

Confidential Ethics Helpline FAQs

Reporting – General

If I become aware of misconduct, what should I do?

When you observe some behavior that you believe does not align with the principles in our [Code of Conduct](#) applicable laws, or The Toro Company (“TTC”) policies, TTC encourages you to speak up and report it in good faith – without fear of retaliation of any kind. Ideally, you should bring any concerns forward to your supervisor, management, a member of Human Resources, a member of the Legal or Compliance Departments, or a member of TTC’s executive team.

TTC recognizes, however, that there may be circumstances when you are not comfortable reporting an issue in this manner. For such circumstances, TTC encourages employees to use TTC’s Confidential Ethics Helpline. TTC has partnered with [EthicsPoint](#) to provide these additional reporting channels, with the option of remaining anonymous. We would much prefer that you report anonymously than keep the information to yourself.

May I report online or by telephone?

Yes. With EthicsPoint, you have the ability to file a confidential report via either the telephone or online using this [webform](#). Reporters using these channels may choose to remain anonymous, although that may limit TTC’s ability to conduct a thorough investigation.

What type of situations should I report?

The Ethics Helpline is designed for reporting in good-faith suspected violations of TTC’s Code of Conduct, applicable laws and regulations, TTC policies and procedures, or other similar concerns.

Why should I report what I know?

Ethics violations and corporate misconduct can have serious consequences for TTC and its employees. By speaking up if you have concerns, you contribute to promoting an ethical culture and respectful environment.

Does TTC really want me to report?

Yes. In fact, TTC needs you to report. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on TTC and its people. Also, offering positive input may help identify issues that can improve TTC’s culture and performance. TTC strictly prohibits any form of retaliation due to a report made in good faith.

After I make a report, how long will it take for TTC to address my concerns?

TTC strives to address all reports as efficiently and as thoroughly as possible. Each report is different, and the exact timeline depends on the nature of the report. For reporters in the European Union: in compliance with applicable law, within 7 days of receipt of the report, the reporter will receive acknowledgement of receipt. Within 3 months of such notice, the reporter will receive appropriate feedback on the action taken.

About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool managed by NAVEX which provides employees, business partners, and other stakeholders a way to raise concerns about Code of Conduct violations, ethical dilemmas, fraud, abuse, and other misconduct in the workplace. EthicsPoint and NAVEX are separate from TTC.

Why do we need a system like EthicsPoint?

- TTC believes that its employees are its most important asset. By creating open channels of communication, we promote a speak-up culture and a respectful and ethical work environment.
- An effective reporting system supports TTC's efforts to foster a culture of integrity and ethical decision-making.
- The EthicsPoint system provides all TTC employees, customers, suppliers, shareholders, and other stakeholders a means to inform TTC about any concerns they may have regarding misconduct within TTC.

Security & Confidentiality

Where do these reports go? Who can access them?

Reports are entered directly on the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint makes these reports available only to a small number of individuals within TTC, which includes personnel from TTC's Human Resources, Internal Audit, Legal, and Finance departments. Appropriate members of this group, based on the type of issue and location of the incident, evaluate, and investigate the report, and send the reporter confirmation of receipt within a reasonable time, or the timeframe required by law. The reporter is notified upon completion of the investigation, or within the time frame required by law, and provided with feedback about the resolution of the case.

TTC ensures the confidentiality of the reporter's identity and of the information contained in the report throughout the case handling process. Disclosure of this information is only permitted where this is a necessary and proportionate obligation in the context of investigations by authorities or legal proceedings. If disclosure of the reporter's identity is necessary, the reporter is informed prior to such disclosure, unless this would prejudice the related investigations and legal proceedings.

It is my understanding that any report I send from a company computer generates a server log that shows every website that my PC connects with. Won't this log identify me as a report originator?

EthicsPoint does not generate or maintain any internal connection logs with IP addresses, so no information linking your computer to EthicsPoint is available.

If you feel uncomfortable making a report on your work device, you have the option of using a device outside our work environment through the EthicsPoint secure website.

Can I file a report from home and remain anonymous?

It doesn't matter where you file a report from – it will remain secure and, if you choose not to provide your contact information, anonymous. An Internet portal never identifies a visitor by screen name and the EthicsPoint system strips away Internet addresses, so your anonymity is not compromised.

I am concerned that the information I provide to EthicsPoint will reveal my identity. How can you assure me that will not happen?

The Ethics Helpline process is designed to protect your anonymity. However, if you wish to remain anonymous, you need to ensure that the body of the report does not reveal your identity by accident. For example, “From my office next to Jan Smith...” or “In my 33 years with TTC...”.

Is the telephone toll-free helpline confidential and anonymous, too?

Yes. You will be asked to provide the same information that you would provide in an Internet-based report and an interviewer will type your responses into the EthicsPoint website. These reports are just as secure and confidential as reports made directly through the EthicsPoint website.

What if I want to be identified with my report?

There is a section in the report for identifying yourself, if you wish.

What are the protections for reporters?

At TTC, retaliation is strictly prohibited. Accordingly, TTC undertakes to protect the reporter who is reporting in good faith, and anyone participating in or related to the investigation, from any form of retaliation, discrimination or penalization for reasons related, directly or indirectly to the report. If you believe that you have suffered such retaliation, you should report this using any of the reporting options listed here.

Tips & Best Practices

I am not sure if what I have seen or heard is a violation of company policy, or involves unethical conduct, but it just does not look right to me. What should I do?

When in doubt, ask for help. If you have an ethical concern, TTC wants to address it. You can choose how to report, but we need you to act. EthicsPoint can help you prepare and file a report. TTC would rather you report a situation that turns out to be harmless than let possible unethical and damaging behavior go unchecked. TTC does not tolerate retaliation against anyone who reports a concern in good faith, even if such concern turns out to be unfounded.

Reports that are manifestly unfounded, opportunistic and/or made for the sole purpose of damaging the person concerned by the report or, in any event, persons covered by it, will not be taken into consideration and may give rise to penalties and/or legal action.

What if my boss or other managers are involved in a violation? Won't they get the report and start a cover-up?

Only a small number of people within TTC have access to the reports that are filed through the Ethics Helpline. The Ethics Helpline and report distribution are designed so that people who are identified in reports are not notified. The system also screens the incoming reports: if any person who has access to the reports is named in a report, they will not be able to see that report.

What if I remember something important about the incident after I file the report? Or what if the company has further questions for me concerning my report?

When you file a report at the EthicsPoint website or through the EthicsPoint telephone number, you receive a unique username and are asked to choose a password. You can return to the EthicsPoint system again either by Internet or telephone and access the original report to add more detail or answer

questions posed by a company representative and add further information that will help resolve open issues. Please return to the site in the time specified to answer any additional questions posted by a TTC investigator. This allows for additional information to be given, if necessary, so that situations are not only identified, but can also be resolved, no matter how complex.

Are these follow-ups on reports as secure as the first one?

Yes.

Can I still file a report if I don't have access to the Internet?

You can file an EthicsPoint report from any computer that can access the Internet. You can file from home. Many public locations, including the public library, have computers. If you don't have access to or are uncomfortable using a computer, you can call the EthicsPoint toll-free helpline, which is available 24 hours a day, 365 days a year.

Can I file a report with law enforcement or a government agency?

Nothing in the internal reporting processes described above is intended to prevent anyone from reporting information to applicable law enforcement agencies when there is reasonable cause to believe that the violation of law has occurred. A report to law enforcement, regulatory, or administrative agencies may be made instead of, or in addition to, a report directly to TTC through the Ethics Helpline or any other reporting method specified here.