

The Toro Company Conflict Minerals Policy

The Toro Company (Toro) is committed to compliance with Rule 13p-1 under the Securities Exchange Act (the Conflict Minerals Rule) and takes its obligations under Securities and Exchange Commission and other regulations seriously. "Conflict Minerals" are columbite-tantalite (coltan), cassiterite, gold, wolframite and the derivatives tantalum, tin, and tungsten such that they directly or indirectly finance or benefit armed groups through mining or mineral trading in the Democratic Republic of the Congo or an adjoining country).

Suppliers are expected to establish their own Conflict Minerals programs, which include policies, due diligence frameworks consistent with the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance)* and to otherwise conduct analyses and inquiries in a manner consistent with the requirements of the Conflict Minerals Rule applicable to companies that are subject thereto.

Without limiting the foregoing, Suppliers are expected to define, implement and communicate to their suppliers a Conflict Mineral Policy consistent with this Policy and the OECD Guidance. In addition, Suppliers are expected to work with their suppliers to ensure traceability of conflict minerals at least to the smelter or refiner level. Suppliers will be required to provide Toro, periodically and upon request, with origin and other information for all conflict minerals in the components, parts or products supplied to Toro. Suppliers are expected to require their direct and indirect suppliers to adopt policies, procedures, due diligence frameworks and management systems that are consistent with those contained or contemplated herein and in the OECD Guidance.

Suppliers who do not comply with the expectations and requirements set forth in this Policy may be reviewed and evaluated accordingly for future business and sourcing decisions.

Suspected violations of this policy should be reported to Toro. Reports can be made by phone at 1-800-850-7247 (U.S.) or +1-678-999-4558 (Outside the U.S.), or by submitting a confidential web form found under "Investor Information" at www.thetorocompany.com.