

WHISTLEBLOWER POLICY

Introduction

Toyota Material Handling Australia Pty Ltd (TMHA) aims to create and maintain an open working environment in which all directors, employees, contractors and consultants are able to raise concerns regarding actual or suspected unethical, illegal or undesirable behaviour which TMHA does not tolerate. To achieve this, we aim to foster an environment of integrity in all our interactions and operations.

We also want our employees to have confidence that their concerns will be properly taken into account by the company and that they will not be penalised or subject to victimisation, fear reprisal or feel threatened for reporting their concerns. We encourage all of our employees, customers and other business partners to report any concerns related to the direct activities, or the supply chains of TMHA. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.

Definitions

Improper Conduct <i>(in relation to this Policy)</i>	<ul style="list-style-type: none"> a) dishonest, fraudulent, corrupt or illegal conduct, activity, reporting, or practice; b) falsifying of company records; c) a substantial mismanagement of TMHA resources; d) bribery; e) inappropriate or irregular accounting or internal accounting controls/audits; f) conduct involving substantial risk to public health or safety; g) conduct involving substantial risk to the environment; h) a breach of the TMHA's CCA Compliance Manual or Compliance Policy; i) conduct or proposed conduct suspected to be in breach of the Competition and Consumer Act 2010, Corporations Act 2001, Australian Securities and Investments Commission Act 2001 or the competition law or fair trading laws of any other country or state in which the company does business; j) risk to a person under the provisions of the Modern Slavery Act 2018 by either TMHA, its employees or a member of TMHA's supply chain; or k) that would, if proven, constitute by TMHA or its employee/s (or supply chain partners in terms of Modern Slavery); <ul style="list-style-type: none"> i. a criminal offence; ii. reasonable grounds for dismissing or dispensing with, or otherwise terminating, the services of a TMHA employee/s (or supply chain partner) who was, or is, engaged in that conduct; or iii. reasonable grounds for disciplinary action.
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Policy Statement

This policy is to be read in conjunction with the TP-L-003 Whistleblowing and Complaints Procedure and is concerned about reporting matters in the public interest. It is not intended to replace other reporting structures documented by TMHA such as those for dispute resolution, complaints/grievances, equal opportunity, discrimination, harassment or bullying, except where the issue is of a serious nature where existing reporting systems have failed to process the issue or processed it in an inappropriate, unfair or biased manner.

Executive management encourage a corporate culture supporting and valuing the reporting of improper conduct, corruption and serious waste. TMHA employees are encouraged, and have the responsibility to report any known or reasonably suspected incidences of improper conduct by making a protected disclosure in accordance the TP-L-003 Whistleblowing and Complaints Procedure.

TMHA recognises that the most common method of detecting improper conduct is by notification of the improper conduct by its own team members. TMHA is committed to maintaining an environment in which all Workers are able to report, without fear of retaliatory action, concerns about any serious instances of improper conduct that they believe may be occurring.

TMHA will not tolerate any instances of whistleblowers that make protected disclosures being dismissed, demoted, or subject to any form of victimisation, harassment, persecution, or discrimination. TMHA will take all reasonable steps to protect the identity of the whistleblower and will treat all disclosures made under this policy in a confidential, sensitive and secure manner.

It is TMHA's aim to ensure that employees do not feel the need to discuss TMHA concerns outside the company. However TMHA understands that circumstances may exist where the person wishes to remain anonymous, the person does not feel comfortable in reporting to their immediate supervisor / manager or the Legal Officer, or believe their concerns have not been adequately addressed or not addressed impartially.

In these cases, TMHA has engaged the services of an experienced independent, impartial whistleblowing service where disclosures can be made, anonymously if required. This service is provided by STOPline Pty Ltd (contact details below).

Whistleblowing can be defined as: the deliberate, voluntary disclosure of individual or organisational improper conduct by a person who has or had privileged access to data, events or information about an actual, suspected or anticipated improper conduct or wrongdoing within or by an organisation that is within its ability to control.

(The provisions of this policy are not designed to question financial or business decisions taken by TMHA, or to be used to reconsider any matters which have already been addressed under other policies and procedures).

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Accountability / Responsibility / Point of Contact

This policy applies to all TMHA Workers and in terms of Modern Slavery TMHA's business partners in the supply chain. It will be made available to new employees and upon request to TMHA's legal department. All team members are required to be aware of this policy and its location and follow it where appropriate.

The Director & Chief Financial Officer and General Manager of Human Resources are responsible for the oversight of this policy and are hereafter described for the purpose of management of the policy and reports / disclosures / complaints received, as the Disclosure Officers.

This Whistleblower Policy will be reviewed at least annually to ensure it complies with all relevant laws and remains relevant and effective. A report will be made by the Disclosure Officers to the Directors for the purposes of this review which will include the outcome of each review during the period and any recommended changes to the whistleblower system which are proposed. The review must address generally the efficiency of the whistleblower program. In particular, it must consider the fairness of investigations undertaken, the actual consequences of making disclosures, the performance of the Disclosure Coordinator and Independent Service provider and compliance with this policy generally.

Contact Details			
STOPline	Telephone, Toll Free – 1300 30 45 50 Locked Bag Mail: Toyota Material Handling Australia C/- The STOPline Locked Bag 8 Hawthorn VIC 3122	TMHA	Telephone - (02) 8706 6100 If you would like more information about TMHA's approach to whistleblowing, please contact Legal.tmha@tmha.com.au

Policy Authorised By



Toshi Nakazawa
Chairman
Toyota Material Handling Australia



Steve Takacs
President & CEO
Toyota Material Handling Australia