

# Code of Conduct Policy

of

**Hino Motors Sales India Private Limited  
("HMSIN")**

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## ***1. Managing Director's Message***

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Our corporate mission is “To make the world a better place to live”. From this starting point, we have been bringing good value through our trucks and buses to customers and society since our establishment in 1942. Hino Motors Sales India is a company which procures Competitive Indian parts and contributes to strengthening the appeal of Trucks and Buses.

This Code of Conduct has been prepared to help you understand the Company's various policies and practices which are related to you and your job. We believe that over a period of time, you will find that working with this Company becomes more than just a job. For most of us it is a commitment towards a mutually beneficial goal - that of building HINO Motors.

## ***2. Toyota's Guiding Principles***

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Hino Motors Sales India Private Limited (“the Company” or “HMSIN”) aligns to Toyota's Guiding Principles, which are:

- Honor the language and spirit of the law of every nation and undertake open and fair corporate activities to be a good corporate citizen of the world.
- Respect the culture and customs of every nation and contribute to economic and social development through corporate activities in their respective communities.
- Dedicate ourselves to providing clean and safe products and to enhancing the quality of life everywhere through all of our activities.
- Create and develop advanced technologies and provide outstanding products and services that fulfill the needs of customers worldwide.
- Foster a corporate culture that enhances both individual creativity and the value of teamwork, while honoring mutual trust and respect between labor and management.
- Pursue growth in harmony with the global community through innovative management.
- Work with Business Partners in research and creation to achieve stable, long-term growth and mutual benefits, while remaining open to new partnerships.

## ***3. Our Shared Responsibility***

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The Company's daily business operations are built on and supported by Toyota's Guiding Principles. The Principles summarize the corporate philosophy that reflects HMSIN's vision and what kind of company HMSIN wants to be. The Principles paired with our values and Code of Conduct serve as guidance for daily business operations and for Employees on acceptable and unacceptable practices; they encourage our Employees to behave ethically.

This Code of Conduct applies to all Employees. Following the Code of Conduct enables the Company to make good decisions, effectively protect HMSIN's reputation, and build a positive environment in which everyone cares about going above and beyond. The Code of Conduct helps us determine the right thing to do, especially when rules are absent or unclear. It integrates the Guiding Principles and our values, providing practical guidance for navigating areas of ethical or legal risk.

The Code of Conduct is the Company's outline to living the Hino Way principles, acting in a manner that allows Employees to successfully serve our customers and achieve our goals the right way.

The Code of Conduct should be openly communicated to HMSIN's Employees, Business Partners, and all other External Parties who do business with us.

**3.1 Special Responsibilities for Leaders and Supervisors:** While every Employee shares the responsibility to uphold the tenets shared in this Code of Conduct, those who lead others have a particular opportunity and duty to set an example and proactively shape an ethical culture. This means that leadership must:

- Demonstrate ethical leadership and inspire others to do the same;
- Recognize and reward acts of ethical leadership and acknowledge how these acts drive business success;
- Discuss the Code of Conduct and the values during team meetings and throughout the performance review process;
- Lead by example by promptly completing any required training; and
- Confirm Employees are aware of the different ways to report concerns and understand that retaliation will not be tolerated.

#### **4. Speak-Up Culture**

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We take violations of the Code of Conduct very seriously. Each Employee has an obligation to truthfully report any workplace misconduct so that the Company can investigate properly, thoroughly and objectively. During these investigations, Employees are expected to cooperate fully, while being truthful and forthcoming. If the results of an investigation warrant action, HMSIN will take appropriate steps to prevent similar problems from reoccurring.

Employees are encouraged to talk to supervisors, Human Resources (“HR”) Department, and/or the Compliance Department but recognize that there may be times when other channels are needed. For that reason, we offer the Speak-Up program. The Speak-Up program allows Employees additional ways to raise questions or concerns. You may choose to provide your contact information or report anonymously. Employees can ask a question or report a concern through various reporting channels. *Refer to the Speak-Up Policy for more details.*

All Employees who report a concern in good faith will be protected from retaliation, even if the concern is not substantiated. The steps taken in an investigation will vary depending on the nature of the allegations. At times, requests for additional information may be made to the reporter if follow up information is required. In an effort to ensure similar problems are reduced, HMSIN will take appropriate action if the result of an investigation warrants it. While complete confidentiality cannot be guaranteed, the Company limits the disclosure of information related to an investigation to individuals who have a legitimate reason to know the specific information. *Refer to the Speak-Up Policy for more details.*

#### **5. Non-Retaliation and Protection**

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All Employees can report violations of the Code of Conduct in confidence without risk of reprisal. The Company does not discipline, discriminate against, or retaliate against any Employee who reports incidents of misconduct in good faith or who cooperates in any investigation or inquiry regarding such conduct. Retaliation against anyone for making a good faith report or cooperating in an investigation is not tolerated and is considered a violation of this Code of Conduct.

However, making a report that is intentionally false is contrary to our values and will result in appropriate disciplinary action. *Refer to the Non-Retaliation Policy for more details.*

#### **6. Disciplinary Action**

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Our Business Partners and customers partner to meet performance expectations and demonstrate the Company’s competencies each day. Our high-performing Employees are what make HMSIN a great company. Each Employee is responsible for meeting all performance, attendance, and ethical expectations. If an Employee should fall short of this expectation, the Company has tools for improvement. Performance, attendance, and ethics, which includes behavioral issues, may be addressed in a variety of ways, including oral reprimands, written warnings, unpaid suspensions of no more than seven days, demotions, expulsions, exclusion from raises or bonuses, or termination without compensation.

The Company will determine the most appropriate action based on the circumstances. In some instances, employment may be terminated without previous warnings. HMSIN will make compensation payment to a terminated Employee at no less than the rate prescribed by law if the employee is entitled to compensation according to the law.

*Refer to the Employee Compliance Manual for further information.*

## **7. Compliance with Laws, Regulations and Standards**

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**7.1 Good Corporate Citizen:** As a good citizen of India, we comply with the letter and spirit of laws and regulations everywhere we do business. As a responsible corporate citizen of India, our most basic obligation is to do no harm and to follow the laws and regulations that apply to the Company. Employees should also remember that just because something is legal, does not mean it is ethical. As Employees we:

- Keep informed and seek advice where necessary about the laws and regulations that apply in our areas of responsibility;
- Get advice from Compliance, or raise a concern via the Speak-Up program if there appears to be any inconsistency between this Code of Conduct or a company policy and the local law;
- Raise any potential violations or requests to violate any law, regulation, or policy to any Speak-Up channel; and
- Make decisions and engage in actions that are consistent with our values even if the action may be in the best interest of HMSIN.

### Guidance

**Q:** A fellow employee is reviewing some damaged parts and fails to put on the appropriate safety equipment to enter your area. What should you do?

**A:** Notify the employee that they must wear the appropriate safety equipment in this area. If the Employee ignores or refuses the request, report the incident to your superior immediately.

**7.2 Accurate Books and Records:** HMSIN creates and maintains business records with accuracy and integrity. Keeping complete and accurate records helps us to operate more efficiently, reduce business risk, document our rigorous product testing, comply with regulations, and make responsible business decisions. As HMSIN Employees we:

- Keep records that honestly and accurately reflect financial transactions, operating procedures (i.e., testing and results) and other matters on which the Company or others may need to rely;
- Comply with Indian Accounting Standard (“Ind-A S”), internal financial controls, and all related legal and financial obligations;
- Record all assets, liabilities, revenues, and expenses completely, accurately, in the proper period and in a timely manner;
- Identify, classify, and retain all official records, regardless of format;
- Keep records in a secure and organized environment, so they can easily be retrieved;
- Submit expense reports, time records, and sales invoices promptly and within the required timeframes.
- Record all time worked if Employee is overtime eligible;
- Make disclosures to internal and external auditors or regulators that are accurate, timely, and complete;
- Comply fully with all litigation hold orders;
- Destroy stored paper records and electronic files once the retention period expires (not before), using approved disposal methods; and
- Raise any concerns about false, misleading or inaccurate records.

Guidance

**Q:** You are not over-time eligible and worked extra hours over the last two weeks. You decide to take a vacation day on Friday but not record it since you technically worked a full day in overtime. Is this okay??

**A:** No, you must ensure your working time is recorded accurately. All Employees are prohibited from making inaccurate records, including inaccurate records of time.

## **8. *Respect for Human Rights and Liberty***

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**8.1 Privacy:** The Company protects personal information. At work, as in personal lives, Employees have a right to expect that their personal information will be kept confidential and secure. If a position requires a legitimate need to access, use or share other's personal data, it must be done with the utmost care. As HMSIN Employees we:

- Follow all applicable privacy laws and company privacy procedures and practices;
- Collect, use, and process personal information only for legitimate business purposes; and
- Protect the privacy and security of information entrusted to us.

Guidance

**Q:** As part of your job function you handle personal data of employees. You are requested to send an employee's data to another individual; what steps do you take?

**A:** Clarify with the requester if the need is a legitimate business need. If it is a legitimate business need, you must prevent leakage of the data by sending the information via encrypted email or send the data directly in a sealed envelope with a "CONFIDENTIAL" stamp. If you have any questions or concerns about transferring the data or the need for the data, escalate to your superior for additional guidance before sharing the information or data.

**Q:** As part of your job function you request personal data of employees. When there is no longer a legitimate business need to have the personal data; what should you do with the data?

**A:** Destroy it or send it back to the sender. Avoid making copies. The data needs to be kept in a secured location with measures to prevent access from others.

**8.2 Equal Treatment:** HMSIN respects and protects human rights. We believe that every individual has the right to be treated with dignity. The Company will not discriminate against anyone due to their race, religion, gender, age, color, education, social status, or physical or mental condition. We support the protection of human rights in business operations, supply chain and communities. As HMSIN Employees we:

- Provide proper working conditions to all Employees that are free from harassment or unfair treatment;
- Treat everyone with respect and honor;
- Treat others fairly without considering physical and mental characteristics, nationality, religion, gender, age, color, education, social status, or any other factors;
- Conduct job functions correctly and fairly (e.g., recruitment, remuneration payment, working hours, job holidays, assignments, performance appraisals, training, development);
- Work only with suppliers and other Business Partners who are committed to fair labor and sustainable sourcing practices that protect the health and well-being of workers and communities;
- Never use child or forced prison labor; and
- Refuse to look the other way when an Employee sees or suspects human rights violations and alert the Company.

Guidance

**Q:** You are assigned to work with employees in another department that are different in race, nationality, gender, language, age, appearance, education, or social status; what should you do?

**A:** Treat them equally and fairly.

**Q:** As a supervisor you have to do a performance appraisal on an employee who you have a personal conflict with; what should you do?

**A:** You must treat every employee fairly without discrimination. You must avoid any action that is unreasonable. The appraisal must be based on the employee's competence and performance that is free from personal judgment, bias, or prejudice.

**8.3 Discrimination or Harassment:** HMSIN values its Employees. We are committed to maintaining a diverse and inclusive workplace where everyone is inspired to do their best work. Employees make every effort to understand each other and build mutual trust. As Employees, we speak up openly and honestly and report any concerns quickly so that they can be resolved. This creates a collaborative work environment to better innovate for our customers.

We are each accountable in creating a working environment of trust and dignity. Employees work as a team to succeed together. Each of us has a responsibility to speak openly and honestly to help each other to be successful in our jobs.

HMSIN values our Employees' experience and opinions and provides opportunities to develop personally and professionally. We recognize that diversity of experience, background, and perspective helps the Company overcome challenges, solve problems, and innovate. Diversity promotes *kaizen* and makes the work environment more productive. As HMSIN Employees we:

- Listen to everyone's ideas so an Employee can consider and benefit from thoughts and opinions that are different;
- Treat people fairly and provide Employees with equal opportunities, based on their qualifications and skills;
- Ask for and are receptive to feedback from others;
- Do not discriminate based on protected characteristics in hiring, assigning work, promoting, or other aspects of employment;
- Work together collaboratively, providing help when needed;
- Do not tolerate behavior that could make others feel threatened or intimidated;
- Do not tolerate harassment or bullying, whether it's what someone says, does, or posts online;
- Report offensive jokes, insults, or other comments about race, gender, color, religion, or other characteristics protected by law;
- Do not make unwelcome sexual remarks or advances, or display sexually explicit material that others could find offensive; and
- Report any threatening, intimidating, or unethical behavior, whether it targets us or someone else, to the HR Department.

#### Guidance

**Q:** You are working as part of a team, and everyone is suggesting different ideas to solve an issue. If you disagree with a person's idea, what should you do?

**A:** You must respect other individual's ideas. Do not overtly disagree or use sarcasm. You may explain your own viewpoint rationally.

**Q:** A fellow employee has a habit of touching other employees, both male and female (e.g., patting on the head, shoulder, waist or thigh with the objective of greeting, teasing, consoling, or showing sympathy).

**A:** You must report this situation to your Supervisor and/or any Speak-Up channel.

**8.4 Politics and Religion:** The Company encourages active participation in the political process. As a company, we engage constructively with all governments in the regions in which we operate. By encouraging active participation in the political process, HMSIN can make a positive difference in the communities it serves. As HMSIN Employees we:

- Represent the Employee in an individual capacity, without reference to a position or title;
- Seek the approval of Administration when participating in the political process on behalf of the Company;

- Do not impede the political rights of another person, (e.g., exercising the right to vote in an election);
- Do not incite, encourage, or force any subordinates to support a politician or political party;
- Do not obstruct the beliefs and profession of religion or religious rites;
- Avoid sharing opinions on politics or religion that may lead to conflict; and
- Do not donate money on behalf of HMSIN to any Government Official, political party, or official or candidate for public office.

#### Guidance

**Q:** You have been invited to be a consultant of a governmental commission; can you accept it?

**A:** Yes. Giving advice is your political right. You must clarify that your viewpoint is your own and that you are not giving advice on behalf of the Company. The consultation cannot be a regular job and must not affect your work with us. You must report in advance to your superior before accepting the invitation.

**Q:** If your subordinate notifies you that they are applying as a candidate for a state legislative assembly in the upcoming election, how do you handle this?

**A:** Explain to the Employee that they can apply as a candidate in the election as long as it does not interfere with their normal working hours, they cannot claim employment with HMSIN as an advantage in the election or canvassing and they cannot claim or mislead the public that the Company supports, is involved or backs a specific political group or candidate. If the Employee is elected as an assembly member, they cannot utilize their normal working hours to complete political office duties. Any conflict of interest with the Company is prohibited.

## ***9. Safety, Health and Environment***

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**9.1 Safety and Health:** The Company strives to keep all Employees safe and treats safety as a priority. We maintain a safe work environment for all Employees, Business Partners and visitors. For everyone's protection, safety concerns must be communicated in a timely manner. As HMSIN Employees we:

- Prioritize safety as Employees plan and carry out work;
- Follow safe practices and procedures and abide by laws, regulations, and policies;
- Report any unsafe conditions, near misses, injuries or illnesses that could impact workplace safety immediately;
- Work free from the influence of alcohol or drugs that affect Employee safety; and
- Keep current on Employee safety training and comply with safety requirements per the Employee Compliance Manual.

#### Guidance

**Q:** A fellow Employee does not always wear personal protection equipment ("PPE") because they feel it is uncomfortable and believes an accident is a matter of fate. What should you do?

**A:** You should remind them to always wear their PPE every time because it is policy and that not doing increases the chance of likelihood of an accident. If they choose not to wear the PPE, escalate the situation to your supervisor.

**Q:** A fellow Employee injured their back, sought medical attention, and was diagnosed by a medical professional that it may have been caused by a working condition. As his supervisor, what should you do?

**A:** As a supervisor, evaluate the job and observe the working conditions and the Employee's posture (e.g., lifting too heavy items, the sitting position is unsuitable, the height of the working item is improper) to discover the root cause and develop countermeasures.

**Q:** Several fellow Employees are out sick today. We are having a hard time staffing all positions. There is an Employee who can drive a forklift, but they have not done/completed the required training. Can we move him to that position just for today, so we can get the work done?



**A:** No. Employees cannot operate equipment without completing HMSIN's required training. Moving someone to a role without training would violate safety regulations and our policies and could cause risk of injury or damage.

**9.2 Environmental:** We recognize the importance of operating in a sustainable manner and are dedicated to minimizing the environmental impact of the Company's business operations, including manufacturing, distribution, research and development, and our products. We want to reduce our environmental footprint and contribute to society by sharing our innovations so that all can benefit. As HMSIN Employees we:

- Comply with all applicable environmental laws, regulations and policies;
- Apply kaizen in pursuit of excellence in sustainable business practices;
- Follow protocols at all facilities to help ensure that our environmental goals and objectives are achieved annually (e.g., reduce, re-use, recycle);
- Foster environmental awareness and practices with our Business Partners and never ignore complaints from the community; and
- Take practical steps every day to conserve energy, water and other resources and cut emissions.

#### Guidance

**Q:** You are investigating replacing a supplier of a current product with a new supplier. The new supplier's product is the same quality as our current and has a lower price. The only issue is that the new supplier does not comply with the HMSIN's environmental standards. Should I switch supplier to save the company money?

**A:** No, since we encourage our Business Partners to practice conservation of the environment and to comply with all laws and regulations, you should avoid contracting with the new supplier, even if it comes at a lower cost. Also, you should encourage the new supplier to offer it again after they meet the required environmental standards.

**9.3 Product Safety:** The Company prioritizes safety and quality in the development, manufacture and support of all Hino products. Every day, each of us helps bring to life HMSIN's vision. This demands continual focus on meeting quality and safety standards and constantly seeking ways to improve. As HMSIN Employees we:

- Follow all standards and procedures designed to ensure product quality and safety, never cutting corners or looking for shortcuts;
- Recognize that our brand and reputation rest on every single decision and action of Employees concerning product quality or safety issues;
- Take personal responsibility for keeping our customers and their families safe by reporting any concerns about product quality or safety; and
- Promptly address concerns about product quality or safety.

#### Guidance

**Q:** In my work area I noticed a shipment of parts that look very different from prior shipments, and I am concerned there is a problem. What should I do?

**A:** It is every Employee's responsibility to raise awareness and pull the product if you detect an abnormality, even if you are unsure. Each of us can make a difference when ensuring the quality and safety of our products.

## **10. Receiving or Giving Benefits**

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The Company offers and receives only appropriate gifts and hospitality and believes in building strong business relationships for the long term. We understand that appropriate gifts and hospitality can promote goodwill, but Employees should never offer or accept anything to influence a business decision. Special rules apply to things of value provided to Government Officials, and preapproval is required before these items can be given or promised. *Refer to the Gifts and Hospitality Policy for additional details.* As Employees we:

- Offer gifts or hospitality only when it is:
  - For a legitimate purpose (such as hospitality connected with a site visit or a customary seasonal gift);
  - Permitted by our policies and the recipient's policies (if known);
  - In compliance with local and related international laws (contact the Compliance Department if unsure);
  - Reasonable in value and appropriate under the circumstances; and
  - Accurately accounted for in the Company's books and records;
- Never request gifts from suppliers or service providers;
- Politely refuse gifts from suppliers or vendors that are offered around the time of a procurement decision;
- Do not accept gifts in cash or cash equivalents (i.e., gift cards, gold);
- Do not ignore or overlook any transaction possibly considered as corruption relating to HMSIN. Employees must report the incident to a superior and the Compliance Department and also cooperate during any fact finding investigation, if required;
- Are strictly prohibited from receiving a gift or benefit with unclear origin or reason; and
- Do not allow or direct a Third Party to provide anything of value to another person or entity on the Company's behalf.

Please consult the Compliance Department for guidance if you have any questions or are unsure about a situation. Also, you can review the Gifts and Hospitality Policy, Donations and Sponsorships Policy, and the Anti-Bribery and Anti-Corruption Policy for more information.

#### Guidance

**Q:** Are there any specific items I should do when I want to offer gifts or hospitality to Government Officials, high ranking officers, other government employees, or any public organization or a third party agent?

**A:** Offering, giving, or accepting gifts and hospitality to or from Government Officials, officers, and employees poses significant corruption risk. For that reason, ALL such items must be pre-approved before they can be offered or given. Please consult the Compliance Department for guidance. Refer to the *Gifts and Hospitality Policy, Donations and Sponsorships Policy, and the Anti-Bribery and Anti-Corruption Policy* for more information.

**Q:** During a bid process, a Business Partner is offering a price of INR 17,000 higher than any other supplier. In discussions with this Business Partner, they mention the increased INR 17,000 can be provided back to you personally as a kickback if they are awarded the job. Can you accept this?

**A:** No. Kickbacks are strictly prohibited. Such actions are fraud, and in addition, it is theft from the Company. Such behavior violates the law and HMSIN's Anti-Bribery and Anti-Corruption Policy and is grounds for significant employment action, up to and including termination as well as the dismissal of the business partner and legal action.

**Q:** A contractor who works with you learns that you are taking your family on vacation in the upcountry. The contractor offers you his own resort free of charge because no one normally uses it. Can you accept his offer?

**A:** No. You should not accept his offer since it may influence your decision, does not fall into normal entertainment, and exceeds the limit allowed under the Gifts and Hospitality Policy.

**Q:** You are attending a Company-paid conference and there is a raffle for the participants, and you are drawn and win a prize. Can you keep the prize for yourself?

**A:** Yes, if the prize is won from a lucky draw raffle and is won with transparency, the other conference participants are also eligible, and the prize does not influence your decision-making. If the prize is of excessive value, you must notify your supervisor and the Compliance Department for further guidance and to confirm the giving is not intended to motivate upcoming business decisions.

## ***11. Conflict of Interest***

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We act with integrity and keep promises. Doing the right thing and following through on commitments is central to how we operate. When going to market, we are not just selling products, we are making a promise to better the lives of millions of consumers through safety and satisfaction. Our reputation depends on acting with integrity and keeping that promise every day, every step of the way.

Employees must disclose when there is a potential conflict of interest. Acting with integrity means doing what is right and not allowing personal interests or relationships to interfere with what is best for HMSIN. Even the appearance of a conflict of interest could make others doubt our integrity, harming trust and our ability to deliver on promises. We must therefore always be alert to the possibility of conflicts of interest, especially when it comes to:

- Outside employment with a customer, supplier, or competitor
- Personal or close familial relationships
- Financial interests
- Romantic relationships
- Gifts and hospitality

As HMSIN Employees we:

- Give the best effort every day at work, not performing outside employment, community service or other activities during work time;
- Ensure that Employee personal investments and those of close relatives do not create a conflict of interest;
- Maintain good judgement and avoid bias by disclosing personal relationships with other Employees;
- Don't influence hiring, performance evaluations, or promotion decisions regarding covered personal relationships;
- Ensure transparency and independence when close friends or relatives are being considered as potential Business Partners;
- Do not do business or be a shareholder with decision making power in a business that competes with HMSIN;
- Only give and receive gifts or hospitality that are appropriate and reasonable in value;
- Only offer gifts and hospitality that are appropriate and reasonable in value to Government Officials in accordance with law and policy; and
- Acknowledge that opportunities and discoveries that are made during the course of employment, while using company property, are intellectual property, are owned by and used to better the Company.

### Guidance

**Q:** You are responsible for ordering office supplies and you have a relative that owns an office supply distributor who has offered you a discount. Can you purchase office supplies from your relative?

**A:** No. You cannot directly procure the products, nor can you be involved in that procurement process. Procurement and approval by the same person can cause doubts about fairness. You must disclose the relationship properly. The Company can assign another Employee to conduct the bid and negotiate the ongoing transactions, but all purchase transactions must be clear and transparent.

**Q:** A close friend asks for your help in introducing their company as a potential Business Partner to HMSIN. Can you do it?

**A:** Anyone suggesting a potential Business Partner should only do so based on the Business Partner's potential and in the best interest of the Company. You must be clear and transparent in your relationship with the Business Partner. If you are involved in the selection process for the friend's company, you must withdraw from the process to avoid conflicts of interest.

**Q:** Your brother owns a contracting company that does business with HMSIN. Your brother passes away and you are now responsible for the business. What should you do?

**A:** You must notify management and the Compliance Department to discuss the situation. In most cases you cannot work as an Employee and at the same time be a Business Partner.

## ***12. Anti-Fraud***

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Fraud of any kind is strictly prohibited. The Company does not tolerate any form of fraudulent activities. This includes any type of intentional, deceptive act that can result in a misstatement in the financial statements for personal gain.

Fraud may include, but is not limited to:

- Impropropriety in the handling or reporting of money or financial transactions;
- Profiteering as a result of insider knowledge of company activities;
- Disclosing confidential and proprietary information to outside parties;
- Overstating or inaccurately describing services or goods that HMSIN receives from a third party;
- Accepting or seeking anything of material value from contractors, vendors, or persons providing services/materials to the Company (*Refer to Anti-Bribery and Anti-Corruption Policy for further details*);
- Destruction, removal, or inappropriate use of records, furniture, fixtures, and equipment;
- Payment of anything of value to public officials or other third parties with the intent of obtaining or retaining business; and
- Any other dishonest or deceptive act.

Every Employee has an important role in making sure that the Company's books records, and accounts, (journals, ledger sheets and account ledgers, etc.) are accurate and transactions are properly accounted for and supported by proper documentation. Submission of falsified receipts or other documentation is grounds for discipline or termination. Employees must not, in the course of business for or in connection with HMSIN, conduct off-the-book, fictitious or otherwise falsified transactions, or any other similar acts prone to be misconstrued as such. Employees must never hide or purposefully misclassify expenses. Each Employee is responsible for ensuring that the Company's internal controls are effective and consistently enforced.

HMSIN will protect and provide fair treatment to Employees who refuse to be involved with fraudulent acts or who report any fraudulent activities in good faith, as well as provide protection to whistleblowers/reporters subject to the law. Anyone who retaliates against an Employee who reports a suspected fraud may be subject to corrective action, up to and including termination. *Refer to the Non-Retaliation Policy for further information.*

The Company does not consider conduct in violation of this Code of Conduct to be within the scope of an Employee's job duties, and such conduct may subject the Employee to criminal and civil penalties, including fines and, in some cases, imprisonment. Violators, and those who have knowledge of incidents that they fail to report, may also be subject to appropriate disciplinary action.

HMSIN's Executives, Management, and Supervisors, at all levels, are accountable for the actions of their subordinates in cases where the superior knew or should reasonably have known that a subordinate was either involved in fraud or had refrained from performing duties that would have helped the Company to detect fraud occurrences.

As HMSIN Employees we:

- Are transparent, ethical, and accountable for their own work and actions;
- Do not tolerate any form of fraudulent activities by any Employee, supplier, vendor, Third Party, or any party with which HMSIN conducts business;

- Speak up and report any suspicions of any fraudulent activities by any Employee, supplier, vendor, Third Party, or any party with which HMSIN conducts business to the Compliance Responsible or via a Speak-Up channel; and
- Contribute to an overall ethical environment and Speak-Up culture.

#### Guidance

**Q:** How can you ensure Company growth and still comply with anti-fraud policies, Indian laws, and the Code of Conduct?

**A:** Communicate HMSIN's ethical standards to internal and external stakeholders. Prior to engaging Business Partners, consult with the Procurement Department to ensure appropriate due diligence of the vendor has occurred. Incorporate contractual safeguards into agreements and educate your Business Partners or vendors on applicable anti-fraud and corruption compliance.

**Q:** A third party offers to give your son a job in their company, but they make it clear that in return they expect to be awarded an upcoming indirect procurement bid. The third party was going to be awarded the bid anyway. Can your son accept the position?

**A:** No, acceptance is prohibited per the Code of Conduct; you must escalate the offer to the Compliance Department.

**Q:** Who should I contact with questions or concerns regarding anti-fraud compliance?

**A:** Questions or concerns regarding anti-fraud compliance should be directed to the Compliance Department.

### ***13. Anti-Corruption***

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The Company stands against corruption and builds business and relationships on the basis of trust, transparency, and integrity. We do not engage in bribery or other corrupt practices – ever. It's illegal and it's not how we operate. HMSIN believes in the quality of our products and the value of our partnerships. We would rather lose business than pay a bribe to win it. As Employees we:

- Never offer, provide, or accept anything of value in exchange for business or to gain an improper advantage over our competitors;
- Keep books and records that fully and accurately describe all payments, expenses, and assets;
- Conduct appropriate due diligence on our vendors, suppliers, and service providers, as required; and
- Never ask third parties to engage in activities we would not be comfortable engaging in, such as unlawful or unethical activities.

#### Guidance

**Q:** During the selection of new office equipment suppliers, one of the suppliers is offering to provide you cash and the newest model mobile phone if you procure products or services from their company. What should you do?

**A:** You must refuse the offer and immediately escalate the offer to the Compliance Department and your supervisor to be addressed appropriately. Offering a bribe is illegal and a violation of our Anti-Bribery and Anti-Corruption Policy. The Company must refrain from making transactions with any supplier that exhibits fraudulent behavior or offers bribes.

### ***14. Procurement***

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HMSIN selects Business Partners fairly and objectively for mutual benefit while protecting our reputation. We depend on a number of suppliers and other Business Partners. The quality and safety of our products and the efficiency of our production processes demand that we work with

the very best partners and select them based on fair and reasonable criteria. The Company is committed to promote localization to support the country's automotive industry. As Employees we:

- Deal fairly and honestly with all business partners, regardless of the value of the transaction or the length of the relationship;
- Select suppliers who best meet our business needs and objectives and are mindful of HMSIN's commitment to diversity in the supplier base;
- Base decisions on objective criteria such as quality, price, service, reliability, availability, technical excellence, and delivery, as well as ethical business practices;
- Avoid conflicts of interest, or the appearance of them, which could raise a question about our ability to exercise independent judgment on the Company's behalf; and
- Accept only gifts and entertainment that are appropriate and reasonable in value from Business Partners and disclose them according to policy.

#### Guidance

**Q:** My uncle has a catering business and we are currently planning for an onsite event requiring catering. Can I submit my uncle's company for consideration as the catering vendor?

**A:** It is important to protect HMSIN's interests and to make sure we are getting the best value. Your uncle's catering company can be considered as a vendor provided that your uncle follows the vendor approval process, and your family relationship is properly disclosed. Under no circumstances should you participate in or attempt to influence the vendor selection process.

### ***15. Competition and Antitrust***

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The Company competes vigorously and fairly, winning in the marketplace through superior performance and value. We believe that a free and competitive marketplace offers us the best opportunity to differentiate the brand and succeed over the long term. By delivering innovation, value, and reliability, we outperform the competition while strengthening customer trust. Violation of the antitrust laws designed to ensure free competition can have serious consequences for HMSIN and for individuals. Even the appearance of unfairness or deception in the Company's competitive practices can directly impact our chances of success. As Employees we:

- Don't have conversations or make agreements with competitors about:
  - Pricing and costs;
  - Contract terms and conditions;
  - Bids;
  - Markets and territories;
  - Customers and suppliers; and/or
  - Any other matter that could suggest collusion;
- Avoid negative comments about competitors or their products;
- Use only honest, accurate and fact-based language to describe Hino's products;
- Don't interfere with others' business contracts; and
- Accept terms and conditions that can be fully and consistently abided by.

#### Guidance

**Q:** Could something violate our antitrust policies, as stated in this Code of Conduct, even if it doesn't violate the law?

**A:** Yes, it could. If you disclose confidential information to competitors like pricing, contract terms, products, market share, customers, or market plans, you are violating the policy even if it is not acted upon.

**Q:** Do I have to make a report if a competitor proposes something about pricing or customers?

**A:** Yes. Notify the Compliance Department and let them know what happened.

## ***16. Use and Management of the Company's Assets and Information***

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**16.1 Tangible and Intangible Assets:** Employees must be good stewards of the Company's assets. Our assets take many forms: physical assets (such as facilities and equipment); financial assets (such as cash and bank deposits); information assets (including all the data in files and on servers) and intangible assets (such as reputation, ideas, inventions and intellectual property). All Employees have an obligation to protect the HMSIN's assets because they are critical to ongoing business operations and fuel future innovation and growth. As HMSIN Employees we:

- Take care to ensure that assets are not damaged, abused, wasted, lost or stolen;
- Use good judgment in relation to information and communications systems, and the electronic data they store, process, or transmit;
- Always handle company funds honestly, responsibly and in accordance with company policies;
- Report any abuse or misuse of company assets, such as burglary, misuse of personal assets for personal gain, damage or loss of property, etc.;
- Safeguard company-owned property against removal from our facilities for personal use or by unauthorized individuals; and

### Guidance

**Q:** You witness one of the company vehicles being used in an inappropriate way. What should you do?

**A:** A company vehicle is regarded as an asset to be used for business purposes only. Witnessing it being utilized in another way (e.g., for private benefit) should be reported immediately to the controllers of the vehicle.

**16.2 Confidential Information (Including Intellectual Property):** All Employees must protect the Company's confidential and proprietary information. Our confidential business information and ideas, know-how, and other intellectual property are vital business assets that differentiate us from our competitors. Each of us shares the responsibility for keeping these assets secure, preventing them from unauthorized disclosure or misuse. As HMSIN Employees we:

- Share confidential information only with authorized individuals who have a legitimate business need for it;
- Confirm non-disclosure agreements are in place before releasing confidential or proprietary information outside of the Company;
- Secure documents, data, and devices in accordance with security practices (e.g., encryptions);
- Appropriately dispose of confidential paper documents using secure shred bins;
- Avoid discussing confidential information in public or allowing people to view it on mobile devices;
- Escort visitors within facilities and do not allow them into restricted areas;
- Upon leaving the employment of HMSIN, return all intellectual property and/or trade secrets, and work output to the Company, regardless of the forms the data are in;
- Never destroy records before the expiration date of the retention period; and when the period for storage has expired, the Employees responsible should ensure the records are destroyed in the manner appropriate; and
- Report misuse of intellectual property or unauthorized disclosures to the Compliance Department or any Speak-Up channel.

### Guidance

**Q:** You witness your fellow Employee sending out confidential information to an outsider without permission. What should you do?

**A:** You should notify your supervisor immediately along with the related department. Also, you can report the issue to any Speak-Up channel.

**Q:** As part of your role, you have access to the bidding documents from Business Partners. Another Business Partner offers to buy the information from you. What should you do?

**A:** You should notify your supervisor and Procurement immediately. Such behavior violates Company policy and is grounds for significant action. Never send information from one bidder to a competitor. You are responsible for maintaining the confidentiality of the Business Partner's information. Procurement should terminate the business relationship with the Business Partner that offered to buy the information.

**16.3 Technology and Information Systems:** We use technology and information systems responsibly. Our technology and information systems, and the data they store and transmit, are critical to business success. Laptops, telephones, mobile devices, and the infrastructure that supports them help communicate and collaborate more productively so that we can continuously improve and better serve customers. HMSIN must use them responsibly to conserve resources, safeguard the security and preserve its reputation. As HMSIN Employees we:

- Take reasonable care of any company equipment issued to an Employee;
- Grant system access only to those who need it to do their jobs and only for so long as it is needed;
- Follow all required data security protocols to prevent unauthorized access to company mobile devices and networks;
- Do not download unapproved software, open unfamiliar email attachments or use unapproved storage media;
- Protect confidential information at all times, ensuring emails are sent only to the intended recipients and never posting confidential information on social media sites;
- Make only limited, infrequent and incidental personal use of company electronic devices (i.e., company phones, internet bandwidth) during worktime; and
- Follow policies related to use of personal electronic devices while on company time.

#### Guidance

**Q:** I have a business activity outside of the Company. I need a computer to do some work for my other business activity each week. Can I utilize my work computer to do my other business?

**A:** A Company computer is regarded as an asset to be used for business purposes only. Utilizing it to conduct a personal business activity is a violation and against HMSIN policy.

**16.4 Insider Trading:** The Company safeguards information unavailable to the public from improper disclosure or use. In the course of employment, Employees may acquire nonpublic information about the plans or condition of HMSIN or another company. This "insider" knowledge could provide a financial advantage when used to buy or sell shares of stock. Using this information to trade in securities (or "tipping" others so that they can do so) could be illegal and could result in significant fines and prison sentences.

As HMSIN Employees we:

- Keep inside information secure – whether that means locking drawers or keeping laptops and mobile devices protected;
- Do not use inside information to buy or sell securities before that information has been released to the public, and investors have had a chance to evaluate it;
- Share confidential information only with those who need to know; and
- Never disclose inside information to anyone outside the company, including family members, friends and social media communities.

#### Guidance

**Q:** You have access to information about a potential site for new construction related to the HMSIN property that has not been revealed to the public. You are thinking of purchasing some land near the proposed site as an investment. Can you do this?

**A:** No, you should not proceed with the purchase as this information is regarded as "insider" information and would be considered an exploitation of that knowledge. You may proceed with purchasing property after the information has been made public knowledge.



## ***17. Use and Management of Other's Assets and Information***

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**17.1 Business Partner Information:** We respect and protect others' confidential and proprietary information including intellectual property. The Company respects the right of customers and Business Partners to keep their confidential information secure, just as we expects the same of others. We understand that the unauthorized copying or use of ideas, know-how or intellectual property belonging to others is never allowed and may create financial and legal liability for HMSIN. As HMSIN Employees we:

- Request written permission before disclosing Business Partners' and customers' confidential information;
- Take appropriate measures to secure all confidential information, whether on paper or stored electronically;
- Notify the Compliance Department immediately if, inadvertently, an Employee comes into possession of what appears to be another organization's trade secrets or other proprietary information;
- Do not knowingly infringe on others' copyrights, patents, trademarks, trade secrets, names, design rights, logos, or know-how;
- Use all Third Party assets – including software, music, videos and text-based content – according to their specific license terms; and
- Seek any necessary permissions from the Compliance Department regarding intellectual property.

### Guidance

**Q:** A former Employee has reached out asking if you could provide contact information for a few of our current suppliers that they worked with in the past. Can I give them the contact information?

**A:** No. We cultivate strong, lasting relationships with our customers, suppliers and vendors, based on integrity and trust. To maintain those relationships, we must protect the other party's information. This includes not sharing contact information unless the relevant customer, supplier or vendor has given express consent.

**Q:** I'm working on a product development project in collaboration with a new supplier. I have been impressed by what I have learned about the new supplier. I think that knowledge of their systems could be helpful in our collaboration with another supplier on an unrelated product. Can I share the information?

**A:** No. It is important to safeguard the information of suppliers. Supplier information should not be shared with other suppliers without the documented consent by the supplier owning the information.

**17.2 Competitor Information:** We stay ahead of market trends and customer needs by keeping informed. Gathering information appropriately on the industry, customer needs and competitors' value propositions allows HMSIN to continuously improve its products and compete more effectively. However, we never put our reputation or integrity at risk for competitive information. HMSIN treats competitors with the fairness it expects to be treated. As HMSIN Employees we:

- Are truthful about the Company's identity and motives when making inquiries;
- Don't use Third Parties to engage in action we would not engage in, such as unlawful or unethical activities; and
- Do not request or require Employees (or prospective Employees) to reveal confidential information about their former employers.

### Guidance

**Q:** Before I joined HMSIN last year, I worked for another automotive manufacturer. While there, my team and I developed the concept for an app that IT developed for the tracking of parts shipments. It proved to be very useful and a time-saver. I realized the other day that I have a copy of the coding that IT wrote. Can I utilize this coding to create the same app for HMSIN?

**A:** No. While we always encourage Employees to look for ways to improve our processes, it's important that the source of innovation come from within. Information from other companies, including other automotive manufacturers, may be proprietary, and therefore using it could put the company at great legal and ethical risk. If you have questions about any information for use in implementing or changing any Company business-related processes or operations, please see your supervisor, the HR Department, or the Compliance Department.

## **18. Corporate Communication**

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**18.1 Accurate Communications:** We takes pride in our brand and promote our products in a honest and transparent way. Our customers quite literally drive the vision for moving people safely and responsibly. HMSIN is committed to providing present and future consumers with accurate and truthful information in marketing and advertising to promote informed purchasing decisions and, most importantly, trust in our brand. As HMSIN Employees we:

- Market products in a manner that is truthful and not misleading;
- Ensure that every claim in our advertisements and marketing materials is adequately substantiated as required by law;
- Secure the proper approvals before the release of internal or external messaging, including Business Partners creating materials on behalf of the Company;
- Ensure that emails, social media posts, and internet usage do not involve any material that is offensive or illegal; and
- Comply with all laws and regulations.

### Guidance

**Q:** I know that product reviews on social media are very powerful. I really believe that our products are great. Can I write a comment or review on social media?

**A:** While Employees are welcome to talk about the Company on Social Media, we may not represent that we are speaking on behalf of the Company. If you have questions about when or how to appropriately discuss our product in social media, please review the Social Media section of this Code of Conduct.

**18.2 Authorized Communications:** We are honest and accurate in communications, building trust in our brand. The Company's commitment to integrity means providing honest, clear information about us. It also means identifying the Employees who are best qualified to represent HMSIN with a consistent and positive voice and addressing any questions or concerns our stakeholders may raise. As HMSIN Employees we:

- Refer any external inquiries to the Managing Director to speak on the Company's behalf;
- Understand the importance of brand communications and ensure that only the best and most accurate information is communicated and relied on; and
- Use corporate logos accurately and not for personal use.

### Guidance

**Q:** Yesterday a local reporter called me about a story she is writing on great vehicles. She wants to know about a current model we are working on. I'm not sure what to tell her.

**A:** If you receive calls from external parties asking for comments on behalf of HMSIN or its products and services, direct them to the Managing Director. We need to be especially cautious about external inquiries that may be an attempt to collect confidential, non-public information.

**Q:** I received a call from a government inspector requesting to see files regarding a vehicle. I don't normally interact with government inspectors. What should I do?

**A:** Such calls need to be directed to your supervisor and you should contact the Compliance Department immediately. This will help ensure we provide a timely and accurate response.

## **19. Government Relations**

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The Company engages constructively with all governments in the regions in which we operate. It is our goal to maintain good associations with the public sector (including the political sector) by building good relationships and operating with transparency and honesty. We will conduct business with the public sector without motivating company Employees or Government Officials to act inappropriately. As HMSIN Employees we:

- Represent in an individual capacity, without reference to the positions or title with the Company;
- Seek the approval of the Managing Director when participating in the political process on behalf of HMSIN;
- Conduct business or contract with the public sector or a Government Official transparently and in accordance with laws and company policies; and
- Do not make any political contribution on behalf of the Company to any Government Official, political party or official, or candidate for public office.

*Refer to the Anti-Bribery and Anti-Corruption Policy, Donations and Sponsorships Policy, Gifts and Hospitality Policy for more details.*

### Guidance

**Q:** As part of a project you are leading, you were just informed that in order to get approval you will need to pay a fee. Should you pay the fee?

**A:** Do not pay money or provide benefits to anyone in order to secure business or a contract. Report the situation to the Compliance Department.

## **20. Corporate Social Responsibility**

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We embrace the role and responsibilities as a corporate citizen. While the mission is to better lives through mobility, we also recognizes the responsibility to economic and social development through corporate-sponsored activities in the communities. HMSIN supports Employees' efforts to positively impact the communities and demonstrate commitment to being a good corporate citizen. We contribute to our communities and support initiatives that help strengthen these communities, making them better places to live and work. The Company partners with organizations who are focused on improving mobility, the environment, education and safety. As HMSIN Employees we:

- Have the option to participate in volunteer activities through company philanthropy programs or established business partnering groups;
- Represent HMSIN in the community on company-sponsored boards, committees and at events;
- Encourage Employees to give our time and talents to other organizations that work to improve the communities; and
- Follow the Gifts and Hospitality Policy, Donations and Sponsorships Policy, and Travel Policy.

## **21. International Trade**

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The Company complies with international trade regulations. As a global company doing business in many countries, we recognize the responsibilities in helping increase safety and security in international commerce by complying with all applicable trade regulations and restrictions. Many countries place controls on the import and export of sensitive equipment and data or restrict business with certain groups, individuals or countries. As HMSIN Employees we:

- Are familiar with and comply with all applicable laws and company policies regarding international trade restrictions;
- Do not sell, market to or partner with organizations or individuals that are on government sanction or boycott lists;
- Report concerns if there may be an inappropriate export of sensitive data or equipment;
- Represent HMSIN when working overseas and elsewhere by acting consistently with the local cultures and traditions and within Indian and local laws; and
- Consult supervisors, or the Compliance Department when in doubt that actions may cause conflict against the local culture, laws, or international laws.

#### Guidance

**Q:** I am partnering with a team in Japan on a contract with a global supplier. The standard contract language may not cover everything for this particular project. What should I do?

**A:** As a global company, we need to think about the reach of our activities. Sometimes activities can be directly impacted by many international trade compliance laws and regulations. It is important to contact the Compliance Department with concerns related to global activity.

**Q:** I am on an overseas business trip, I heard from a fellow Employee that one of the local companies we are thinking of working with on this project has a negative reputation and may have been in trouble regarding trade laws. What should I do?

**A:** Escalate immediately to the Compliance Department your concerns and seek guidance on how to perform due diligence on the local company prior to entering into any binding agreements with that company.

## **22. Social Media**

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We recognize the opportunities social media gives to connect, learn and share and are always responsible in online activity. Social media is a powerful tool for enhancing communication and collaboration. It helps us foster more meaningful connections with Employees, customers, investors and communities. HMSIN is responsible and thoughtful in its social media activity to prevent harm to its people, its information or our reputation. As HMSIN Employees we:

- Maintain the same high standards of ethics and courtesy in online exchanges as in person;
- Keep confidential information (about the Company, Employees, customers and Business Partners) secure and out of public view and never disclose without authorization; and
- Make clear that any opinions expressed are individual to the Employee.

Examples of social media include the following:

- Social blogs (e.g., Facebook)
- Video (e.g., YouTube, Tik Tok)
- Photographs or pictures (e.g., Instagram, Snapchat)
- Rating and social bookmarking (e.g., Pinterest)
- Blogging and microblogging (e.g., Twitter, Tumblr, Reddit)
- Messaging (e.g., WhatsApp)
- Wikis (e.g., Wikipedia)
- Gaming (e.g., ppgames.net)

#### Guidance

**Q:** Last night, when I was looking at one of my social media feeds, I noticed a post by an Employee with whom I am friends. He had posted photos of a vehicle not yet released to the public. He was commenting on how excited he was about helping in its development. Should I ask him to take down the post?

**A:** You should report your concern to your supervisor, the HR Department or any Speak-Up channel. Employees should not share confidential, non-public information at any time without express authorization from company leadership.

**Q:** I was reading articles on a vehicle industry blog written by someone not employed by HMSIN. The article seemed to have a lot of specific facts and data related to one of our vehicles. I am concerned that some of the information may be confidential. Who should I talk to?

**A:** You should report your concern to your supervisor, the HR Department or any Speak-Up channel.

### **23. Training**

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HMSIN recognizes the importance of ensuring all Employees understand the Code of Conduct in order to maintain compliance with the policy. HMSIN Employees will:

- Receive initial Code of Conduct training upon hiring and onboarding;
- Annually receive refresher training on the Code of Conduct and all Employee expectations as outlined within the Code of Conduct; and
- Annually declare our commitment to the HMSIN Code of Conduct by signing the Employee Declaration on Compliance with Code of Conduct. *Refer to Appendix A for Declaration of Compliance with Code of Conduct form.*

All Code of Conduct training, including the initial onboarding and annual refreshers, will be provided by the HR Department.

Following each training session, HMSIN Employees must declare their commitment to the Code of Conduct by signing the Employee Declaration of Compliance with the Code of Conduct. *Refer to Appendix A for the Declaration of Compliance with the Code of Conduct form.*

To ensure Employee compliance with the annual Code of Conduct training, attendance will be tracked. Attendance records and Employees' Declaration of Compliance with Code of Conduct forms will be maintained by the HR Department.

### **24. Monitoring**

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HMSIN recognizes the importance of regularly reviewing, monitoring and auditing all Company policies and guidelines, including the Code of Conduct. This Code of Conduct will be reviewed annually by the HR Department and Compliance Department for any necessary updates. All other HMSIN policies and guidelines will be reviewed every two years by the HR and Compliance Departments, and any relevant additional departments for any necessary updates.

### **25. Summary**

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Shared values are the foundation for HMSIN's success. The Code of Conduct guides us to:

- Value fellow Employees;
- Strive for the safety and satisfaction of customers every day, working to continuously improve what we deliver;
- Build relationships based on trust;
- Act with integrity and keep promises; and
- Embrace the role and responsibility as a corporate citizen.

This document has been published using short and straightforward language for easy understanding. If an interpretation is needed, it should focus on intent, rather than words. When there is any doubt or an action is encountered that is or may be unethical, Employees should consult a supervisor or the Compliance Department.

Other than clear violations of this Code of Conduct, the following actions are regarded as violations as well:

- Advise, promote, and encourage another person to violate the Code of Conduct;
- Neglect or ignore it upon witnessing a violation;
- Obstruct or not cooperate with fact-finding activities;
- Retaliate against a “whistle blower” or otherwise treat a reporter unfairly; and

The Company considers the Code of Conduct as its policy, and any violators are subject to corrective action up to and including termination as well as prosecution relevant to any relevant country or local laws.

All Employees must declare their commitment to the Code of Conduct.

## **26. Additional Resources**

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- Anti-Bribery and Anti-Corruption Policy
- Donations and Sponsorships Policy
- Gifts and Hospitality Policy
- Non-Retaliation Policy
- Speak-Up Policy and Guideline
- Travel Policy

**Remark:** This list is not exhaustive.

## **27. Appendix**

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- **Appendix A:** Declaration of Compliance with Code of Conduct

**Appendix A to the Code of Conduct: Declaration of Compliance with Code of Conduct**

Hino Motor Sales India Private Limited

Employee Declaration on Compliance with HMSIN's Code of Conduct. Employees will sign this Declaration on Compliance below.

I have thoroughly read the Code of Conduct including the guidelines and precautions. I am aware that violation of the Code of Conduct is regarded as a violation of Company Policy. I am aware of the Company's policy to have all Employees comply with it and to detect any unethical practices.

By this Compliance Declaration, I declare to HMSIN that as of this time forward:

- a) I am currently in compliance with the Code of Conduct and all Company's policies.
- b) I will work in compliance with the Code of Conduct and will not violate any part of it.
- c) If I am aware of any violation of the Code of Conduct, I will report it to my superior or the Compliance Department.

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Position: \_\_\_\_\_

Date: \_\_\_\_\_

Hino Motor Sales India Private Limited Code of Conduct

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