

## Compliance Commitment for Suppliers and Contractors

At Bridgestone, we strive to work with suppliers and contractors who take ethics and compliance seriously and who take demonstrated actions to show such commitment, including (amongst other ways) treating their employees with dignity and respect, conducting business in an ethical and honest manner; making products and providing services in an environmentally sustainable manner; and adhering to applicable laws and regulations. Accordingly, we require each supplier and contractor, as well as their subsidiaries, affiliates and subcontractors providing goods and/or services to any Bridgestone entity in the Americas region (collectively, “Suppliers and Contractors”) to comply with the following terms, which are considered to be contractually binding (the “Compliance Commitment”). Suppliers and Contractors shall additionally ensure that any third parties they use in relation to an agreement with Bridgestone are compliant with the provisions of this Compliance Commitment and applicable laws.

The provisions contained herein are designed to give further effect to Bridgestone’s global Code of Conduct (available at <https://www.bridgestone.com/responsibilities/code/>), Global Anti-Bribery Policy (available at [https://www.bridgestone.com/responsibilities/anti\\_bribery/](https://www.bridgestone.com/responsibilities/anti_bribery/)), and Global Sustainable Procurement Policy (available at [https://www.bridgestone.com/responsibilities/social/procurement/policy\\_global/](https://www.bridgestone.com/responsibilities/social/procurement/policy_global/)) and we encourage Suppliers and Contractors to become familiar with these documents and to ask questions about them. As a starting point, Suppliers and Contractors shall adhere to all applicable federal, state and/or local laws and regulations, including all applicable statutory and governmental reporting obligations. However, this commitment goes beyond mere compliance with applicable laws by drawing upon internationally recognized standards to advance social and environmental responsibility. Not all provisions will be applicable to the business structure of, or goods/services provided by, each Supplier or Contractor, but we share the holistic commitment with all Suppliers and Contractors in order to emphasize the importance of acting ethically and in a compliant manner.

**1. Ethics and Integrity:** Suppliers and Contractors are required to uphold the highest standards of ethics and integrity, including:

- ***Anti-Bribery and Anti-Corruption*** – Bridgestone is committed to conducting its operations around the globe ethically and in compliance with all applicable anti-bribery laws. Numerous international laws and treaties have been adopted in recent years that prohibit a variety of corrupt practices, including international bribery. Bridgestone has affirmed its commitment against corruption and bribery by adopting a Global Anti-Bribery Policy (available at [https://www.bridgestone.com/responsibilities/anti\\_bribery/](https://www.bridgestone.com/responsibilities/anti_bribery/)). In support of this commitment, Suppliers and Contractors are expected to adhere to the following:
  - Suppliers and Contractors are required to have a well-designed and effective anti-bribery program that is adequately resourced and empowered to ensure their operations comply with applicable laws.
  - Suppliers and Contractors are forbidden from engaging in any forms of corruption, extortion, bribery or embezzlement and must immediately notify Bridgestone of any incidences of any of the above, including any offers or requests for any of the above.
  - Suppliers and Contractors are forbidden from offering or giving any items of value to any government officials or union officials without obtaining the prior written approval of Bridgestone.
  - Suppliers and Contractors must fully comply with any due diligence requests from Bridgestone in a timely manner, including ensuring compliance with the foregoing by any subcontractors used in providing services to Bridgestone.
  - Suppliers and Contractors are required to provide appropriate, effective and tailored training and education to ensure their employees, representatives or other personnel fully comply with all applicable anti-bribery and anti-corruption laws.
- ***Antitrust*** - Bridgestone is committed conducting its operations around the globe in compliance with all applicable antitrust and competition laws. Bridgestone employees should never gather competitive information through misrepresentation or theft, nor accept confidential information without the owner’s consent. We expect our Suppliers and Contractors to take an equally clear position on competitive and confidential information and to communicate that position to their employees and representatives. Suppliers and Contractors are required to have a well-designed and effective antitrust compliance program that is adequately resourced and empowered to ensure their operations comply with applicable laws. Since antitrust is a complicated area of the law, Suppliers and Contractors are also required to provide appropriate, effective

and tailored training and education to ensure their employees, representatives or other personnel fully comply with all applicable antitrust laws and to offer resources for employees to report concerns or possible violations.

- ***Gifts and Gratuities*** - Bridgestone recognizes that there are certain occasions in which the exchange of small gifts and modest business courtesies between business partners is a common and often positive part of doing business. Bridgestone does not allow the offering, giving or receiving of any items of value that could influence or appear to influence the independent business judgment of any Bridgestone employees or that of any of the business partners (including our Suppliers and Contractors). Bridgestone considers any items that are illegal, in cash or cash equivalent form (i.e. gift cards) or sexually orientated or otherwise inappropriate to be unacceptable and prohibited. No items of value should be offered or provided to any government or union official on Bridgestone's behalf without the prior written approval of Bridgestone. Suppliers and Contractors should not offer or provide any items of value to Bridgestone employees or on Bridgestone's behalf that could influence or appear to influence the independent business judgment of the recipient and should immediately notify Bridgestone of any requests from Bridgestone employees for any such items of value or if any Supplier or Contractor has questions about this topic.
- ***Confidentiality and Personal Data*** - Bridgestone respects the confidentiality of the personal, financial and health information of its employees, Suppliers, Contractors and customers. We expect the same level of respect from our Suppliers and Contractors with regard to Bridgestone intellectual property, trade secrets, proprietary and confidential information. Suppliers and Contractors 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.

2. **Human Rights:** Bridgestone takes its international human rights obligations very seriously and has confirmed its commitment to advancing fundamental human rights and responsible labor practices by adopting a global Policy on Human Rights (available at [https://www.bridgestone.com/responsibilities/human\\_rights/](https://www.bridgestone.com/responsibilities/human_rights/)). We will not do business with Suppliers and Contractors who do not have a sound and comprehensive program to ensure no slavery, forced labor, child labor, or inhuman conditions exist in its operations or supply chains. 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. Bridgestone may reconsider its willingness to partner with Suppliers and Contractors that fail to comply with this Policy.

3. **Labor and Employment:** Bridgestone 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 and Contractors 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 and Contractor's compliance program.

4. **Health and Safety:** Suppliers and Contractors 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 may ask for documentation supporting a Supplier's or Contractor's health and safety programs. Suppliers and Contractors agree to cooperate with such requests and provide timely responses. If a Supplier or Contractor has been charged with a serious health or safety violation that results in suspension of operations or significant penalties, or if a Supplier or Contractor is found guilty in any legal or administrative proceeding of a serious health or safety violation, the Supplier or Contractor must immediately notify Bridgestone.

5. **Environmental Responsibility:** Bridgestone 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 and Contractors to comply with all applicable environmental laws and regulations as well as the Supplier or Contractor's own internal environmental policies. Suppliers and Contractors agree to provide environmental compliance histories and documentation upon request by Bridgestone. If a Supplier or Contractor has been charged

with a serious environmental law violation that results in suspension of operations or significant penalties, or if a Supplier or Contractor is found guilty in any legal or administrative proceeding of any serious environmental law violation, the Supplier or Contractor must immediately notify Bridgestone.

**6. Review and Testing:** Whenever Bridgestone has compliance reporting obligations, we expect our Suppliers and Contractors to respond timely and accurately to our requests for information. While we understand confidentiality obligations and have no desire to be overly-intrusive, Bridgestone reserves the right to require Suppliers and Contractors to complete an annual questionnaire, to promptly respond to compliance due diligence requests, and to open their doors for an occasional, limited-scope audit. For example, if Bridgestone wants to ensure that a Supplier or Contractor is compliant with certain environmental regulations, we may request an on-site visit. We expect cooperation from our Suppliers and Contractors and will, in turn, give proper and reasonable notice (typically at least 24 hours) before any visit.

**7. Compliance and Reporting Potential Misconduct:** Suppliers and Contractors must notify Bridgestone, unless prohibited by law, if they are the subject of any enforcement action or investigation by a government authority of alleged violations of anti-bribery or antitrust laws. Suppliers and Contractors must also report suspected or actual violations of this Compliance Commitment and shall, consistent with any applicable law and privilege, provide reasonable assistance to any investigation by Bridgestone of a violation of this Compliance Commitment. There are a number of ways in which reports or concerns can be raised, including through your Bridgestone business contact, Bridgestone Procurement, the Bridgestone Law Department or through the BridgeLine. Suppliers and Contractors may report concerns through the BridgeLine by calling 1-800-842-0504 (if inside the U.S.) or by filing a report online at [www.bridgestoneamericascompliance.com](http://www.bridgestoneamericascompliance.com) (international dialing instructions for outside of the U.S. are available on this website as well). The BridgeLine is operated by third party specialists to allow employees and others to confidentially report compliance and ethical concerns. Calls can be made anonymously, if preferred. Suppliers and Contractors can also contact the Bridgestone Law Department at [compliance@bfusa.com](mailto:compliance@bfusa.com).

Suppliers, Contractors and their representatives must protect anyone who works for them, either as an employee or a consultant, from any form of retaliation for reporting suspected or actual misconduct. We seek relationships with Suppliers and Contractors that are committed to adhering to fair and safe labor conditions and sound environmental practices. If we determine that a particular Supplier or Contractor does not comply with this Compliance Commitment, this will be considered a breach of the contractual arrangement between Bridgestone and the Supplier or Contractor. While Bridgestone may decide to work with the Supplier or Contractor to develop and implement an appropriate corrective action plan, depending on the circumstances Bridgestone may also elect to end its relationship with the Supplier or Contractor at any time for failing to adhere to this Compliance Commitment.