

Recovery training for design drawings and other data is also carried out so that product development can be continued even after disasters. In addition, workshops to strengthen crisis management not only in our own companies but also at affiliates and suppliers are conducted regularly. Assessments using anti-earthquake measures implementation status check sheets, clarification of weak points with graphs, introduction of responses taken at Toyoda Gosei and other companies, and cooperative preparation of business continuation plans (BCP) are carried out.

Efforts to date

Classification	Measures
Facility and equipment measures	<ul style="list-style-type: none"> • Earthquake resistance measures for buildings and facilities • Establishment of a disaster prevention center to serve as an operations base for the entire company for anti-disaster department operations • Equipping all locations with a multi-channel access radio system (which is used in Japan for various purposes, from daily work to emergency and disaster situations) and satellite phones • Installation of a crisis management server (earthquake-resistant structure) and emergency power generators • Operation of a disaster recovery system for restoration of damaged systems and data centers (special facilities equipped with and operating computers, data communications, and other devices)
System measures	<ul style="list-style-type: none"> • Introduction of site and building safety decisions • Maintenance of supply chain information • Teleconference system for multiple locations using tablet computers • Earthquake bulletin and employee safety information system training • Employee safety follow-up system incorporating arrival and departure times at company and business trip data • Preparation of a BCP

Strengthening information security measures and raising awareness

To strengthen the control of confidential information, annual checks of the compliance status of each division based on company confidentiality management regulations are conducted together with onsite audits. Self-inspections are also done at Group companies in Japan and overseas business

bases. Confidentiality officers are assigned in all departments, and confidentiality education activities are conducted based on information system security operating standards and a confidential information management manual. Security control education is also conducted for new employees.

Enhanced measures

Classification	Measures
Prevention of leaks from negligence	<p>Tangible measures</p> <ul style="list-style-type: none"> • Printing restrictions with ID card authentication on multifunction machines and dedicated drawing printers
	<p>Intangible measures</p> <ul style="list-style-type: none"> • Data encryption of all PCs • Security measures when sending emails out of the Company (mandatory cc to superiors, encryption of attached files)
Prevention of malicious unauthorized leaks	<p>Tangible measures</p> <ul style="list-style-type: none"> • Increased surveillance cameras • Installation of wire locks to prevent PC theft <p>• Restrictions on writing onto external storage media</p>
	<p>Intangible measures</p> <ul style="list-style-type: none"> • Confidentiality pledge • Stricter applications for taking items from premises • Restricted file server access <p>• System use records and access log records monitoring</p> <p>• Strengthened hacking prevention measures (Internet)</p> <p>• Prevention of unauthorized connection of terminals brought in from outside</p>
Educational activities (ethics)	<ul style="list-style-type: none"> • New employee education • Company-wide security control voluntary inspections using check sheets <p>• On-site checks of each department</p> <p>• Training in responding to targeted attack emails</p>

Compliance

Basic philosophy

Toyoda Gosei’s management philosophy states, “We promote business operations with integrity through the establishment of a system founded on thorough compliance and corporate ethics.” We strive for thorough compliance in all areas based on this philosophy.

The Toyoda Gosei Group Charter for Business Ethics sets forth shared values and behavioral standards for the entire

Toyoda Gosei Group worldwide, and Group companies in Japan and other countries formulate their own behavioral guidelines based on the Charter. Toyoda Gosei Co., Ltd. has also established the Toyoda Gosei Guidelines for Business Ethics, which it expects every employee to follow, and has worked to familiarize all employees with these guidelines.

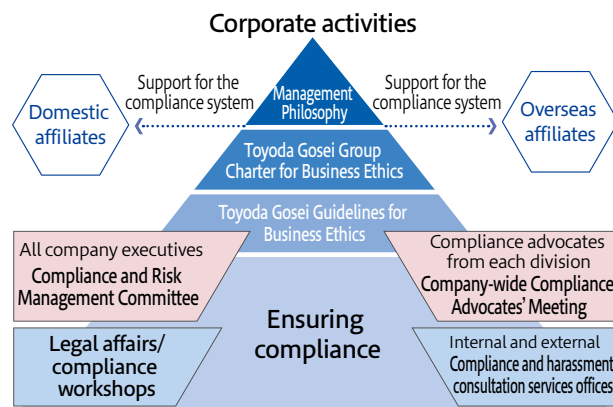


Compliance system

Toyoda Gosei has established the Compliance and Risk Management Committee with the Company’s president serving as chairman and all company officers as members. Together with compliance advocates in each division, the committee works for thorough compliance with a unified approach between management and the workplace.

In Japan, regular compliance liaison conferences are held with Group companies. Group companies in other countries have established compliance committees, appointed compliance advocates, or set up other compliance systems suited to the circumstances in their region and company. Compliance activities are carried out in coordination with Toyoda Gosei.

Compliance



Specific efforts

• Compliance consultation office

To identify and resolve compliance problems at an early stage, Toyoda Gosei has established internal and external compliance consultation services offices and an internal harassment consultation office.

Group companies in Japan have their own consultation

offices, in addition to which they have established a joint external compliance consultation office together with Toyoda Gosei. Group companies in other countries have established external or internal consultation offices.

• Compliance activity checks and *kaizen*

Toyoda Gosei conducts compliance entrenchment questionnaires of all employees each year to confirm penetration of compliance transparency and whether there are signs of violations. *Kaizen* activities are then conducted based on the results.

For Group companies in Japan and other countries, a

voluntary check sheet is used to check their basic policy and systems for compliance, the status of compliance with important laws including anti-trust laws and bribery and corruption laws, and risks in key areas such as human resources, finance, sales, procurement, safety, and quality. Based on the results, *kaizen* activities are conducted.

• Efforts to prevent violations of anti-trust laws

Toyoda Gosei has prepared guidelines for Japan and key regions where Group companies are located (United States, EU, China, Thailand, India, Brazil, and others), and is undertaking efforts globally to prevent anti-competitive acts at Toyoda Gosei Group companies.

Specific behavioral guidelines that Toyoda Gosei expects employees to follow in various business activities,

especially sales activities, are embodied in the Codes of Conduct for Antitrust Law Compliance in the Company’s internal regulations, and thorough compliance is expected of employees.

Continuing education activities are also conducted through special training in competition laws and regular compliance training for each level within the Company.

• Anti-bribery efforts

Toyoda Gosei has formulated Global Anti-Bribery Guidelines as a common guide to conducting transparent and sound business activities globally, and is doing its utmost to prevent bribery and corruption at all Toyoda Gosei Group companies. Education activities are continuously conducted for employees through training for each level and risk.



Compliance training (international Group company)