business partners and the community. High business standards are essential to maintain our competitive position and ensure that Toyota remains a valued member of the communities where we do business.

At Toyota, ethical behavior means more than just satisfying legal requirements; it means acting with honesty, fairness, integrity and social responsibility.

Our goal is for all associates to conduct their business activities with high integrity and ethical standards. This means that we all must understand and follow this Code of Conduct in both letter and spirit.

This Code of Conduct is a summary of important topics addressed in our Company policies and serves as a framework for the ethical and legal responsibilities of all associates. It is not intended to replace existing policies or to be a comprehensive rulebook, but rather should be used in conjunction with other Company policies.

Violations of this Code are not permitted. We each have a responsibility to ask questions when we are in doubt and to report problems and possible violations of laws, Toyota policy or this Code.

This Code does not change the at-will employment relationship between TMS and its associates. TMS reserves the right to modify, amend or terminate this Code at any time.





## WORK ENVIRONMENT AND RESPECT FOR PEOPLE

### CORE VALUES

The “Toyota Way” encapsulates our business philosophy and forms the basis for our core values. It serves as a driving force to promote continuous improvement and, most importantly, respect for people.

The Toyota Way directs us to:

- Act with honesty and integrity
- Communicate openly
- Leverage diversity and inclusion to achieve business goals
- Continuously learn

Toyota is committed to a workplace where associates are treated with dignity and respect.

All associates are expected to treat each other with courtesy, consideration and respect at all times.

### DIVERSITY AND INCLUSION

Toyota supports diversity and inclusion efforts in a broad range of areas. Central to Toyota’s diversity efforts is to strive to build inclusion at all levels of the Company. Toyota desires a work environment that attracts, retains and fully engages the talent of our associates.

### INTERACTIONS WITH OTHERS

Harassment and illegal discrimination are inconsistent with our objective of being the most respected car company in America and is prohibited. Associates, business partners, vendors, authorized dealers, retail customers and government officials are to be treated with respect at or away from the workplace.



## PROCUREMENT AND BUSINESS PARTNER RELATIONSHIPS

There are many challenges in selecting potential business partners and negotiating contracts. For this reason, purchasing decisions should always be based on sound business criteria, such as suitability, diversity, quality, delivery and cost.

When selecting a business partner, a violation of the conflict of interest occurs if personal relationships or the possibility of personal gain influences or even appears to influence business decisions. You should decline lavish or frequent gifts, favors or entertainment, and should inform business partners of our policy.

All suppliers will be dealt with fairly, honestly and openly.

When necessary, associates should consult with the Legal Services Group and/or Procurement with business partner concerns.

Associates are responsible for:

- Learning to recognize and avoid potential conflicts of interest
- Complying with Ethics guidelines on giving and accepting gifts or social invitations
- Not accepting cash or cash equivalents from any person or firm with whom we do or potentially will do business
- Having proper authorization when they make purchases or enter into a contract on behalf of the Company



## PROTECTING INFORMATION AND ASSETS OF OTHER COMPANIES

It is very important to respect the confidential information of business partners. Associates may not disclose confidential information from suppliers, such as pricing information, without written permission from the supplier.

Associates must never use illegal or unethical methods to gather information about other companies.



# INFORMATION SECURITY AND COMPANY ASSETS

## INFORMATION SECURITY

The protection of Company information and assets is a key responsibility for all associates. Information includes any data relating to Toyota's business collected and/or held in electronic, paper or other format and under the direct or indirect control of the Company (e.g., financial, warranty and customer data). Information assets include any device or facility that stores, manipulates, processes, collects, transmits or otherwise handles information (e.g., desktop and laptop computers). All associates must comply with the Company's information security-related policies and practices. Associates are expected to comply with signed non-disclosure agreements.

## COMPANY ASSETS

Toyota assets, including facilities, equipment, vehicles and information should be used only for Company business or purposes authorized by management. Associates are expected to protect Toyota assets from theft, carelessness, waste and misuse.



# CONFIDENTIAL AND PROTECTED INFORMATION

Toyota has an obligation to protect personal, confidential and proprietary information of its associates, customers, dealers, suppliers, contractors, business partners, affiliated companies and other third parties from unauthorized use or disclosure.

Information about Company operations, performance, technology or personnel may be classified as confidential or protected under the Information Classification Practice. Toyota associates should take steps to determine the classification of information and then to handle it properly. Associates should also ensure that confidential and protected information is not exposed to unauthorized parties.

Some examples of confidential information are:

- Technical designs and processes
- Manufacturing designs and processes
- Financial records and data
- Marketing and business plans
- Sensitive personal background information data such as social security numbers or driver's license numbers
- Personal health information



# INSIDER TRADING AND STOCK TIPPING

Inside information is information that has not been disseminated to the investing public. Material information is any information that a reasonable investor would consider important in determining whether to buy, sell or hold securities. Associates are prohibited from buying or selling company stock on the basis of material inside information.

Associates aware of material inside information relating to Toyota, or to companies with whom Toyota does business, as well as any other corporation or business about which associates of the Company may obtain material inside information, may not, directly or through friends, family or any third party:

- Buy or sell stock until that information is made public by the company
- Pass inside information on to others, including other Toyota associates

Associates should not:

- Disclose insider information regarding Toyota or any other company in an illegal manner
- Buy or sell securities or make other financial investments in Toyota or any other company while they have inside information
- Recommend or suggest that any other person, including friends and family members, purchase, sell or retain securities of Toyota or any other company based on inside information





# CORPORATE SOCIAL RESPONSIBILITY

## SUPPORTING THE COMMUNITY

Each associate can play a role in demonstrating our commitment to being a good neighbor and corporate citizen through both monetary contributions and personal involvement. In doing so, we help create a stronger community.

When considering Toyota's charitable contributions, the Company will not only take into consideration the critical needs of the community, but also prioritize and evaluate the suitability for Toyota's support. Through this careful assessment, we make certain that our support will:

- Achieve the maximum effect in providing improvement to the quality of life
- Increase goodwill for the Company

As a contributor, Toyota will not seek nor expect any type of preferential treatment from the recipients of the support.

## PROTECTING THE ENVIRONMENT

Toyota has the highest regard for the quality of the environment including the water, air and general land usage of the communities where we do business. All associates are responsible for observing prudent environmental practices.

Associates are expected to:

- Be compliant with all environmental practices and establish Environmental Management Systems (EMS) at all operational facilities
- Implement leading environmental practices and apply kaizen (continuous improvement) on an ongoing basis to ensure sustainable development in all aspects of our business
- Participate in community environmental awareness activities
- Foster environmental awareness and practices with our business partners
- Work to ensure Toyota's environmental objectives and targets are achieved on an annual basis

## PROMOTING A SAFE AND HEALTHY WORK ENVIRONMENT

Safety is a corporate priority. Toyota is committed to maintaining a safe and healthy work environment. Every associate has an obligation to provide and maintain safe work conditions.

Every Toyota facility has a location-specific Injury and Illness Prevention Plan or an approved equivalent.

Associates are responsible for:

- Complying with all health and safety laws and regulations, including participation in required training programs
- Upholding safe work practices in all daily activities
- Reporting any unsafe conditions to management



## FAIR COMPETITION/ANTITRUST

Toyota holds in high regard free trade and fair-market competition and the laws that protect these principles.

Antitrust laws prohibit conspiring with competitors to limit production, allocate markets, fix prices or otherwise limit fair-market competition.

Examples of antitrust violations include:

- Agreeing with competitors to fix prices or other terms of sale
- Agreeing with others to boycott or otherwise refuse to deal with certain suppliers or customers
- Facilitating agreement on price or other terms of sale among dealers
- Agreeing with distributors on resale pricing
- Pricing to drive a competitor out of business
- Disparaging, misrepresenting or harassing a competitor

Violations of antitrust laws and regulations can have serious consequences for the Company and for individuals, subjecting both parties to civil and criminal penalties. This area of the law is extremely complex and can vary from state to state and country to country.

If an associate is ever in doubt about whether a transaction may violate antitrust laws, he or she should contact the Legal Services Group before proceeding.



## BUSINESS RECORDS AND COMMUNICATIONS

No associate should ever make false or misleading entries, statements or alterations in any Company record, regardless of whether it relates to financial data or business data.

Any tampering, "window dressing" of accounts, false reports or acts of tax evasion are potential violations of the law and our policies.

No associate should be pressured to make false or misleading entries, statements or alterations in any Company record. Associates are expected to cooperate fully with internal and external auditors.

Internal controls and record retention policies must always be followed. Since business records and communications may become public, it is important to be truthful and to avoid exaggeration, inappropriate language and derogatory remarks or characterizations. This applies to communications of all kinds, including e-mail, voice mail, daily planner notes and other informal notes or memos.

Associates are prohibited from:

- Creating, or participating in the creation of, any undisclosed or unrecorded funds or assets
- Creating, or participating in the creation of, any records that are false or intended to mislead
- Destroying any records relating to pending or current litigation. Any associate receiving an external request for documents to be used in litigation should immediately contact the Legal Services Group for guidance and assistance



## SOFTWARE AND COPYRIGHT COMPLIANCE

Toyota abides by copyright laws and observes the terms and conditions of any license agreements to which the Company has agreed. In most cases, this means that the software used by associates is copyrighted, and the Company does not have the right to make copies of that software except for backup purposes. Copyright protection also extends to other media, including published materials, photos, sounds and music.

Associates are prohibited from:

- Installing or using unlicensed software on Company computer equipment
- Making or using copies of non-licensed material, including software, documentation, graphics, photographs, clip art, animation, movie/video clips, sound and music in conflict with applicable laws



## POLITICAL, PUBLIC AND GOVERNMENTAL ACTIVITIES

### PERSONAL POLITICAL ACTIVITIES

Toyota associates are encouraged to exercise their right to participate in political activities. Any decision to become involved is entirely personal and voluntary. An associate's personal political activities must be performed on the associate's own time and with the associate's own resources.

While associates may participate in political activities, they may not use their position or title with Toyota in support of these activities or otherwise represent themselves as an agent of Toyota. Associates are prohibited from using Toyota assets to support personal political activities.

### CORPORATE POLITICAL AND GOVERNMENTAL ACTIVITIES

Associates whose job duties include lobbying and interacting with government officials on behalf of Toyota must become familiar with and comply with all laws regulating such activities, including federal and state campaign laws. U.S. federal law prohibits corporations from donating anything of value, including mailing lists, supplies and money, to a candidate for a federal office. The laws vary at the state level, with some states allowing for corporate political contributions.

Associates are prohibited from:

- Offering anything of value to a government official, candidate for public office or political party on behalf of Toyota without prior approval from the Legal Services Group
- Using their position or title with Toyota or any other resource of the Company to support a candidate or political party without prior approval from the Legal Services Group

## **POLITICAL, PUBLIC AND GOVERNMENTAL ACTIVITIES**

CONTD.

### **COMMUNICATING TO THE PUBLIC**

The Corporate Communications Division oversees communication with the public and the news media. Toyota makes every effort to present public communications, including press releases, advertising, marketing, sales data and promotional literature, in a true and accurate manner and free from false claims. Only authorized associates should communicate to the media about the Company.

Associates involved in the review and approval of advertising, marketing, and/or promotional literature should be thoroughly familiar with Toyota's Advertising Guidelines. Questions on any planned advertising, marketing or promotional literature should be directed to the Legal Services Group.

### **REGULATORY INVESTIGATIONS AND INQUIRIES**

Government agencies sometimes request information from Toyota. Associates must always be truthful and appropriately responsive to governmental requests for information. A condition of such cooperation, however, is that the Company be adequately represented in such investigations by its own legal counsel. Associates who participate in such investigations must be direct and truthful in discussions with regulatory agency representatives and government officials.

Associates should never alter, conceal or destroy documents or records that have been requested by a government agency or that are likely to be requested in connection with an investigation.

Associates may not make false or misleading statements to any government employee, official or agency conducting an inspection, inquiry or investigation regarding Toyota, nor should associates destroy or alter any documents that are relevant to the investigation or inquiry. Any associate who receives an inquiry, subpoena or other legal document regarding Toyota from any government employee, official or agency should immediately contact the Legal Services Group for guidance and assistance.



# INTERNATIONAL BUSINESS

## TRANSACTIONING INTERNATIONAL BUSINESS

Associates whose job functions involve international trade must be knowledgeable of and compliant with the applicable restrictions and Company policies on embargoes, boycotts, import/export, customs and other trade laws. Associates with questions regarding these matters should consult with the Legal Services Group or the Tax and Customs Department.

Associates should make sure that all international transactions are handled or reviewed in advance by authorized Company associates with extensive knowledge and experience in export and import control law and regulation. In addition, associates are responsible for verifying that international transactions are in compliance with all applicable laws and regulations that restrict or prohibit transactions with certain countries or persons. When in doubt, associates should contact the Legal Services Group or the Tax and Customs Department.

## FOREIGN CORRUPT PRACTICES ACT

The U.S. Foreign Corrupt Practices Act and similar anti-corruption laws and regulations of other countries prohibit making any direct or indirect payment or promises of payment to a foreign official for the purpose of obtaining or retaining business.

Associates are responsible for:

- Using extreme caution in all transactions with any foreign agents, such as consultants, foreign government employees, officials or agencies
- Following Company policy prohibiting the offer of any payments or anything of value, directly or indirectly (including discounts, trips or offers of employment), for the purpose of inducing the individual to use his/her position to obtain or retain Toyota business

## MONEY LAUNDERING

Toyota associates must be alert to individuals and businesses that seek to use the Company's legitimate business operations to launder the proceeds of criminal activity.

Associates are responsible for:

- Complying with all laws and Company policies regarding record keeping and tax reporting requirements and the reporting of cash transactions
- Carefully scrutinizing requests by customers, dealers, suppliers, contractors, business partners or affiliated companies to transact business using large sums of cash
- Being wary of requests to transact business in a manner that differs from normally accepted business practices, such as requests for wire transfers to unusual locations or unknown third parties
- Avoiding the use of any personal accounts for any Company-related commercial or financial transaction without first obtaining appropriate Company authorization



## WHAT TO DO IF YOU HAVE A LEGAL OR ETHICAL CONCERN

Toyota's integrity is compromised and its reputation is tarnished whenever the Company's ethical standards are breached. Therefore, it is the obligation of each associate to promptly report what he or she, in good faith, believes to be a violation of Toyota's Code of Conduct, the Ethics and Conflict of Interest Policy or any other Company policy.

- Prompt reporting of any alleged misconduct is critical to protecting the Company's interests. An associate who fails to report suspected legal or ethical violations on a timely basis might cause additional harm to Toyota's interests. Supervisors and managers have a particular duty to report misconduct promptly.
- Toyota will investigate reports of suspected violations. The Company will work hard to keep the investigation confidential to the extent possible, but complete confidentiality cannot be guaranteed as information may be disclosed on a need-to-know basis.
- If you submit a claim or allegation, do not discuss the allegation with anyone until the investigation has been completed. This prohibition includes fellow associates, friends, and family members.



## WHOM TO CONTACT

The Ethics Officer has responsibility for ensuring the consistent application and communication of the Code of Conduct and Ethics and Conflict of Interest Policy and for promoting compliance throughout Toyota. If associates have any questions or concerns about the TMS Code of Conduct or a particular policy or practice, they may submit questions or concerns directly to the Ethics Officer. All associates are responsible for ensuring that questions and concerns are submitted in good faith.

All suspected violations must be reported to the Ethics Officer directly or through the Toyota Concern Line.

If an associate believes an ethical violation has occurred, he or she has the following options:

1. Report the violation to an immediate supervisor
2. Report the violation to the next-level manager or an uninvolved manager or officer if the immediate supervisor may be involved
3. Report the violation to a Human Resources Consultant
4. Call the Toyota Concern Line at 1-800-963-6401

Suspected violations may also be reported to the Ethics Officer or to the Legal Services Group.

Toyota reserves the right to determine the nature and extent of the investigation based on each set of facts and circumstances.

Communications will be kept as confidential as possible and concerns will be diligently addressed. Associates will be informed of the outcome of an investigation as appropriate. Toyota does not tolerate any retaliation against associates for reporting concerns or violations of Company policy. Associates who believe they have been retaliated against should promptly contact a Human Resources Consultant.

It is against Company policy for anyone to discharge, demote, suspend, threaten, harass or in any other manner discriminate against an associate in the terms and conditions of employment because the associate provides information, causes information to be provided or otherwise assists in an investigation regarding any conduct alleged to be in violation of this or any other Company policy or suspected violation of law.

## PENALTIES FOR VIOLATIONS

The Company's primary goal is to achieve regulatory and policy compliance through training, communication and discipline when warranted. Toyota takes misconduct seriously and will not tolerate behavior that compromises the Company's ethical standards or violates Company policy or the law.

Toyota's commitment remains firm, regardless of whether misconduct was intended to be in the interest of the Company, in the interest of the customer or is carried out by or at the behest of an executive. Associates who engage in unethical or illegal conduct or who violate Company policy will be subject to disciplinary action up to and including termination of employment.

Associates should:

- Always conduct activities on behalf of Toyota in a manner that complies with the Code of Conduct, the Ethics and Conflict of Interest Policy, Company policy and the law
- Never encourage others to engage in unethical or illegal conduct or to violate Company policy
- Never retaliate against or condone retaliation against anyone who reports an allegation of unethical or illegal conduct or who provides information or assists in the investigation of such conduct

## AT-WILL EMPLOYMENT STATUS

Nothing in this policy alters the at-will employment status of any associate, nor should this policy be interpreted or deemed to alter the at-will employment status of any associate, which may be changed only by a writing that explicitly alters the individual associate's at-will status and is President, or Senior Vice President of Toyota. □□



# RESOURCE GUIDE

## WORK ENVIRONMENT AND RESPECT FOR PEOPLE

### TRAINING

eLAW online training courses are available through the University of Toyota Web site (<http://www.uotonline.com>). Course topics include:

- Equal Employment Opportunity
- Preventing Workplace Harassment and Discrimination
- Americans with Disabilities Act

### POLICIES

- Equal Employment Opportunity Policy (E-1)
- Non-Harassment Policy (E-15)
- Drug and Alcohol Policy (E-16)

### FOR MORE INFORMATION

- TMS policies on compensation, time off, benefits, employment and work-life are available on the HR Web site on Toyota Vision
- Diversity@Toyota on Toyota Vision

### NOTIFICATION

Report any violations to your manager, Human Resources, Legal Services or the Ethics Officer at [ethics\\_officer@toyota.com](mailto:ethics_officer@toyota.com).

## PROCUREMENT AND BUSINESS PARTNER RELATIONSHIPS

### TRAINING

eLAW online training courses are available through the University of Toyota Web site (<http://www.uotonline.com>). Course topics include:

- Toyota Ethics & Conflicts of Interest Policy

### POLICIES

- Corporate Purchasing Policies (P-1)
- Corporate Expenditures Policy (P-2)
- Corporate Purchasing Card Policy (P-3)
- Ethics and Conflict of Interest Policy (E-10)

### NOTIFICATION

Report any violations to your manager, Human Resources, Legal Services or the Ethics Officer at [ethics\\_officer@toyota.com](mailto:ethics_officer@toyota.com).

## PROTECTING INFORMATION AND ASSETS OF OTHER COMPANIES

### NOTIFICATION

Report any violations to the Legal Services Group or to the Ethics Officer at [ethics\\_officer@toyota.com](mailto:ethics_officer@toyota.com).

## INFORMATION SECURITY AND COMPANY ASSETS

### TRAINING

eLAW online training courses are available through the University of Toyota Web site (<http://www.uotonline.com>). Course topics include:

- Information Security Best Practices

### POLICIES

- TMS Information Security and Privacy Management Policy and related Practices
- TMS IS Disaster Recovery Policy
- Electronic Communications Policy (E-19)

### FOR MORE INFORMATION

- Enterprise Information Security & Privacy (EISP), a department within the Information Systems Division, establishes the guiding rules by which TMS will collect, use, share, and protect information as well as the governance structure by which risk

issues will be managed, EISP can be contacted at [eisp\\_admin@toyota.com](mailto:eisp_admin@toyota.com)

- For fixed asset policies and tagging procedures, see the General Accounting and Fixed Asset area within the Finance and Accounting web site on Toyota Vision, and see the Vehicle Services web site for policies and practices pertaining to Company vehicles assets

### NOTIFICATION

- Report any violations to the Chief Information Security Officer at [eisp\\_admin@toyota.com](mailto:eisp_admin@toyota.com) or by calling 310-468-7685
- Report the unauthorized disclosure or compromise of Personally Identifiable Information by calling the Incident Reporting Telephone Number 1-866-610-8005

## CONFIDENTIAL AND PROTECTED INFORMATION

### TRAINING

Tutorials are available online at <http://tv/eisp/>

### POLICIES

The Enterprise Information Security & Privacy Management Policy

### FOR MORE INFORMATION

Refer to the EISP web site at <http://tv/eisp/>

### NOTIFICATION

- Report any violations to the Chief Information Security Officer at [eisp\\_admin@toyota.com](mailto:eisp_admin@toyota.com) or by calling 1-310-468-7685
- Report the unauthorized disclosure or compromise of Personally Identifiable Information by calling the Incident Reporting Telephone Number at 1-866-610-8005
- Report any violations to the Ethics Officer at [ethics\\_officer@toyota.com](mailto:ethics_officer@toyota.com)

## INSIDER TRADING AND STOCK TIPPING

### TRAINING

eLAW online training courses are available through the University of Toyota Web site (<http://www.uotonline.com>). Course topics include:

- Insider Trading

### NOTIFICATION

Report any violations to your manager, Human Resources, Legal Services or the Ethics Officer at [ethics\\_officer@toyota.com](mailto:ethics_officer@toyota.com).

## CORPORATE SOCIAL RESPONSIBILITY

### TRAINING

Applicable environmental training courses are available through the Environmental Coordination Office. Course topics include:

- Hazardous Materials Transportation
- Hazardous Waste Transportation
- Incidental Spill Response

### FOR MORE INFORMATION

- Contact Legal Services Environmental Coordination Office (ECO)
- Learn more about the Toyota's environmental programs at <http://www.toyota.com/about/environment/index.html> and <http://tv/hazmat/default.htm>

- Get details on Toyota's environmental programs through the Toyota North American Environmental Report at <http://www.toyota.com/about/environment/news/enviroreport.html>
- Contact the Corporate Health and Safety Department
- Learn more about the Toyota's Injury and Illness Prevention Planning programs at <http://tv/safety/H&S/safetycommitteeframes.htm>

### NOTIFICATION

Report any suspected environmental violations to the ECO@ Environmental Coordination Office/Al/Toyota or Contact the Corporate Health and Safety Department.

## FAIR COMPETITION/ANTITRUST

### TRAINING

eLAW online training courses are available through the University of Toyota Web site (<http://www.uotonline.com>). Course topics include:

- Antitrust: Overview
- Antitrust: Talking With Your Competitors
- Avoiding Illegal Competition

### FOR MORE INFORMATION

Contact the Legal Services Group

### NOTIFICATION

Report any communication in which a competitor, customer or supplier makes any reference to improper agreements or understandings regarding any aspect of competition to your manager or the Legal Services Group.

### POLICIES

TMS Antitrust Laws Compliance Policy

## BUSINESS RECORDS AND COMMUNICATIONS

### TRAINING

eLAW online training courses are available through the University of Toyota Web site (<http://www.uotonline.com>). Course topics include:

- Careful Communication

### NOTIFICATION

Report any violations to the Ethics Officer at [ethics\\_officer@toyota.com](mailto:ethics_officer@toyota.com).

### FOR MORE INFORMATION

- Refer to the Finance and Accounting web site on Toyota Vision

## SOFTWARE AND COPYRIGHT COMPLIANCE

### POLICIES

Software/Copyright Policy (E-20)

### NOTIFICATION

Report any violations to the Ethics Officer at [ethics\\_officer@toyota.com](mailto:ethics_officer@toyota.com).

## POLITICAL, PUBLIC AND GOVERNMENTAL ACTIVITIES

### TRAINING

eLAW online training courses are available through the University of Toyota Web site (<http://www.uotonline.com>). Course topics include:

- Advertising: The Basics

### NOTIFICATION

Report any violations to TMS Corporate Communications Division.

### FOR MORE INFORMATION

Contact the Legal Services Group.

### POLICIES

- Electronic Communications Policy (E-19)
- Voting Time-Off Policy (B-11)

## INTERNATIONAL BUSINESS

### FOR MORE INFORMATION

Contact the Legal Services Group

### NOTIFICATION

- Promptly report any boycott-related requests to your management or the Legal Services Group
- Report any violations to the Legal Services Group

## WHAT TO DO IF YOU HAVE A LEGAL OR ETHICAL CONCERN

### TRAINING

eLAW on-line training courses are available through the University of Toyota Web site (<http://www.uotonline.com>). Course topics include:

- Equal Employment Opportunity
- Preventing Workplace Harassment and Discrimination
- Americans with Disabilities Act

- Non-Harassment Policy (E-15)
- Drug and Alcohol Policy (E-16)

### FOR MORE INFORMATION

- TMS policies on compensation, time-off, benefits, employment and work-life are available on the HR Web site on Toyota Vision
- [Diversity@Toyota](mailto:Diversity@Toyota) on Toyota Vision

### POLICIES

- Equal Employment Opportunity Policy (E-1)
- Ethics and Conflict of Interest Policy (E-10)

### NOTIFICATION

Report any violations to your manager, Human Resources, Legal Services or the Ethics Officer at [ethics\\_officer@toyota.com](mailto:ethics_officer@toyota.com).

# TOYOTA

© 2006 Toyota Motor Sales, U.S.A., Inc.  
All rights reserved.



Printed on Recycled Paper.