

The Toro Company 2019 Slavery and Human Trafficking Statement

The Toro Company and its subsidiaries (collectively “TTC”) strongly oppose modern slavery by any person or organization, including its business partners. Furthermore, as a manufacturer doing business globally, TTC is committed to compliance with all applicable modern slavery transparency laws. As used in this Statement, “modern slavery” encompasses forced labor, prison labor, indentured labor, bonded labor, debt servitude, state imposed forced labor, human trafficking and child labor.

This consolidated Statement describes TTC’s efforts to mitigate the risks of modern slavery in its business and supply chains and relates to TTC’s fiscal year ended October 31, 2019. This Statement has been prepared pursuant to California’s Transparency in Supply Chains Act and the United Kingdom’s Modern Slavery Act. 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.

On April 1, 2019, TTC completed our acquisition of The Charles Machine Works, Inc. (“CMW”), a privately held Oklahoma corporation, and CMW is now a wholly-owned subsidiary of TTC. TTC is still in the process of integrating CMW into our modern slavery compliance program. Therefore, not all of the statements in this consolidated Statement applied to CMW for 2019.

Our Business and Supply Chains

TTC 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, specialty and underground 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 and home centers, as well as online (direct to end-users), under the primary trademarks of Toro®, eXmark®, BOSS®, Ditch Witch®, American Augers®, Subsite®, HammerHead®, Trenchor®, Radius®, Irritrol®, Unique Lighting Systems®, Rain Master®, Pope®, PERROT®, Hayter®, and Lawn-Boy®, most of which are registered in the United States (“U.S.”) and/or in the primary countries outside the U.S. where we market our products branded under such trademarks.

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, where applicable. We design component parts in cooperation with our vendors, contract with them for the development of tooling, and subsequently enter into agreements with such 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.

TTC purchases commodities composed of raw materials such as steel, aluminum, petroleum and natural gas-based resins, linerboard, and other materials, as well as components, such as engines, transmissions, transaxles, hydraulics, and electric motors, for use in our products. In addition, we are a purchaser of parts and accessories containing various commodities, including steel, aluminum, copper, lead, rubber, and others that are integrated into our end products. Our largest spend for commodities, components, parts, and accessories 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

TTC's **Code of Conduct (Code)**, available in multiple languages at www.thetorocompany.com/ethics, 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 TTC'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 TTC policies may result in disciplinary action up to and including termination of employment.

Our **Supplier Terms of Commerce (STOC)** affirms that TTC 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 their employment practices and work conditions are non-discriminatory and not detrimental to the health and well-being of their employees. Moreover, TTC will not accept parts, components or products from any supplier that utilizes illegal child labor or convict, forced or indentured labor in any stage of the mining, production, manufacturing, contracting or subcontracting of the merchandise or any component thereof.

TTC 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

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

Right of Inspection

Our STOC gives TTC 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 TTC employee or designated representative to inspect may subject all outstanding orders to cancellation.

Reporting Violations

TTC 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. TTC also has reporting mechanisms that can be used by suppliers, their workers and other third parties. Concerns or suspected violations of TTC's Supplier Terms of Commerce or Employee Code of Conduct can be reported

anonymously to TTC's Ethics helpline website at <http://www.thetorocompany.com/ethicshelpline> 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 a written resolution of the Toro Principal Manufacturing Limited Board of Directors, effective January 17, 2020, and signed by a director of that entity.

TORO PRINCIPAL MANUFACTURING LIMITED

Date: January 17, 2020

By:



Bradley W. Dolan
Director