

# Bridgestone Americas Code of Conduct

## Suppliers and Service Providers Guide

As an integral part of its corporate vision, Bridgestone Americas strives to build and maintain a meaningful, effective and practical ethics and compliance program that its teammates support and understand. We expect all teammates and business partners to conduct business in an ethical and honest manner, in full compliance with all applicable laws and regulations.

Bridgestone Americas communicates its expectations to teammates in readily accessible and clear language, first and foremost through our Code of Conduct. All teammates receive a copy of the Bridgestone Americas Code of Conduct, which can also be accessed online at any time. All teammates receive Code of Conduct training as part of their mandatory compliance training program.

Bridgestone Americas reinforces its Code of Conduct through its policies, procedures, regular communications, and mandatory live and online training.

We also provide various avenues for teammates to report potential violations or concerns, including through management and department channels or anonymously, if preferred.

Bridgestone Americas' internal auditing conducts regular audits of its ethics and compliance program. Bridgestone Americas' Board of Directors also receives regular updates on the state of the program, as do empowered executive committees such as Audit, and Risk & Governance Committees.

When it comes to Bridgestone Americas suppliers and service providers (collectively, "suppliers"), we recognize and appreciate that those companies have their own unique operating structures, cultures and ethics and compliance programs.

Accordingly, we ask our suppliers to implement and follow their own Code of Conduct when doing business with Bridgestone Americas, provided their Code of Conduct meets or exceeds the minimum standards identified in this **Bridgestone Americas Code of Conduct for Suppliers and Service Providers**.

Once a supplier is selected by Bridgestone Americas, each supplier is requested to complete a questionnaire confirming its compliance with both this Bridgestone Americas Code of Conduct for Suppliers and Service Providers and the supplier's own Code of Conduct. You will receive an e-mail that provides a link to the questionnaire. In subsequent years, if a supplier's relationship with Bridgestone Americas continues, we require that within 30 days of the anniversary date of the agreement, suppliers reconfirm their compliance commitment by completing a new questionnaire. We will send an e-mail reminder of this requirement each year.

Bridgestone Americas does not wish to impose overly burdensome requirements on its suppliers. We understand and value the important role suppliers play in our success. However, just as Bridgestone Americas places high expectations on its teammates, we place similar expectations on our suppliers.

This Bridgestone Americas Code of Conduct for Suppliers and Service Providers sets forth our minimum expectations. Suppliers must agree to comply with the requirements contained in this Bridgestone Americas Code of Conduct for Suppliers and Service Providers in order to do business with Bridgestone Americas. These requirements are mandatory; no exceptions.

## **Notice**

If a supplier violates this Bridgestone Americas Code of Conduct for Suppliers and Service Providers or a federal, state or local law or regulation, the supplier agrees to notify Bridgestone Americas and further agrees that any such violation provides sufficient grounds for Bridgestone Americas to unilaterally terminate its relationship with the supplier. Bridgestone Americas reserves the right to reasonably request documented confirmation of compliance with this requirement and any applicable laws and regulations.

## **Review & Testing**

As a preliminary matter, Bridgestone Americas expects that suppliers will comply not only with this Bridgestone Americas Code of Conduct for Suppliers and Service Providers and their own Code of Conduct, but also with all applicable federal, state and local laws and regulations. Whenever Bridgestone Americas has compliance reporting obligations, we expect our suppliers to respond timely and accurately to our requests for information. While we understand confidentiality obligations and have no desire to be overly-intrusive, Bridgestone Americas reserves the right

## **Review & Testing (Cont.)**

to require suppliers to complete an annual questionnaire and to open their doors for an occasional, limited-scope audit. For example, if Bridgestone Americas wants to ensure that a supplier is compliant with certain environmental regulations, we may request an on-site visit. We expect cooperation from our suppliers and will, in turn, give proper and reasonable notice (typically at least 24 hours) before any visit.

## **Anti-Bribery, Anti-Corruption and Foreign Corrupt Practice Act**

Suppliers acting on behalf of Bridgestone Americas must comply with the Foreign Corrupt Practices Act, the U.K. Bribery Act, and all other applicable anti-bribery or anti-corruption laws. Suppliers acting on behalf of Bridgestone Americas or involved in a transaction with Bridgestone Americas must never, under any circumstances, authorize or pay a bribe.

In addition, such suppliers must never transfer anything of value, directly or indirectly, to a foreign government official or anyone else, in an effort to obtain or retain business or for any other commercial advantage.

## **Health & Safety**

Suppliers must have in place a robust health and safety program and must comply with all laws and regulations governing workplace safety. Safety must always come first; no job is so important or task so urgent that it cannot be performed safely. Bridgestone Americas may ask for documentation supporting a supplier's health and safety programs. Suppliers agree to cooperate with such requests and provide timely responses. If a supplier has been charged with a serious health or safety violation that results in suspension of operations or significant penalties, or if a supplier is found guilty in any legal or administrative proceeding of a serious health or safety violation, the supplier must immediately notify Bridgestone Americas.

## **Environment**

Bridgestone Americas has a strong history of identifying ways to reduce its environmental impact and to act as an environmental steward in the communities where we do business. We expect our suppliers to comply with all applicable environmental laws and regulations as well as the supplier's own internal environmental policies. Suppliers agree to provide environmental compliance histories and documentation upon request by Bridgestone Americas.



### **Environment (Cont.)**

If a supplier has been charged with a serious environmental law violation that results in suspension of operations or significant penalties, or if a supplier is found guilty in any legal or administrative proceeding of any serious environmental law violation, the supplier must immediately notify Bridgestone Americas.

### **Drugs & Alcohol**

Bridgestone Americas has a mandatory Drug Free Workplace Policy across all of its locations. We expect our suppliers to have a comparable program in terms of scope and requirements. Suppliers agree to carefully review the Bridgestone Americas Drug Free Workplace Policy in order to confirm that they have a policy in place that is at least as strict. If there are discrepancies or material differences between the Bridgestone Americas Drug Free Workplace Policy and the supplier's policy, the supplier agrees to notify Bridgestone Americas so the Company can evaluate whether the discrepancies or material differences require further action.

### **Conflicts of Interest**

Bridgestone Americas teammates should have no financial or personal relationship with a supplier that conflicts, or appear to conflict, with the teammate's ability to act in the best interests of Bridgestone Americas

### **Conflicts of Interest (Cont.)**

For example, when a close family member of a Bridgestone Americas teammate is employed by a supplier, the conflict should be immediately reported to the Bridgestone Americas Law Department. Disclosure of this relationship is mandatory.

The Company reserves the right to reassign teammates under such circumstances in order to avoid the conflict.

### **Human Rights**

Bridgestone Americas and its parent company take their international human rights obligations very seriously. We will not do business with suppliers who do not have a sound and comprehensive program to insure no slavery, forced labor, child labor, or inhuman conditions exist in its operations or supply chains. Accordingly, Bridgestone has implemented a policy of conflict-free sourcing and expects its suppliers of raw materials and components containing conflict minerals to provide it with completed conflict minerals declarations using the current Conflict Minerals Reporting Template. Bridgestone may reconsider its willingness to partner with suppliers that fail to comply with this Policy.

## **Labor & Employment**

Bridgestone Americas does not tolerate and strictly prohibits unlawful discrimination, harassment and retaliation, including any behavior that creates an intimidating, offensive or hostile work environment.

We expect our suppliers to implement strong equal employment opportunity (“EEO”), compensation and personnel policies and to educate their employees on diversity and EEO issues. All applicable EEO, wage and hour, and personnel policies must be consistent with current laws, regularly disseminated to all employees, and strictly enforced. Mutual respect should also be an important and visible part of a supplier’s compliance program.

## **Antitrust**

Bridgestone Americas takes a very clear position with respect to antitrust issues. Simple things like a careless conversation with an old friend over lunch or a trade association gripe session can violate the law. Teammates should never gather competitive information through misrepresentation or theft, nor accept confidential information without the owner’s consent. We expect our suppliers to take an equally clear position on competitive and confidential information and to communicate that position to their employees and agents.

## **Antitrust (Cont.)**

Since antitrust is a complicated area of the law, we expect suppliers to properly train their employees on applicable laws and regulations and to offer resources for employees to report concerns or possible violations.

## **Gifts & Gratuities**

Bridgestone Americas prohibits its teammates from accepting anything more than modest gifts, meals or entertainment from suppliers. Business meals in the normal course as well as small tokens of appreciation during the holidays are generally fine, but if suppliers have any doubts, they should check with their Bridgestone Americas contact. Gift cards or cash equivalents are never allowed.

## **Confidentiality & Personal Data**

Bridgestone Americas respects the confidentiality of the personal, financial and health information of its teammates, suppliers and customers. We expect the same level of respect from our suppliers with regard to Bridgestone Americas’ intellectual property, trade secrets, proprietary and confidential information. Suppliers must have proper protections and policies in place so they can safeguard any such items and must always comply with applicable data privacy laws. Personal data should be handled and processed only when there is a legitimate business reason to do so, and then only in accordance with applicable law.

## **Reporting Potential Misconduct**

Suppliers who have concerns about the behavior or actions of a Bridgestone Americas teammate should report those concerns to their Bridgestone Americas contact, the Law Department or through the BridgeLine or Action Line. Suppliers with concerns about a Bridgestone Americas teammate within the retail group (“BSRO”) should call the Action Line (1-800-750-4975). Suppliers with concerns about a Bridgestone Americas non-BSRO teammate within the United States should call the BridgeLine (1-800-842-0504).

The BridgeLine and Action Line are operated by third party specialists to allow teammates and others to confidentially report compliance and ethical concerns. Calls can be made anonymously, if preferred. Suppliers can also contact the Law Department at [compliance@bfusa.com](mailto:compliance@bfusa.com). Suppliers should have a similar resource within their organization that allows employees to report ethics and compliance violations.

This resource should be readily available to employees, clearly communicated on a regular basis, and should allow for anonymous complaints.