



**GOODYEAR AUSTRALIA  
MODERN SLAVERY STATEMENT**

*Financial year ending 31 December 2020*

# INTRODUCTION AND SCOPE

*This section addresses mandatory criteria (a): the identification of reporting entities.*

This statement, prepared and published pursuant to the Modern Slavery Act 2018 (Cth) (“Act”), is the first Modern Slavery Statement for Goodyear in Australia.

This statement addresses each of the mandatory criteria required under section 16 of the Act. It is a joint statement pursuant to section 14 of the Act.

This statement covers the activities of the following Goodyear entities in Australia, including its controlled businesses and divisions, for the period 1 January 2020 to 31 December 2020:

- Goodyear & Dunlop Tyres (Aust) Pty Ltd (ABN 86 004 098 346)
- Goodyear Australia Pty Limited (ABN 75 000 017 489)
- Total Tyres Australia Pty Ltd (ABN 68 086 070 671)
- Goodyear Tyres Pty Ltd (ABN 80 000 145 433)
- Goodyear Earthmover Pty Limited (ABN 15 008 581 351)

This statement sets out the steps taken by Goodyear in Australia to assess and address, with the ultimate aim of minimising, the risk of modern slavery and human trafficking in our operations and supply chain.

As it has direct relevance to our structure, operations, and supply chain, this statement also includes information more generally related to the activities of the global Goodyear group.

# GOODYEAR'S GLOBAL BUSINESS

*This section (along with others as specified in this statement) addresses mandatory criteria (b): the structure, operations, and supply chains of the reporting entity.*

Goodyear is one of the world's leading tyre companies, with one of the most recognisable brand names.

Goodyear develops, manufactures, markets and distributes tyres for most applications and manufactures and markets rubber-related chemicals for various uses.

The company has also established itself as a leader in providing services, tools, analytics and products for evolving modes of transportation, including electric vehicles, autonomous vehicles and fleets of shared and connected consumer vehicles.

Goodyear was the first major tyre manufacturer to offer direct-to-consumer tyre sales on-line and offers a proprietary service and maintenance platform for fleets of shared passenger vehicles. Within its global retail presence, Goodyear operates approximately 1,000 company-owned outlets around the world where it offers its products for sale to consumer and commercial customers and provides repair and other services. It is one of the world's largest operators of commercial truck service and tyre retreading centers and offers a leading service and maintenance platform for commercial fleets.

Goodyear is annually recognised as a top place to work and is guided by its corporate responsibility framework, Goodyear Better Future, which articulates the company's commitment to sustainability. The company manufactures its products in 46 facilities in 21 countries and has operations in most regions of the world. Its two Innovation Centers 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.

# STRUCTURE AND OPERATIONS

*This section (along with others as specified in this statement) addresses mandatory criteria (b): the structure, operations, and supply chains of the reporting entity.*

Goodyear's structure, presence, and operations in Australia encompass the following.

Goodyear & Dunlop Tyres Australia (**GDTA**), headquartered in Melbourne, is one of the country's leading tyre marketers and retailers.

GDTA has three retail networks that are located throughout Australia. These retail networks include the following:

- Beaurepaires tyre retail stores, which comprise of a combination of company-owned and franchised tyre retailers that also offer associated tyre fitment services;
- Goodyear Autocare franchised stores, a network of stores that aim to provide a 'One Stop Shop' for general tyre and automotive services; and
- Dunlop Super Dealer stores, an independent network of licensed stores that offer a comprehensive range of tyre and battery services.

GDTA additionally owns and operates Total Tyres Australia, one of the country's largest wholesalers.

Total Tyres Australia, GDTA's wholesaling arm, wholesales a large range of tyres, tubes and wheels. Its extensive tyre and tube range covers cars, 4WD/SUV, commercial, vans, light trucks, trucks, buses, agricultural vehicles, earthmovers, industrial vehicles, mowers, forklifts and ATV's.

GDTA also performs tyre retreading at a site in Brooklyn, Victoria.

In addition to the above, Goodyear in Australia supplies and distributes off-the-road tyres that are used in a wide variety of applications, including surface and underground mines, quarries, construction sites, and ports.

# SUPPLY CHAINS

*This section (along with others as specified in this statement) addresses mandatory criteria (b): the structure, operations, and supply chains of the reporting entity.*

## GENERAL SUPPLIERS AND SERVICE PROVIDERS

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 do business with reputable suppliers committed to Goodyear's ethical standards and business practices. Goodyear expects its suppliers to act in a manner compatible with standards that contribute to Goodyear's outstanding reputation.

## LOGISTICS

Goodyear owns and operates a number of warehousing, distribution, and customer service centres across Australia that utilise both in-sourced and out-sourced personnel. Goodyear uses integrated providers of logistics services covering import and export services, road and maritime transport, warehousing and distribution, container management, inventory management, storage and handling, and shuttle operations.

# SUPPLY CHAINS (continued)

*This section (along with others as specified in this statement) addresses mandatory criteria (b): the structure, operations, and supply chains of the reporting entity.*

## RUBBER PROCUREMENT

More than 99% of the world's natural rubber is made from latex derived from rubber trees, which are primarily sourced from Southeast Asia. The tyre industry uses approximately 70% of the world's natural rubber, and demand for natural rubber is growing. This raises various social, environmental and economic concerns and opportunities associated with the production of this important commodity.

Goodyear does not own any rubber tree plantations, but we have taken actions as a purchaser of natural rubber. Goodyear manages a complex procurement supply chain in sourcing natural rubber. The rubber supply chain is long, consisting of smallholder growers, industrial plantations, intermediate dealers/consolidators, processors, and trading companies.

## SOYBEAN OIL PROCUREMENT

As part of its commitment to sustainable sourcing, Goodyear is increasing its use of sustainable materials in its products, including soybean oil. Goodyear scientists and engineers – with the support from the United Soybean Board in the United States of America – developed a tread compound in which soybean oil replaced some or all petroleum-derived oil, discovering that soybean oil helps keep a tyre's rubber compound pliable in changing temperatures.

Goodyear's 2020 use of soybean oil increased 73% over our 2018 usage, with a long-term goal of full petroleum oil replacement in our products by 2040.

# RISK MAPPING

*This section (along with others as specified in this statement) addresses mandatory criteria (c): the risks of modern slavery practices in our operations and supply chains.*

Goodyear regularly performs assessments 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 our Supply Chain Management and Supplier Certification processes (more on these below), Goodyear is working to mitigate the risks for these sourced materials.

Additionally, in Australia, Goodyear has introduced a mandatory supplier assessment questionnaire for both our current and ongoing key goods and service providers as well as any potential new vendors and suppliers.

This supplier assessment questionnaire now forms part of the compulsory process that a new vendor or potential bidder must complete before they may be onboarded by our procurement team at Goodyear in Australia.

Goodyear's questionnaire provides a summary of modern slavery definitions and concerns that align with those outlined in the Modern Slavery Act 2018 (Cth). Suppliers are asked to complete the questionnaire honestly and with as much detail as possible.

The aim of the questionnaire is to:

- identify and assess possible modern slavery risks in our supply chain;
- identify mitigation efforts to combat the risk of modern slavery in our procurement processes; and
- foster collaboration between us and our suppliers to address these risks.

# RISK MAPPING (continued)

*This section (along with others as specified in this statement) addresses mandatory criteria (c): the risks of modern slavery practices in our operations and supply chains*

To aid Goodyear's risk assessment mapping, Goodyear's suppliers in Australia are required to provide information and answers on all of the below matters. These mapping efforts are aimed at reducing the risk that the goods and services supplied to Goodyear are the product of modern slavery.

## ORGANISATION SUPPLY CHAINS

Goodyear asks vendors how much visibility their organisations have over their supply chain. Vendors are asked to describe the extent to which they have mapped the full supply chain for key products and services used by their organisations and whether they have identified key suppliers at all levels.

## DUE DILIGENCE

Goodyear asks vendors for information on how their organisations engage in due diligence activities to identify, prevent and mitigate risks specific to modern slavery in their operations and supply chains.

## MODERN SLAVERY POLICIES

Goodyear asks vendors whether they have a policy or policies in place to deal with modern slavery. We also request for a copy of the policy or policies, including information on whether the organisation has a system to monitor compliance with these policies.



# RISK MAPPING (continued)

*This section (along with others as specified in this statement) addresses mandatory criteria (c): the risks of modern slavery practices in our operations and supply chains*

## MONITORING MODERN SLAVERY RISKS

Goodyear asks vendors whether they have a person or team responsible for overseeing modern slavery risks (including record keeping regarding contractors and subcontractors) that arise in relation to the goods or services that they deliver.

## SUPPLIER ENGAGEMENT

Goodyear asks vendors whether they perform screening of all prospective suppliers to assess the risks of modern slavery or other human rights harms that may occur in their operations and supply chains. Vendors who answer in the affirmative are additionally asked how they perform this screening.

## LOW-SKILLED LABOUR

Goodyear asks vendors whether they are aware of low-skilled migrant workers working in their supply chain. Vendors who answer in the affirmative are additionally asked where in the vendor's supply chain such workers are employed.

## SUBSTANDARD WORKING CONDITIONS

Goodyear asks vendors how their organisations respond to allegations of modern slavery or substandard working conditions in their operations or supply chains.

# SUPPLY CHAIN MANAGEMENT

*This section (along with others as specified in this statement) addresses mandatory criteria (d): actions taken to assess and address modern slavery risks, including due diligence and remediation processes*

As part of Goodyear's commitment to responsible sourcing, supply chain management is a high priority for Goodyear.

Goodyear's Chief Procurement Officer leads our Procurement team to manage Goodyear's sourcing for the materials and services we use globally.

Together with other Goodyear teams, our Procurement team oversees and implements policies, programs, supplier assessments and audits. The team also provides employee training on topics such as human trafficking, forced and child labour, anti-corruption, compliance, and strategic sourcing processes.

Procurement team members receive several hours of procurement-specific training, and all team members receive annual refresher training. The training includes content that helps employees identify potential issues and provides us with the skills and resources to respond appropriately.

# COMMITMENT TO HUMAN RIGHTS

*This section (along with others as specified in this statement) addresses mandatory criteria (d): actions taken to assess and address modern slavery risks, including due diligence and remediation processes*

Goodyear's policy on global human rights applies to the company's operations worldwide and is part of our commitment to ethical and socially responsible business practices.

Throughout our global operations, we are committed to maintaining an inclusive workplace, free of harassment based on a person's gender, race, age, religion, disability, ancestry, national origin, sexual orientation, or other characteristics protected by law.

Our commitment to voluntary employment specifically prohibits all forms of compulsory labour including prison labour, indentured labour, slave labour, and human trafficking.

As stated in the policy, Goodyear supports the following principles:

- commitment to maintaining an inclusive workplace free of unlawful harassment and discrimination;
- employment is voluntary; all forms of compulsory labour or human trafficking are prohibited;
- exploitation of children, including child labour, is not permitted;
- employees have the right to join organisations (such as unions) of their choosing or to refrain from joining organisations;
- compliance with all applicable laws and regulations dealing with wages and hours worked; and
- providing a safe and secure workplace.

Goodyear seeks to do business with customers and suppliers that observe similar standards in their relations with their employees and their own suppliers.

# COMMITMENT TO INTEGRITY

*This section (along with others as specified in this statement) addresses mandatory criteria (d): actions taken to assess and address modern slavery risks, including due diligence and remediation processes*

Goodyear's Business Conduct Manual ("the Manual") applies to every employee of the Goodyear family of companies worldwide.

The Manual prescribes specific guidelines for employees to conduct themselves in a way that is honest and ethical.

In a number of instances, the rules described in the Manual also apply to other people working on Goodyear's behalf or at our direction, for example contractors, brokers, or agents.

The Manual provides details about some of the ways in which Goodyear employees must act with integrity.

Goodyear employees are required to read the Manual carefully, make sure that they understand its principles, and review and understand the policies within the Manual that apply to their business and conduct themselves accordingly.

Goodyear employees are also required to report any known or suspected illegal or unethical behaviour or breaches of these policies.

Further, if one is a manager, Goodyear expects them to ensure that employees who report to them also read, understand and follow these policies. Managers must be available to employees who wish to discuss or report concerns and escalate reported issues as required.

Goodyear believes that its steadfast focus on behaving ethically will sustain a work environment that includes mutual respect and openness and reinforce our brand and reputation around the world.

# COMPLIANCE AND ETHICS TRAINING AND AWARENESS

*This section (along with others as specified in this statement) addresses mandatory criteria (d): actions taken to assess and address modern slavery risks, including due diligence and remediation processes*

Goodyear expects every employee to know and understand our compliance and ethics policies and to abide by them.

Goodyear requires almost all global salaried employees and new hires to complete online training covering the Business Conduct Manual and key compliance policies.

In 2019, more than 96% of those employees completed online training courses on such subjects as competition law, anti-corruption and anti-bribery, and being a compliance leader.

We have a training cycle that we review and amend annually to ensure our that ethics and compliance training topics remain relevant and continue to address the risks facing Goodyear.

Throughout the year, we conduct training across all strategic business units as well as focused compliance campaigns in many countries and plants on various subjects, such as respect in the workplace (including harassment and discrimination), conflicts of interest, competition law, speaking up, preventing and detecting fraud and bribery, gift and entertainment policies, and privacy.

Goodyear's ethic awareness campaign, covering topics from the Business Conduct Manual, takes place in our company-owned retail, wholesale and commercial tyre service locations throughout the world, including Australia.

# INTEGRITY HOTLINE

*This section (along with others as specified in this statement) addresses mandatory criteria (d): actions taken to assess and address modern slavery risks, including due diligence and remediation processes*

All employees are required to report any actual, suspected, or potential misconduct to management or through the Company'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 employees and third parties to report a concern or ask a question, including anonymously (where allowed by law).

Goodyear's Compliance & Ethics Department reviews each Integrity Hotline matter and, in cases where an allegation of misconduct is substantiated, the Company takes appropriate disciplinary or remedial action.

Goodyear strictly prohibits retaliation against individuals for making a report in good faith.

Speak Up education and awareness campaigns are held to remind employees of the Integrity Hotline and to encourage them to raise questions or concerns.

# ENVIRONMENTAL, HEALTH & SAFETY (EHS) POLICY

*This section (along with others as specified in this statement) addresses mandatory criteria (d): actions taken to assess and address modern slavery risks, including due diligence and remediation processes*

Through Goodyear's integrated Environmental, Health and Safety (EHS) governance approach, objectives cascade from senior leadership to the regions and throughout each facility.

Our Vice President, Global Environmental, Health, Safety and Sustainability (EHS&S) and Business Continuity facilitates the Goodyear EHS Governance Council, which provides an aligned strategy for regional EHS teams and sets organisational EHS expectations.

Goodyear's Senior Leadership Team holds the Governance Council and local facility teams accountable for strategy execution and results.

Goodyear's Environmental, Health and Safety (EHS) Policy underscores the principles that guide us toward continuous EHS improvement in our workplaces. As a global, socially responsible corporate citizen, Goodyear aims to conduct our business in accordance with the highest applicable legal and ethical standards.

Goodyear strives to contribute to sustainable economic development and environmental protection while seeking to improve the quality of life of our employees, families, communities, and society in general.

Goodyear wants our employees and contractors to have work environments that are safe and secure.

# ENVIRONMENTAL, HEALTH & SAFETY (EHS) POLICY (continued)

*This section (along with others as specified in this statement) addresses mandatory criteria (d): actions taken to assess and address modern slavery risks, including due diligence and remediation processes*

Goodyear is committed to meeting the following objectives as a primary management value that is the collective and individual responsibility of Goodyear employees and contractors worldwide:

- demonstrate EHS leadership through all levels of management and help strengthen our corporate culture so all employees and contractors embrace this policy as their guiding principle;
- comply with all applicable EHS laws and regulations, as well as Goodyear's EHS Management System that is based on our global EHS standards;
- ensure that all employees and contractors are aware of their roles and responsibilities to comply with Goodyear's EHS Policy and Management System;
- encourage and educate all employees and contractors to take personal accountability and share ideas for protecting the environment and continuously improving the safety and health of our workplaces;
- set company-wide goals and objectives that seek to continuously improve EHS systems and performance, reduce our environmental impact, and increase the sustainability of our materials, operations and products;
- integrate our EHS Management System into all business functions, including the design, production, distribution, and support of our products and services;
- strive to reduce our environmental impact and conserve natural resources by minimizing waste, water usage, and air and greenhouse gas emissions while reusing and recycling materials (where possible), and responsibly managing energy use through the life cycle of the tire.



# NATURAL RUBBER PROCUREMENT POLICY

*This section (along with others as specified in this statement) addresses mandatory criteria (d): actions taken to assess and address modern slavery risks, including due diligence and remediation processes*

Goodyear has a natural rubber procurement policy that reflects its strong commitment to the responsible sourcing of raw materials. Social and agricultural practices in natural rubber production can vary greatly and can have significant impacts on the livelihood and rights of local people, as well as local ecosystems through potential habitat conversions and reduction of species from deforestation.

The company believes that implementation and adherence to this policy will help address deforestation, land grabbing, and human rights in the areas of the world where natural rubber is produced.

Building upon the company's Business Conduct Manual and Supplier Code of Conduct, the policy spans seven principles that will guide the development of a long-term, sustainable supply chain:

- Human Rights – Goodyear will work to ensure its natural rubber supply chain protects the rights of all involved, fostering a positive working environment at all levels of the supply chain.
- Responsible Land Acquisition and Use – Goodyear will work to promote an environmentally and socially responsible natural rubber supply chain, free from deforestation and land grabbing.
- Traceability – Goodyear will work toward and promote practices that lead to the ability to trace natural rubber through the entire supply chain.

# NATURAL RUBBER PROCUREMENT POLICY (continued)

*This section (along with others as specified in this statement) addresses mandatory criteria (d): actions taken to assess and address modern slavery risks, including due diligence and remediation processes*

- Natural Rubber Processing – Goodyear expects its suppliers who process natural rubber for its usage to manufacture their product in a responsible and environmentally friendly manner.
- Natural Rubber Growing and Harvesting Process – Goodyear encourages its suppliers to utilise best-known cultivation practices for existing planted and replanted natural rubber trees.
- Smallholder Outreach, Engagement and Community Development – Goodyear will work to increase yields and improve the livelihoods of existing smallholders, encouraging all its direct suppliers and relevant members of their supply chain to support their communities.
- Policy Implementation and Compliance – Goodyear is committed to the corruption-free and transparent implementation of this policy and its principles.

Beyond this policy, Goodyear is also working collaboratively to improve sustainability across the entire natural rubber supply chain.

Goodyear is a member of the Tire Industry Project (TIP), a CEO-led initiative made up of the world's 11 major tyre companies, which is actively working with key stakeholders, including automakers, rubber producers and civil society, to develop an industry platform for natural rubber sustainability.

# SUSTAINABLE SOYBEAN OIL PROCUREMENT POLICY

*This section (along with others as specified in this statement) addresses mandatory criteria (d): actions taken to assess and address modern slavery risks, including due diligence and remediation processes*

Goodyear has a sustainable soybean oil procurement policy that guides us in developing a long-term, sustainable supply chain for our soybean oil requirements.

This policy is intended to help guide the processors, farmers, and all other members of the supply chain to establish practices and make sound environmental and social decisions related to the growing, harvesting, and processing of soybeans.

Increasing global demand for the many uses of soybeans (animal feed, protein, cooking oil, industrial use, etc.) has led to natural and existing ecosystems having been converted to soybean fields.

This has taken place primarily in tropical areas, where deforestation has in some cases removed important habitats.

While Goodyear's use of soybean oil might be small compared to others, we find it valuable and responsible to have a guiding policy to ensure we implement our own supply chain requirements with a sustainable approach.

Soybean oil producers are expected to have transparency and visibility as to the source of soybeans, including traceability back to the farm.

# SUSTAINABLE SOYBEAN OIL PROCUREMENT POLICY (continued)

*This section (along with others as specified in this statement) addresses mandatory criteria (d): actions taken to assess and address modern slavery risks, including due diligence and remediation processes*

Through the corruption-free implementation and adherence to this policy, Goodyear seeks to have a transparent and responsible soybean supply chain and will do its part to help:

- support the rights of workers and responsible labour conditions;
- support responsible acquisition and management of land utilised for growing soybeans free from deforestation and land grabbing;
- promote conservation of important vegetation;
- promote the use of responsible and sustainable production techniques;
- promote the best practices for growing and harvesting techniques;
- align our supply chain with responsible practices and standards; and
- regularly audit and work with our supply chain on compliance.

This policy applies to all soybean-based materials sourced by Goodyear operations worldwide. Goodyear expects suppliers to apply these policy components throughout their soybean supply chains, including all products grown, harvested, processed, produced, purchased or traded, and all operations, including landholdings, farms, joint ventures and third party suppliers, contractors or subcontractors.

# SUPPLIER CERTIFICATION

*This section (along with others as specified in this statement) addresses mandatory criteria (e): how the effectiveness of actions is assessed*

Goodyear has a Goodyear Supplier Code of Conduct which contains specific provisions regarding human rights and other workplace issues, as well as the right for Goodyear to perform human trafficking and slavery audits at any time.

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 their own code of conduct.

# SUPPLIER AUDITS

*This section (along with others as specified in this statement) addresses mandatory criteria (e): how the effectiveness of actions is assessed*

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 at any time. Goodyear does expect that its suppliers be strictly compliant with local laws.

Topics covered in the Supplier Code of Conduct include child labour and other working condition regulations, environmental practices and anti-corruption. We include, in the following pages, a copy of the requirements set out in our Supplier Code of Conduct.

# GOODYEAR SUPPLIER CODE OF CONDUCT

*This section (along with others as specified in this statement) addresses mandatory criteria (e): how the effectiveness of actions is assessed*

## OVERVIEW

The Goodyear Supplier Code of Conduct (the “Code”) helps to ensure that Goodyear does business with reputable business associates committed to Goodyear’s ethical standards and business practices.

The Code applies to people and companies (“Suppliers”) that do business with Goodyear.

Goodyear expects its Suppliers to act in a manner compatible with standards that contribute to Goodyear’s outstanding reputation.

Goodyear expects that its global Suppliers conform to the following:

## CODE OF CONDUCT

### *General Principle*

Goodyear Suppliers must operate in full compliance with applicable laws and regulations of the countries in which they operate, and also in compliance with this Code.

### *Child Labour*

Suppliers shall comply with applicable local child labour laws and employ only workers who meet the applicable minimum legal age requirement for their location. In the absence of local law, Suppliers shall not employ children under the age of 15, except as set forth in the next sentence. If local minimum age law is set below 15 years of age, but is in accordance with developing country exceptions under the International Labor Organization (ILO) Convention 138, the lower age will apply.

### *Compensation and Working Hours*

Suppliers shall comply with applicable wage and hour labour laws including those related to minimum wages, overtime hours and legally mandated benefits.

### *Discrimination*

Suppliers shall not tolerate unlawful discrimination in the workplace. Suppliers shall comply with applicable local laws concerning discrimination in hiring and employment practices.

### *Environment*

Suppliers shall consider the impact their operations have on the environment and reduce that impact where practicable to protect the environment. Suppliers shall comply with applicable environmental laws and regulations in the countries in which they operate.

### *Forced Labour*

Suppliers shall not use forced or involuntary labour including, but not limited to, prison labour, indentured labour, slave labour, human trafficking, or other forms of compulsory labour.

### *Freedom of Association*

Suppliers shall recognize and respect rights of workers to join organizations of their own choosing or to refrain from joining organizations. Suppliers shall respect the rights of workers to bargain collectively through representatives of their own choosing where a union has been chosen in accordance with applicable laws and regulations.

### *Gifts and Gratuities*

Suppliers shall not offer, pay, or accept kickbacks, bribes or other improper payments or benefits prohibited by law. Additionally, Goodyear strictly prohibits Suppliers from offering to, or accepting from, Goodyear representatives any gifts or gratuities of greater than US\$100 in value. A gift of nominal value is not prohibited as long as it is customary and not extravagant, improper or inappropriate; worth US\$100 or less in value; imposes no sense of obligation; and does not result in any special or favored treatment. Cash gifts or gratuities, regardless of amount, are strictly prohibited. Any Supplier that violates this policy risks immediate loss of all existing and future Goodyear business.

### *Health and Safety*

Suppliers shall provide a reasonably safe working environment supportive of accident prevention and minimizing exposure to health risks. Suppliers shall comply with all applicable safety and health laws and regulations in the countries in which they operate.

### *Conflict Minerals*

Suppliers shall source minerals, derivatives of minerals, and other raw materials in a manner that respects human rights. Suppliers shall avoid directly or indirectly financing or benefiting armed groups in the Democratic Republic of Congo (DRC) and/or its adjoining countries. Suppliers are required, from time to time, to certify that all materials and products supplied to Goodyear either: i) do not contain tantalum, tin, tungsten or gold or ii) if they do contain those elements, Suppliers shall cooperate with Goodyear in determining the country of origin and the source (including the applicable smelter) and chain of custody of those elements.



### *Compliance Verification*

Goodyear may from time to time request information or access for purposes of verifying compliance by Supplier. In the event Goodyear provides such a request and is not reasonably satisfied with the Supplier's response, Goodyear may, in its sole discretion, decline to make further purchases under any agreement between Goodyear and Supplier.

### *Application to Subcontractors*

Supplier shall cause its subcontractors to comply with the provisions of this Code as if it were Supplier itself.

### *Event of Violation*

Suppliers shall take necessary corrective actions to promptly remedy identified noncompliance with this Code. Goodyear reserves the right to terminate its business relationship with any Supplier who is unwilling or unable to comply with this Code.

### *Non-Compliance Reporting*

Violations of the Goodyear Supplier Code of Conduct may be confidentially reported, including anonymously, through the Goodyear Integrity Hotline at 1-888-GY-HOTLINE (1-888-494-6854) or [www.goodyear.ethicspoint.com](http://www.goodyear.ethicspoint.com)

# CONSULTATION AND APPROVALS

*This section addresses mandatory criteria (f): the process of consultation within the group*

This statement was produced in consultation with key stakeholders and leadership team members within the Goodyear Australia group of companies.

On a global level, Goodyear's Compliance & Ethics (C&E) Department provides updates on ethics and compliance activities to the Board of Directors multiple times per year.

Our global and regional C&E Committees – composed of top company leaders from business and functional areas – meet several times a year to discuss compliance and ethics matters, initiatives, and training.

This statement was approved by the boards of both of the reporting entities covered by this statement. The board of Goodyear & Dunlop Tyres (Aust) Pty Ltd (Goodyear Dunlop Australia) approved this statement on 10 June 2021. The board of Goodyear Earthmover Pty Limited (Goodyear Australia, OTR) approved this statement on 11 June 2021.



**Chris Radin**  
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