

# TOYOTA PÉNZÜGYI ZRT.

## *CODE OF CONDUCT*

<b>Modified by:</b> Laczai Csaba	<b>Approved by:</b> CEO of TFSH	<b>Policy number:</b> 2014/06
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## **1.0 OVERVIEW**

Regulations of this policy refer to the all employees of Toyota Pénzügyi Zrt. (Toyota Financial Services Hungary; hereinafter referred to as TFSH).

This policy is intended for internal use but since it doesn't contain confidential information, it can be shared by any personal including third parties.

## **2.0 RELATIONSHIP WITH THIRD PARTIES**

### **2.1 Receiving Gifts, Favours or Preferential Treatment**

No employee may accept a gift, favour or form of entertainment from a third party unless it would be viewed as a socially acceptable token of appreciation and as moderate in terms of price, quantity and quality. In no way may a gift, favour or form of entertainment of any kind be accepted if it would impair the employee's sound and independent business judgement or if it is meant to obtain business favours, discounts or preferential treatment. Any gift, favour or form of entertainment of any kind that would violate any applicable law or be viewed as transgressing the boundaries of business ethics must be declined by the employee concerned.

Any employee who is offered a gift, favour or form of entertainment that he or she feels exceeds these boundaries must report such fact to the CEO or someone with supervisory responsibilities so that appropriate action may be taken at company level. For purposes hereof, gifts and entertainment will be deemed acceptable if they represent a value of less than HUF 30,000 (EURO 100) per year to the employee concerned.

### **2.2 Corporate Invitations / Entertainment**

Employees should not accept invitations, which in any way could be related to the procurement or continuation of securing business with TFSH or TOYOTA. The acceptance of any invitations whether in normal working time or not, must be approved in advance by the employee's Line Manager or the CEO.

## **3.0 REQUIREMENTS TO EMPLOYEES**

### **3.1 Misappropriation**

TFSH entrusts its assets to its employees for use for and within TFSH. In return, TFSH expects its employees to do all that is necessary to safeguard and preserve the corporate assets.

Telephone, mobile phone, fax, email system, computer, company car and all other equipment provided by TFSH may only be used for personal purposes in accordance with the company regulations, whether in terms of frequency, quantity or content. Any employee having access to electronic mail or similar means of communication may not misuse such means for any purpose or cause that would be deemed socially or morally unacceptable.

Anything invoiced to the TFSH or claimed via an expenses claim or charged to the TFSH by any other means must be solely and wholly for business purposes.

### **3.2 Conflicts of Interest**

It is the responsibility of employees to avoid situations that could give rise to a conflict of interest. Any situation, in which an employee is faced with conflicting loyalties or divergent business, financial or personal interests with regard to TFSH, will be construed as presenting a conflict of interest. Any situation that constitutes a conflict of interest or could potentially give rise to one must be disclosed to their superior or/and the CEO.

### **3.3 Acts of Dishonesty**

Acts of dishonesty, as well as violations against any law, whether or not they are also violations of this Code of Conduct, will give rise to disciplinary action; as far as this is in an interest of TFSH: Moreover, criminal and civil actions may be filed against the employee concerned should the circumstances or interests of TFSH so warrant. Such acts include, but are not limited to, fraud, embezzlement, theft, forgery, and misappropriation of inside or confidential information, misappropriation of corporate assets and personal benefit.

Any expense report drawn up by an employee must be accurate and truthful, and may only include disbursements actually made as a result of undertaking company business.

### **3.4 Research and Development Activities**

Employees are encouraged to share with TFSH their knowledge and expertise in fields relevant to TFSH's business activities in order to assist in extending market position of TFSH and TOYOTA. By sharing this knowledge and expertise, TFSH's customers will benefit from the best know-how, technology and services available.

### **3.5 Attitude within the Company**

Promotions are merit and experience based only. Any employee who feels unfairly treated within TFSH should report this to the Human Resources Department of TFS Europe and Africa Region, the CEO or an independent superior.

### **3.6 Attitude in Private Life**

No employee shall contribute or use, directly or indirectly, corporate assets or funds for private purposes or causes, nor shall he or she give the impression that TFSH supports, approves of, endorses or subscribes to such purpose or cause. The foregoing includes contributions to political parties, campaigns and candidates.

A breach of this policy would be taken very seriously and may lead to disciplinary action against the individual or individuals involved up to and including dismissal comply to the regulations of 'Etikai és fegyelmi szabályzat'.

## **4.0 FINAL CLAUSE**

This Policy comes to effect by the approval of the CEO on 1<sup>st</sup> September 2014 and at the same time all previous policies on this subject repeals.

Policy must be informed to all employees of TFSH which is the responsibility of the Operations Manager.