The Toro Company 2018 Slavery and Human Trafficking Statement

The Toro Company and its subsidiaries (collectively "Toro") strongly oppose the use of child, slave and forced labor, and participation in human trafficking by any person or organization, including its business partners. Furthermore, as a manufacturer doing business globally, Toro is committed to compliance with all applicable laws, including California's Transparency in Supply Chains Act, the United Kingdom's Modern Slavery Act and similar laws that may be adopted in other jurisdictions.

This consolidated Statement relates to Toro's fiscal year ended October 31, 2018. We have common policies and compliance procedures relating to modern slavery across our businesses. However, not all of our group companies are subject to the Acts referred to above.

Our Business and Supply Chains

Toro designs, manufactures, and markets professional turf maintenance equipment and services, turf irrigation systems, landscaping equipment and lighting products, snow and ice management products, agricultural irrigation systems ("ag-irrigation"), rental and specialty construction equipment, and residential yard and snow thrower products. Our products are advertised and sold worldwide through a network of distributors, dealers, mass retailers, hardware retailers, home centers, as well as online (direct to end-users) under the primary trademarks of Toro[®], Exmark[®], BOSS[®], Irritrol[®], Hayter[®], Pope[®], PERROT[®], Unique Lighting Systems[®], and Lawn-Boy[®] most of which are registered in the United States and/or in the primary countries outside the U.S. where we market such products.

In addition to most final assembly, we have strategically identified specific core manufacturing competencies for vertical integration, such as injection molding, extrusion, welding, stamping, fabrication, laser cutting, painting, machining, and aluminum die casting, and have chosen outside vendors to provide other services. We design component parts in cooperation with our vendors, contract with them for the development of tooling, and then enter into agreements with these vendors to purchase component parts manufactured using the tooling. We also have some agreements with third party manufacturers to manufacture certain products on our behalf.

Toro purchases raw materials such as steel, aluminum, petroleum and natural gas-based resins, linerboard, and other commodities, and components, such as engines, transmissions, transaxles, hydraulics, and electric motors, for use in our products. In addition, we are a purchaser of components and parts containing various commodities, including steel, aluminum, copper, lead, rubber, and others that are integrated into our end products. The largest spend for raw materials and components are generally for steel, engines, hydraulic components, transmissions, resin, aluminum, and electric motors, all of which we purchase from several suppliers around the world.

Policies and Contractual Terms

Toro's **Code of Conduct (Code)**, available in multiple languages at <u>www.thetorocompany.com/ethics</u>, requires all employees to maintain high moral, ethical and legal standards, and to comply with both the letter and spirit of the law, wherever and whenever we conduct business.

Among other things, the Code describes our policy of equal employment opportunity and Toro's commitment to provide a respectful workplace that is free from discrimination, harassment and recognized safety and health hazards. The Code does not explicitly mention modern slavery. However,

as noted in our most recent Code training, the Code is intended to provide a framework for ethical decision-making. Failure to comply with the Code and related Toro policies may result in disciplinary action up to and including termination of employment.

Our **Supplier Terms of Commerce (STOC)** affirms that Toro is committed to complying with all U.S. and international laws and regulations and expects its suppliers to support that commitment. Our suppliers are required to respect the basic human rights of their own workforce and to certify that its employment practices and work conditions are non-discriminatory and not detrimental to the health and well-being of its employees. Moreover, Toro will not accept parts, components or products from any supplier that utilizes child, convict, forced or indentured labor in its mining, production, manufacturing, contracting or subcontracting processes.

Toro suppliers are required to sign the STOC before they can become approved suppliers. Suppliers that do not comply with the expectations and requirements set forth in the STOC may be reviewed and evaluated accordingly for future business and sourcing decisions.

Training

Toro conducts annual Code of Conduct training and requires all employees to complete such training.

Right of Inspection

Our STOC gives Toro or its designated representative the right to conduct an on-site inspection of its supplier's production facilities, scheduled in advance by agreement of the parties during regular business hours and conducted in a non-disruptive manner. Failure to comply or refusal of the Toro employee or designated representative to inspect may subject all outstanding orders to cancellation.

Reporting Violations

Toro provides multiple ways for its employees to ask for help regarding ethical concerns and to report any misconduct or suspected violation of the Code without fear of retaliation. Toro also has reporting mechanisms that can be used by suppliers, their workers and other third parties. Concerns or suspected violations of Toro's Supplier Terms of Commerce or Employee Code of Conduct can be reported anonymously to Toro's Ethics helpline website at <u>http://www.thetorocompany.com/ethicshelpline</u> or by making a confidential call to our ethics helpline, where the operators speak the local language, at:

Australia	1-800-955-174
Belgium	0-800-100-10, followed by 1-800-850-7247
China	4006612175
Germany	0-800-225-5288, followed by 1-800-850-7247
Italy	800-797121
Mexico	001-844-237-4647
Poland	00-800-151-0270
Romania	0800477041
United Kingdom	0808-234-9109
United States	1-800-850-7247

Solely for purposes of compliance with the UK Modern Slavery Act, this Statement has been approved by the Toro Principal Manufacturing Limited Board of Directors and signed by a director of that entity.

TORO PRINCIPAL MANUFACTURING LIMITED

Date: February 11, 2019

By:

Kunjunni R. Das Director