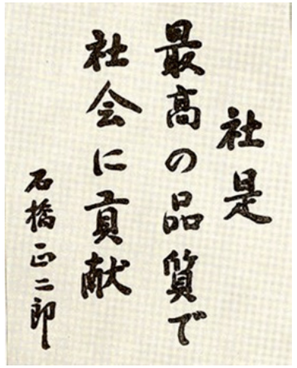
CODE OF CONDUCT

BRIDGESTONE

"The larger a company grows, the greater its responsibilities to society. A company must seek at all times to fulfill this mission…

My hope is that Bridgestone will continue to grow and contribute to society while preserving this traditional Bridgestone spirit."

Shojiro Ishibashi
Bridgestone Founder



Bridgestone's Corporate Mission

"Serving Society with Superior Quality."
Written by the founder in 1968.

INTEGRITY AT BRIDGESTONE

Bridgestone has long embraced “Serving Society with Superior Quality,” our corporate Mission based on the philosophy articulated by Bridgestone’s founder, Shojiro Ishibashi. Indeed, the Mission is fundamental to Bridgestone’s corporate philosophy, the Bridgestone Essence, and serves as the core of Bridgestone’s global CSR commitment, *Our Way to Serve*.

Our Mission represents more than a simple obligation to serve consumers by providing high-quality, innovative products and services. Rather, it requires us to hold ourselves and our coworkers to the highest standards in our day-to-day efforts to secure Bridgestone’s global success. It means that we must act with integrity in all aspects of Bridgestone’s business.

Sometimes, doing the right thing is easy. Other times, doing the right thing may come at a price. A lost sale. A missed opportunity. Higher costs. Acting with integrity means doing the right thing even when it’s hard.

This Code of Conduct provides guidance on Bridgestone’s commitment to integrity and its expectations for Bridgestone employees worldwide. Use this Code wisely. Refer to it often. Ask your supervisor or refer to the other resources identified in this Code if you have questions or need guidance. Always be mindful of the critical role we each play in accomplishing Bridgestone’s Mission of “Serving Society with Superior Quality” and abiding by the goals articulated in our CSR initiative, *Our Way to Serve*.

Thank you for your commitment to Bridgestone and our Mission.

Regards,

Masaaki Tsuya
Chairman of the Board, CEO and Representative Executive Officer

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Bridgestone Asia Pacific Headquarters, Singapore

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Our Way to Serve

Bridgestone has embraced the Mission of "Serving Society with Superior Quality" and the idea that the best companies not only perform for their stakeholders, but also contribute to a better world. This conviction is clearly reflected in the Bridgestone Essence and has also informed the company's Safety, Quality and Environmental Mission Statements.

In 2017, Bridgestone reaffirmed these foundational principles by launching a refined global corporate social responsibility (CSR) commitment, *Our Way to Serve*, centered around three Priority Areas: Mobility, People and Environment. *Our Way to Serve* also embraces Management Fundamentals—governance, compliance and behavioral principles that will ensure Bridgestone operates with the level of integrity expected of a global company. Together, the Priority Areas and Management Fundamentals highlight the company's commitment to operating with integrity, transparency and ethics while delivering the highest quality products and services.

The company's ability to follow through on these commitments depends on the day-to-day actions of its employees. This is fundamental to the way Bridgestone does business as a global company.

The Purpose of the Code

This Code of Conduct was developed with Bridgestone's Mission, *Our Way to Serve* and the company's other foundational documents in mind and is intended to provide practical guidance for handling many of the ethical issues you may face as a Bridgestone employee. By learning and following the principles in the Code, we will continue to earn the trust of our customers and communities and take pride in our company and coworkers across the globe.

The Code cannot, of course, cover every situation. It's not a substitute for good judgment and common sense. Instead, think of the Code as a GPS for the company's commitment to responsible business practices. You're responsible for determining where to go and how to get there. The principles in the Code are there to help you stay on course.

Read the Code carefully, considering the issues it raises and how they affect you in your daily work life. Review the Questions and Answers at the end of each section for additional clarification.

The topics covered in this Code are important. Violations of the Code can cause great harm to the company and its reputation. Employees who violate the Code may be subject to appropriate disciplinary action, up to and including termination of their employment. The Code of Conduct is a living document, and Bridgestone may change it from time to time, as appropriate.

When the Code Applies

The Code is intended to create a common guide for employees of all Bridgestone companies around the globe. As used in this Code, the term "employees" includes directors and officers of these companies.

In some cases Bridgestone companies may have local policies with content that overlaps with this Code. If a local policy is less restrictive than the Code, the Code will apply.

Additionally, in very rare cases, a country's local laws may prohibit compliance with certain provisions of this Code. If you believe this may be the case, please consult with a member of the Law Department.

Our Responsibilities as Employees and Managers

As Bridgestone employees, we all:

- Must demonstrate integrity in all we do.
- Familiarize ourselves with and follow the Code of Conduct and other company policies that may apply in our locations.
- Contact the BridgeLine or speak to any person listed in "Where to Go For Help" (page 14) regarding possible Code or policy violations or other ethical concerns.

In addition to their responsibilities as employees, Bridgestone managers must:

- Create an environment where Bridgestone employees feel comfortable raising and speaking openly about ethical questions or concerns.
- Ensure that employees understand the importance of this Code and follow it.
- Act as a role model at all times.
- Champion the company's ethics and compliance program and participate actively in their location's ethics and compliance initiatives.

Our Expectations for Suppliers and Contractors

The rules and expectations set forth in this Code not only apply to all Bridgestone employees worldwide, they also serve as a set of expectations for the suppliers and contractors who work with us in all our locations. Share these expectations with our suppliers and contractors. Explain their importance.

Retaliation is Prohibited

Retaliation is a deliberate adverse action against an employee for making a report in good faith. Examples of retaliation include firing or demoting an employee, removing an employee from a project, and verbally or physically threatening an employee who has reported, threatened to report, or otherwise taken action to address conduct that is illegal or inconsistent with this Code or any policy in your location.

Bridgestone prohibits retaliation when business conduct or ethical issues are reported in good faith.

From the Field

You work in a small department. You want to report misconduct, but are afraid that if you contact the BridgeLine everyone will know and find subtle ways to get back at you. Does the company really prohibit this sort of retaliation?

Absolutely. We understand that retaliation can take many forms. The company does not tolerate any forms of retaliation. If you believe you are being retaliated against for raising a good-faith concern, reach out to any of the contacts listed in "Where to Go for Help" (page 14).

Warren County Tire Plant, Tennessee USA

Where to Go for Help

You have many resources available to help you with questions or concerns relating to ethics, legal compliance and company policy, including:

Your Supervisor

Your supervisor is often a good person to start with for an ethics or company policy question. If you are not comfortable asking your supervisor, any other resource listed on this page can assist you.

Human Resources

Members of your Human Resources Department can often help you determine the best course of action for a broad range of ethical and compliance concerns.

Chief Compliance Officer

You can always contact your region's Chief Compliance Officer or a compliance professional with any questions about Bridgestone's ethics and compliance program or any other concern relating to this Code.

Law Department

If you have any doubt about the legality or ethics of a course of conduct, or just want to understand the legal risks involved, contact any member of the Law Department.

Internal Audit

Your region's Internal Audit department is able to discreetly discuss and follow up on questions regarding internal controls and compliance with established policies.

Company Policies

Many of the topics addressed in this Code are also covered in global, regional or local Bridgestone policies. Please consult these policies for additional guidance and information.

| The BridgeLine

Bridgestone has established web-based reporting systems and phone hotlines operated by third party specialists to allow employees and others to confidentially report suspected criminal conduct; violations of this Code, other company policies, or the law; or other ethical concerns and questions. In this document, we refer to these hotlines and electronic reporting systems as the "BridgeLine."

Where permitted by local laws, BridgeLine reports can be made anonymously. The BridgeLine operator or web portal will indicate whether an anonymous report is possible.

To find BridgeLine information for your location, visit https://www.bridgestone.com/responsibilities/bridgeline/.

The Bridgestone Integrity Test

When confronted with an ethical question that does not appear to have an obvious answer, ask yourself the following questions:

- **Does it seem like the right thing to do?**
- **Do I know that it is legal and consistent with both Bridgestone's values and this Code?**
- **Would I be proud if my actions were shared in the news media?**
- **Would I feel comfortable talking to my family about my course of action?**
- **Would I stake my reputation on it?**
- **Does it build trust and pride in Bridgestone?**

NO

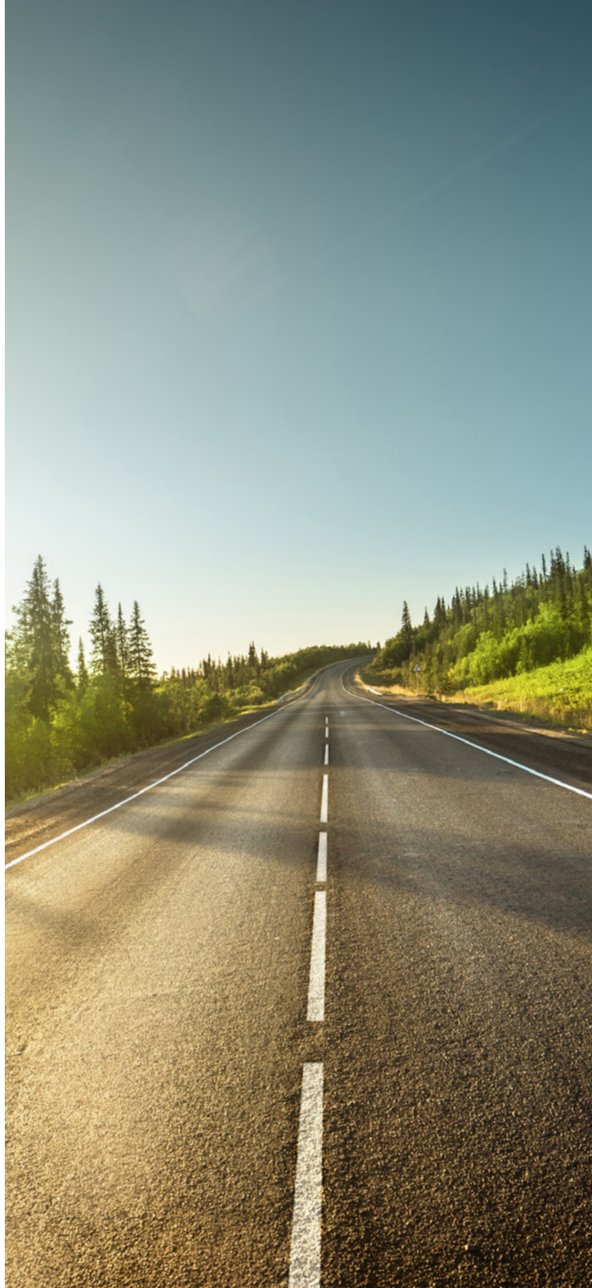
If the answer to **any** of these questions is **NO**, the action may have serious consequences.

Do not do it. Seek guidance.

YES

If the answer to **all** of these questions is **YES**, proceed with confidence.

IF YOU ARE NOT SURE, OR OTHERWISE HAVE ANY QUESTIONS, SEEK GUIDANCE.



BRIDGESTONE INTEGRITY
IN THE WORKPLACE

Bridgestone Kurume Plant, Japan

RESPECTING EACH OTHER

Promoting Respect and Dignity

Diversity

Health and Safety

Workplace Violence

Drugs and Alcohol

Privacy and Personal Data

Communication and Information Sharing

Promoting Respect and Dignity

Bridgestone's employees are its most valuable resource. To be successful, we must treat each other with respect and dignity at all times.

No Harassment

Bridgestone will not tolerate bullying or harassment, including (without limitation) sexual harassment. Harassment can take many forms, but can generally be defined as any unwelcome conduct that creates an intimidating, hostile or offensive work environment, or that has the purpose or effect of unreasonably interfering with an individual's work performance. Harassment does not require intent to offend. Inappropriate conduct meant as a joke, a prank or a compliment can contribute to harassment.

YOU SHOULD

- Speak out. If you see someone harassing a coworker, tell them to stop. If they don't stop, contact any of the resources listed in "Where to Go for Help" (page 14).
- Be mindful of how your words and actions affect others.
- Make decisions regarding the hiring, development and promotion of employees solely on the merits.
- Participate in employment and labor relations training and familiarize yourself with employment laws in your location. Follow them.
- Embrace the views of a coworker whose life experience differs from your own.

Diversity

Diversity is a source of strength for Bridgestone. The diverse experiences, viewpoints and styles of the company's employees not only give us an important competitive advantage in the marketplace, but also contribute to a rich work environment where we can all learn from one another.

We are committed to maintaining an inclusive culture where diversity is embraced and celebrated, enabling all Bridgestone employees to thrive.

No Discrimination

Bridgestone makes employment and career development decisions on the merits. We affirm the fundamental principle that everyone is entitled to fair treatment and equal opportunity without discrimination on the basis of any characteristic such as race, ethnicity, color, nationality, gender, gender identity, sexual orientation, age, language, religion, creed, social status, disability, or any other legally protected class.

We do not tolerate behavior that is discriminatory, harassing, disrespectful, or otherwise degrading to individual dignity. We are committed to protecting the rights of individuals in traditionally under-privileged groups and expanding their employment opportunities.

Group Global Human Rights Policy

Bridgestone has confirmed its commitment to advancing fundamental human rights and responsible labor practices throughout our global operations by adopting a global Policy on Human Rights. The policy, which applies to all Bridgestone employees and locations, affirms the company's:

- **Respect for diversity and inclusion**
- **Prohibition of discrimination and harassment**
- **Focus on workplace safety and health**
- **Commitment to responsible labor practices**
- **Protection of free speech and association**

Familiarize yourself with the policy. We expect all of our employees to uphold this policy, and we expect our vendors and suppliers to do the same, as reflected in our Global Sustainable Procurement Policy.

Health and Safety

Bridgestone prides itself on providing a safe, healthy working environment. Safety is our top priority, and we expect our employees and contractors to embrace our philosophy of putting "Safety First, Always."

Bridgestone is committed to complying with all laws and regulations governing workplace safety. We will provide you, our employees, with all the training and education you need to perform your jobs safely. No job is so important, no task so urgent that it cannot be done safely. Safety always comes first.

YOU SHOULD

- Understand your facility's health and safety rules and follow them. Make sure your coworkers do the same.
- Always follow the working standard. Don't take shortcuts.
- Make sure you know what to do in an emergency.
- Immediately tell your supervisor or your location's safety manager about any accidents, unsafe conditions, unsafe behaviors or other safety concerns.

YOU MUST NOT

- Make verbal or physical threats.
- Engage in hitting, fighting, pushing or any intimidating physical contact.
- Send harassing or threatening emails or correspondence, or make harassing or threatening phone calls.
- Make threats or otherwise encourage or support violence.

Workplace Violence

Bridgestone prohibits violence, threats of violence, intimidation and disruptive conduct on company premises and even off company premises if the employee is on company business or the behavior is an extension of the workplace, such as online bullying directed at a coworker.

This prohibition applies to all Bridgestone employees, whether full-time, part time or temporary—as well as to customers, suppliers, contractors and visitors.

For the safety of all employees, customers and visitors, Bridgestone prohibits the possession of firearms or other weapons on company property, in company vehicles, in rental vehicles, while on company business or at company-sponsored events (even if held off company premises). Very limited exceptions, such as those necessary to comply with local laws, may apply, but only with proper approval in accordance with your local policy. Ask a Law Department member if you need more information.

You should immediately notify management, Security or Human Resources of any prohibited behavior. Security procedures may vary region by region, so please consult local policies. Also see the resources listed in "Where to Go For Help" (page 14).

Drugs and Alcohol

Bridgestone employees have a right to a workplace free from the effects of alcohol and drugs. Employees under the influence of drugs or alcohol are a danger to themselves, to their coworkers and to the business.

The possession, sale or use of illegal drugs on company time or property is prohibited. Impairment from alcohol or improper use of legal drugs while conducting company business is also forbidden. Review your location's drug and alcohol policy for the specific rules that apply to you.

When allowed by law, Bridgestone may conduct pre-hire and post-hire drug and alcohol testing to ensure that our workplace is safe and productive.

YOU SHOULD

- If you suspect someone is using drugs or alcohol in violation of company policy, immediately tell the person's supervisor or another member of management.
- Understand and follow your location's drug and alcohol policy.
- Contact any of the resources listed in "Where to Go for Help" (page 14) if you suspect illegal drug activity in the workplace.

Bridgestone Proving Ground, Tochigi, Japan

Privacy and Personal Data

Bridgestone respects the confidentiality of our customers' and employees' personal, financial and health information. Personal data should be handled, used, or shared only when there is a legitimate business reason to do so, and then only in accordance with applicable law and company policy.

Penalties for violating data protection laws can be severe. If you deal with personal data in your work, you are responsible for understanding and complying with legal requirements and the company data security and privacy policies for your location.

YOU SHOULD

- Use caution when handling personal, health or financial information to ensure that confidentiality is maintained. When in doubt, ask Human Resources or a member of the Law Department for guidance.
- Understand that privacy laws vary greatly from country to country. Acceptable handling procedures in one country may not be acceptable in another.

Communication and Information Sharing

Follow these simple rules when interacting with your coworkers to build trust and the sound, lasting relationships that make Bridgestone a stronger company:

- Tell the truth.
- Be respectful.
- Be open and transparent.
- Share good news and bad news without hesitation.
- Be mindful and respectful of local customs and practices, and take special care to communicate clearly and respectfully, when communicating with others outside of your region.
- If you believe the other person may have misunderstood you, take the time to correct any misunderstanding.
- If you do not understand the other person, have the courage to speak up and let them know you do not understand.
- When requesting information, always explain the purpose of the request clearly and accurately.

Remember, proper communication and information sharing is critical to Bridgestone's success as a global company.

Promoting Respect and Dignity

Q: I just learned a coworker has accused me of harassment. What's going to happen to me?

A: The company will conduct a complete and impartial investigation into the allegations. You and others will be interviewed and given an opportunity to describe what happened. The outcome will depend on a number of factors, including the specific facts, seriousness of the conduct and history.

Q: A coworker in my department is constantly joking about other members of the department. He thinks he's funny but he's making everyone feel really uncomfortable. What can I do?

A: Each of your coworkers deserves respect. Someone needs to talk with the disrespectful coworker. If you are comfortable doing this yourself, you should. If not, you should talk to your supervisor or Human Resources about the situation. If the conduct continues, contact Human Resources immediately.

Q: My new supervisor has been paying me a lot of attention recently. Last week, he stopped by my desk to ask a question and started rubbing my shoulders. I did not invite him to touch me, and it made me very uncomfortable. What should I do?

A: If you are comfortable doing so, you should let your supervisor know that his behavior is unwelcome and makes you uncomfortable. If not, you should talk to Human Resources about the situation or contact the BridgeLine. If the conduct continues, contact Human Resources immediately.

Diversity

Q: I've been passed over for a promotion for which I believe I am qualified. I think it is discrimination because I have received positive reviews while others who have not performed as well get promoted. What should I do?

A: The first thing to do is to talk with Human Resources or the hiring manager about the qualifications and performance necessary for the position, and why you were not selected. If you still believe you may have been discriminated against, contact Human Resources. You may also contact the BridgeLine with your concerns.

Q: I may be old fashioned, but I believe certain jobs in my department require too much travel time for single parents. Can I screen out single parents from my list of job candidates?

A: Absolutely not. At Bridgestone, equal opportunity means just that—a fair chance for everyone.

Health and Safety

Q: Two employees suffered minor accidents on the production floor last week. Neither was seriously hurt. My supervisor told me not to include the events on an accident report since they were minor, and the department wants to get the safety award this year. Should I allow the accidents to go unreported?

A: No. Even small incidents and minor injuries can have serious consequences. Bridgestone requires employees to report all accidents and injuries. Reports can be used to spot safety issues and trends that may help prevent more serious injuries in the future.

Q: A couple of things that we do in my area bother me because they don't seem safe. The problem is, I don't want to bring them up because I'm new here and don't want to seem like a troublemaker.

A: Immediately discuss your concerns with your supervisor or your location's safety manager. Sometimes new eyes see things that other eyes have missed. Raising a concern for safety is not making trouble. It shows you care.

Workplace Violence

Q: I was in the office last weekend and used my company ID to enter the building. A well dressed man entered right behind me without using his ID. Did I make a mistake by letting him in?

A: Yes. An unescorted and unidentified person on company property is a serious security risk and could even increase the risk of violence at your workplace. Even though it may have felt awkward, you should have asked to see the person's work identification or separately confirmed his right to enter before letting him in the building. If the person refused, you should have contacted a manager or Security immediately.

Q: A coworker in my department is having marital problems. Last week, she told me her husband has threatened to come to the office to "settle some things." How should this situation be handled?

A: First of all, take this situation very seriously. Never dismiss even a potential threat. Immediately notify Security or your manager so that they can determine appropriate methods to deal with the situation. If you believe you are in imminent danger, remain calm, determine the best course of action for your safety, signal coworkers if you can and as soon as possible, call the police.

Drugs and Alcohol

Q: My manager has been coming to work with alcohol on his breath. He doesn't seem drunk, and I don't want to get anyone in trouble. What should I do?

A: If someone has alcohol on their breath, a problem may exist. Speak right away with another supervisor, Human Resources or contact the BridgeLine so the situation can be addressed.

Privacy and Personal Data

Q: I was working late last night at the office. When I went to use the copier, I found a stack of personnel records in the sorter. There is a lot of personal information on these forms. I don't think it is right that this kind of information is left for all to see. What should I do?

A: You should return the papers to Human Resources immediately by confidential means. Protecting confidentiality and privacy is the personal responsibility of each Bridgestone employee. You are doing the right thing by being alert to the issue and acting accordingly. Human Resources should identify the person who left the papers in the copier and counsel him or her on the duty to protect the confidentiality of coworkers' personal information.

Q: Is my company laptop private?

A: Bridgestone provides its employees services and equipment such as computers, email and mobile devices for work-related purposes. To protect its employees and the company as a whole, Bridgestone, subject to applicable law, may inspect its facilities and property, including computer hard drives, telephone records, voice mail, email, Internet usage, documents, offices, filing cabinets, lockers and other work spaces.

The BridgeLine To find BridgeLine information for your location, visit https://www.bridgestone.com/responsibilities/bridgeline/.

BRIDGESTONE INTEGRITY
IN THE MARKETPLACE

Thai Bridgestone Rangsit Plant,
Pathumthani, Thailand

PLAYING BY THE RULES

Product Safety and Quality

Competitive Information

Free and Fair Competition

Bribery and Corruption

Our Dealings with Suppliers

Our Dealings with Customers

The Government as a Customer

Trade Restrictions

Product Safety and Quality

If you have spent any time working at or with Bridgestone, you know our Mission—Serving Society with Superior Quality. Simply put, the services we provide and the products we make and sell must be safe for our customers and of high quality.

When thinking about safety, remember that the concept of safety includes not just the product itself, but also instructions for use, product certifications, safety warnings, maintenance, the selection of the right application, installation and service.

Bridgestone aims to create customer value and trust by promoting Total Quality Management (TQM) improvement activities in all its departments globally.

Remember, quality improvement and customer satisfaction are the responsibilities of all Bridgestone employees. You should always follow our quality processes and continuously seek out ways we can improve on safety and quality. Immediately notify your supervisor or your facility's quality manager of any suspected quality issue or failure to follow the company's quality control processes.

YOU MUST NOT

- Sacrifice safety for cost or deadlines.
- Hide substandard work.
- Falsify test results.

Competitive Information

In today's marketplace, it is important to keep an eye on the competition. As Bridgestone employees, however, we have an obligation to ourselves and the company to ensure that our collection of competitive information is both legal and ethical. We should never gather competitive information through misrepresentation or theft, accept confidential information from someone who is not authorized to disclose it, or misuse confidential information that was provided under a confidentiality agreement for a limited purpose. When in doubt, seek guidance from the Law Department.

YOU SHOULD

Use acceptable sources for competitive information. For example:

- Articles in a newspaper or magazine or on public Internet sites.
- Industry surveys by reputable consultants.
- Trade shows.
- Public filings.
- Other publicly available information.

From the Field

Your department has just hired a new employee who previously worked for a Bridgestone competitor.

Can this person share information about her former employer?

Although the new employee may of course use the professional skills she has acquired throughout her career, she is not permitted to use or share trade secrets or sensitive competitive information she learned while working for her former employer. And she should never seek to obtain competitive information about her former employer from former coworkers or other business contacts.

You may not ask for or allow the new employee to volunteer any such information about her former employer. Speak to your supervisor or the Law Department if you have any questions.

Bicycle Wheels at the Bridgestone Cycle Ageo Plant, Japan

Free and Fair Competition

Bridgestone is a strong competitor in the marketplace. We may play hard, but we always play fair and by the rules. We win on the merits.

Be careful. Antitrust and competition laws are tricky. Simple things like a careless conversation with an old friend over lunch or over a break at a trade association meeting can violate the law. The penalties can include prison time for employees and steep fines for companies.

Always consult with the Law Department before acting as Bridgestone's representative at a trade association to ensure proper review of the association's policies and practices. Always review available guidance or seek advice from the Law Department prior to other dealings with competitors. And immediately report any potentially prohibited communications by a competitor to a member of the Law Department.

Remember: Bridgestone has antitrust and competition training available for all its employees. If you have not received training recently, don't wait. Contact the Law Department for assistance.

YOU MUST NOT

- Agree on or discuss prices or related terms of sale with a competitor.
- Divide customers, markets or territories with a competitor.
- Agree with competitors to limit production.
- Agree with competitors to not deal with suppliers or customers.
- Discuss with competitors or otherwise tamper with a competitive bidding process (i.e., engage in "bid rigging").
- Share confidential company information with a competitor, including information received from customers.
- Agree with another employer not to recruit certain job candidates or not to compete on terms of compensation.

From the Field

You are attending a trade association meeting. During a coffee break, an executive from a competitor approaches you. This executive was your supervisor many years ago, and you have a lot of respect for her. She complains about another competitor's price discounting policies. She suggests that you talk to the competitor about the need to develop a more "realistic" pricing strategy.

What should you do?

Never discuss anything related to pricing or other terms of sale with a competitor. If a competitor attempts to have a prohibited communication with you:

- Inform the person that you will NOT discuss the prohibited subject.
- End the conversation immediately.
- WALK AWAY if the other person insists on continuing the conversation.
- Report the matter IMMEDIATELY to a member of the Law Department.

Bribery and Corruption

Bridgestone employees in all countries are absolutely prohibited from engaging in bribery. Under no circumstances may a Bridgestone employee or a third party acting on Bridgestone's behalf offer anything of value to a government official or any other third party, or their representatives, to obtain or retain business or for any other commercial advantage.

Bribery is illegal in countries throughout the world. Additionally, some countries have bribery laws that can extend to certain actions taken by Bridgestone companies outside that country's borders. These laws carry stiff penalties such as fines and imprisonment. Violation of these laws can ruin Bridgestone's good name and business prospects from a global perspective.

YOU MUST NOT

Bribery is strictly prohibited.

Remember, a bribe can be anything of value. Cash, gifts, donations to selected organizations, a job offer for a family member, even paying for a business trip, a meal or other business courtesies could be considered a bribe if offered to obtain an improper business advantage.

Bribery of Government Officials

Many countries have very strict laws regarding bribery of government officials. For purposes of these laws, a government official can be a government employee, a political party candidate or employee, an employee of a state-owned enterprise, an employee of a public international organization, or anyone acting in an official capacity. If you have any dealings with government officials or manage those who do, contact your Law Department for special guidance and training.

Look for Warning Signs

Companies can be held responsible not only for bribes offered by employees, but also by third parties acting on their behalf. We must therefore use great care when hiring and working with third parties who will represent Bridgestone—always looking out for warning signs suggesting that a representative might be engaged in bribery.

SEEK ASSISTANCE

If you notice that an agent or representative of Bridgestone exhibits any of these "red flags" for corruption, contact the Law Department.

The agent or representative:

- Was recommended to the company by a government official or third party whose favor we are seeking.
- Has close family or other affiliation with a government official or third party whose favor we are seeking.
- Requested payment to a third party or to accounts in foreign countries.
- Requested reimbursement for poorly documented expenses.
- Requested payment that is unusually high for services performed.
- Has inconsistencies on expense reports.
- Used undisclosed subagents to assist in performing services.

Our Dealings with Suppliers

Bridgestone and its customers have long benefited from the company's strong, lasting relationships with its suppliers. Simply put, we cannot succeed without them.

When selecting and managing suppliers, including consultants, brokers, agents, or contractors, verify that they are qualified to do business with us. Many countries have laws prohibiting transactions with certain restricted parties or may require certain credentials or certifications. Bridgestone also has specific procurement policies, including the Global Sustainable Procurement Policy, which establish requirements for supplier operations.

Choose the qualified supplier that will provide the best overall value, taking into account quality, price, service, delivery, and reputation. Always choose suppliers based on the merits, avoiding conflicts of interest, inappropriate gifts and entertainment, or any other favoritism that might improperly influence or appear to influence the selection process (see the Gifts and Entertainment section of this Code for additional guidance). Never, ever accept payments or other items of value intended to influence our decisions about suppliers. Competitive bidding must be handled fairly, with each supplier having an equal chance to compete for our business. And when we engage a supplier, contract terms should specifically describe the services to be provided and otherwise comply with Procurement policies.

Remember, our suppliers' reputation and behavior can directly affect Bridgestone. Only do business with companies that comply with the law and understand and operate consistently with our commitment to compliance and ethics.

Our Dealings with Customers

How we do business is just as important as what we do. As a Bridgestone employee, it's your job to ensure that every single dealing with our customers is honest, fair and professional.

When entering into sales agreements, verify the transaction is not prohibited by trade or sanctions laws. Many countries have laws requiring product certifications or prohibiting transactions with certain restricted parties.

We must tell the truth when advertising our products, and never make false claims about our own or our competitors' offerings. And we must never charge a customer for services or products that we have not provided, nor cause customers to incur costs due to carelessness or faulty workmanship. If you believe a customer may have been treated unfairly, it's your duty to fix it.

The Government as a Customer

In many respects, our relations with a government agency or a government-owned business as a customer are just like our dealings with private sector customers. Each must be treated with the highest standard of fairness and honesty.

However, there are many special rules and safeguards that apply to government sales. These rules can apply to bidding processes, the use of subcontractors, gifts and entertainment, conflicts of interest, the company's hiring practices, and other areas. Government contracting regulations vary from country to country and even within some countries from one location to another. If you deal with sales to the government or a government-owned business, you are responsible for knowing and complying with all applicable laws and regulations. Please consult a member of the Law Department for guidance.

Trade Restrictions

Bridgestone does business in many countries around the world. Each of these countries has laws that control the import and export of goods, services and information. Some of these laws prohibit the sale of any goods or services to certain countries. Others require companies to obtain special permits for certain types of products. Some laws prohibit the sharing of technology with citizens of certain countries. Serious penalties, including fines and imprisonment, can apply when these laws are violated.

If you are involved in the sale or transfer of products, services or information across international borders, make sure that you are familiar with the applicable laws and regulations. Be sure to follow all applicable import and export control policies and procedures. Keep in mind that trade prohibitions vary by country and are subject to frequent change. If you are uncertain or have any questions, contact the Law Department.

Product Safety and Quality

Q: A shift supervisor has told us to skip a quality control procedure. I think this violates company policy, but he is the supervisor. What should I do?

A: Don't skip the quality control procedure. If you think the supervisor is breaking the rules, contact your supervisor's manager, your company's Quality Assurance Department, or contact the BridgeLine.

Competitive Information

Q: Sometimes a customer will complain that our prices are higher than the competition. Can I ask the customer for copies of our competitor's proposals to confirm that the competitor's price is lower than the price we are quoting?

A: Possibly, but this is a tricky area. Contact a member of the Law Department for advice on how to proceed.

Free and Fair Competition

Q: I got a call from a former coworker who works for a competitor, asking if Bridgestone was planning to bid on a particular program. He suggested that if we skipped this one, his company would skip the next one. Frankly, we're too busy to finish this bid in time anyway. Should I accept his offer?

A: No. This offer is bid rigging, or collusion, and it's illegal to accept his proposal. Our company's decision not to compete for this business must be made for valid reasons, not as part of a "deal" with a competitor. Be very clear with your former coworker that our company would never consider this kind of offer. Contact the Law Department immediately.

Q: One of our largest dealers emails me all the time complaining about another dealer's pricing. He says he wants us to talk to them about their "pricing philosophy." I don't want to offend him. What can I do?

A: Politely but firmly explain that we cannot involve ourselves in the pricing decisions of our customers. Each dealer is free to set its own prices in the marketplace. Contact the Law Department for additional guidance.

Bribery and Corruption

Q: I know it's against the law to make payments to government officials, but everybody tells me that it's the only way to get things done in this country. Can't I get around this by hiring an agent who will pay the officials a commission?

A: No. It's against the law. The consequences of getting caught for you and the company could be severe. You can't get around your legal responsibilities by hiring agents to do what you are not permitted to do.

Q: I took a course on the Foreign Corrupt Practices Act, the U.S. anti-bribery law, recently. I remember learning that sometimes "facilitating payments" (small payments to government officials to expedite routine transactions) were permitted under the law. What is our company's position on facilitating payments?

A: Facilitating payments are not permitted under company policy and are prohibited by law in most countries.

Q: I have heard rumors that my manager recently offered a bribe to a prospective customer in order to secure their purchase of our products. I don't know if they are true. What should I do?

A: Contact the Law Department or the BridgeLine right away.

Our Dealings with Suppliers

Q: One of our oldest and most reliable suppliers has been struggling financially and has asked for a temporary price increase. One of the supplier's competitors offers the same products cheaper but does not have the same track record for quality. Do we have to give the business to the supplier with the lowest prices?

A: Not necessarily. Bridgestone looks for the best overall value. Price is an important factor but not the only one. We also must take into account quality, delivery, service and reputation, among other considerations.

The BridgeLine To find BridgeLine information for your location, visit https://www.bridgestone.com/responsibilities/bridgeline/.

Our Dealings with Customers

Q: My coworkers and I compete with people from other companies who take business from us by lying about their pricing policy and services. Sometimes I feel like the only way to compete is to resort to the same cheap tactics. What should I do?

A: Don't give in. Bridgestone's success depends on long-term customers—customers who are satisfied that we have fulfilled our commitments to them. You will build a better company through referrals and continued business from satisfied customers than from quick sales that disappoint. If you learn of competitor misconduct, notify the Law Department.

The Government as a Customer

Q: The company is bidding on a state contract. We had several meetings with state officials that extended through the lunch hour. Is it okay to treat them to lunch?

A: It might not be. In many locations, it is a crime to give even small, token gifts to government officials. We should not do anything that may improperly influence, or appear to improperly influence, the bidding process. Ask a Law Department member for help.

Trade Restrictions

Q: We have received an order for an unusual volume of tires from a new customer. The customer is in a country where we are allowed to ship, but we have heard that the customer may have close ties to a regime in a country where we may not ship. Payment will be made in the currency of yet another country. It's a big sale and our local representative says not to worry. Can we just assume that the tires will be used in the country where we are shipping, or is this a problem?

A: The information you have indicates that the tires might be shipped to a prohibited country. You should seek advice from the Law Department before acting.

Q: I believe European law applies restrictions to sales to Syria and certain other countries, but I am not a European citizen and I don't work in the European Union. Do these laws apply to me too?

A: Many EU trade laws apply not only to EU companies but also indirectly to their subsidiaries around the world. Please consult with the Law Department for assistance in this complex area.

Q: I work in Bridgestone's U.S. Commercial Tire Sales division and recently met a prospective customer at a trade show. When he gave me his business card, I realized that his business is located in a country that is subject to U.S. trade restrictions. Can I pass his information along to a coworker in another country that does not have trade restrictions?

A: No. U.S. law not only prohibits you from selling products to people or businesses located in the restricted country, but also prohibits facilitation of sales to people or businesses located in that country—even if the company that ultimately makes the sale is not located in the U.S. Just forwarding a business card to a coworker could constitute facilitation, if it results in a sale. If you aren't sure what to do, ask the Law Department.

BRIDGESTONE INTEGRITY
IN OUR DAILY WORK LIVES

Firestone Farm Tire Test Center, Ohio USA

PROTECTING COMPANY ASSETS

Gifts and Entertainment

Conflicts of Interest

Confidential and Proprietary Information

Use of Company Resources

Patents, Trademarks and Copyrights—Ours and Others'

Electronic Communications and Computer Systems

Integrity of Records, Disclosures and Financial Reports

Insider Trading

Money Laundering

Internal Controls, Audits and Investigations, and Fraud

Gifts and Entertainment

The exchange of small gifts and modest business courtesies between business partners is a common and often a positive part of doing business. This practice, however, can sometimes create conflicts of interest or the appearance of wrongdoing. At Bridgestone, we cannot allow the exchange of gifts and entertainment to influence or appear to influence our independent business judgment or the independent business judgment of the companies with which we do business.

Some gifts and forms of entertainment might be acceptable, but require special review and approval. Seek guidance and written approval from your supervisor:

- If you are exchanging gifts or entertainment with the same person or company on multiple occasions.
- When your location's policy requires supervisor approval for certain gifts.

In addition to these basic principles, be sure to review the gift and entertainment policy for your location closely to understand the specific rules that apply to you. Be proactive. Regularly inform suppliers, customers and other companies with whom we do business about our policy on gifts and entertainment. An especially good time to do this is several weeks before the holidays or periods in which it is customary to give gifts. You can, seek guidance from your supervisor, a member of the Law Department, Human Resources or Internal Audit.

And remember, other companies have gifts and entertainment policies, too. Be mindful of these policies and ask before offering gifts and entertainment.

NEVER ACCEPTABLE

Bridgestone employees are prohibited from giving or accepting gifts or entertainment that are:

- Illegal.
- In cash or cash equivalent.
- Offered in exchange for something in return.
- Sexually oriented or otherwise inappropriate.
- Offered to a government official without the prior written approval of the Law Department.
- In violation of any more restrictive policy in effect in your department or at your location.

USUALLY ACCEPTABLE

The following are examples of gifts that are usually acceptable:

- A box of chocolates or fruit basket during the holidays.
- A reasonable business meal at a local restaurant.
- Promotional items of small value such as coffee mugs, pens or golf shirts with company logos.
- Occasional attendance at a regular season sporting event or similar entertainment event where the price per ticket is not excessive, as determined by the policy for your location.

From the Field

A long-time vendor has offered to pay for your travel and lodging expenses for its annual conference.

Can you accept?

No. It would be inappropriate for you to accept the vendor's offer, even if the vendor is paying travel and lodging expenses for other attendees. If you and your supervisor determine that you should attend the conference, your costs of attending should be paid for by Bridgestone.

Conflicts of Interest

Bridgestone employees have a duty of loyalty to the company. We must avoid financial, business and other relationships that conflict, or even appear to conflict, with our duty to act in the best interest of the company at all times.

Common Conflicts of Interest

A potential conflict of interest can arise in many ways. A common situation arises when you or a close family member or a member of your household is employed by or otherwise affiliated with a competitor or supplier or any other company seeking to do business with us.

Other examples include:

- Direct or indirect supervision of a family member, a member of your household, or someone with whom you have a romantic relationship.
- An ownership interest in a customer, supplier or competitor of Bridgestone (excluding small investments in large publicly traded companies).
- Participating in a business transaction to your personal advantage based on information or relationships developed as a company employee.
- Holding a second job that interferes with your ability to do your regular job.

Your location may have a policy that helps clarify other situations that create a conflict.

How to Resolve Conflicts of Interest

The first step in resolving any potential conflict of interest is simply to notify your supervisor. The disclosure should be made in writing. Your supervisor will then work with Human Resources and, as appropriate, others to determine what, if anything, needs to be done.

In many cases, disclosure alone (with proper documentation of the disclosure and resolution of the conflict) will be enough. Occasionally, it may be necessary to reassign some of your job responsibilities. Certain conflicts can only be resolved by ending the conflicting relationship. For example, it would not be permissible for a Bridgestone employee to work for a competitor while also working for Bridgestone.

YOU SHOULD

- Notify your supervisor of any potential conflict of interest in which you are involved.
- Ensure the assessment or resolution of the conflict is properly documented.
- If you observe a conflict of interest relating to others, notify your supervisor or Human Resources or contact the BridgeLine.

Confidential and Proprietary Information

As a Bridgestone employee, you may have knowledge of confidential and proprietary information about our products, services or the business affairs of the company, its customers, suppliers and other third parties. This information is vital to our success and must be protected. It should never be used for personal gain.

Understand and follow local policies for classifying and protecting confidential information. You can protect the company's proprietary and confidential information by maintaining it in authorized, secured locations (e.g., locked filing cabinets or password protected computer files). Never disclose proprietary or confidential information to third parties without authorization. If you plan on electronically sharing confidential information with any third party, be sure to comply with data security requirements in your location. Be careful when using speakerphones and cell phones, and never discuss sensitive company information in public. Some employees may have access to our customers' and others' financial or personal information. This information must be safeguarded at all times and only used for legitimate business purposes. Remember, your duty to safeguard proprietary and confidential information continues even after you leave the company.

If you are not sure about whether certain information is confidential and must be protected, talk to your supervisor or ask a member of the Law Department.

Confidential / Non-Confidential Items

Confidential Items

The following are examples of proprietary and confidential information and/or trade secrets that should not be shared without proper authorization:

- Compounds and formulas for our products.
- Written or oral agreements between the company and its business partners.
- Financial information about the company.
- Engineering drawings and other technical information.
- Pricing, sales and marketing information.
- Manufacturing processes, know-how and production schedules.
- Strategic and business planning information.

Non-Confidential Items

- News reports.
- Court records that are not sealed.
- Advertising or sales literature.
- Public speeches.
- Published financials.

Team Bridgestone Cycling

Use of Company Resources

We each have a duty to use Bridgestone's assets and resources, including cash, inventory, facilities, equipment, computer software, vehicles, supplies and tools, carefully, efficiently and for the company's benefit. Occasional, limited use of the company's office equipment for personal use is permissible in some Bridgestone locations. As always, exercise good judgment and when, in doubt, ask your supervisor for guidance.

SEEK ASSISTANCE

Ask the Law Department or Intellectual Property Department if you have any questions about how to handle the intellectual property of Bridgestone or any third party.

Patents, Trademarks and Copyrights—Ours and Others'

Many of Bridgestone's ideas, inventions, trademarks, logos and other writings are protected by patents, trademarks and copyright law. This intellectual property is very valuable and must be used in strict accordance with company guidelines.

If you are unsure how to handle the company's intellectual property, consult a member of the Law Department or Intellectual Property Department for guidance.

Third parties have intellectual property rights, too, and we must always be careful to respect them. You may not download, copy, distribute, display or modify copyrighted materials without the consent of their owner. Please be aware that a work may be protected by a copyright even if there is no copyright notice on the work.

Guayule Farm at Bridgestone Biorubber Process Research Center, Arizona, USA

Electronic Communications and Computer Systems

Bridgestone has adopted comprehensive policies governing the use of the company's electronic communications and computer systems in each of its locations. Each of us must know and follow the policies applicable in our location.

Key Features of These Policies

Business Use

Bridgestone's electronic communications and computer systems are provided for business use. Limited personal use that does not consume significant company resources is, however, permissible in some Bridgestone locations.

Company Rights

Subject to applicable law, the company has the right to access, review and disclose any information stored on or communicated through its computers or electronic communication systems.

Limitations on Access

Access to information in our electronic communications and computer systems is allowed only to authorized employees and third parties. You may only access, use or download company information for which you have specific authorization.

No Harassment

All electronic communication, like other forms of communication, must be professional and appropriate. Your electronic communication must not include messages or links to websites that are discriminatory, harassing, sexually explicit, racist or otherwise offensive in the company's reasonable opinion.

No Unauthorized Downloading of Software

Do not download software to the company's electronic communications and computer systems without prior authorization from IT or a person designated by IT.

Computer Security

Bridgestone invests heavily in the latest information technology security controls for its electronic communications and computer systems. Bridgestone employees are responsible for ensuring that they are using the latest security controls that the company offers and must never disable the security controls that the company has in place.

Social Media

When using social media, do not disclose confidential company information or communicate in a way that could reflect poorly on the company or its employees. Always distinguish carefully between your own personal views and the views of the company. Do not speak on the company's behalf without proper authorization from the Communications Department.

Integrity of Records, Disclosures and Financial Reports

Bridgestone's success and credibility in the global marketplace depend on the accuracy and completeness of its financial and business records. Moreover, Bridgestone Corporation, as a publicly-traded company, must disclose certain important business information periodically. Accurate business records provide a foundation for wise business decisions. Incomplete or inaccurate records will lead to poor decision-making and can place Bridgestone at financial and legal risk.

Whether you are completing time cards, expense reports, financial statements, disclosure statements, testing reports, quality control records or other business records, take extra care to ensure that each and every document you prepare or review is complete and accurate.

False or misleading entries in financial statements, disclosure statements or other business records are prohibited. Strict compliance with generally accepted accounting principles is required. No undisclosed or unrecorded funds or assets, or other off-book accounts, are to be established for any purpose. If you are unsure how to record a financial transaction, don't guess. Ask for help from a manager in the Finance, Accounting or Internal Audit departments.

Never authorize payment of company funds without proper documentation, or with the knowledge that all or part of the payment will be used for any purpose other than the purpose described in the supporting documents.

Never conceal, alter or otherwise tamper with company records. Retain and destroy documents only in accordance with applicable law and your location's records management policy.

YOU SHOULD

SPEAK UP—for your own benefit and the benefit of the company.

If you suspect that a company document is not accurate, tell your supervisor, Internal Audit, the Law Department or contact the BridgeLine.

Firestone Polyiso Roofing Insulation

Insider Trading

In the course of their work, Bridgestone employees may learn material, nonpublic information about Bridgestone Corporation or another publicly traded business—for example, a vendor, customer or acquisition target. Legal and ethical requirements prohibit us from:

- Making investment decisions based on this insider knowledge ("insider trading"), and
- Sharing information with others that enables those individuals to benefit from this insider information ("tipping").

The consequences of insider trading and tipping are serious and can include criminal and civil liability, reputational damage, and revenue loss. Contact the Law Department if you have any questions.

Money Laundering

Money laundering is the process of hiding funds obtained through illegal activity, or otherwise making such funds look as though they were legitimately obtained. Participation in any money laundering activity is strictly prohibited.

If you suspect that a coworker, vendor or customer is involved in money laundering activities, immediately notify the Law Department or Internal Audit, or contact the BridgeLine.

SEEK ASSISTANCE

If you notice that a coworker, vendor, prospective business partner or customer exhibits any of these "red flags" for money laundering, contact the Law Department or Internal Audit:

- Seeking to establish "structured transactions" or "structured payments" (repeated transactions or payments in amounts intended to avoid triggering the reporting obligations of financial institutions).
- Requesting unusual funds transfers—for example, asking that payments be made to another entity with no apparent connection to the arrangement.
- Requesting a wire transfer to a country where the person or entity is not located and to which it cannot prove a legitimate connection.
- Refusing or failing to provide complete and accurate information about a company making or receiving payment or its owners.

Internal Controls, Audits and Investigations, and Fraud

Internal Controls

Reliable internal controls can limit fraud and waste, and help ensure the accuracy of our books and records. Become familiar with the internal controls in place in your department. Using the principles of "kaizen" (continuous improvement), each of us should periodically evaluate the adequacy of these controls, working to improve them whenever we believe they do not adequately detect or prevent inaccuracies, waste or fraud.

Audits and Internal Investigations

Bridgestone's internal and external auditors work hard to eliminate waste and fraud and to ensure that each of us complies with the company's policies and procedures. They can do their jobs only if we provide them prompt, courteous and complete cooperation. When you are asked to respond to requests for documents by auditors, or in connection with an internal investigation, your responses must be complete and truthful. Don't play games. Your responses should include all relevant information.

Fraud

Any effort to cheat someone out of money, property or honest services is fraud. Submitting false expense reports, misusing company property, and altering company records are all examples of fraud. Fraud, as well as the theft of assets that belong to the company, is a violation of company policy and the law and will not be tolerated. If you suspect that a Bridgestone employee, contractor or business partner is engaged in fraud or theft, notify any of the resources listed in "Where to Go for Help" (page 14).

Gifts and Entertainment

Q: I received an expensive basket of fruit from a supplier as a holiday present. I did not ask for the gift. What should I do?

A: Tell your supervisor that the gift was received. Generally, we must return gifts exceeding an acceptable value to the sender. In case of a gift of food, it might be appropriate to share it with others in the work area or give it to a charitable organization.

Q: I want to give one of our best customers a special gift to say thanks. Bridgestone has access to tickets to a Firestone sponsored music tour, and giving them to this customer would be in line with our policies. I know she would like the tickets, but I think it is against her company's policy for her to accept them. If she doesn't care about the policy, can I give her the tickets?

A: If you aren't sure whether the customer's policy allows the gift, ask her whether she is permitted to receive it. If she says no, or you otherwise know giving a gift will violate her company's policy, you may not give the gift. Just as we want others to respect our standards, we must respect theirs.

Conflicts of Interest

Q: I am dating a coworker who is being considered for a leadership position for the group I am in. Do we have to bring this to the attention of our supervisor?

A: Yes. This situation could create a conflict of interest in your group. Even if you and your coworker are currently equals in the same group, you should advise your supervisor of the relationship so that your supervisor can prevent an inappropriate reporting relationship.

Q: My coworker's son has just been hired for a job in our department. Does this represent a conflict of interest?

A: A conflict of interest would clearly exist if his parent is directly supervising him. However, we do have cases where relatives work in the same department. When this occurs, raises and job performance evaluations must be handled by an independent person. These decisions should be monitored on an ongoing basis to ensure objectivity and fairness for all.

Q: I do contract work for a company that has business dealings with Bridgestone. In my job at Bridgestone, I also have contact with that company from time to time. Is this a problem?

A: Quite possibly. These circumstances must be brought to the attention of your supervisor. It is important that all actual or potential conflicts be disclosed so that any issues can be anticipated and avoided.

Confidential and Proprietary Information

Q: I have been asked to speak at an industry conference on the subject of our company's technology and its benefits to our customers. What should I do?

A: Discuss the content of the presentation with your supervisor before accepting the invitation. Industry conferences can be a good opportunity to promote the company. However, we must use extra caution to protect confidential information. Your presentation material may also need to be reviewed by the Communications Department and the Law Department.

Q: My work involves confidential information. I use a laptop computer when traveling on business. What precautions should I take?

A: Keep your laptop computer secure at all times, following security requirements applicable in your location. If you travel with confidential information, be careful where you work on sensitive documents. If you are traveling to high-risk locations, check with IT or Security to see if any special steps are required by your local policies. Avoid public places where your information might be seen, such as planes, airports, hotel lobbies or restaurants. If you travel frequently and must use a laptop in public spaces, use a screen guard.

Use of Company Resources

Q: I am moving into a new home. Is it OK if I borrow a company truck over the weekend to move a few of the larger items?

A: No. The company provides vehicles solely for use on company business and not for personal activities.

Q: My daughter has asked me to photocopy a homework assignment for her. Can I use the company's copier?

A: Please check your local policy. Occasional and limited personal use of company copy machines is acceptable in many locations.

The BridgeLine To find BridgeLine information for your location, visit https://www.bridgestone.com/responsibilities/bridgeline/.

Patents, Trademarks and Copyrights—Ours and Others'

Q: I work as a sales manager in India. Over the past several months, I have seen instances of companies selling tires with names similar to ours—"Blackstone," "Richstone," names like that. What should I do?

A: Notify a member of the Law Department or the Intellectual Property Department. These companies are trading on our good name and possibly doing harm to our reputation in the process. Our Intellectual Property team can take the steps needed to protect the company.

Electronic Communications and Computer Systems

Q: When I eat lunch at my desk, I will often surf the Internet to take care of small personal matters or check the news. Am I violating company policy?

A: Maybe. Check with your manager regarding local policies. In many locations, limited personal use of the Internet that does not interfere with your job performance is permitted.

Q: My friends and I use Facebook and Twitter all the time. Sometimes the topic of work comes up. Are there any special rules that apply to my use of social media?

A: When using social media, do not disclose confidential company information or communicate in a way that could reflect poorly on the company or its employees. Always distinguish carefully between your own personal views and the views of the company. Do not speak on the company's behalf without proper authorization from the Communications Department. This is a dynamic area. Seek guidance and follow company policies for your location as they are developed.

Firestone Airide™ Air Springs

Integrity of Records and Financial Reports

Q: It is the last week in the quarterly reporting period. My boss wants to make sure we meet our numbers for the quarter, so he asked me to record an unconfirmed sale now that won't be finalized until next week. I guess this won't hurt anyone—should I do what he says?

A: No. Costs and revenues must be recorded in the correct time period. The sale is not yet complete. It would be a misrepresentation and could amount to fraud to include the transaction in an earlier period. Check with Finance if you have any questions about revenue recognition rules; they can be complex.

Q: I ordered some software and my supervisor asked me to record the charge against another expense category because our software budget has been exceeded. What should I do?

A: Remind your supervisor that no one should knowingly make an incorrect entry in the books and records of the company. If your supervisor persists, contact your supervisor's boss, the Law Department, Internal Audit or the BridgeLine.

Internal Controls, Audits and Investigations, and Fraud

Q: I thought I saw a coworker change environmental monitoring reports. What should I do?

A: Immediately notify your supervisor, the site environment manager, Internal Audit, the Law Department or the BridgeLine and provide the details.

The BridgeLine To find BridgeLine information for your location, visit https://www.bridgestone.com/responsibilities/bridgeline/.

BRIDGESTONE INTEGRITY
IN OUR COMMUNITIES

Bridgestone Kalimantan Plantation, Indonesia

SERVING THE COMMUNITY AND SOCIETY

Our Commitment to the Environment

Personal Charity and Community Service

Corporate and Personal Political Activities

Government, Media and Other Inquiries

Our Commitment to the Environment

Bridgestone's Environmental Mission Statement, "to help ensure a healthy environment for current and future generations," serves as the company's enduring environmental philosophy. To support that mission, Bridgestone has declared its commitment to working together with its many stakeholders to realize a sustainable society.

We honor our mission and this commitment by providing quality products and services in a manner that embraces careful and responsible management of our natural resources and the environment. We are committed to building a sustainable society because it is good for business and the world around us.

At Bridgestone, conservation goes beyond simply decreasing the amount of natural resources we use to create our products. Conservation extends to our operations and our activities in the community.

Consistent with these principles, all employees are required to comply with all applicable environmental laws and regulations, as well as the company's environmental policies. This is our minimum standard. Our expectation is that all employees will act as environmental stewards, actively looking for ways to reduce the company's environmental footprint. If you know of any potential violation of environmental laws or company environmental policy, you must report the matter immediately to any of the resources listed in "Where to Go for Help" (page 14). If you have questions or are uncertain of how to proceed with regard to an environmental matter, contact your location's environmental manager or the Law Department.

YOU SHOULD

- Familiarize yourself with the company's Environmental Mission Statement and policies and procedures that apply to your area of the business.
- Think about how you can help the company meet its environmental objectives.

Personal Charity and Community Service

The commitment of Bridgestone employees to their communities and local charities is inspiring. We are proud of what you do and want you to keep up the great work.

When performing personal charity and community service, keep our CSR commitment, *Our Way to Serve*, in mind. Please make sure that your outside activities do not interfere with your work for the company or create a conflict of interest. Community service and charitable contributions are voluntary and personal choices. A Bridgestone employee should never feel pressured to do either by coworkers, supervisors or managers. Finally, do not claim to represent the company in connection with your community service unless specifically authorized to do so.

Corporate and Personal Political Activities

The laws of many countries set strict limits on, and in some cases prohibit, contributions by corporations to political parties and candidates.

Political Contributions

To avoid any confusion, Bridgestone has adopted a simple rule with regard to political contributions: No company funds, resources or facilities may be used for the purpose of supporting directly or indirectly any political party or candidate anywhere in the world, unless the contribution has been determined to be legal by the Law Department, has been approved by the Government Relations Department for your region (if any), and is made in strict accordance with your regional and local policies.

Personal Political Activities

Bridgestone honors its employees who are personally active in the political process. When you do engage in the political process, be sure to do so on your own time and with your own resources. Take care to ensure that any views you express are understood to be yours personally and not the company's.

If you plan to seek or accept a public office, notify your manager in advance. You will need to discuss with your manager and Human Resources whether your official duties might affect your work for the company.

Lobbying

Company officials and representatives sometimes meet with members of government to share views and concerns on specific policies and legislation of interest to the company. These lobbying activities are subject to special rules and must be coordinated to be effective.

Before engaging in any non-routine contact with government officials or employees, you must first consult with the Law Department.

YOU MUST NOT

Use company funds, resources or facilities for the purpose of supporting, directly or indirectly, any political party or candidate in the world without prior approval in accordance with this Code and local policies or rules for your region.

Examples of indirect support include:

- Buying tickets for a political fundraising event.
- Providing meals, goods, services or transportation to a candidate, a government official or political party.
- The "loan" of Bridgestone employees to political parties or campaigns.

Government, Media and Other Inquiries

Governmental Requests and Investigations

Bridgestone occasionally receives requests for information and documents from government agencies and officials. Our responses to those requests must always be accurate.

If you receive a request for information from a government agency or official that is non-routine or relates to an investigation, promptly notify the Law Department. The Law Department will help to ensure that the responses are accurate, timely and complete, fully satisfy our legal obligations, and that the company's own rights under the law have been preserved.

Media Requests

Bridgestone values its relationship with the media. We want to ensure that information about the company is portrayed accurately in the public eye. The Communications Department is responsible for ensuring that all responses to media inquiries are prompt and accurate and made by authorized personnel.

If you are contacted by a reporter or other member of the media, you must politely refer the inquiry to the Communications Department or other person in your organization designated to handle media inquiries. Be sure to follow any media relations policies and procedures developed specifically for your location, including policies related to social media. If you do not know who handles these inquiries for your location, simply take a message and ask your supervisor to assist you in directing the message to the right person. It is important to remember that comments to reporters may be misconstrued no matter how careful you are.

Other Inquiries

Bridgestone prefers to resolve business disputes on friendly terms without resorting to costly litigation. However, this is not always possible. All inquiries or documents received from any attorney or legal representative for any third party must be immediately forwarded to the Law Department for review and response.

Our Commitment to the Environment

Q: I have heard about Bridgestone's efforts to keep our local streams and rivers clean. How can I participate in these kinds of activities?

A: We are glad you want to help. Contact Human Resources, the Communications Department, or your location's environmental group for additional information about upcoming projects.

Q: What happens to all the tires we make after they are used by our customers?

A: Increasingly, they are recovered and recycled to be used in the construction of asphalt roads, athletic fields, construction projects and numerous consumer products. Bridgestone continues to work to advance the environmentally and economically sound management of used tires.

Personal Charity and Community Service

Q: A coworker and I would like to use company stationery to solicit donations for a charity fundraising event we are coordinating in our community. The company isn't involved in the event, but I think using the Bridgestone name may encourage companies to donate. Do we need permission before sending the letters?

A: Yes. Even though the coordinators of the event happen to be Bridgestone employees, the event is not company-sponsored. You will need to obtain approval before using company stationery or the company's name in connection with this charitable activity.

Q: A business partner has asked us to support a charitable organization of which he is a board member. I have never heard of the organization. Is it acceptable for the company to make a donation?

A: Bridgestone must be particularly careful when making charitable donations. These transactions, by their nature, involve Bridgestone making a payment without receiving anything of value in return. Before making a donation, sufficient background information on the establishment and the purpose of the organization must be collected in order to verify the donation is consistent with legal requirements. Check your local policy on donations and the authority schedule for required information and approvals necessary for donations.

Corporate and Personal Political Activities

Q: I am working on a campaign to re-elect our city's mayor and need to attend a fundraiser that is happening during work hours. This is a personal interest and does not involve the Company. Can I go if I get my supervisor's permission?

A: Yes. However, the time off cannot be charged to the company. You'll have to use personal time to attend this event.

Q: I am running for public office. I want to use the office copier to make copies of my campaign flyer. Is that okay?

A: No. Company property and equipment may not be used for a political purpose without authorization from the Law Department. Running for any public office is a political purpose.

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Q: A lawyer telephoned me at the office recently and asked me questions about Bridgestone. He said his law firm was working for us on a big case and needed the information fast. Should I have answered his questions?

A: No. Before disclosing any confidential information about Bridgestone, you should ensure that: (1) you know precisely to whom the information is being disclosed and why the person requires the information; and (2) you have permission from the Law Department to disclose the information.

Q: I work on the second shift at a Bridgestone plant. A reporter called me at home asking for my comments about a change in our production schedule. I know the answer to his question. Can I tell him what he wanted to know?

A: No. You should not answer any questions about Bridgestone's business from reporters. Refer calls from the media to the Communications Department or other person in your organization designated to handle media inquiries. They will determine how to respond and if your involvement is required.

The BridgeLine To find BridgeLine information for your location, visit https://www.bridgestone.com/responsibilities/bridgeline/.

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