



Goodyear Australia

Modern Slavery Statement

For the reporting period
1 January 2024 to 31 December 2024



1. Introduction

This statement is made and published pursuant to section 14 of the Modern Slavery Act 2018 (Cth) (**Act**). This statement supersedes our prior statement which was made and published in June 2024 relating to the period 1 January 2023 to 31 December 2023 (**Reporting Period**).

(a) Identification of reporting entities

It has been prepared on behalf of **Goodyear Australia Pty Ltd** ACN 000 017 489 and the entities it controlled throughout its financial year commencing 1 January 2024 and ending 31 December 2024 being:

- *Goodyear Tyres (Aust) Pty Ltd* ACN 004 098 346 (formerly known as Goodyear & Dunlop Tyres (Aust) Pty Ltd)
- *Total Tyres Australia Pty Ltd* ACN 086 070 671
- *Goodyear Tyres Pty Ltd* ACN 000 145 433; and
- *Goodyear Earthmover Pty Ltd* ACN 008 581 351

together the **Goodyear Australia Group**.

2. About the Goodyear group

The Goodyear Australian Group is part of the international Goodyear group of companies owned and led by the parent company The Goodyear Tire & Rubber Company (**Goodyear Parent**). The Goodyear Parent and its subsidiaries form the Goodyear Group (**Goodyear Group, also referenced as 'we', 'us' and 'our'**).

The Goodyear Group is one of the largest tire companies in the world which began over 125 years ago in Akron, Ohio. The Goodyear Group is a leader in creating the future of mobility and is constantly developing new and innovative products designed to harness the power of forward movement.

(a) Goodyear Group commitment

The Goodyear Group as a whole is committed to respecting, safeguarding and supporting fundamental human rights, in line with internationally recognised human rights standards including the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the International Labour Organization's Declaration of Fundamental Principles and Rights at Work and related conventions. The Goodyear Australia Group shares this commitment.



The Goodyear Group commitment to acting with integrity, honesty and respect reflects how we work and serves as the foundation for our duty to protect and promote human rights across our value chain.

(b) Goodyear Group core values

Our protection and upholding of human rights are core company values. Our approach to human rights is informed by our understanding and evaluation of the potential risks and challenges, as well as opportunities, to reduce risk in our operations and value chain.

3. Goodyear Australia Group restructure

The Australian operations have considerably reduced in scale since our last Modern Slavery Statement relating to the calendar year ending 31 December 2023. The Goodyear Australia Group restructure has reduced our own supply chain operations thereby lowering the modern slavery risk factors identified previously.

(a) Purpose of statement

This statement is designed to increase transparency and accountability regarding the modern slavery risks within the Goodyear Australian Group and our supply chains. In this report we will identify, assess and address modern slavery risks and the steps taken by the Goodyear Australia Group thereby contributing to the global effort to eliminate modern slavery.

(b) Australian commitment

The Goodyear Australian Group is committed to the prevention of modern slavery in all forms – it is a violation of human rights. The Goodyear Australia Group will not tolerate forced labour in its operations or in those of its supply chain.

(c) Changes to Australian structure and operations

Goodyear's structure and operations in Australia have changed considerably since December 2023.

Goodyear has reduced the scale of its Australian operations by:

- closing its Beaurepaires tyre retail stores;
- closing its tyre wholesale business operated by Total Tyres Australia Pty Ltd;



- selling the assets of the Brooklyn tyre retreading business and ceasing all operations at both Brooklyn and Geebung retreading plants; and
- changing its logistical operations by ceasing to operate warehousing, distribution and customer service centres across Australia that previously utilised both in-sourced and out-sourced personnel and replacing it with the appointment of two independent distributors who manage the supply chain from factory to customer.

(d) Divestments

Although outside the Reporting Period, it is important to note that the Goodyear Group has also sold its:

- off-the-road tyre business to The Yokohama Rubber Company, Limited on 3 February 2025; and
- its Dunlop intellectual property and associated goodwill to Sumitomo Rubber Industries, Ltd on 7 May 2025 resulting in the termination of its Dunlop distribution agreement and its Dunlop Super Dealer licence agreements

further reducing the scale of its business and the risk of modern slavery occurring in its operations or in its supply chain. These sales have eliminated any risks that were previously identified with respect to the off-the-road tyre business and the Dunlop supply chain.

4. Goodyear Australia Group structure and operations

During the Reporting Period, it was only Goodyear Tyres (Aust) Pty Ltd, Goodyear Earthmover Pty Ltd and Goodyear Tyres Pty Ltd that employed staff. None of the Goodyear Australian Group companies manufacture tyres.

Goodyear Tyres (Aust) Pty Ltd, headquartered in Melbourne, is a tyre marketer. During the Reporting Period, it transitioned from operating under an importation, distribution and warehousing model to both retail and commercial customers, to a third-party distribution model.

It transitioned nearly all of its Goodyear Autocare franchised stores, a network of stores aiming to provide a 'One Stop Shop' for tyre and automotive services, to a trademark licence model. This network became like our Dunlop Super Dealer store network, an independent network of licensed stores offering a range of tyre and battery services. Goodyear Tyres (Aust) Pty Ltd also closed all of its Beaurepaires tyre retail stores, a mostly company-owned network of tyre retailers in metropolitan locations in Australia that also offered associated tyre fitment, battery and other like services, and also closed its retreading operations. These changes have led to a



significant reduction in the scrapping of tyres reducing the environmental footprint of Goodyear Tyres (Aust) Pty Ltd.

Total Tyres Australia Pty Ltd was until 31 March 2024 the wholesaling arm of the Goodyear Australia Group. It wholesaled a large range of tyres, tubes and wheels covering cars, 4WD/SUV, commercial, vans, light trucks, trucks, buses, agricultural vehicles, earthmovers, industrial vehicles, mowers, forklifts and ATVs. The company scaled back operations in the first 3 months of 2024. The closing of this wholesale business coincided with the commencement of the Goodyear and Dunlop distribution arrangements on 1 April 2024 which are specified below.

Total Tyres Australia Pty Ltd remains a tenant of certain premises but is seeking to exit them. It does not otherwise conduct any business. The headcount for Goodyear Tyres (Aust) Pty Ltd significantly reduced during the Reporting Period given this restructure.

Goodyear Earthmover Pty Ltd during the Reporting Period continue to supply and distribute off-the-road tyres that are used in a wide variety of applications including surface and underground mines, quarries, construction sites and ports. Goodyear Earthmover Pty Ltd was based in Sydney, New South Wales during the Reporting Period. An error has been identified in our prior statement, this entity has not supplied or distributed airline tyres. The only company in the Goodyear Australia Group that supplies and distributes aviation tyres is Goodyear Tyres Pty Ltd.

The restructuring that occurred during the Reporting Period and its impact on modern slavery risks are considered in more detail below.

(a) Goodyear Tyres (Aust) Pty Ltd

As part of Goodyear Tyres (Aust) Pty Ltd's operations, it has exclusive rights to import Goodyear branded tyres into Australia. Goodyear Tyres (Aust) Pty Ltd, after conducting due diligence, appointed Tyremax Pty Ltd as trustee for The On Track Tyres No. 2 Trust (**Tyremax**) as its distributor of such tyres for resale within Australia on 1 April 2024. This was the only distribution agreement regarding Goodyear tyres in the Reporting Period. That distribution agreement requires Tyremax to, and to procure that any person that it sells the Products to, must conduct themselves according to the highest standard of business ethics.

Tyremax has completed its own [Modern Slavery Statement](#) and has confirmed in the statement its "...unwavering commitment to working against Modern Slavery in all its forms".

Although Tyremax operationally controls the purchase and supply of Goodyear tyres, Goodyear Tyres (Aust) Pty Ltd maintains oversight over its operations and has audit rights in

Goodyear Tyres (Aust) Pty Ltd has entered into Goodyear Autocare License Agreements enabling independent tyre retailers to utilise the Goodyear trademark. Licensees are



contractually required to comply with all applicable laws and regulations in the conduct of their own independent businesses. The company has reduced its franchise numbers down to 9 and continued to grow its licence network. Goodyear Tyres (Aust) Pty Ltd does not source any parts and ancillary items connected with providing automotive services and repairs. The licensees and franchises directly order tyres from Tyremax and other tyre distributors. The owners of the Goodyear Autocare stores are independent and run their stores as separate businesses. Accordingly, each owner purchases their own tyres, parts and ancillary items.

The Goodyear Parent has retained a licence to market, sell and distribute motorbike tyres, including in Australia. Goodyear Tyres (Aust) Pty Ltd does continue to import motorbike tyres for provision to one distributor in Australia for on sale. This distributor is contractually bound to comply with the highest standards of business ethics in connection with the sale of the tyres and to comply with all applicable laws, rules and regulations. This arrangement will be considered below.

(b) Earthmoving – off-the road tyre business

As noted in our previous Modern Slavery Statement, Goodyear Australia Pty Ltd was supplying and distributing off-the-road tyres that are used in a wide variety of applications, including surface and underground mines, quarries, construction sites and ports. On 22 July 2024, the Goodyear Parent entered into a global Share and Asset Purchase Agreement with The Yokohama Rubber Company, Limited to sell certain assets and shares which comprised its off-the-road tire business. This sale concluded on 3 February 2025 and included the sale of all of the shares in Goodyear Earthmover Pty Ltd which ran the Australian off-the-road tire business. Accordingly, Goodyear no longer has any off-the-road operations in Australia. This has reduced the scope and scale of the Australian supply chain operations.

(c) Dunlop brand

The operating arrangements specified in our last Modern Slavery Statement were wound down from 1 January 2024 to 31 March 2024.

From 1 April 2024 until 7 May 2025, Goodyear Tyres (Aust) Pty Ltd sold Dunlop tyres to National Tyre & Wheel Pty Ltd (**NTAW**) for on-selling pursuant to a distribution agreement. The distribution agreement required NTAW to at all times conduct itself according to the highest standard of business ethics in connection with its sale of the Dunlop tyres. NTAW agreed to comply with all applicable laws, rules and regulations and to do nothing that would cause Goodyear Australia to be in violation of any law, guidelines or regulation. NTAW was also required to procure that those that it on-sold the Dunlop tyres to would comply with such obligations.



NTAW has completed its own [Modern Slavery Statement](#) and has confirmed in the statement that it is "...committed to operating responsibly and ensuring we have robust standards and processes to minimise and address modern slavery risks.

The Dunlop tyres were manufactured by Sumitomo Rubber Industries, Ltd, or its related bodies corporate, in Japan, China, Indonesia and Thailand and shipped directly to NTAW. A small volume was also manufactured by us in Europe and the Middle East at our Colmar-Berg (Luxembourg), Krank (Slovenia), Debica (Poland), Adapazari (Turkey) and Izmit (Turkey) factories. The supply chain was controlled by Sumitomo Rubber Industries, Ltd until shipment to NTAW in which time it was controlled by NTAW. Due diligence was undertaken at the time the global Dunlop tyre arrangements were put in place by the Goodyear Parent with the Sumitomo Rubber Industries, Ltd and were reviewed on a frequent basis. Sumitomo is a signatory to the UN Global Compact, to respect human rights in all its activities and in all countries where it and its subsidiaries operate.

NTAW directly supplied Dunlop tyres to the Dunlop Super Dealers, independent store owners who had a licence to utilise the Dunlop trademark. The licence agreements required Dunlop Super Dealers to comply with all applicable laws and regulations.

Goodyear Tyres (Aust) Pty Ltd also sold some Dunlop tyres to Wildan One Three Pty Ltd who supplied them to Toyota Motor Corporation Australia Limited for its TGRA 86 series. These tyres were manufactured by Sumitomo and our European factories. Toyota's has issued and published its own [Modern Slavery Statement](#).

On 7 January 2025, the Goodyear Parent entered into a global Purchase Agreement with Sumitomo Rubber Industries, Ltd to sell the Dunlop trademarks, domain names and associated business goodwill. The sale included the Dunlop intellectual property and business goodwill owned by Goodyear Tyres (Aust) Pty Ltd and some domain names owned by Goodyear Tyres Pty Ltd.

As a result of this transaction, Goodyear Tyres (Aust) Pty Ltd terminated its exclusive Dunlop distribution agreement with National Tyre & Wheel Pty Ltd and terminated all of its Dunlop Super Dealer Licence Agreements with independent retailers as at the completion of the sale being 7 May 2025. As a result of the transaction, several supply contracts (including those with Toyota and Wildan as noted above) were also assigned to subsidiaries of Sumitomo Rubber Industries, Ltd. Sumitomo Rubber Australia Pty Ltd has issued and published its own [Modern Slavery Statement](#).

This has significantly reduced the scale of the Australian supply chain operations.

(d) Dunlop motorbike tyres



Goodyear supplied Ficeda Pty Ltd, a company in the Yamaha Motor Australia Group of Companies, with Dunlop branded motorbike tyres throughout 2024 which were manufactured by Sumitomo Rubber Industries, Ltd, or its related bodies corporate in Indonesia, Japan and in the United States. The tyres are shipped directly by the Sumitomo manufacturing entity to Ficeda Pty Ltd. This arrangement continues in 2025 as the Goodyear Parent has a licence from Sumitomo Rubber Industries, Ltd,. to continue to market and sell Dunlop branded motorbike tyres. Ficeda Pty Ltd has lodged its [Modern Slavery Statement](#). There is also some manufacturing by us of Dunlop branded motorbike tyres in our European factories.

(e) Beaurepaires

Goodyear Tyres (Aust) Pty Ltd closed all of its Beaurepaires tyre retail stores, which were mostly company owned, throughout Australia between 1 January 2024 and 30 September 2024. As these stores closed, Goodyear Tyres (Aust) Pty Ltd stopped purchasing tyres, parts and other ancillary items connected with providing automobile services and repairs.

(f) Total Tyres wholesale operations

Total Tyres Australia Pty Ltd wholesaled a large range of tyres, tubes and wheels up until 31 March 2024. Its extensive tyre and tube range covered cars, 4WD/SUV, commercial, vans, light trucks, trucks, buses, agricultural vehicles, earthmovers, industrial vehicles, mowers, forklifts and ATV's. The closure of the wholesale business significantly reduced our interactions and dealings with third parties and removed our need for warehousing and distribution. This further reduced the risk of modern slavery occurring within our supply chain.

(g) Aviation

Goodyear Tyres Pty Ltd supplies and distributes aviation tyres for a variety of aircrafts owned and leased by commercial airlines in Australia. Tyres are manufactured by Goodyear in Virginia in the United States and in Pathum Thani in Thailand and shipped directly to third party warehouses who manage storage, inventory management and direct supply to the commercial airlines.

(h) Retreading operations

Goodyear Tyres (Aust) Pty Ltd sold the assets of its Brooklyn tyre retreading business to Black Rubber Sydney Pty Ltd on 28 October 2024 and ceased all operations.

Goodyear Tyres (Aust) Pty Ltd sold some of the equipment utilized in its Geebung tyre retreading business to Black Rubber Sydney Pty Ltd on or about 23 October 2024. The company ceased operating the Geebung retreading operations in September 2024 and closed the plant in November 2024 after completing make good.



These closures resulted in the cessation of the import of retread raw materials and retreaded tyres to Goodyear Tyres (Aust) Pty Ltd and the cessation of the supply by the company of retreaded tyres to contracted customers throughout Australia. This lessened our environmental footprint and the risk of modern slavery.

(i) Logistics

On 31 March 2024, Goodyear Tyres (Aust) Pty Ltd ceased supplying tyres within Australia and commenced distribution arrangements with NTAW and TyreMax. This significant restructure resulted in the closure of the company's warehousing distribution and customer service centres across Australia that previously utilized both in-sourced and out-sourced personnel. It also resulted in the termination of all logistical arrangements relating the import, transport to warehouse and route to market with the exception of aviation and motorsport.

The two distributors, one for Goodyear tyres and one for Dunlop tyres, place orders for tyres with Goodyear Tyres (Aust) Pty Ltd which are directly fulfilled and shipped to the distributors by Goodyear factories located in Asia, and in the case of Dunlop, from the Sumitomo factory in Japan.

5. Goodyear supply chains

(a) Group Overview

Goodyear is one of the world's largest tyre companies. It manufactures its products in 55 manufacturing facilities in 23 countries. It employs approximately 72,000 people worldwide. Its two Innovation Centres in Akron, Ohio and Colmar-Berg, Luxembourg strive to develop state-of-the-art products and services that set the technology and performance standard for the industry. For more information about Goodyear and its products, go to www.goodyear.com/corporate.

Goodyear's end-to-end supply chain is comprised of suppliers based throughout the world that provide a wide range of products and services related to the development, manufacturing, marketing and distribution of tyres for most applications.

Goodyear strives to source from and partner with suppliers that share our values and commitment to ethical, responsible and lawful conduct. We require suppliers to comply with the applicable legal requirements of anti-slavery, forced labour and human trafficking laws and expect suppliers to enact practices to ensure compliance with such laws.

(b) Supply chain relevant to Australia



The Goodyear Tyres (Aust) Pty Ltd and Goodyear Tyres Pty Ltd tyre businesses source tyres exclusively and directly from other Goodyear companies controlled by the Goodyear Parent with the exception of Dunlop tyres which Goodyear Tyres (Aust) Pty Ltd procured from Sumitomo.

The majority of the Goodyear tyres which Goodyear Tyres (Aust) Pty Ltd supplies to Tyremax are manufactured in our factory in Bogor, Indonesia, Bangkok Thailand and in Kunshan, Pulandian and Qingdao in China. Some of these factories produce Goodyear consumer tyres and some produce Goodyear commercial tyres. There was also some Goodyear tyres manufactured by our factories in Colmar-Berg in Luxembourg, Kranj in Slovenia, Debica in Poland and Adapazari and Izmit in Turkey and an even smaller volume made in Brazil, United States and Mexico. The Goodyear aviation tyres which Goodyear Tyres Pty Ltd supplies to commercial airlines are manufactured in Bangkok, Thailand.

During the Reporting Period, the Goodyear off-the-road tyres sold by Goodyear Earthmover Pty Ltd were manufactured in Bogor, Indonesia.

Goodyear Tyres (Aust) Pty Ltd and Goodyear Tyres Pty Ltd no longer manage or operate any warehouse or distribution centres.

(c) Supply chain risks

Goodyear acknowledges that risks may present through third-party suppliers of raw materials to the Goodyear and Sumitomo factories prior to the manufacturing process however it seeks to address and mitigate such risk through extensive due diligence and ensuring strict compliance with its sourcing policies and procedures.

(d) Goodyear operations

Goodyear, through its [Global Human Rights Policy](#) is committed to compliance with all laws regulating minimum working age for each individual's position, including any laws pertaining to the employment, apprenticeships, and internships of you and students and the strict prohibition on the use of forced labour and exploitative working conditions in line with the definition of "forced labour" by the International Labour Organisation as "work or service which is extracted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily."

Each Goodyear factory, most relevantly the factories identified above which supply Goodyear tyres to Goodyear Tyres (Aust) Pty Ltd (for direct supply to Tyremax) and Goodyear Tyres Pty Ltd are compliant with the International Organisation for Standardisation (**ISO**) and are thus ISO certified. These standards ensure consistent processes, continuous improvement, and a focus on meeting customer expectations.



As part of such certification, the Goodyear factories are assessed and audited by an independent thirdparty organization to evaluate Goodyear's internal processes and practices as a supplier to other Goodyear entities and third parties. The assessment requires document verification of policies, practices, and performance claims in the areas of environment, fair labour and human rights, business ethics, and sustainable procurement. The third-party reviews our firm's documents against globally recognised standards and frameworks, including those for human rights.

This is an important part of our due diligence processes which helps reduce the risk of modern slavery in our operations.

(e) Supply chain operations

The Goodyear Parent and the manufacturing entities that it controls follow a risk-based approach and work with third parties to help identify, prevent, mitigate, account for, and where applicable, support remediation of adverse human rights impacts, including but not limited to modern slavery, and identify and support opportunities for improvement.

Taking this approach, which includes conducting a risk analysis, allows us to understand, identify and evaluate the human rights risks within our supply chain, and to prioritize these risks for further processing. The results of this analysis aids in our decision-making processes regarding our supply base. We may also receive alerts through Goodyear's Integrity Hotline or through other channels.

As part of our supplier due diligence process in the Reporting Period, the standard templates for Request for Tender (RFT) and Request for Proposal (RFP) used by our sourcing team include questions to screen potential suppliers based on their practices and policies. These questions focus on areas such as human rights, including assessment of supplier policies and/ or processes that protect and promote human rights and prohibit modern slavery.

New suppliers go through an onboarding process that includes risk-based screening to confirm the supplier follows applicable laws and meets our standards. This process includes additional questions for suppliers with potentially higher human rights risk based on considerations such as spend level, country risk, and category risk.

During onboarding, suppliers are asked to agree to our [Goodyear Supplier Code of Conduct](#). Our [Goodyear Supplier Code of Conduct](#) requires suppliers to comply with the applicable legal requirements of anti-slavery, human trafficking, forced labour and child labour laws and expects suppliers to enact practices to ensure compliance with such laws. The [Goodyear Supplier Code of Conduct](#) is embedded in our standard contract template. Once a supplier is onboarded, we conduct diligence checks to assess changes in suppliers' circumstances at intervals determined by the supplier's risk profile.



Goodyear uses D&B Compass, a global cloud-based supplier risk assessment tool which integrates with SAP MDG. It has automated workflow management meaning that Goodyear risk assessors are immediately notified when necessary. A new supplier can only be set up in the system once the applicable risk assessments are completed in the D&B compass tool. Goodyear uses this tool to help ensure compliance with, and detect any non-compliance with, the [Goodyear Supplier Code of Conduct](#).

Goodyear uses Securimate, a due diligence program that supports compliance with laws and ensures good governance. Each step in the due diligence process must be satisfied before a distributor is approved. Securimate requires regular checks to ensure a supplier continues to be compliant. It is a useful tool in lowering the risks of modern slavery occurring in our supply chain.

(f) Risk assessment

Goodyear performs an assessment of the materials and countries of origin in its raw material supply chain to determine which materials come from countries or industries that have a higher risk of having been produced by forced labour, child labour or both, in violation of international standards. Through its Supplier Certification process (below), Goodyear is working to mitigate the risks for these sourced materials.

If a material risk is observed, Goodyear has the processes in place to track, monitor and remediate such issues, as appropriate.

Given the controls and measures Goodyear has in place, we consider the risk of modern slavery within Goodyear's operations to be low. There is potential risk exposure through arrangements with third party suppliers where Goodyear could find itself exposed to modern slavery actions by others. However, suppliers are made aware of our zero-tolerance stance enforced through our policies and codes.

The geographic locations from which we source some raw materials do carry some risk. We do however have the processes in place to detect and mitigate such risks.

(g) Supplier audits

Goodyear performs periodic supplier audits on an ongoing basis for validation of material quality and supplier conformance to certain regulatory requirements. All suppliers that certify to the [Goodyear Supplier Code of Conduct](#) may be subject to human trafficking and slavery audits.

Goodyear is focused on ensuring that modern slavery practices do not take place in its supply chain. Goodyear has the abovenamed global policies in place to check its supplier base regularly to ensure that any new suppliers to the Goodyear factories are reviewed for their risk exposure



to modern slavery. There have been no changes to the Goodyear global policies that may change the risk profile of modern slavery.

The Goodyear Parent has taken a comprehensive approach to ethics and compliance measures and works to ensure its own operations do not allow or pose significant risk for either child or forced labour. Goodyear has adopted risk-based assessments, supplier audits and procurement trainings as noted above.

6. Human Rights policy framework

Goodyear's [Global Human Rights Policy](#) applies to the operations and affiliates of all Goodyear entities controlled by the Goodyear Parent worldwide. This is part of Goodyear's commitment to ethical and socially responsible business practices.

As stated in the Policy, Goodyear is committed to the following principles:

- maintaining an inclusive workplace free of unlawful harassment and discrimination;
- voluntary employment and the prohibition of all forms of compulsory labor and human trafficking;
- prohibiting the exploitation of children, including child labour;
- recognising and respecting the right of associates to join organizations (such as unions) of their choosing, or to refrain from joining organizations;
- complying with all applicable labor laws and regulations, including those related to wages and hours worked; and
- providing a safe and secure workplace.

Goodyear prohibits all forms of forced or compulsory labour, including prison labour, indentured labour, slave labour and human trafficking and the use of any form of child labour. Goodyear has a confidential Integrity Hotline which is available 24 hours a day, 7 days a week for associates to report any concerns they may have. Each report is reviewed by the Goodyear Compliance & Ethics Department to determine the most appropriate action to be taken in response to the concern reported.

All Goodyear employees worldwide, including in Australia, must adhere to the Goodyear [Business Conduct Manual](#), which incorporates Goodyear's policies relating to global human rights and provides for disciplinary action in the event of violations.



Goodyear strives to do business with reputable suppliers committed to Goodyear's ethical standards and business practices, including in relation to modern slavery and human trafficking. Goodyear's [Supplier Code of Conduct](#) contains provisions regarding human rights and other workplace issues, as well as the right for Goodyear to perform human trafficking and slavery audits. Goodyear requires certain raw material suppliers to certify to Goodyear's Supplier Code of Conduct or provide their own code of conduct that Goodyear must review and accept. Goodyear may decline to make future purchases from a supplier that does not certify to the Goodyear Supplier Code of Conduct or does not provide an acceptable version of its own code of conduct. In addition to the principles set forth in the Supplier Code of Conduct, Goodyear expects its suppliers to act in a manner compatible with the standards set out in Goodyear's [Natural Rubber Procurement Policy](#) and [Soybean Oil Procurement Policy](#).

7. Modern Slavery risks

As with any Australian company sourcing products from overseas through a parent company and its subsidiaries, there are a variety of risks relating to infringements of protection rights that may arise particularly with respect to third party suppliers. In this context, such risks are related to a potential negative impact on humans and the environment. The main aim of risk management is to eliminate or at least control such risks.

As noted above, Goodyear has established a comprehensive risk management system within its management system which includes frequent and appropriate risk assessments to determine the human rights and environmental risks in its business operations with regard to direct suppliers. Risk analysis follows a systematic and standardized method to ensure comparability and take special organization features into account on an equal weighted basis. Business models, ability to step in, probability of occurrence, contributing factors and impact and its severity are all taken into account. All defined steps and relevant risks are identified, assessed, weighted and prioritised.

8. Actions taken and their effectiveness

(a) Mitigation measures

Goodyear's risk mitigation measures are periodically reviewed to ensure that they are focused on risks identified through its risk assessment and due diligence processes. In the Reporting Period, for example, Goodyear has taken steps to enhance its global policy framework in relation to human rights risks as well as its human rights due diligence processes for its direct operations and supply chains.

(b) Training and awareness



Employees of Goodyear who are directly responsible for suppliers are provided with awareness training on forced labour, child labour, and human trafficking risks. In addition, in the Reporting Period, Goodyear provided dedicated forced labour awareness training to senior management personnel globally.

This training ensures that our employees can identify indicators of modern slavery internally and externally such as the unlawful holding of wages, withholding of identity documents, short-stay immigration visas, excessive work hours, restriction of movement, inflated loans to be paid back to employer, wage deductions relating to services provided to employees. Our employees have a contractual as well as an ethical and legal obligation to report any assessed areas of vulnerability.

(c) Raising concerns

All Goodyear associates are required to report any actual, suspected, or potential misconduct to management or through Goodyear's [Integrity Hotline](#). Available 24 hours a day, 7 days a week from anywhere in the world via toll-free telephone or by a dedicated website, our Integrity Hotline allows associates and third parties to report a concern or ask a question, including anonymously (where allowed by law).

(d) Measuring effectiveness

Goodyear measures the effectiveness of its compliance program and progress over time through a number of key performance indicators (KPIs). More details can be found in Goodyear's Annual [Corporate Responsibility Report](#).

The Goodyear Group, including the Goodyear Australia Group, are firmly committed to continuous improvement across all of our operations and within our supply chain. We have implemented a policy governance practice to review and reauthorise policies on an annual basis. We also evaluate the effectiveness of our processes through targeted assessments, reviews, and audits.

Additional, throughout the Goodyear Group, we leverage third-party platforms to benchmark policies and procedures against best practice and participate in independent audits of our factories and undertake audits of our suppliers.

To assess the effectiveness of the procedures we have in place to ensure that modern slavery is not being used in our operations and supply chain, we review:

- our practices,
- training completion rates,
- results identified through third-party assessments,
- remediation measures,



- the number of verified modern slavery incidents identified;
- the number and type of complaints received through Goodyear's [Integrity Hotline](#), and other internal reporting mechanisms.

Goodyear is also investing in new digital and enforcement technologies to identify risks and measure our effectiveness in managing them.

(e) Remediation

The Goodyear Australia Group has not identified any instances of modern slavery in our own operations or supply chain, and so no remediation measures were required.

The Goodyear Australia Group has not been notified of any instances of modern slavery by any other Goodyear entity in the Goodyear Group or by any third party that we do business with.

The Goodyear Australia Group has not identified any instances of loss of income in our own operations or supply chain due to measures we have taken to address the risk of modern slavery, and so no measures were required to remediate loss of income.

(f) Ongoing steps

To confirm our commitment to prohibiting modern slavery and human trafficking in our supply chains and in any part of our business, the Goodyear Australia Group will take the following further steps:

- continue to measure the effectiveness of our policies and procedures;
- invest in technology to assist us with identifying and mitigating risks;
- continue to train our employees to enable them how to identify risks of slavery internally and within our supply chains;
- continue to train our employees on how to escalate any identified risks or concerns internally;
- continue to audit our supplies and have our factories independently audited.

The Goodyear Group, including the Goodyear Australia Group, are steadfastly committed to working with all relevant bodies to do what we can to reduce the risk of modern slavery and human trafficking in our business and within our supply chain.

9. Approval

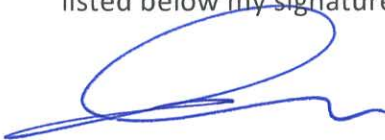
This statement is for the report of the Goodyear Australia Group for its financial year ending 31 December 31 2024.



This statement has been approved by the boards of Goodyear Tyres (Aust) Pty Ltd, Total Tyres Australia Pty Ltd and Goodyear Tyres Pty Ltd. As we divested all shares in Goodyear Earthmover Pty Ltd before the preparation of this statement, it was not possible to table this statement before its board which has been appointed by The Yokohama Rubber Company, Limited, the purchaser of our shares in the company.

I, in the capacity of Director of Goodyear Australia Pty Ltd, the parent company of the Goodyear Australia Group, attest that I have reviewed the information contained in this statement on behalf of the board of directors of the entity listed below my signature. This statement has also been reviewed and approved by the board of directors of Goodyear Tyres (Aust) Pty Ltd, Total Tyres Australia Pty Ltd and Goodyear Tyres Pty Ltd.

Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this Statement is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above. I have the authority to bind the entity listed below my signature.

A handwritten signature in blue ink, appearing to read "Jock Clark".

Jock Clark
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