

CODE OF CONDUCT

1. A Message from the President & Chief Executive Officer (CEO)

Dear Colleagues,

We all must take seriously our responsibility to ensure that at all times Toyota Material Handling Australia (“TMHA”) conducts business fairly, honestly, ethically and with integrity at every level of the organisation. Although it is important that we grow our business, at all times each of us has a personal responsibility to ensure we comply with all local, national and international laws and regulations and ensure we do not engage in behaviour or practices that may undermine TMHA’s reputation both in Australia and globally.

This Code of Conduct describes the behavioural business standards and ethical practices we must all follow in connection with TMHA’s activities, and it provides a guide for all of us with regard to our business conduct and behaviour in the course of our employment and where our conduct or behaviour out of hours may impact on TMHA. It also prescribes consequences for any breach of this Code of Conduct.

To ensure compliance with this Code of Conduct the role of Compliance Officer exists which is responsible for the overall co-ordination of compliance activities for TMHA and will serve as a resource for employees, monitor compliance and oversee implementation of this Code of Conduct. This role is held by Robert Watkins.

This Code of Conduct has our full support and the support of our fellow Board Members, Senior Management and Compliance Officer. Please make sure that you understand your obligations and responsibilities as required by this Code of Conduct. If you have any comments or questions, contact the Compliance Officer.

Thank you for your support.

Sincerely,

Policy Authorised By



Steve Takacs

President & CEO

Toyota Material Handling Australia

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2. Why We Have a Code of Conduct

Toyota's outstanding global reputation flows from the steadfast commitment to comply with the law and to do what is right. We depend on all employees, including managers and executives, to comply with the law and to make the right decisions. However, we recognize that TMHA operates in an increasingly complex and dynamic world where what is "right" may not always be obvious. TMHA has issued this Code of Conduct to offer you guidance and to make clear what TMHA expects of employees at all levels.

TMHA's Code of Conduct provides practical statements of some of the legal and ethical standards that we all must follow on a day-to-day basis.

This Code of Conduct is one way that TMHA provides employees with guidance on expected behaviour, and is part of a larger effort designed to prevent unlawful or improper conduct from occurring within TMHA.

We are each responsible for our own actions. No one has authority to approve illegal or improper acts, and an illegal or improper act cannot be justified for any reason.

TMHA policy prohibits any manager or employee from directing or encouraging another to violate the law or to act improperly. If you are ever faced with this situation, contact a manager, the Human Resources Department, the Compliance Officer, or call the TMHA Company Helpline.

Failure to comply with this Code of Conduct or the law can have severe consequences for TMHA and those employees involved. Any employee who fails to comply with this Code of Conduct or the law will be subject to disciplinary action, which may include termination of employment. Disciplinary action may also be imposed for:

- Retaliating against another employee because the employee reported a violation of the Code of Conduct or cooperated in an investigation;
- Making a report in bad faith or lying in an investigation; or
- Directing or encouraging another employee to violate this Code of Conduct or the law.

Each manager and supervisor has a responsibility to monitor and oversee the conduct of the employees under his or her supervision. If a member of management learns something that suggests this Code of Conduct or the law has been violated, he or she must report the matter immediately to the Compliance Officer. Disciplinary action may also be taken against a supervisor or manager if the circumstances reflect inadequate supervision or inaction on the part of the supervisor or manager.

Actions that violate this Code of Conduct also may violate State or Federal laws. For individuals, violations can result in criminal prosecution, fines and even jail. TMHA may face criminal prosecution, fines, and severe damage to its reputation as a consequence of violations of this Code of Conduct by its employees.

TMHA may amend or vary this Code of Conduct, in its absolute discretion, from time to time

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3. Asking for Guidance & Voicing Concerns

We recognise that no single document – including this Code of Conduct – can give you an answer for every situation or dilemma that you may face.

If you are ever uncertain about something you intend to do, including after you have consulted this Code of Conduct, it is important that you seek advice before acting. You also have an obligation to let your Supervisor, Management, the General Manager Human Resources, the Human Resources Department, the Compliance Officer, TMHA's legal department or the TMHA Company Helpline know if you see or learn something that suggests this Code of Conduct or the law has been breached and they may also be able to assist you if you are uncertain as may the appropriate department (for example, the Human Resources Department or the Purchasing Department). You should also consult TMHA's Skytrust Integrated Management System for the individual policies /guidelines referenced in this Code of Conduct and TMHA's other policies and procedures. Use the method that is most comfortable for you. The most important thing is that you let us know. You will not be penalised for raising a question or concern in good faith.

The TMHA Company Helpline is designed as an alternative, confidential, anonymous and independent method of reporting unethical or illegal behaviour. The Helpline is available to you between 9.00 am and 5.00 pm Monday to Friday. Your concerns will be taken seriously and acted upon if appropriate.

The TMHA Company Helpline Contact details are:

Phone	1300 30 45 50
Fax	03 9882 4480
Email	TMHA@stopline.com.au
Postal Address	The TMHA Company Helpline, C/O THE Stopline PO Box 175, Hawthorn, VIC, 3122

4. Investigation of Improper Conduct

TMHA takes seriously reports of possible violations of this Code of Conduct; TMHA's other policies, or the law. With the advice and support of legal counsel, the Compliance Officer will oversee any necessary investigations of potential violations or misconduct.

You are expected to cooperate in any investigation. After an investigation, TMHA will, if necessary, take corrective action which may include putting in place policies and procedures to prevent a recurrence of identified problems.

5. Introduction

TMHA's core purpose and values, which should be familiar to all employees, state that TMHA is a place where professional excellence is encouraged and where customers come first. It is our goal to provide the highest quality service to our customers, whilst maintaining an exceptional standard of conduct amongst our employees. We expect all employees to treat each other and our customers with respect, and conduct themselves in accordance with TMHA's principles.

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This Code of Conduct sets out the appropriate standard of behaviour in several areas including (but not limited to):

- Compliance with Company Policies
- Relations with Customers, Suppliers and Internal Colleagues
- Conflict of Interest / Corporate Opportunity
- Outside Employment / Directorship
- Confidential Information
- Company Property
- Political Contributions
- Environmental Preservation and Harmony with Society
- Associated Guidelines, Policies and Forms

6. Compliance with Company Policies

TMHA will conduct its business with the utmost integrity and in accordance with TMHA guidelines and policies, including but not limited to the following:

6.1 Equal Employment Opportunity

It is our goal to provide equal employment opportunities for all employees, and to prohibit discrimination in employment on any basis protected by applicable law. It is also TMHA's intention to promote the full realisation of equal employment opportunities through a positive continuing program. Please refer to TMHA's Equal Employment Opportunities Guideline for further information.

6.2 Workplace Behaviour

At TMHA, we treat each other with courtesy, dignity and respect. This means, that employment related actions, decisions and opportunities are not based on factors such as race, colour, religion, sex, national origin, age or disability. TMHA also makes accommodations for individuals with disabilities in accordance with legislative requirements.

TMHA makes every effort to provide a safe and healthy work environment where individuals treat each other with mutual respect, free from unacceptable behaviour such as unlawful harassment, discrimination, vilification, bullying or victimisation. This involves actions which include educating employees about inappropriate behaviour, putting this Code of Conduct in place, implementing grievance procedures, ensuring compliance by all employees and disciplining employees for any breach of this Code of Conduct.

TMHA will not tolerate employees engaging in any unacceptable behaviour. We expect that all employees and customers will be treated fairly, with dignity and respect. Unacceptable behaviour covers a wide spectrum of conduct including, but not limited to:

- Unwelcome remarks, gestures or physical contact, or requests for sexual favours;
- The display or circulation of sexually explicit or derogatory pictures or other materials;
- Sexist or racist innuendo or jokes;
- Verbal abuse, threats, taunting, leering or staring;
- Questions or conversations about sexual activities;
- Bullying;
- Discrimination;
- Vilification; and
- Victimisation

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All employees must refrain from this type of conduct, or any other form of unacceptable behaviour. Please refer to TMHA's Unlawful Harassment section of the Equal Opportunity Guideline for more information about your responsibility to understand and follow these guidelines.

6.2.1 Discrimination

Unlawful discrimination means treating a person less favourably because of a personal attribute they have, which is covered by any State, Territory or Federal Equal Opportunity Legislation.

"Direct" discrimination occurs where a person is treated less favourably on the basis of one of these legislated grounds.

"Indirect" discrimination occurs when an employment requirement or condition which may be neutral on its face, is imposed and operates unfairly and is unreasonable in relation to a particular group.

Unlawful grounds of discrimination vary in each State and Territory but can include; race, colour, sex, religion, political opinion, national or social origin, age, medical record, criminal record, marital status, mental or physical disability, sexual preference, trade union activity, family responsibilities/role as carer, pregnancy or potential pregnancy, and physical features.

TMHA does not condone nor does it tolerate any unlawful discrimination by any employee. Any employee who commits unlawful discrimination will be subject to disciplinary action, which may include termination. Please refer to the Unlawful Discrimination section of TMHA's Equal Opportunity Guideline for more information.

6.2.2 Workplace Harassment & Bullying

In general, harassment is any form of behaviour that is unwelcome and that a reasonable person would have anticipated would:

- Humiliate someone;
- Offend someone; or
- Intimidate someone

Workplace harassment usually consists of a pattern of unwelcome behaviour. However it can consist of just one act where this is of a serious nature. Also there is no requirement that the harasser intend to offend or harm in order for it to be unlawful. All that is required is that a reasonable person would consider that the person being harassed would be offended, humiliated or intimidated by the behaviour in question.

Unlawful workplace harassment can be based on race, disability, age, pregnancy, marital status, homosexuality, and transgender or HIV/AIDS status.

The most common form of unlawful workplace harassment is sexual harassment. Sexual harassment is behaviour of a sexual nature which is unwelcome and has the effect of offending, intimidating or humiliating the person being harassed. There is no requirement that the harasser intends to offend, humiliate or intimidate another person. A person's intention is irrelevant.

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Examples of sexual harassment include, but are not limited to:

- Comments about a person's body or appearance;
- Staring at a person or parts of their body;
- Gender based insults or taunting;
- Sexist or racist jokes;
- Asking questions or divulging confidences of a sexual nature;
- Sexually suggestive behaviour;
- Physical conduct of a sexual nature;
- Making jokes, verbal abuse or derogatory comments based on a personal characteristic; and
- Pornographic, rude or sexual emails or screensavers.

6.2.3 Bullying

Bullying in a workplace context consists of a repeated, unreasonable pattern of behaviour, directed towards an individual by another person or group of people, which may be considered to be unreasonable or inappropriate workplace behaviour, or which may create a risk to health and safety. Unreasonable behaviour is such that a reasonable person, having regard to all the circumstances, could anticipate the behaviour would humiliate, intimidate, undermine or threaten. Examples of bullying a particular individual or group of individuals may include:

- Verbal or physical abuse;
- Excluding or isolating individuals;
- Psychological harassment;
- Deliberately undermining work performance, for example, by refusing to give sufficient instructions or resources, imposing unnecessary deadlines or impossible assignments;
- Belittling an individual's contribution or opinion;
- Misusing a performance management system, or a return to work process; and
- Publicly criticising an individual or group of individuals

6.2.4 Discrimination, Harassment or Bullying Outside TMHA Premises

Employees should be aware that TMHA will not tolerate a breach of this Code of Conduct by employees outside work hours where the breach has the impact of affecting work relationships, impacting their ability or other employees' abilities to perform their work, exposing TMHA to liability, or still may have a connection to employment.

6.2.5 Victimisation

Victimisation is any conduct which disadvantages a person because he or she has complained, or intends to complain about, being harassed, sexually harassed, discriminated against, bullied or vilified. Victimisation also includes any conduct which disadvantages a person who is assisting or supporting a person who has been subjected to inappropriate behaviour.

Victimisation can take any form including;

- Intimidation;
- Exclusion from team or company activities;
- Withholding opportunities;
- Terminating the employment of an individual or refusing them a promotion; and
- Threatening a person or limiting their access to benefits.

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If an individual lodges a complaint pursuant to legislation, or even merely raises a complaint about a matter that may be unlawful under legislation, it is unlawful to victimise that individual or any person assisting with the complaint. There are legislative penalties for individuals, which include fines and imprisonment.

6.2.5 Vilification

Vilification is the use of acts or words (whether spoken or written) in public which provoke hatred, ridicule or contempt for a person or a group of people. Vilification is unlawful if it is on the grounds of race, homosexuality or HIV/AIDS. Examples of vilification include displaying or communicating offensive material, calling people names and making offensive comments.

6.2.5 Grievance Procedure

If you believe that you or another employee has been subject to any unacceptable behaviour, immediately notify your supervisor, manager, the Human Resources Department or the Compliance Officer or the company Helpline. Your concerns will be investigated promptly, taken seriously, and handled in a professional and confidential manner. You will not be penalised for reporting your concerns.

Any employee who violates this guideline will be subject to disciplinary action, which may include termination of employment. An employee, who retaliates against or intimidates another employee on the basis of their report of a violation or co-operation with an investigation, will be subject to disciplinary action.

6.3 Health, Safety & a Drug-free Workplace

TMHA is committed to providing a clean, safe, healthy, and drug and alcohol free working environment for all employees, customers and other visitors. Our goal is to prevent accidents and injuries in the workplace. You can prevent accidents and injuries if you do certain things including:

- Comply with all safe working operating procedures;
- Comply with TMHA policies;
- Attend all safety training;
- Consult the Hazard Register before using a substance or chemical;
- Use all required personal protective equipment, such as safety glasses and safety shoes;
- Keep work areas neat and clean;
- Keep aisles and doorways free from obstruction;
- Keep emergency exits clear;
- Do not bypass, remove, or alter any safety devices;
- Operate or repair equipment or machines only if you are trained to do so; and
- Observe safety tags and locks.

In the event of any work-related accidents, injuries; risks; hazards; unsafe practices; working or medical conditions or illnesses; or breaches of policies or procedures relevant to health or safety, immediately report them immediately, to your first aid contact and then to your supervisor, your regional OHS Coordinator, any manager; your work site's OHS&E representative or to the National OHS&E Manager.

You also must not use, produce, possess or be under the influence of alcohol, illegal drugs or non-medically prescribed controlled substances on the TMHA's property or while you are engaged in any job-related activity.

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Employees are expected to conduct themselves responsibly and professionally at company-sponsored events, when socialising with customers or vendors, or in any setting where an employee's conduct may reflect on TMHA.

Please refer to TMHA's WH&S, Environment; Alcohol policies and Other Drugs procedure for more information.

6.4 Proper Accounting Practices

TMHA must maintain accurate financial and accounting records. The following guidelines must be adhered to:

- Financial books and records are to be kept in accordance with generally accepted accounting principles (as appropriate) and with established finance and accounting policies;
- Financial records must accurately and fairly reflect, within THMA's established accounting systems, all required transactions and other events;
- Transactions must be recorded so that proper financial statements may be prepared in a manner that ensures accountability for THMA's assets and activities;
- No "off the books" accounts are to be kept to conceal or facilitate illegal or inappropriate payments;
- No employee shall make false or misleading entries in any books or records. All transactions must be documented carefully, and be supported by a valid business purpose;
- No employee, officer, or director shall make any false, misleading or inaccurate statement to any of our accountants or auditors; and
- In conjunction with the preparation of THMA's financial statements, certain senior employees will be expected to sign a management representation letter acknowledging this understanding.

THMA's policy is to retain written or electronic records only for as long as the records are being actively used, unless the law or THMA's business needs require longer retention.

If it becomes apparent that documents of any type will be required in connection with a lawsuit or government investigation, all relevant documents should be preserved in accordance with legislative requirements. In this event, all ordinary disposal or alteration of documents pertaining to the subjects of the litigation or investigation should be immediately suspended.

7. Relations with Customers, Suppliers & internal Colleagues

TMHA will deal with customers and suppliers fairly, honestly, with integrity and in accordance with the law.

Free market competition benefits us all as consumers. The Competition and Consumer Act (2010) Cth (the "Competition and Consumer Law") exists to protect free market competition and consumers. TMHA strongly supports free market competition and the Competition and Consumer Law.

If you have sales, purchasing or pricing responsibilities for TMHA equipment, parts or service you will be required to undertake regular Competition and Consumer Law compliance training.

The Competition and Consumer Law protects companies and individuals by ensuring fair competition, and penalising those who do not comply. Employees who breach the Competition and Consumer Law could be subject to; disciplinary action which may result in termination of employment, imposition of fines and possible imprisonment.

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If you have been asked to or are about to undertake any action that you believe may contravene the Competition and Consumer Law, please refer to the Competition and Consumer Law Manual found on Skytrust or contact TMHA's Legal department.

In addition:

- Employees should follow the TMHA Gifts & Gratuities Policy, if they are offered any gifts in connection with a purchasing decision, or if they believe a gift is intended to influence their objectivity or independence;
- An employee must not accept a personal discount that is not generally available to the public (or pursuant to an established discount program) from a customer or supplier, nor may any employee accept excessive gifts those of a value over \$100 from customers or suppliers;
- Employees should never place themselves in the position of being under an obligation or otherwise being indebted, financially or otherwise, to a client, customer, or supplier. Although employees should accept and reciprocate invitations to socialise with customers and suppliers, they must keep in mind that their relationship with such persons is strictly professional;
- Entertainment of business customers or prospects should be done in moderation, only for valid business purposes and the expenses incurred must be carefully documented;
- Excessive or lavish gifts to customers or potential customers should be avoided; and
- In addition, no employee may accept a payment or any other benefit, in return for publicly endorsing any product or service, including those of customers or suppliers.

7.1 Bribes, Kickbacks or Other Improper Payments

Any employee who comes in contact with government officials from any country must behave in a professional manner, considering the following:

- Employees must refrain from offering anything of value, including gifts, money or loans in order to achieve a business advantage for TMHA; and
- Employees must refrain from accepting any favours, gifts, or loans from a government official.

8. Conflicts of Interest / Corporate Opportunity

Every employee owes a duty of loyalty to TMHA, and must at all times act in TMHA's best interests.

We all must avoid conflicts of interest. A conflict of interest exists when a personal interest or activity interferes, or appears to interfere, with the obligations that you owe to TMHA.

A conflict of interest may unconsciously influence even the most honest person and even the appearance of a conflict may cause an employee's integrity to be questioned. As a result, employees must avoid those things that affect, or appear to affect, his or her ability to act in the best interests of TMHA.

You should carefully review your own situation for any conflicts of interest. You must disclose any actual or potential conflicts to either; your supervisor or manager or the Compliance Officer.

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If you have any questions relating to a potential conflict of interest or where your business opportunities (or those of an immediate family member) may conflict with those of TMHA disclose and discuss the facts of the situation in the first instance with your supervisor / manager and if necessary with either the General Manager HR or the Compliance Officer. Unless and until consent is obtained for you to continue with your business interests or the conflict, you should suspend all activity. You must comply with any directions given by TMHA in relation to the potential conflict or business interest. A failure to comply with this direction may result in disciplinary action including termination of employment.

9. Outside Employment / Directorships

It is in TMHA's best interests that all employees devote their energies to their work for TMHA. Although TMHA encourages employees to engage in activities in their communities, other employment whilst an employee of TMHA may interfere with an employee's ability to fulfil their professional responsibilities adequately and could jeopardise their job performance.

Prior to undertaking any other employment activity, employees should discuss the activity with either their supervisor, manager or the General Manager of HR. You must not continue in this employment or accept any offer of employment until you have been given written permission to do so.

Employees who are granted permission to work for another employer may not use TMHA's time, facilities, resources, or supplies for such work.

10. Confidential Information

Confidential corporate information belongs to TMHA. No employee may divulge or use for their own benefit any confidential information that belongs to TMHA or its customers. Customers rely on TMHA to maintain the privacy of their confidential information.

As part of your job, you may create or become aware of confidential information. Confidential information includes anything that TMHA would want to protect from disclosure and anything which may be referred to in your contract of employment as "confidential information". "Confidential information" includes, but is not limited to; strategic, technical and financial information about the Company's operations, wages and salary information, business and marketing plans, documents, databases or drawings.

Confidential information should only be disclosed to other employees within TMHA on a need to know basis.

- The Company's confidential information should:
 - Only be sent electronically (via e-mail, for example) after weighing the business need against the risk of unintended disclosure;
- Not be left out where others can see it;
- Be clearly marked as and kept confidential;
- Not be discussed where other individuals may overhear; and
- Not be sent to unattended fax machines or printers;
- Be disposed of appropriately when no longer needed

In respect of our customers, suppliers or competitors you must ensure that:

- Knowledge of a client's business affairs is never disclosed or used other than in the performance of your duties which must ensure that this knowledge is never disclosed or used in an improper manner;

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- Confidential client matters are not discussed with unrelated customers or with third parties unless you are authorised to do so;
- Great care is exercised if discussing confidential client matters in public places where the discussions may be overheard;
- The trade secrets or confidential information of another company are not obtained by improper means;
- Any papers, property or confidential information from prior employers are not brought to or used within TMHA;
- Confidential information is not solicited from another company's current or former employees;
- Ensure all reasonable and necessary precautions are taken to maintain secrecy and prevent the disclosure of any confidential information;
- No part of confidential information is used, nor any copies made of any confidential information except as; reasonably required in the ordinary and proper course of your employment; to the extent required by law; or with TMHA's prior written consent;
- Unauthorised copies of software are not made or used and the terms of software licences complied with; and
- Written materials subject to copyright protection are only copied if written permission has been granted from the copyright holder.

If you leave TMHA, you must return all TMHA property, assets and confidential information.

If there are any doubts as to what may constitute confidential information, employees are encouraged to speak to their Supervisor or Manager directly or contact the Compliance Officer.

TMHA and its employees are subject to the privacy principles set out in the Privacy Act 1988 (Cth) and will abide by those principles in relation to any information whether of a corporate or personal nature sought or collected by TMHA and will be dealt with in accordance with the National Privacy Principles contained therein.

For further information please refer to the section on confidential information and privacy in the General HR guideline.

11. Company Property

No employee shall use any TMHA property (including, but not limited to, equipment and supplies, trademarks, logos, electric communication and software) for their own use, without approval.

Any employee who unlawfully removes any TMHA Property will be subject to disciplinary action, which may include termination of employment and/or criminal prosecution.

Please refer to Company Property & Copyright sections of TMHA General HR guideline for further information.

11.1 Computer, Mobile Phone & Internet Usage

All TMHA provided computers and mobile phones, and all documents and messages created, sent and stored on them belong to TMHA and are subject to review by authorised employees at any time.

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Guidelines for computer and mobile phone use:

- You must only use office computers in the manner in which you have been instructed and you may only use properly licensed software;
- You are responsible for all activities undertaken using your allocated User (login) ID and password and are encouraged not to share these or to use any other employees' ID and password to access records (unless authorised);
- You may only use authorised remote access methods to connect to TMHA's computer networks;
- All computer equipment, software and facilities used by you are the property of TMHA, including all documents, materials and emails created. You should expect no privacy in relation to all communications carried out on the company network and/or equipment;
- Be sure to protect information on your computer by logging off each night and locking your computer when away from your desk;
- You are to take all reasonable steps to prevent the negligent or careless introduction of computer viruses;
- You should not attach any non TMHA provided compute peripherals to a TMHA device;
- At no time should TMHA's email / internet system be used to access any pornography or gambling websites. Your business or email accounts should not have notifications or requests coming from personal sites like facebook;
- Allocated equipment should be treated with care, with any damage or loss to company property due to your negligence possibly leading to disciplinary action. Any loss or damage to equipment should be reported to your Manager or Supervisor;
- You may not alter records or software instructions unless authorised in writing to do so;
- All devices remain the property of TMHA and must be returned upon request;
- When using mobile telephones you must abide by all applicable Australian laws, in particular those applying whilst driving;
- TMHA will accept reasonable usage of local personal calls made on a TMHA mobile device however any excessive usage or international personal calls made will be paid for by the employee;
- You must not use computers or other electrical resources to access, transmit or communicate images or messages that are sexually explicit, or contain defamatory, discriminatory or harassing remarks; and
- Remember to think before you write. Always use care in drafting documents, especially email messages. Write courteously and respectfully; avoid exaggeration, inflammatory statements and legal conclusions. Once created, an e-mail message will be difficult to remove, and your e-mail may be read by someone other than the intended recipient. Taken out of context, words used in written and electronic records may harm TMHA and its employees.

When using email you should consider the following:

- Email is a tool for business communication and should be used in an efficient, effective and lawful manner;
- Email communications remain the property of TMHA;
- TMHA reserves the right to monitor email for a legitimate business purpose;

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- Violation of this Code of Conduct may result in disciplinary action, including possible termination and/or legal action; and
- Avoid opening attachments and emails from unknown sources.

Please refer to the Internet, Intranet & Email Sections of the Equal Opportunities guideline for more information.

11.2 Monitoring & Computer Surveillance

TMHA may monitor your internet, email and computer usage (including business and personal communications) on a continuous and ongoing basis. Without limiting the purpose for which we may undertake such monitoring, monitoring may be undertaken to assess compliance with this Code of Conduct or to ascertain whether or not the employee is performing their duties or complying with their obligations to us.

TMHA may undertake surveillance in a number of ways including, but not limited to:

- Accessing and reviewing employee's email accounts, including inbox/sent box and deleted items in your email system;
- Accessing and reviewing employee's work computers, or files created by them; and
- Creating and reviewing logs recording employee's email and internet access, and computer usage.

These methods of monitoring may change over time due to technological enhancements that may occur.

12. Environmental Preservation & Harmony with Society

12.1 Environmental Commitment

TMHA is committed to operating in a manner that is consistent with environmental preservation and also in harmony with society. The following principles should guide the conduct of all employees:

- We will operate as an environmentally responsible corporate citizen;
- We will seek to prevent pollution and to ensure that our operations comply with all environmental laws and obligations;
- We will ensure that all waste products, hazardous materials and other regulated items are stored, handled and disposed of in compliance with all applicable laws and regulations; and
- We will implement an environmental and safety management system that includes objectives and targets, periodic review, and a commitment to continuous improvement.

For more information, please refer to the Environment and WHS&E policies or contact the WHS&E Department.

12.2 Political Contributions & Activities

TMHA funds and resources (such as office space and/or employee work time) are not to be applied or contributed to any political organisation, candidate, or public official.

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TMHA or any of its employees will not engage in any activities that may suggest the existence of mutually profitable partnerships or illegal profit sharing between TMHA and politicians or government officials.

12.3 Interaction with the Government

TMHA's policy is to deal honestly and fairly with government representatives and their agents, and to comply with valid and reasonable governmental requests and processes.

Employees must be truthful in their dealings with government officials and may not direct or encourage anyone to provide false or misleading information to any government office or official. Employees may not direct or encourage anyone to alter or destroy records relevant to an investigation.

From time to time, regulatory officials may seek to inspect TMHA property and facilities. For example, a Work Cover / Work Safe or an Environment Protection Agency official may ask to conduct an inspection. If this occurs, immediately notify your manager and the Legal department. If at all possible the inspection should be delayed until you have obtained permission from one of these authorised representatives for it to proceed.

Although it is highly unlikely, a representative of the government may request to question you regarding TMHA's business activities or your work at TMHA. In this event, you and TMHA have the right to have access to legal representation, before any comment is made.

If a government official contacts you or asks questions, immediately contact your supervisor/ manager and the Compliance Officer, and do not make any comment.

12.4 Public Relations & Media Contact

TMHA and Toyota's reputation for integrity is a priceless asset and results from the efforts over many decades of all employees. In all selling and advertising, TMHA competes only on the merits of our products. What we tell customers and potential customers must be truthful and accurate.

It is important that all information disclosed outside TMHA – for example, to the public or the media – be accurate, complete and consistent. If someone asks you for information, follow these guidelines and remember to be polite and courteous at all times.

In the event of any approaches made to you by the media or press you should not make any comment and immediately refer the individual to either the Marketing and Business Development Manager or TMHA's legal department.

If the media appear unexpectedly at any of TMHA's facilities and ask to shoot video, take photographs or make other inquiries, immediately direct them to management and notify the Marketing and Business Development Manager or the TMHA's legal department. Do not discuss TMHA's business with the media.

Before any information or document is disclosed to the media, it must be approved by forwarding to the Marketing and Business Development Manager and TMHA's legal department.

Any inquiries about former employees, such as reference requests or contact details, should be referred to the HR department.

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12.5 Use of Company Identity

Any use of the TMHA logo, brand name, Trademark(s) or requests for references (in writing using the TMHA name) should be referred to either the Marketing and Business Development Manager or TMHA's legal department.

13. Associated Guidelines, Policies & Forms

- Alcohol & Other Drugs Policy
- Company Property & Copyright section of the General HR Guideline
- Confidential Information & Privacy section of the General HR Guideline
- Discipline and termination section of the Separations Guideline
- Equal Employment Opportunities Guideline
- Internet, Intranet & Email Sections of the Equal Employment Opportunities Guideline
- Unlawful Harassment Section of the Equal Employment Opportunities Guideline
- Unlawful Discrimination Section of the Equal Employment Opportunities Guideline
- Alcohol and Other Drugs procedure
- Environment Policy
- WH&S Policy

Further Information

For more information in relation to the above documents and this Code of Conduct, please contact the Compliance Officer or the HR department.