

**THE TORO  
COMPANY**

## **Statement on Modern Slavery**

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 applicable laws prohibiting modern slavery. As used in this Statement, "modern slavery" encompasses forced labor, prison labor, indentured labor, bonded labor, debt servitude, state imposed forced labor, human trafficking, child labor and other similar conduct commonly thought of as modern slavery.

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 beginning November 1, 2023, and ended October 31, 2024. This Statement has been prepared pursuant to California's Transparency in Supply Chains Act, the United Kingdom's Modern Slavery Act, Australia's Commonwealth Modern Slavery Act, and Canada's Fighting Against Forced Labour and Child Labour in Supply Chains 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. To the extent applicable, the signature pages to this Statement include additional disclosures specific to the entities required to prepare a statement under one or more of the laws listed above.

### ***Our Organization, Business and Supply Chain***

With roots dating back to 1914, The Toro Company was built on a tradition of quality and caring relationships. Today, the company is a leading worldwide provider of innovative solutions for the outdoor environment. Our purpose is to help our customers enrich the beauty, productivity, and sustainability of the land.

TTC designs, manufactures, markets, and sells professional turf maintenance equipment and services; turf irrigation systems; landscaping equipment and lighting products; snow and ice management products; agricultural irrigation ("ag-irrigation") systems; rental, specialty and underground construction equipment; and residential yard and snow thrower products. Our products are marketed and sold worldwide through a network of distributors, dealers, mass retailers, hardware retailers, equipment rental centers, and home centers, as well as online and direct to end-users under the primary trademarks of Toro®, Ditch Witch®, eXmark®, Spartan®, BOSS®, Ventrac®, American Augers®, Trencor®, Pope®, Subsite®, HammerHead®, Radius®, Perrot®, Hayter®, Unique Lighting Systems®, Irritrol®, 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.<sup>1</sup>

TTC focuses on innovation and quality in our products, customer service, manufacturing, and marketing. Our manufacturing facilities are designed to provide efficient and flexible assembly-line manufacturing of our 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, where

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<sup>1</sup> On July 1, 2024, The Toro Company, through its wholly-owned subsidiaries Toro Australia Pty Ltd and Toro Australia Group Sales Pty Ltd based in South Australia (collectively "Toro Australia") announced the sale of its Pope® Products residential garden watering and irrigation business to The Ames Company Inc., a subsidiary of Griffon Corporation.

applicable. We design component parts through collaboration 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 agreements with third-party manufacturers to produce certain standalone end-products on our behalf.

TTC purchases commodities, components, parts, and accessories for use in our manufacturing process and end-products or to be sold as stand-alone end-products. Our primary cost exposures for such items used in our products are with steel, aluminum, petroleum and natural gas-based resins, linerboard, copper, lead, rubber, engines, transmissions, transaxles, hydraulics, electrification components, and others, all of which we purchase from several suppliers around the world. Besides our direct spend, we engage third-party vendors for the maintenance of our facilities and to engage contract staffing at certain locations.

During the fiscal year 2024, TTC employed an average of 11,464 employees. The total number of employees as of October 31, 2024 was 11,108.

### ***Policies and Contractual Terms***

TTC's policies and contractual terms that must be followed by any suppliers doing business with, or wanting to do business with, our company can be found on The Toro Company Supplier Connection at <https://www.toro.com/en/supplier-registration/supplier-information>. The materials most relevant to modern slavery are described in more detail below.

TTC's **Human Rights Policy (Policy)**, last updated March 27, 2024, and available at [www.thetorocompany.com/sustainability/people](http://www.thetorocompany.com/sustainability/people), is informed by the principles of the United Nations' Universal Declaration of Human Rights and the United Nations Guiding Principles on Business and Human Rights and stands as the cornerstone of our dedication to upholding human rights. Regarding involuntary labor, the Policy affirms our belief that all labor must be voluntary. The Policy emphasizes that we stand against all forms of child labor and forced labor including indentured labor, bonded labor, military labor, slave labor and any form of human trafficking. The Policy further states that we will not tolerate within our business or supply chain any act of recruiting, harboring, transporting, providing or obtaining a human being for compelled labor or other unlawful purposes and that we expect all our employees and business partners to comply with local labor and employment laws wherever they operate. Suppliers are required to review this Policy during their onboarding as a TTC supplier.

TTC's **Code of Conduct (Code)**, available in multiple languages at <https://www.thetorocompany.com/corporate-governance/code-conduct>, provides a framework for our actions and is the foundation of our partnership with TTC stakeholders – customers, suppliers, shareholders, communities, employees, and others. The Code requires all employees, regardless of their global location, to conduct business with high moral, ethical and legal standards, and to comply with both the letter and spirit of the law, wherever and whenever we conduct business. Moreover, our CoC reinforces that those in leadership and supervisory roles are expected to create a trusting and respectful environment where employees feel comfortable discussing ethical concerns.

The current version of the Code does not explicitly mention modern slavery. However, it is intended to provide a framework for ethical decision-making. Failure to comply with the Code and related TTC policies will result in disciplinary action up to and including termination of employment and referral for criminal prosecution where applicable. The Code is currently being updated with an anticipated release in Summer 2025. The new version of the Code will specifically address compliance with laws that prohibit human rights abuses and modern slavery in all of its forms and

will encourage employees to speak up if they see warning signs of human rights abuse or modern slavery from our company, suppliers, and those throughout our supply chain.

Our **Supplier Terms of Commerce Policy (STOCP)**, last updated on January 20, 2025, and available at [www.thetorocompany.com/sustainability/process](http://www.thetorocompany.com/sustainability/process), affirms that TTC is committed to complying with applicable laws and regulations regarding modern slavery and expects its suppliers to support that commitment. Our suppliers are required to respect the basic human rights of their own workforce in any stage of production including, but not limited to, design and development, mining, manufacture, contracting or subcontracting of goods or components. The purchase agreements that TTC enters into with suppliers incorporate by reference the terms, requirements, protocols and processes in our STOCP.

TTC suppliers are required to sign the STOCP before they can become approved suppliers and, in doing so, to certify to TTC that its employment practices and work conditions are non-discriminatory and not detrimental to the health and well-being of its employees. Failure by any supplier to comply with the terms of the Human Rights and Modern Slavery section of our STOCP may result in actions undertaken at TTC's sole discretion, including, but not limited to, the cancellation of any or all outstanding orders, without recourse from Supplier to TTC.

TTC sends annual letters to our suppliers regarding our Human Rights Policy, Supplier Terms of Commerce Policy and Statement on Modern Slavery and their continuing obligation to comply with the requirements set forth therein. They are also reminded that failure to comply with the terms of these documents may result in actions undertaken at TTC's sole discretion, including, but not limited to, the cancellation of any or all outstanding orders.

### ***Training***

TTC conducts annual Code of Conduct (COC) training that is mandatory for all employees to complete. The next COC training will be conducted in Summer 2025 and will include a module specifically addressing modern slavery.

### ***Right of Inspection***

Our STOCP gives TTC or its designated representative the right to conduct an on-site inspection of its suppliers' 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 of Conduct 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 Policy, Code of Conduct and/or Human Rights Policy can be reported anonymously through the comprehensive and confidential [EthicsPoint](http://www.thetorocompany.com/ethicshelpline) reporting tool managed by NAVEX, available at <http://www.thetorocompany.com/ethicshelpline>.

### ***Due Diligence and Risk Assessment***

In addition to the policies and practices discussed above, and to better assess and address modern slavery risks within our own operations and from our supply chain and third-party

business partners going forward, The Toro Company took the following actions this reporting period:

- Prioritized communication and training to all employees on modern slavery risks by developing a module to be included in our next Code of Conduct training that specifically addresses modern slavery.
- Added language to the Human Rights section of the upcoming update to our Code of Conduct that speaks directly to complying with laws that prohibit human rights abuses and modern slavery in all of its forms, and encourages all employees to speak up if they see warning signs of human rights abuse or modern slavery in our operations or those of our suppliers or any link in our supply chain.
- Engaged a third-party ESG consultant to leverage its supply chain mapping, data collection and management, and training tools and strategies to help us better identify and mitigate the risk of modern slavery in our supply chain.

Understanding our modern slavery risks and improving our ability to assess and address modern slavery risks in our operations and supply chain is an ongoing and evolving process for The Toro Company. We believe the modern slavery risk inherent in the supply chain for our products is that violations of our policies could occur in upper tiers of the supply chain without our knowledge. We are committed to continuing to develop and review our frameworks and processes to ensure the effectiveness of our actions to assess and mitigate modern slavery risks in our operations and supply chain.

When our due diligence exercises and risk assessments of our suppliers in relation to modern slavery prevention practices suggest the risk of modern slavery, we will request the supplier(s) to investigate and remedy, where applicable, and to provide us with timely corrective action reports. If the supplier fails to take appropriate action, we may decide to cease further business with the supplier.

In accordance with the applicable sections of the Acts listed below, this Statement on Modern Slavery has been reviewed and approved by the Board of Directors of The Toro Company on May 20, 2025.

- United Kingdom's Modern Slavery Act 2015, Section 54(6)(a)
- Australia's Commonwealth Modern Slavery Act 2018, Section 13(2)(c) & (d)
- Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act 2022, Section 11(4)(b)(ii)

## THE TORO COMPANY

By: /s/ Richard M. Olson  
Richard M. Olson  
Chairman and Chief Executive

Dated: May 20, 2025

Solely for purposes of compliance with the UK Modern Slavery Act, this Statement has been approved by the Toro U.K. Limited Board of Directors, on May 20, 2025, and signed by a director of that entity on the date indicated below.

Toro U.K. Limited is a wholly-owned subsidiary of The Toro Company with its headquarters located in Hertfordshire, United Kingdom. Toro U.K. Limited is a manufacturing, distribution and sales entity that designs, produces, imports and sells Toro® and Hayter® branded equipment within and outside the U.K. During this reporting period, Toro U.K. Limited employed an average of 100 employees. Toro U.K. Limited sources components from suppliers globally.

Toro U.K. Limited generally sells the same products as are sold by TTC in other parts of the world and has the same regional and global supply chain as other TTC companies. TTC's supply chain is discussed in the TTC Statement above. We believe the modern slavery risk inherent in the supply chain for products sold by Toro U.K. Limited is that violations of our policies could occur in upper tiers of the supply chain without our knowledge. We seek to address this risk through the policies, procedures and other measures described earlier in this Statement.

#### **Toro U.K. Limited**

By: /s/ Zachary J. Taylor  
Zachary J. Taylor  
Director

Dated: May 20, 2025

Solely for purposes of compliance with Australia's Commonwealth Modern Slavery Act, this Statement has been approved by the Toro Australia Pty Limited Board of Directors, on May 20, 2025, and signed by a director of that entity on the date indicated below.

Toro Australia Pty Limited is a wholly-owned subsidiary of The Toro Company ("TTC") with its headquarters located in Beverley, South Australia. Toro Australia Pty Limited is a manufacturing entity and owns 100% of Toro Australia Group Sales Pty Limited ("Toro Australia"). The latter sales entity is also based in Beverley and maintains sales offices and distribution centers across Australia. During this reporting period, Toro Australia Pty Limited employed an average of 167 employees, while the sales entity employed an average of 28 staff. There are no retail stores, Toro Australia sells direct, through commercial dealers, and mass merchants. Prior to July 1, 2024, Toro Australia sold POPE® products in Australia and overseas.

Toro Australia generally sells the same products as are sold by TTC in other parts of the world and has the same regional and global supply chain as other TTC companies. TTC's supply chain is discussed in the TTC Statement above. We believe the modern slavery risk inherent in the supply chain for products sold by Toro Australia is that violations of our policies could occur in upper tiers of the supply chain without our knowledge. We seek to address this risk through the policies, procedures and other measures described earlier in this Statement.

#### **Toro AUSTRALIA PTY LIMITED**

By: /s/ Scott D. N. Maanum  
Scott D. N. Maanum  
Director

Dated: May 20, 2025