

The Goodyear Tire & Rubber Company

Supplier Code of Conduct

OVERVIEW

This Goodyear Supplier Code of Conduct (this “Code”) helps to ensure that Goodyear does business with suppliers that share Goodyear’s commitment to ethical and sustainability standards and business practices. People and companies (“suppliers”) that supply goods and/or services to The Goodyear Tire & Rubber Company or any of its subsidiaries or affiliates (“Goodyear”) must comply with the principles set out in this Code, as may be amended by Goodyear from time to time.

CODE OF CONDUCT

1. General Principles

Suppliers must operate in full compliance both with all applicable local laws and regulations. Where local laws are less stringent than our policies, including the standards set out in this Code, we expect our suppliers to apply the more stringent standards. Suppliers must also comply with all other Goodyear policies that apply to their operations, including, as applicable, Goodyear’s Natural Rubber Procurement Policy and Goodyear’s Sustainable Soybean Oil Procurement Policy. We also expect our suppliers to respond to reasonable requests for information related to matters covered by this Code.

2. Human Rights

Goodyear is committed to respecting internationally recognized human rights in line with relevant standards including the UN Guiding Principles on Business and Human Rights, and expects its suppliers to respect human rights. Suppliers must comply with all applicable labor and human rights laws, regulations and standards, including, but not limited to:

- Compliance with applicable child labor laws, limiting employment to workers who meet the applicable minimum legal age requirement for their respective locations. In the absence of local law setting a higher age, suppliers must not employ children under the age of 15, except in limited circumstances and subject to strict criteria in the Family Farm context. For this purpose, a Family Farm is a small-sized, family run farm characterized by family-focused motives such as favoring the stability of the farm household system, using mainly family labor for production, and using the produce as a means of family income. Criteria applied in the Family Farm context include that: (i) work does not interfere with compulsory schooling; (ii) work is appropriately supervised by a parent or guardian; (iii) work does not damage health or personal development, based on hours and conditions of work, the child’s age, activities performed and hazards involved; and (iv) if asked, the minor freely reports their wish to help and learn at the Family Farm.
- Compliance with applicable wage and hour labor laws, including those related to minimum wage, overtime and legally mandated benefits.
- No unlawful discrimination or harassment in the workplace including on the basis of gender, nationality, race or any other characteristic protected by law, and compliance with applicable laws concerning discrimination, hiring and employment practices.
- No use of forced or involuntary labor, including, but not limited to, prison labor, indentured labor, slave labor, human trafficking, or other forms of compulsory labor. Suppliers must avoid the following practices:

restricting worker movement, isolating workers, intimidating or threatening workers, allowing abusive working and living conditions, retaining identity documents, withholding wages, allowing excessive or involuntary overtime and charging recruitment fees (either directly, or indirectly through business partner activities) or hiring or use of private or public security forces without adequate training or oversight.

- Recognition of and respect for the freedom of association of workers to join organizations of their choosing or to likewise refrain from joining such organizations. This includes the rights of workers to collectively bargain through representatives of their choosing where a union has been established/chosen in accordance with applicable local law.

3. Health and Safety

Suppliers must provide a safe and healthy work environment. This includes identifying, evaluating, and controlling worker exposure to safety and health hazards, providing personal protective equipment, conducting mandatory training on hazards and emergency procedures in a language workers can understand and anticipating and planning for emergencies, for example by conducting fire and other emergency evacuation drills.

4. Environment

Suppliers must comply with applicable environmental laws in the jurisdictions in which they operate. Suppliers are expected to: (i) identify, and minimize or eliminate, the use, in their manufacturing processes and products, of substances restricted under applicable laws and regulations, including hazardous or toxic substances, and ensure full regulatory compliance, including proper management, storage and disposal; (ii) be aware of any use of reportable substances in their manufacturing processes and products, and actively investigate suitable substitutes; and (iii) obtain all necessary environmental permits or similar consents, and comply with all conditions.

Suppliers must also consider the impact their operations have on the environment and reduce that impact where practicable to protect the environment, such as by:

- Tracking and documenting energy use and greenhouse gas emissions at a facility and/or corporate level, implementing a comprehensive energy reduction strategy and management program and increasing use of renewable energy. Suppliers are encouraged to look for cost effective ways to minimize energy consumption and greenhouse gas emissions.
- Effectively reducing, reusing and recycling water with responsible treatment of wastewater discharges to protect the environment and improve overall water quality. Suppliers are encouraged to implement water risk assessments, establish a baseline and set goals and initiatives and conservation projects for water reduction.
- Routinely monitoring, controlling, minimizing, and to the extent feasible eliminating, emissions contributing to local air pollution and waste sent to landfills.
- Encouraging and supporting the use of sustainable, renewable natural resources while reducing waste and increasing reuse and recycling. Suppliers are encouraged to set targets for waste reduction and establish a waste management hierarchy.

5. Conflict Minerals

Suppliers must source minerals, derivatives of minerals and other raw materials in compliance with applicable laws and regulations and in a manner that respects human rights. Suppliers must 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, (i) to certify that all materials and products supplied to Goodyear do not contain tantalum, tin, tungsten, gold, cobalt, or mica or (ii) if they do contain those elements, to cooperate with Goodyear to conduct appropriate due diligence, including determining the country of origin and the source (including the applicable smelter) and chain of custody of those elements.

6. Business Ethics

In addition to compliance with applicable laws, Goodyear expects its suppliers at all times to adhere to high standards of integrity, and to conduct themselves in a manner that will help protect Goodyear's good name in the marketplace. These requirements include, but are not limited to, the following:

Gifts, Gratuities and Entertainment

No gifts, gratuities, other personal inducements ("gifts"), or entertainment, may be provided to any Goodyear associate unless expressly permitted by this Section and in accordance with Goodyear's Business Conduct Manual.

Suppliers should be aware that:

- Gifts, gratuities, entertainment or other personal inducements are unnecessary in the context of obtaining or retaining Goodyear's business.
- Excessive gifts, gratuities, entertainment or other personal inducements are contrary to good business practices, are detrimental to the interests of our shareholders, customers and associates and violate both Goodyear policy and this Code of Conduct.

In general, suppliers should refrain from providing gifts to Goodyear associates. Gifts of cash or cash equivalents, such as gift cards or gift certificates, are absolutely prohibited. A gift of nominal value (less than \$100 USD or its equivalent) is not prohibited, as long as it (i) is customary and would not appear extravagant, improper or inappropriate to the recipient or an objective observer, (ii) is not linked to any business decision by Goodyear and imposes no sense of obligation on the giver or recipient, (iii) does not result in any special or favored treatment between the giver and recipient, (iv) complies with any additional specific limits established by Goodyear, (v) does not otherwise violate the internal policy of the giver or recipient and (vi) is otherwise in accordance with the Goodyear Business Conduct Manual.

Entertainment, such as meals and, if infrequent, events, that are business-related and occur under appropriate circumstances for the conduct of business may also be permitted, provided they comply with the requirements listed above and, in addition, are attended by supplier and held at a venue appropriate for business discussions.

Anti-Corruption/Anti-Bribery

Suppliers must comply with all applicable laws regarding bribery and corruption, including, but not limited to, the U.S. Foreign Corrupt Practices Act and UK Bribery Act, and [Goodyear's Anti-Bribery Policy](#). Suppliers must never offer or pay any money or anything of value to a government official or any other person for the purpose of obtaining or retaining business, gaining favorable treatment, or for any other improper purpose. This includes a prohibition on facilitating or "grease" payments intended to expedite or secure performance of a routine governmental action. Suppliers must maintain a written accounting of all payments (including any gifts, meals, entertainment or anything else of value) made in connection with work done for Goodyear and must provide a copy of this accounting to Goodyear upon request.

Competition Laws

Suppliers must conduct their business in accordance with all applicable competition and antitrust laws.

Conflicts of Interest

Goodyear associates are required to act in the best interest of Goodyear. Accordingly, suppliers must avoid any relationship with a Goodyear associate that might conflict, or appear to conflict, with the associate's obligation to act in the best interest of Goodyear. For example, suppliers must not employ or otherwise retain Goodyear associates, and must ensure that any gifts and entertainment provided to Goodyear associates comply with Goodyear's requirements. If a supplier employee or contractor is a family relation (spouse/partner, parent, sibling, child, grandchild) or shares a household with a Goodyear associate, the supplier must disclose this fact to Goodyear.

Counterfeit Parts

Suppliers must not supply counterfeit products or components to Goodyear and will cooperate with Goodyear in any investigation related to suspected counterfeit activity.

Reporting and protection against retaliation

Suppliers must provide a complaint reporting mechanism, including for anonymous reporting, for supplier workers to report workplace grievances or other compliance concerns, in accordance with local laws and regulations. Suppliers must maintain reporter confidentiality and prohibit retaliation against workers who report matters in good faith.

7. Privacy and data protection

Suppliers must maintain the confidentiality of information entrusted to them by Goodyear. Suppliers must comply with applicable privacy and information security laws and Goodyear policies, and must implement appropriate measures to protect confidential information and personal data against loss and unauthorized access or use.

COMPLIANCE VERIFICATION

Goodyear may, from time to time, request information or access for purposes of verifying suppliers' compliance with this Code. In the event Goodyear provides such a request and is not reasonably satisfied with a supplier's response, Goodyear may take the actions described under "Violations" below.

APPLICATION TO EMPLOYEES, AGENTS, SUBCONTRACTORS AND OTHERS

Suppliers must ensure that any person who performs services for them or on their behalf in any capacity, including employees, agents and representatives, complies with this Code. This Code also applies to each supplier's subcontractors and subsuppliers for work that is directly related to Goodyear, and each supplier must ensure such subcontractors and subsuppliers comply with the provisions of this Code as if they were the supplier itself.

VIOLATIONS

Suppliers must promptly take necessary corrective actions to remedy any noncompliance with this Code. In the event of any noncompliance, or in the event a supplier is unwilling or unable to comply with this Code, Goodyear reserves the right, in its sole discretion, to decline to make further purchases under any agreement between Goodyear and the supplier, terminate any such agreements and/or terminate its business relationship with the supplier, in addition to exercising any other available remedies.

NON COMPLIANCE REPORTING

Violations of this Code and/or other questions or concerns regarding compliance and ethics issues may be confidentially reported, including anonymously, through the Goodyear Integrity Hotline at www.goodyear.ethicspoint.com. In the United States and Canada, you can call toll-free: 1-888-GY-HOTLINE (1-888-494-6854). From all other countries, access dialing instructions at: www.goodyear.ethicspoint.com or place a reverse charge/collect call to +1-503-726-2371.

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