

BUSINESS CONDUCT MANUAL



GOODYEAR 

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ACT WITH INTEGRITY

Goodyear's commitment to the highest ethical standards drives how we work and is rooted in our longstanding pledge to Protect Our Good Name.

Our commitment to **Act with Integrity** is foundational to everything we do at Goodyear. It ensures that we build trust and earn confidence through honesty and respect. We do the right thing, and we Protect Our Good Name.

Integrity is our first and guiding principle, laying the groundwork for how we conduct business around the world. Integrity means we act with honesty, treat others with respect and dignity, and do the right thing—even when it is difficult or unpopular.

The Business Conduct Manual helps Associates understand what it means to Act with Integrity and know their roles and responsibilities in following our legal and ethical standards in doing business the right way—every day and everywhere. Acting with integrity enables us to protect our team, our community, our business and assets, and our reputation.

PROTECT OUR GOOD NAME

First used by Goodyear in 1915, the phrase "Protect Our Good Name" emphasized that what Goodyear did, how it performed, the quality of its products and its character were in the hands of its Associates.

This has long served as a reminder that Goodyear Associates are responsible for the Company's reputation. For more than a century, "Protect Our Good Name" has appeared on the walls of Goodyear facilities around the world.

A MESSAGE FROM OUR CEO AND PRESIDENT



For more than 125 years, doing the right thing, the right way, has been the foundation of Goodyear's reputation.

We all take actions and make decisions every day that affect our fellow Associates, our customers, our communities and our business. When we do so with integrity, we inspire trust and strengthen our culture and our business.

Our Business Conduct Manual (BCM) helps every one of us live up to our ethical obligations as Goodyear Associates. It's our main reference guide to Goodyear's core

policies, and it reinforces our shared responsibility to operate not only legally but with integrity.

The BCM helps us put ethical principles into practice and make decisions that create value for our business while keeping us safe, honest and respectful. Goodyear's policies support our efforts to operate responsibly and sustainably. These are important aspects of our company and our culture that we can take pride in together.

Thank you for reviewing the BCM and always keeping Goodyear's expectations and policies top of mind. I'm counting on you to continue to do the right thing, the right way, and to Protect Our Good Name.

A handwritten signature in white ink that reads "Mark W. Stewart". The signature is written in a cursive, flowing style.

Mark Stewart
CEO and President

A MESSAGE FROM OUR GENERAL COUNSEL

No matter your job, location or length of time at Goodyear, Act with Integrity is central to our history and paramount to our future. Acting with integrity ensures that we will continue to be a Company that leads by example and maintains a reputation for doing the right thing.

Goodyear's Act with Integrity value informs how we work and provides the foundation that helps Protect Our Good Name. Our Business Conduct Manual guides Associates in doing the right thing by acting in ways that reflect our long-established commitment to the highest ethical standards.

These policies also support an environment in which all Associates feel comfortable speaking up when we see something that isn't right, and I encourage you to ask questions whenever something isn't clear or you have a concern.

By speaking up, we hold ourselves—and one another—accountable to everything the BCM covers and what we stand for as a Company. Speaking up protects you, your fellow Associates and our Company, and it will always make us safer, more innovative and more successful.

Thank you for everything you do to protect Goodyear's legacy and for doing your part to Act with Integrity.



A handwritten signature in white ink, appearing to read 'D. Phillips', written over a dark blue background.

David Phillips
Senior Vice President & General Counsel

HOW TO USE THIS MANUAL

While Goodyear’s Business Conduct Manual (BCM) does not cover every law or ethical standard for every situation you may face, it does summarize many of the legal and ethical requirements we all must follow.

The BCM applies to every Associate of the Goodyear family of companies worldwide, so “Goodyear” or “Company” refers to any such Company, and “Associate” means every director, officer and salaried and hourly Associate, unless otherwise specified. In many instances, the rules described in the BCM also apply to people working on our behalf or at our direction, such as contractors, brokers or agents.

All information in the BCM is important, whether or not you view your work as directly affected by a particular topic. This is why Goodyear requires you to read and understand this BCM, to ask for help with anything you do not understand, to seek advice when you need it and to report any known or suspected violation that comes to your attention.

CONTACT

For compliance and ethics information or advice, you may contact:

- Your manager;
- Your Human Resources representative;
- Compliance & Ethics;
- Internal Audit;
- The Goodyear Integrity Hotline (phone numbers and web intake form may be accessed at <http://goodyear.ethicspoint.com>; the phone number for the U.S. and Canada is 1-888-494-6854, and other country-specific phone numbers are available at the website; or place a reverse charge/collect call to +1-503-726-2371); or
- The Goodyear lawyer responsible for your business or function or the Office of the General Counsel (visit Goodyear’s [Legal Contacts website](#) for contact information).



OTHER RESOURCES

Throughout the BCM, you will find references to Goodyear policies related to, or providing more information about, the subject matter discussed. If you are reviewing the BCM online within the Goodyear network, policy references are hyperlinks, which will direct you to the policies. If you are reviewing a printed version of the BCM, or reviewing the BCM online outside of the Goodyear network, you can access the complete policies on the Goodyear Policies site, available at: <https://sharepoint.goodyear.com/sites/companypolicies/SitePages/Home.aspx>.

Refer to the BCM whenever you have questions and/or when your job assignment or work situation changes. If you need additional information or materials or to arrange for special training, please contact the Goodyear lawyer responsible for your business or function or Compliance & Ethics.

TAKE NOTE

This Business Conduct Manual and the policies described in it are not an employment contract. Goodyear does not create any contractual rights by issuing the BCM or the policies.



PROTECT OUR GOOD NAME



YOUR RESPONSIBILITY

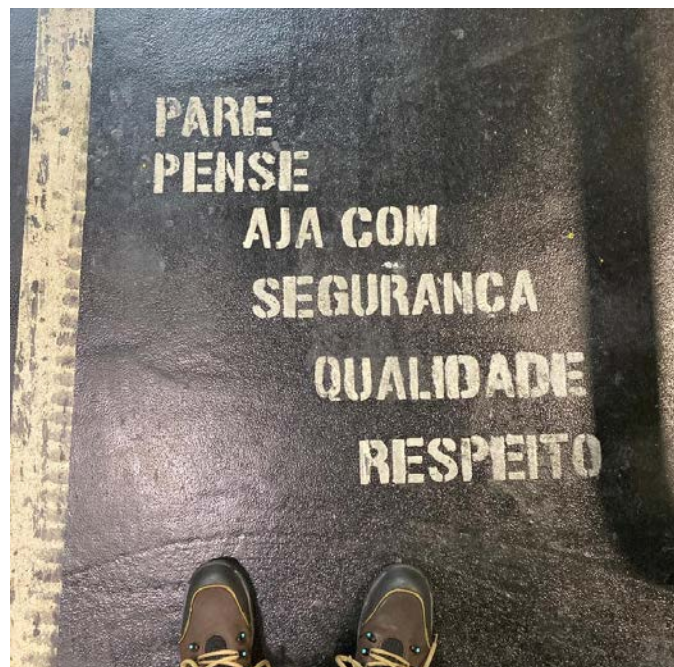
Goodyear is proud of the reputation we have built as a company committed to doing the right thing. We believe that every associate is responsible for upholding the highest standards for ethical business conduct and the respectful treatment of others.

ASSOCIATE RESPONSIBILITY

As an Associate, it is your responsibility to:

- **Act with Integrity.** Know and comply with the policies, laws and regulations that apply to your job and Goodyear, whether stated in the BCM or elsewhere, and act ethically;
- **Provide full, accurate, timely and clear information at all times,** including in reports and documents that Goodyear files with, or submits to, government authorities and regulators (including but not limited to the Securities and Exchange Commission) and in other public communications made by Goodyear;
- **Report any known or suspected violation of law or Company policies,** or if you are asked or directed to do anything you believe would be a violation; and
- **Cooperate fully and truthfully** in any review or investigation of a possible violation.

Compliance with the Company's policies and ethical standards is vital to our business success and to Protect Our Good Name.



Our Associates play a critical role in protecting our good name by always doing the right thing and speaking up when they have questions or concerns. Each of us shares in this responsibility—no matter our country, business unit or role at Goodyear.

ADDITIONAL RESPONSIBILITIES FOR MANAGERS

If you are a manager, it is also your responsibility to:

- **Lead by example.** Demonstrate your commitment to our high ethical standards through your words and actions.
- **Communicate and discuss applicable policies, laws and regulations.** Make sure everyone you manage or supervise understands their obligations and lives up to the spirit and letter of our Compliance & Ethics Policies, the law and regulations. Ensure Associates complete all required Compliance & Ethics training.
- **Monitor and ensure compliance by Associates.** Hold everyone accountable for ethical behavior. Ensure our policies and business practices are followed consistently throughout your department, business unit or region.
- **Encourage open and honest communication.** Be open and available to Associates who want to discuss a concern, make a report or ask a question. Create an environment that encourages questions and discussions about legal and compliance practices at all levels within the company.
- **Support Associates who raise issues.** Treat all issues raised by Associates seriously and work toward a prompt and effective resolution.
- **Protect confidentiality.** Do not share Associate issues and concerns with others who do not have a legitimate “need to know.” However, do not guarantee absolute confidentiality to anyone, as the Company may be obligated to investigate the concern. All reasonable steps will be taken to safeguard the Associate’s identity.

- **Report matters brought to your attention.** If Associates report to you concerns regarding questionable or unethical behavior, you are responsible for bringing those concerns to the appropriate department for review and investigation. You may not conduct your own investigation, and you may not direct the reporter to “Call the Hotline.” See the *Speak Up!* section on [p. 13](#) for more details.
- **Ensure there is no retaliation.** Clearly communicate the Company’s strict “no retaliation” policy, which protects Associates who report violations in good faith from adverse action as a result of making the report.

Refer to the following for more information:

- [Leading with Integrity ... A Guide for Managers](#)

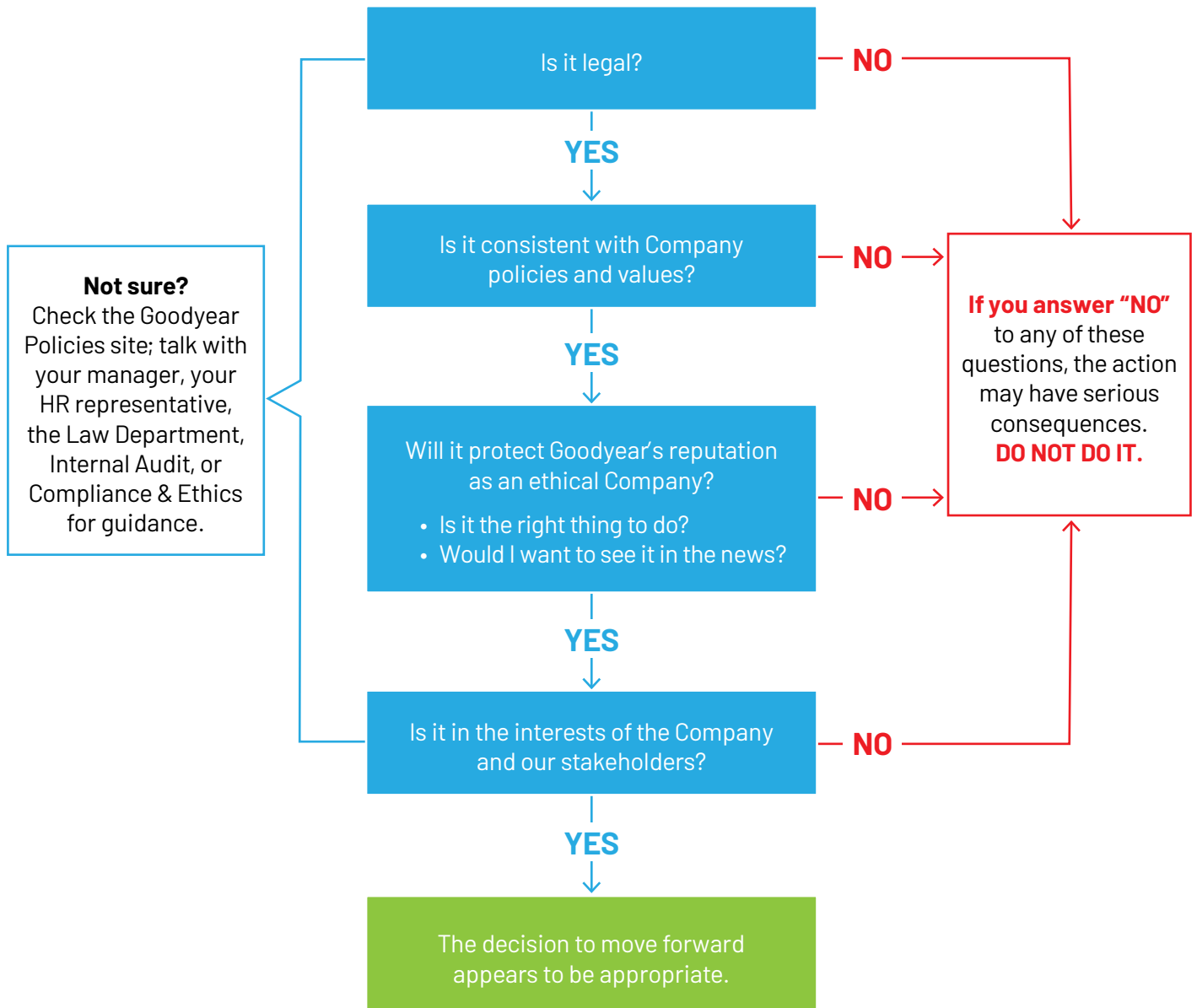
TAKE NOTE

Allegations of questionable or unethical conduct do not always arrive neatly packaged. As a manager, it is your responsibility to report concerns about something that may violate policy or law. This duty is incumbent upon managers regardless of whether the allegations were reported to you informally, imprecisely, or by an individual who may not have even recognized the concerns as a potential violation, and regardless of whether you are unsure if the allegations are true. If you become aware of a concern about possible misconduct, it is your job to Speak Up by using any of the reporting channels on [p. 13](#).

ETHICAL DECISION-MAKING

Not all situations are clear-cut, so good judgment is essential. When in doubt, ask yourself these questions about the action you are considering:

ASK YOURSELF



THE “DO NOT TRY TO HANDLE IT YOURSELF” LIST

The following are examples of allegations or matters that must be escalated or referred for investigation. This list is not exhaustive. If you have questions about whether a matter should be referred or escalated, contact the Law Department or Compliance & Ethics.

PRODUCT-RELATED MATTERS

- Any noncompliance with product quality requirements

FINANCIAL MATTERS

- Giving or receiving any kickback to/from a customer or a supplier/vendor of products or services
- Providing bribes or other improper benefits to a government official or another individual
- Offering or giving benefits to a customer to encourage or reward the purchase of products
- Committing theft or fraud
- Improperly booking/accounting for revenue or expenses
- Making misstatements in accounting records, whether intentional or accidental
- Inaccurately creating, reporting or falsifying Company business records, financial records or regulatory submissions
- Exchanging pricing data or other proprietary information with competitors or others

EMPLOYEE-RELATED MATTERS

- Unsafe work practices or conditions
- Discrimination or sexual harassment
- Workplace threats or violence
- Accepting or giving improper gifts or entertainment
- Misuse of intellectual property rights
- Conflicts of interest
- Privacy data breaches, misuse of Personally Identifiable Information (PII), or other cybersecurity matters
- Improper labor practices, including wage and hour violations, forced labor, and child labor

SPEAK UP!

REPORTING A CONCERN

If you have a concern regarding a compliance and ethics issue, you must make a report to any of the following resources:

- Your manager;
- Your Human Resources representative;
- Compliance & Ethics;
- Internal Audit;
- The Goodyear Integrity Hotline (phone numbers and web intake form may be accessed at <http://goodyear.ethicspoint.com>; the phone number for the U.S. and Canada is 1-888-494-6854, and other country-specific phone numbers are available at the website); or
- The Goodyear lawyer responsible for your business or function or the Office of the General Counsel.

We encourage individuals to report complaints through one of Goodyear's internal channels listed above, so that the Company can review and address them. Please refer to Goodyear's [Speak Up Policy](#) for more details. Nothing in the BCM or Speak Up Policy is intended to limit or discourage any individual from exercising their rights under applicable law to report complaints to government agencies.

— Q & A —

Q: *Yesterday, I overheard two colleagues talking about their suspicion that someone might be stealing scrap materials from the plant. I do not have many details because I only heard part of the conversation, and I do not know if it is true or not. But if it is true, it seems pretty concerning. What should I do? Is this something that I should report to the Integrity Hotline, even if I do not have very much information to provide?*

A: Yes, you should report this. All Associates have an obligation to report suspected violations of policy, law, or ethical standards. The suspected theft of scrap materials is a possible violation and should be reported to the Integrity Hotline or one of the other resources listed on this page. Reporting a concern in good faith—i.e., sincerely and truthfully reporting something that you believe is, or might be, a violation—is always the right approach, regardless of whether an investigation later determines that your concern was accurate.

Goodyear strictly prohibits any retaliation against individuals who report a concern in good faith. In this instance, you should report the conversation that you overheard even though you do not have very much information. Compliance & Ethics will determine how best to review the concerns you have reported and gather more information.

PROTECT OUR GOOD NAME

WHAT WILL GOODYEAR DO WHEN IT RECEIVES A REPORT THROUGH THE INTEGRITY HOTLINE?

**Speak
up!** INTEGRITY
HOTLINE



STEP 1: REPORT A CONCERN OR QUESTION

You can report a concern or question to Goodyear's Integrity Hotline, or through the internal reporting channel options: a Goodyear manager, HR, Compliance & Ethics, Internal Audit, or the Law Department. If reporting anonymously, see below.*



STEP 2: ASSESSMENT OF THE REPORT

Regardless of how you report, all matters are reviewed by Compliance & Ethics, which assigns each matter to a designated investigator, which might include HR, Legal, Compliance & Ethics, Internal Audit, or Global Security.



STEP 3: INVESTIGATION

The investigation may involve interviews of Associates or third parties, review of business records, and analysis of processes. If you provided your contact information, the investigator might contact you for more information.



STEP 4: DETERMINATION OF THE OUTCOME

At the end of the investigation, the investigation team determines and documents the outcome, including any remediation or disciplinary recommendations.



STEP 5: CLOSING THE CASE

The investigation is closed. The results are tracked and reported internally, and the investigator follows up with the reporter where possible. Due to confidentiality, the investigator may not be able to provide you with details about specific actions.

Online reporting here: <http://goodyear.ethicspoint.com>

* Anonymous reporters: Use the "report key" and password to check for updates and communicate anonymously with Goodyear. You can also submit your email address to the Hotline to receive email alerts when Goodyear posts information or asks a question through the Hotline, and this email address is not shared with Goodyear.

TAKE NOTE

How does the Integrity Hotline work?

- Reports can be submitted to the Integrity Hotline via telephone or online, 24 hours a day, every day of the year, and in any language.
- Translation services are available upon request.
- Reports may be made anonymously; Goodyear endeavors to protect the confidentiality and anonymity of reporters to the greatest extent possible.
- Telephone reporting here: 1-888-494-6854 (for U.S. and Canada); see website for other country-specific phone numbers.
- For more information, refer to [Goodyear's Speak Up Policy](#).

WHAT HAPPENS IF THERE IS A LEGAL OR POLICY VIOLATION?

Following review of the matter, any Associate who:

- Violates, or requests that someone else violate, any Company policy or legal requirement;
- Fails to promptly report a known or suspected violation;
- Conceals or destroys evidence or information related to an investigation or a violation; and/or
- Withholds information from, refuses to cooperate with or provides false information during an investigation of a possible violation

is subject to appropriate discipline, ranging from additional training and coaching to employment consequences, up to and including termination of employment, forfeiture of benefits, and civil and criminal prosecution.

The Company commits to administering disciplinary action and penalties in a consistent, proportionate and lawful manner.

RETALIATION IS PROHIBITED

Goodyear strictly prohibits any form of retaliation against individuals who:

- Report in good faith known or suspected violations of policy or law (even if those concerns are found to be unsubstantiated) or
- Participate and cooperate honestly and completely in an investigation.

Retaliation is serious misconduct and any instances of retaliation are subject to disciplinary action, up to and including termination of employment and forfeiture of benefits.

If you believe you have experienced retaliation or that someone else has been retaliated against, report this immediately by contacting one of the resources on [p. 13](#).

Making a report or cooperating in an investigation does not protect individuals from discipline for their own misconduct or wrongdoing. However, self-reporting and cooperation are factors that are taken into consideration when determining appropriate remediation and discipline.

Refer to the following for more information:

- [Speak Up Policy](#)

PROTECT OUR TEAM



GOOD YEAR.
Lawton

RESPECT ONE ANOTHER

Goodyear demands a workplace environment that maximizes the potential of its Associates and fosters a team spirit in a diverse workforce.

To that end, Goodyear has zero tolerance for acts of harassment and discrimination, based upon race, color, ethnicity, religion, national origin, sex (including pregnancy), sexual orientation, gender identity, age, disability, veteran status, genetic information, citizenship status, or other characteristics protected by applicable law. Goodyear also has zero tolerance for any form of retaliation, bullying, or workplace violence. We maintain a respectful workplace environment and expect all Associates to treat each other with respect.

Goodyear recruits, hires, trains, compensates, promotes and provides other conditions of employment without regard to an individual's race, color, ethnicity, religion, national origin, sex (including pregnancy), sexual orientation, gender identity, age, disability, veteran status, genetic information, citizenship status, or other characteristics protected by applicable law. Goodyear will use merit, qualifications and other job-related criteria as the basis for all employment-related decisions affecting Associates and applicants.

Goodyear is an equal opportunity employer and provides equal employment opportunities to qualified Associates and applicants for employment, without regard to race, color, ethnicity, religion, sex (including pregnancy), sexual orientation, gender identity, national origin, age, disability, veteran status, genetic information, citizenship status or other characteristics protected by applicable law.

TAKE NOTE

At Goodyear, we respect the unique abilities, experiences, cultures and differences of our Associates. Embracing the diversity of our Associates enriches our corporate environment, helps to create a business advantage and is an essential component of our success.

Goodyear is committed to protecting our team. Our policies—as outlined in the Business Conduct Manual—help ensure that we all work together and behave in ways that protect privacy, drive responsible operations and support quality of life while maintaining our dedication to life-saving practices and a respectful and inclusive workplace.

Harassment includes conduct that is unwelcome and unwanted and has the purpose or effect of creating an intimidating, hostile or offensive working environment.

Inappropriate conduct, behavior or material includes offensive name-calling, slurs, taunting, nicknames, epithets, graffiti, jokes, posters, calendars, emails, pictures or other things deemed inappropriate by the Company.

This policy prohibits unwanted sexual advances, requests for sexual favors, and visual, verbal and physical conduct of a sexual nature, including but not limited to:

- Offering employment benefits in exchange for sexual favors;
- Making or threatening reprisals after a negative response to sexual advances;
- Visual conduct, such as leering; making sexual gestures; or viewing, forwarding or displaying sexually suggestive objects, pictures, cartoons, websites or posters (including on Company-provided assets such as mobile devices or computers);
- Verbal conduct, such as making or using derogatory sexual comments, nicknames, epithets, slurs or jokes; graphic verbal commentaries about an individual's body; sexual comments on or inquiries into one's sex life or sexual activities; obscene letters, emails, pictures, graffiti, social media posts, websites or notes; and
- Physical conduct, such as impeding or blocking movements, touching, groping or assaulting.

Refer to the following for more information:

- [Zero Tolerance Policy](#)
- [Global Workplace Personal and Family Relationships Policy](#)
- [Social Media Policy](#)
- [Acceptable Use of IT Resources Policy](#)

— Q & A —

Q: *Is it permissible to have a dating relationship with another Goodyear Associate?*

A: Goodyear does not prohibit Associates from engaging in consensual romantic or personal relationships. However, these relationships have the potential to create conflicts of interest and other issues. As such, Associates must promptly report to their manager, Human Resources, or the Law Department any romantic or personal relationship with another Associate that may create, or that could appear (to an impartial observer) to create, a conflict of interest with either Associate's job responsibilities or the interests of Goodyear. Romantic relationships are prohibited between supervisors or managers and Associates who report to them, and between supervisors or managers and any other Associate for whom they have influence over promotions, salary actions, or disciplinary actions. The best time to address any potential issues is before the relationship starts. As always, your conduct must be guided by the BCM and the Global Workplace Personal and Family Relationships Policy.

PROTECT OUR TEAM

WORKPLACE SAFETY AND HEALTH

Safety is a value in every facility and for all Goodyear Associates, which means we all must take personal responsibility for our safety and the safety of others around us. We have a simple and straightforward goal for safety at Goodyear, and it is reflected by our global safety initiative: eliminating all serious injuries and fatalities from our workplace. We strive for each Goodyear Associate and contractor around the world to go home injury-free every day.

Goodyear is committed to operating its facilities in compliance with applicable national, provincial, state, and local safety, health and environmental requirements. Management works to ensure that Goodyear's facilities enhance quality of life in the workplace and in the communities in which Goodyear operates. Goodyear Associates are responsible for contributing to a culture that reduces risk of injury to themselves, their co-workers and others. Associates should never compromise the safety or health of anyone, including themselves, for the sake of production or other results. Associates must stop work and report to a responsible manager if they know or have reason to believe that a workplace condition poses an unreasonable danger to the safety or health of the Associate or others.

Refer to the following for more information:

- [Responsible Operations Policy](#)

SUBSTANCE ABUSE

Goodyear is committed to providing a safe and productive work environment that is free from the influence of alcohol, illegal drugs, misused prescription medication, and certain legal drugs.

The improper use, sale, manufacture, purchase, transfer or possession of the above-noted substances (or being under the influence of the above-noted substances) on Company time and property is prohibited.

In the United States, refer to the following for more information:

- [Alcohol and Illegal Drugs Policy](#)

Please consult your local Human Resources representative or the Law Department for additional information and policies for your location.



ASSOCIATE PRIVACY

Goodyear conducts its worldwide business operations in a manner that complies with applicable legal requirements and protects personal privacy. When legal and business

requirements make it necessary for Goodyear to acquire, record, process, store and use the Personally Identifiable Information (PII) of Associates, the information must be handled appropriately and securely.

It is the responsibility of every Associate to recognize and respect the sensitive and confidential nature of PII. PII is any information related to an identified or identifiable person. PII includes, but is not limited to, name, address, phone number, email address, online identifiers (e.g., cookies, device IDs, IP addresses or RFID tags), location data, genetic data, financial account information, personal identification number (e.g., Social Security number or government identification number) and credit card information.



— Q & A —

Q: *We are contracting with a new employee benefits provider, and we will need to transfer Associate PII to the provider for it to provide services to Goodyear. What is the proper way to handle the transfer of Associate PII to a third party?*

1. *Tell them our data protection requirements and send them a link to our privacy policies.*
2. *Work with the IT Security team and the Law Department to assess the service provider's capability to protect PII, include the correct contractual provisions in the agreement, and ensure compliance with Goodyear's privacy policies and applicable laws.*
3. *Do not permit transfer to the third party under any circumstances.*

A: The correct answer is #2. All contracts involving employee information should include appropriate language about our data protection requirements, and Goodyear may need to assess the cybersecurity and data protection practices of certain vendors. As a general practice, you must limit the data transfer to only that data which is needed for the service to be provided. Moreover, Goodyear should include this new use of PII in its Data Map and conduct upfront due diligence to ensure the third party adequately protects PII. The teams that help onboard vendors can make introductions to these processes.

Goodyear will collect, use and otherwise process only those items of PII that are required for business and legal purposes. For example, the Company may process the PII it obtains from its Associates for such purposes as administering all stages of the employment relationship, talent management, payroll and payroll taxes, benefits administration, protecting Company assets, travel and entertainment reimbursement, provisioning IT tools, and compliance with legal, health and safety obligations.

Subject to any stricter requirements under applicable law, Goodyear will endeavor to:

- Process PII only in ways that are compatible with the purposes for which it was collected or subsequently authorized by the Associate; and
- Take reasonable steps to ensure that PII is relevant to its intended use, accurate, complete, and current.

Goodyear also maintains a program designed to take reasonable precautions to protect PII in its possession from loss, misuse and unauthorized access, disclosure, alteration and destruction.

Access to PII by other Associates is to be limited to those items necessary and relevant in the performance of their job responsibilities. Associates are expected to comply with all Company policies and applicable laws and regulations regarding the collection, recording, processing, storage, and use of PII.

Refer to the following for more information:

- [Global Privacy Policy](#)
- [Online Privacy Policy](#)
- [Associate Privacy Policy](#)
- [HIPAA Privacy Notice \(U.S.\)](#)
- [Acceptable Use of IT Resources](#)



PROTECT OUR COMMUNITY



PRODUCT QUALITY

Goodyear's reputation depends on the quality of every product we produce. We must always follow applicable specifications and established procedures so that we build quality into every product. Let your manager know of any product or process that does not comply with Goodyear's quality standards. All Associates must do their part to ensure that Goodyear's quality standards are met every day and everywhere we do business. Goodyear achieves business excellence by:

- Ensuring consistent quality through our robust Quality Management System, which provides a framework for quality standards and best practices;
- Conducting audits, by both local plant Associates and regional functional experts, at our manufacturing facilities;
- Adhering to specific ISO and international quality standards; and
- Reviewing our performance, and implementing continuous improvement actions when necessary.

Refer to the following for more information:

- [Responsible Operations Policy](#)

TAKE NOTE

If you are aware of or suspect any Associate of not meeting our quality, safety or environmental expectations, contact your manager, the Law Department or the Integrity Hotline.

PROTECTING THE ENVIRONMENT

At Goodyear, we are dedicated to ethical and sustainable practices to protect our planet and people. Our policy is to always manufacture, handle and dispose of materials in an environmentally responsible manner, and we require strict adherence to all applicable laws and regulations.

Goodyear is also committed to the conservation of natural resources and to waste reduction. We expect every Associate to help in these and our other sustainability efforts. Sustainability is an integral part of our business strategy and how we work. Goodyear is committed to understanding the potential impacts our value chain may have on nature and our natural resources, and we continually seek sustainable material options that deliver product performance while meeting our high standards of quality and safety.

Goodyear strives to be a good citizen everywhere we do business, and we take pride in our efforts to protect the communities in which we operate. These efforts include ensuring quality products for our customers and limiting our environmental impacts, while safeguarding human rights and labor standards.

Goodyear strives to reduce environmental impacts and conserve natural resources by minimizing waste, water usage and air emissions, reusing and recycling materials, and responsibly managing energy use. We manage our environmental impacts and plan for adverse conditions to support business continuity. We also proactively work with our suppliers to identify and evaluate environmental and societal impacts, risks and opportunities, while collaborating with them on ways to build a more sustainable and resilient supply chain.

Refer to the following for more information:

- [Responsible Operations Policy](#)
- [Goodyear's Corporate Responsibility Website](#)
- [Supplier Code of Conduct](#)
- [Natural Rubber Procurement Policy](#)
- [Sustainable Soybean Oil Procurement Policy](#)

POLICY ON GLOBAL HUMAN RIGHTS

Goodyear's Global Human Rights Policy is part of our commitment to ethical and socially responsible business practices. Goodyear is committed to respecting and protecting fundamental human rights, in compliance with the laws and regulations of each country in which we operate and in line with internationally recognized 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.

We will comply with all applicable laws and regulations concerning human rights and labor standards. Where there is no law or regulation covering a human rights issue described in this section, or where conflicts exist between our policies and applicable laws or regulations, Goodyear will comply with applicable laws and regulations while seeking ways to honor internationally recognized human rights and the principles set forth in this Policy.

This Global Human Rights Policy applies across Goodyear's global operations, along with our BCM. We require our suppliers to comply with similar standards through our Supplier Code of Conduct.

PROTECT OUR COMMUNITY

PROHIBITION OF FORCED LABOR

Goodyear prohibits all forms of forced or compulsory labor, including prison labor, indentured labor (including debt bondage), slave labor, and human trafficking. Consistent with our commitment to freely chosen employment:

- Recruitment must be conducted in a manner that respects and protects internationally recognized human rights.
- No individual shall be required to pay recruitment fees or related costs to secure employment with Goodyear.
- Agreement to terms and conditions of employment must be voluntary and free from deception or coercion.
- Workers' freedom of movement must not be restricted through conditions of employment, retention of identity or immigration documents, holding of deposits, or other action aimed at restricting mobility.

PROHIBITION OF CHILD LABOR

Goodyear prohibits the use of child labor. We comply with applicable child labor laws, and we limit 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, we will not employ children under the age of 15. Where young workers above the Minimum Age but below the age of 18 are employed, they must not be permitted to perform work that is hazardous or that may otherwise jeopardize their physical or psychological well-being.



WORKING CONDITIONS

Goodyear is committed to creating safe workplaces in which the human rights of all Associates and contractors are respected. As described in the BCM:

- Workplace health and safety is a core value in every facility and for all Goodyear Associates.
- We prohibit all forms of violence, threats, intimidation, and sexual or other harassment.
- We do not tolerate any acts of discrimination, based on race, color, ethnicity, religion, national origin, sex (including pregnancy), sexual orientation, gender identity, age, disability, veteran status, genetic information, ancestry, citizenship status, or other characteristics protected by applicable law.
- We respect our Associates' personal privacy and comply with applicable data privacy laws.

We also comply with applicable laws, regulations, and collective agreements (whichever affords greater protection) related to wages and hours worked.

FREEDOM OF ASSOCIATION

Goodyear recognizes and respects the rights and freedom of workers to join and collectively bargain through organizations of their choosing (such as unions) or to refrain from joining such organizations. No Associate will be subject to dismissal, discrimination, harassment, intimidation, or retaliation due to membership in a lawful workers' association or union or participation in the lawful activities of such organizations.

RETENTION OF IDENTITY DOCUMENTS

Workers shall retain possession and control of their identity documents, including passports, work permits, certificates of qualification or travel documentation. Goodyear shall not restrict workers' abilities to move around and to leave the country in which they are employed. Goodyear will use copies of identity documents whenever possible. If it is necessary for Goodyear to handle original Identity Documents for the purposes of complying with local laws—for example, to process work permit applications—the following safeguards shall be implemented:

- Obtain the written consent of workers, which must be freely given;
- Ensure that documents are not held for longer than is strictly necessary; and
- Provide workers with copies of their Identity Documents to facilitate their freedom of movement while they are not in possession of their original documents.

Any foreign, migrant workers shall have access to an individual, secured locker to which only they have access and in which they can store their Identity Documents.

PROTECT OUR COMMUNITY

RESPONSIBLE RECRUITMENT

Recruitment should take place in a way that respects and protects internationally recognized human rights. Associates must either be hired directly by Goodyear or through labor brokers and/or recruitment agencies that have (i) been appropriately screened as “Human Resources Consultants/Advisors” and passed our due diligence process and (ii) agreed to comply with our human rights standards as outlined in our Supplier Code of Conduct.

Agreement to terms and conditions of employment must be voluntary and free from deception or coercion. Before they enter into employment, all workers shall be provided with clear, written employment terms and conditions that include details regarding wages and hours and are written in a language that the worker understands.

We support the Employer Pays Principle: No worker should pay for a job—the costs of recruitment should be borne not by the worker but by the employer. No individual shall be required or asked to pay recruitment fees or related costs to their employer, or any labor broker, agent or recruitment company, to secure employment with Goodyear. Costs related to the recruitment process may include pre-employment drug screening, medical costs, insurance costs, costs for skills and qualification tests, costs for training and orientation, equipment costs, travel and lodging costs, and administrative costs. If we learn that a worker has been required to pay such fees or costs, we will reimburse the worker as soon as practicable upon discovery.

EXPECTATIONS OF CUSTOMERS AND SUPPLIERS

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

Refer to the following for more information:

- [Global Human Rights Policy](#)
- [Retention of Identity Documents Policy](#)
- [Responsible Recruitment Policy](#)
- [Supplier Code of Conduct](#)
- [Goodyear’s Corporate Responsibility Website](#)
- [Natural Rubber Procurement Policy](#)
- [Sustainable Soybean Oil Procurement Policy](#)



PROTECT OUR BUSINESS & ASSETS



GOVERNMENT BUSINESS AND COMPLIANCE WITH REGULATORY REQUIREMENTS

We all have a shared responsibility to protect Goodyear and its assets. To help Protect Our Good Name, we must be familiar with and comply with all applicable laws and policies, and we must take care to properly use and safeguard Goodyear's assets.

There are special rules that apply when Goodyear does business with governments and state-owned enterprises. At Goodyear, we are committed to following laws and regulations relevant to transacting in the public marketplace and meeting all obligations imposed by this type of business.

ANTI-BRIBERY

Goodyear strictly prohibits giving and receiving bribes. We will give up any business opportunity that can be won only by giving an improper or illegal payment, bribe, gift, rebate, kickback, or similar inducement. This section contains an overview of the key provisions of the [Anti-Bribery Policy](#).

The Foreign Corrupt Practices Act (FCPA) makes it a crime under U.S. law to offer, pay, promise to pay or authorize the payment of money or any thing of value to any person while knowing that all or a portion of such money or thing of value will be offered, given or promised, directly or indirectly, to a non-USA government official for the purpose of obtaining or retaining business or securing any improper advantage.

The FCPA also requires companies like Goodyear, which are traded on U.S. stock exchanges, to maintain sufficient internal controls over financial reporting.

Likewise, the FCPA prohibits individuals and companies from knowingly falsifying the books and records of publicly-traded companies, like Goodyear.

Although the FCPA's bribery provisions focus primarily on interactions with non-USA government officials, many U.S. state laws prohibit commercial bribery and bribery of U.S. government officials. Under the U.S. Travel Act, the U.S. federal government can prosecute violations of these state laws as well as federal laws. As such, almost any act of bribery—regardless of the recipient—is a crime under U.S. state law, U.S. federal law, or both. Under the U.S. Foreign Extortion Prevention Act, non-USA government officials are also prohibited from accepting, demanding or requesting bribes from companies.

Goodyear follows a simple, yet powerful, philosophy—we do the right thing. We follow this philosophy in everything we do, including by protecting against corruption, avoiding conflicts of interest, maintaining accurate financial records, and safeguarding the Company's intellectual property and confidential information.

Many other countries have similar laws prohibiting offering, giving, and receiving bribes (including the UK Bribery Act, Brazil's Clean Company Act, France's Sapin II, and others). Associates must comply with all applicable anti-bribery laws and regulations as well as Goodyear's policies.

The **UK Bribery Act** contains similar prohibitions on bribery of non-UK government officials. In addition to these prohibitions, the UK Bribery Act also prohibits the offenses of (i) a company's failure to establish adequate procedures to prevent bribery by individuals associated with it, and (ii) the offering, making and receiving of bribes to or from private (non-government) individuals—a type of bribery known as "commercial bribery." Commercial bribery is a form of bribery that does not necessarily involve any government official but instead involves a bribe paid to a private person, such as a representative of a customer or supplier.

TAKE NOTE

Goodyear's policy prohibits all forms of bribery, including bribery of government officials and commercial bribery. This policy prohibits bribes given, promised or offered by or through a third party, as well as those given, promised or offered directly by a Goodyear Associate. **Goodyear Associates, agents and other third parties conducting business with Goodyear are prohibited from giving, offering, or promising bribes to any individual, no matter whether that individual is a government official or a private person.**

Q & A

Q: *I am working with a consultant to help secure a government truck tires contract. The consultant's commission is somewhat higher than we typically pay and he has asked that we pay him in cash. Should we proceed?*

A: First, the consultant must be reviewed as part of Goodyear's Anti-Bribery Due Diligence Process as described in the [International Anti-Bribery Compliance Operational Guide](#). Second, high commissions and cash payments are "red flags" of potentially corrupt behavior. Red flags need to be reviewed and **MUST** be cleared by the Law Department before proceeding. Contact the Law Department for assistance.

FACILITATING PAYMENTS

“Facilitating Payments” are small payments made to low-level government officials for the purpose of securing the performance of certain routine, non-discretionary government actions to which a company is already entitled under local law (such as the proper processing of governmental papers like visas, loading or unloading cargo, providing police protection, and mail pick-up or delivery).

Even though the FCPA contains a narrow exemption for “facilitating or expediting payments” to non-USA government officials, Facilitating Payments are not permitted under the UK Bribery Act and the local laws of many countries. **Goodyear’s Policy absolutely prohibits the making of Facilitating Payments.**

TAKE NOTE

FACILITATING PAYMENTS ARE NOT PERMITTED UNDER GOODYEAR’S ANTI-BRIBERY POLICY.

Q & A

Q: You are at a customs office and are asked to pay the required fee to ship goods, but the customs office employee charges you an extra 10% that he asks you to pay in cash and he refuses to provide a receipt. What should you do?

1. Pay it and do not tell anyone about the extra amount.
2. Use normal Company funds to pay the required fee, but use petty cash for the additional 10%.
3. Offer to make a larger additional payment to induce the official to provide a receipt.
4. Do not pay, leave the office and contact the Law Department.

A: The correct answer is #4. You should leave the office and immediately contact the Law Department. The customs official may be seeking a Facilitating Payment, which is prohibited under Goodyear policy. The Law Department can help determine whether the payment is permissible and how to proceed.



EXTORTION OR DURESS

Payments made under imminent and real threats of violence or harm to individuals do not violate the FCPA or the UK Bribery Act. As such, Goodyear’s policy does not prohibit payments made under the real threat of immediate violence or harm if the payment is necessary to protect the health, liberty or safety of the Associate or representative. If such a situation should occur:

- The payment must not exceed U.S. \$100.00;
- Written disclosure of the payment must be made within 48 hours to the General Counsel; and
- The payment must be properly recorded on Goodyear’s books and records.

BUSINESS COURTESIES TO GOVERNMENT OFFICIALS

There may be occasions where it is appropriate for Goodyear to provide a government official or other person with a nominal gift or business-related travel, meal or entertainment, as long as it is done in accordance with the BCM, Company policies (including the Anti-Bribery Policy, Global Business Travel & Expense Policy, the Policy on Gifts, Meals & Entertainment (External Giving and Receiving), and the United States Senate and House Gift and Travel Rules Policy), and with the FCPA and other applicable anti-bribery laws.

Gifts

Goodyear strictly prohibits giving certain types of gifts (such as cash or cash equivalent gifts) to any government official or other third party under any circumstance. Goodyear also requires that any gift given to government officials or other third parties meets certain criteria, including that the gift:

- Is not a bribe;
- Is reasonable and customary;
- Complies with Goodyear policies and approval requirements; and
- Is properly recorded in the documentation and transaction details, and if the recipient is a government official, the records must note that the recipient is a government official.

Please see the section titled [Gifts, Meals and Entertainment](#) for more information.

Any gift to a U.S. government official must also comply with the requirements regarding “Gifts, Travel, Meals and Entertainment to U.S. Government Officials.”

— Q & A —

Q: Last holiday season, a vendor gave everyone in our department shopping cards for a local grocery store. This year, we thought it would be a nice idea for our department to give grocery shopping cards to our customers. Can we do this?

A: No, this is not permitted. Goodyear’s policy prohibits giving cash or cash equivalents—including gift cards, gift certificates (even gift certificates for specific items), shopping cards for use at grocery or other stores, bitcoin, and anything else that can be used like cash—to any third parties. Similarly, the shopping cards given by the vendor last season violated Goodyear’s policy. You should contact the Law Department so the Company can address that vendor’s behavior.

Meals and Entertainment

Meals and entertainment may be provided to government officials or other third parties if they are appropriate and reasonable, given in good faith for a legitimate business purpose, and comply with Goodyear’s policies. However, there are certain kinds of meals and entertainment that Goodyear strictly prohibits. Please see “Gifts, Meals and Entertainment” starting on [p. 39](#) for more information about the kinds of meals and entertainment that can, and cannot, be given to third parties, and about certain criteria that must be met (including that, if the recipient is a government official, the documentation and transaction details must note that the recipient is a government official).

Any meal or entertainment provided to a U.S. government official must also comply with the requirements below regarding “Gifts, Travel, Meals and Entertainment to U.S. Government Officials.”

Travel Expenses

Goodyear’s policy permits the providing of appropriate travel expenses for an individual (including delegation visit expenses for non-USA government officials), provided that any such travel expense: (i) is given in good faith, (ii) is given without any corrupt intent or expectation of a favor, (iii) is not a prohibited gift, meal, or entertainment (see pp. 40-42) and (iv) meets **all of the following criteria:**

- ✓ The travel provided must be directly related to a bona fide and legitimate business purpose and must be approved or required by the non-USA government entity.
- ✓ The value of the travel should be reasonable (in terms of the expense, the number of travelers and the frequency).
- ✓ Any travel for a U.S. government official must also comply with the requirements regarding “Gifts, Travel, Meals and Entertainment to U.S. Government Officials.”

For any travel provided to a non-USA government official, Goodyear Associates must obtain proper approvals, record the travel expenses promptly, fully, and accurately on the Company’s financial books and records, and refer to and comply with other obligations in Goodyear’s Anti-Bribery Policy.

The following types of travel expenses to non-USA government officials are **strictly prohibited:**

- ✗ Tourist and entertainment excursions
- ✗ Expenses associated with family members of officials
- ✗ Any other expenses that violate applicable laws or Company policies
- ✗ Cash, such as compensation per diems, EXCEPT where required by contract with the government entity and/or required by law. No cash may be provided to a government official, even under this exception, unless it is approved, in advance and in writing, by the General Counsel or the Regional Associate General Counsel.



BUSINESS COURTESIES TO U.S. GOVERNMENT OFFICIALS

Gifts to Government Employees in the United States

Federal, state and local government employees in the United States are subject to special laws and regulations restricting their receipt of gifts and gratuities (including meals and entertainment) from organizations with which they do business. Associates must be aware of and comply with all federal, state and local laws and regulations regarding gifts and gratuities. Any gifts, meals, travel, lodging or entertainment for government employees in the United States must be approved, in advance and in writing, by the Law Department.

U.S. Senate and House Gift and Travel Rules

Goodyear's policy is to comply in all respects with all applicable laws and regulations, including the Standing Rules of the U.S. Senate and Rules of the U.S. House of Representatives relating to prohibitions and restrictions on gifts to and travel by Members of the U.S. Senate and the U.S. House of Representatives ("Members of Congress") and their staff. The congressional gift rules define "gift" to include any gratuity, favor, discount, entertainment, hospitality, loan, forbearance or other item having monetary value, including gifts of services, training, transportation, lodging, food, drink, and/or meals, whether provided in kind, by purchase of a ticket, payment in advance, or reimbursement.

As an organization employing federal lobbyists, Goodyear is prohibited from providing any gift, travel, meal, entertainment, or other thing of value, no matter how small the amount, to Members of Congress or congressional staff unless it fits squarely within one of the congressional gift rules' formal exceptions to the gift ban. As a matter of Company policy, all Associates are required to adhere to the congressional gift rules, whether or not they are lobbyists, and **must obtain approval from the General Counsel's Office before offering or providing any gift, travel, meal, entertainment, or other thing of value to any Member of Congress or congressional staff.** For additional information, see Goodyear's [United States Senate and House Gift and Travel Rules Policy](#).



POLITICAL CONTRIBUTIONS

As described above, the FCPA prohibits giving any money or thing of value to non-USA government officials—including to any non-USA political party or party official or any candidate for a non-USA political office—to obtain or retain business or to secure any improper advantage. In addition, other U.S. laws restrict contributions to candidates for U.S. federal offices, U.S. political parties, or U.S. political committees. U.S. laws define these restricted “contributions” to U.S. political candidates, parties, and committees to include, among other things, providing the work time of Associates or allowing the use of any Company facility or resources. Various U.S. state and local laws may also restrict contributions to candidates for state or local office, political party representatives, or political committees.

To ensure compliance with these laws, Goodyear policy requires the specific, written approval of the General Counsel before any contribution out of Company funds can be made to any U.S. or non-USA political party, party official, or political committee, or to any candidate for any U.S. or non-USA national, state, provincial, local or other government office. Advance, written approval from the General Counsel is also required for contributions to support any ballot issue in the United States.

Associates may engage in individual political activity in their personal capacity so long as it is in accordance with applicable law and Company policies, including the Individual Political Activity Policy for Associates who are U.S. citizens, U.S. residents, or based in the United States.

Refer to the following for more information:

- [Individual Political Activity Policy](#)

TAKE NOTE

Goodyear’s Individual Political Activity Policy defines the process that Goodyear Associates must follow prior to making or soliciting political contributions in support of U.S. political candidates at the federal, state or local levels. Associates should refer to this Policy for guidance on political contributions related to political candidates in the United States. For guidance on political contributions in other locations, Associates should refer to applicable local policies and procedures and consult with the Law Department or Compliance & Ethics.

THIRD-PARTY DUE DILIGENCE

Goodyear Associates are required to comply with certain steps to ensure that Third Parties are familiar with and in compliance with Goodyear’s Anti-Bribery Policy, the FCPA, and other applicable anti-bribery laws when they are doing business with or on behalf of Goodyear. In connection with the selection and retention of Third Parties, Associates must comply with Goodyear’s [International Anti-Bribery Compliance Operational Guide](#) (“Operational Guide”). All Covered Third Parties are required to undergo Goodyear’s Anti-Bribery Due Diligence Process before they can do business with Goodyear, and on a periodic ongoing basis during the course of the business relationship. This process is described more fully in the Operational Guide.

As part of Goodyear’s efforts to ensure Third Parties’ compliance, Goodyear Associates are expected to be alert for indications that Third Parties may be violating anti-corruption laws (these indications are also known as “Third-Party Red Flags”). Refer to the Anti-Bribery Policy for a list of some common Third-Party Red Flags that Associates should be aware of and alert to when interacting with Third Parties. If an Associate becomes aware of any Third-Party Red Flags or other concerning circumstances regarding a Third Party, the Associate must report this immediately to the Goodyear lawyer responsible for the relevant location, function, or Business Unit or to Compliance & Ethics.

— Q & A —

Q: Sam is a Goodyear engineer. His team is considering hiring one of the following candidates to design a custom piece of equipment:

1. *Consultant 1: A local company that was recommended to Sam by an acquaintance who works at the state-owned utility company that provides services to Goodyear.*
2. *Consultant 2: One of Goodyear’s raw materials suppliers recently built similar equipment for the supplier’s internal use and offered to design Goodyear’s equipment, even though this isn’t a typical service they provide externally.*
3. *Consultant 3: A well-known and experienced engineering design firm that comes highly recommended by Sam’s colleagues, but the firm has declined to provide Goodyear with information about the company’s ownership.*

Are there any Third-Party Red Flags that Sam should be alert to with respect to these consultants?

A: Yes, each of these consultants exhibits a Third-Party Red Flag that Sam should report to a Goodyear lawyer before proceeding with onboarding: Consultant 1 was recommended by a government official; Consultant 2 is offering services outside of its typical scope of business and, perhaps, beyond its capabilities; and Consultant 3 refuses to explain who owns the company. Each of these details indicates a potential corruption-related issue, and the Goodyear lawyer can help Sam assess the red flag and figure out how to proceed. Please see a summary of common red flags on [p. 47](#).

CHARITABLE DONATIONS

Associates and third parties are required to ensure that charitable donations made on behalf of the Company are given only to legitimate charities and are used for charitable purposes and not otherwise misapplied. If a charitable donation is provided on behalf of Goodyear, it must meet **all of the following criteria:**

- ✓ It is given for a legitimate charitable purpose.
- ✓ It is used by the recipient for charitable purposes and not otherwise misapplied.
- ✓ It is consistent with any applicable governmental policy or local law or regulation, including any applicable tax laws regarding charitable giving.
- ✓ It is not, either directly or indirectly, a bribe or payoff, and is not given to obtain or retain business or secure any improper advantage.
- ✓ It complies with Goodyear's BCM and all Company policies and procedures, including those in Goodyear's Charitable Donations Guidance, and is approved in advance and in writing by the Law Department and local leadership.
- ✓ It is recorded promptly, fully and accurately on the Company's financial books and records, using the appropriate "Charitable Donations" General Ledger Code. Refer to the Global Chart of Accounts and the Worldwide Accounting Policy on GO.

For any charitable donation suggested or required by a government official, Goodyear Associates must:

- ✓ Obtain approval for the donation in advance and in writing by an Associate General Counsel. The documentation of the approval must be retained as part of the record for that charitable donation.

— Q & A —

Q: *I am the Project Manager for a big plant expansion project. We've experienced several delays and have not been able to secure a necessary permit to have electricity in time for production. Last week, while meeting with the head official at the Ministry of Energy, this official suggested that we make a contribution to the hospital foundation where his wife is the chief doctor. The hospital foundation is a good charity, and the plant manager is not opposed to the donation. What should we do?*

A: Regardless of whether the hospital is a legitimate charity, this is a request for a donation by a government official. Moreover, the context of the request suggests that the contribution may be in exchange for obtaining a business advantage for Goodyear—in which case it would be prohibited by law and by Goodyear's Anti-Bribery Policy. Contact the Law Department for more information and instructions.

SPONSORSHIPS

A sponsorship is an arrangement where Goodyear agrees to provide monetary support, assets, products, or services to a third party in exchange for granting marketing rights, assets or other benefits to Goodyear. Sponsorships often relate to an event, activity, or organization, such as a sporting event or conference. Although Goodyear permits appropriate and lawful sponsorships, the risk of bribery in the context of a sponsorship means that these activities, like charitable donations, should be handled with caution. If a sponsorship is provided on behalf of Goodyear, it is permitted only if it meets **all of the following criteria:**

- ✓ It is consistent with all applicable law and Company policies.
- ✓ It is reasonable in value.
- ✓ It is made for a legitimate business purpose.
- ✓ It is not, either directly or indirectly, a bribe or payoff, and is not given to obtain or retain business or secure any improper advantage.
- ✓ It is recorded on the Company's financial books and records promptly, fully, accurately, and in accordance with Goodyear's accounting policies.

For any sponsorship suggested or required by a Government Official, or provided to or on behalf of any government-affiliated entity, Goodyear Associates must:

- ✓ Obtain approval for the sponsorship in advance and in writing by an Associate General Counsel. The documentation of the approval must be retained as part of the record for that sponsorship.

ACQUISITIONS & JOINT VENTURES

When Goodyear engages in a transaction involving acquisitions or joint ventures, Associates must follow specific due diligence and background check procedures that are appropriate to such transactions. The procedures for anti-bribery due diligence in this context are outlined in Goodyear's [Procedure on Anti-Bribery Due Diligence for Acquisitions, Joint Ventures, and Other Significant Transactions](#). Associates involved in the anti-bribery due diligence process for such a transaction must consult with the Law Department regarding this process and the applicable procedures. Due diligence and background checks for acquisitions and joint ventures will require substantial effort and time to complete. For that reason, early involvement of the Law Department is critical.

Recordkeeping

Goodyear is legally required to make and keep accurate records that truthfully and accurately reflect all of the Company's transactions. Goodyear is also legally required to maintain an adequate system of internal accounting controls. Accordingly, Associates must comply with all Company policies and all applicable laws and standards regarding accounting and financial reporting. All transactions must be recorded promptly, fully and accurately in Goodyear's financial books and records, and according to Goodyear's accounting policies.



TRAINING & CERTIFICATION

Goodyear requires that certain Associates, as determined by the Law Department and Compliance & Ethics, undergo periodic anti-bribery and anti-corruption training to ensure that they understand their obligations and potential bribery risks. This training covers relevant anti-bribery laws, the Anti-Bribery Policy, and corresponding procedures and processes. Additionally, these Associates must complete an annual certification attesting to their compliance with Goodyear's Policy and must disclose any known violation of the Anti-Bribery Policy. Associates who are assigned to complete this training or certification must complete it in accordance with a schedule as determined by the Law Department and Compliance & Ethics.

Refer to the following for more information:

- [Anti-Bribery Policy](#)
- [International Anti-Bribery Compliance Operational Guide](#)
- [Anti-Bribery Covered Third Party List](#)
- [Senate and House Gift and Travel Rules](#)
- [Goodyear Procedure on Anti-Bribery Due Diligence for Acquisitions, or Joint Ventures, and Other Significant Transactions](#)
- [Travel for Non-USA Government Officials Checklist](#)
- [Charitable Donations Guidance](#)
- [Worldwide Accounting Policy: Accounting for Charitable Contributions](#)
- [Record Management Policy](#)

GIFTS, MEALS AND ENTERTAINMENT

Business gifts, meals and entertainment on a modest scale are commonly used to build goodwill and strengthen working relationships among business associates. Providing or accepting occasional meals, small Company mementos, or tickets to sporting and cultural events may be appropriate in certain circumstances and when following all of the guidance in the BCM and Company policies. Certain countries, functions, or business units may implement stricter policies that provide further limits on appropriate gifts, meals, and entertainment. Associates are also responsible for complying with any stricter limits implemented by local management. **If the gift, meal, or entertainment is being given to a government official, you must also refer to and comply with the [Anti-Bribery Policy](#).**

You should review the [Policy on Gifts, Meals & Entertainment \(External Giving and Receiving\)](#) and use good judgment when determining whether a gift, meal or entertainment is appropriate. When in doubt as to whether a gift, meal, or entertainment is appropriate, Associates should talk to their manager, the Law Department or Compliance & Ethics.

TAKE NOTE

Gifts and entertainment (received, offered or accepted) should be reported on the [Gift & Entertainment Disclosure Form](#) where required.

GIFTS



NOT PERMITTED

Goodyear strictly prohibits giving to a third party or receiving from a third party the following types of gifts under any circumstances:

- ✗ Cash or cash equivalent gifts (such as gift cards, gift certificates, or shopping cards).
- ✗ Any gift that is inconsistent with: applicable governmental policy, any applicable Goodyear policy, any corporate policy applicable to the other party, or any applicable law or regulation.
- ✗ Any gift that is a bribe or payoff or is given for the purpose of securing any improper advantage.
- ✗ Any gift that is unreasonably expensive or luxurious.



PERMITTED

Goodyear's policy does not prohibit giving to a third party or receiving from a third party a gift of nominal value (and preferably with a Company logo), provided that any such gift:

- ✓ Is not a prohibited gift (or a prohibited meal or entertainment, as described on [p. 42](#)).
- ✓ Is valued at not more than U.S. \$100.00, unless a more expensive gift is approved in advance and in writing by (i) the Associate's first- and second-level reporting managers if the gift is valued between U.S. \$100.00 and U.S. \$250.00, or (ii) an Associate General Counsel of Goodyear and the President of the Region if the gift is valued over U.S. \$250.00.
- ✓ Is customary and would not embarrass either Goodyear or the recipient.
- ✓ Is provided in connection with a recognized gift-giving holiday or other special occasion or for promotional purposes.
- ✓ Does not impose any sense of obligation or favored treatment on the giver or recipient.
- ✓ Complies with any additional specific limits established by local Goodyear management.

For any gift provided to a third party, Goodyear Associates must record it promptly, fully, and accurately on the Company's financial books and records.

Examples of generally acceptable low-value gifts that may be given to, or received from, a third party, provided that they are reasonable in value and nature and comply with the above requirements, include:

- Standard sales promotion, advertising or publicity items, such as pens or coffee mugs with company name or logo;
- Fruit baskets and other non-luxury foods; or
- Flowers and plants.

Examples of generally unacceptable gifts to give to, or receive from, a third party include:

- Shopping cards, grocery cards, store gift certificates, or any other cash equivalent, regardless of whether or not it is limited to use at a specific vendor or for a specific category of goods;
- A car, laptop, iPad, or stereo equipment;
- A personal vacation; or
- Bottles of high-end liquor.

Associates must not ask for gifts from a third party and must refuse or return any gift that is not in compliance with this Policy or any other Company policy. If refusal or return would damage an important business relationship, then the gift should be turned over immediately to the Law Department or Compliance & Ethics for handling and ultimate disposition.

TAKE NOTE

Please also see [p. 32](#) and [p. 34](#) for additional guidance on providing gifts, travel, meals, and entertainment to non-USA government officials, U.S. government officials, and other third parties.

Q & A

Q: *A supplier invited me and other industry leaders to a golf outing. May I attend?*

A: Goodyear's policy permits Associates to accept—and suppliers and other business partners to provide—tickets to sporting and cultural events. Keep in mind that entertainment can be accepted from suppliers only if it complies with policy, is accepted only on an occasional basis, and if the supplier is in attendance. If the value of the ticket or event is greater than U.S. \$250 or its equivalent, or if it involves out-of-town travel or an overnight stay, written preapproval must be obtained from your first- and second-level reporting managers to determine if there is adequate business rationale for the event.

Regardless of value, Goodyear should pay for any travel or lodging related to the event. The entertainment must not be offered as a bribe or otherwise in exchange for anything improper. Be mindful of the gift policy limitation for any items that may be provided during the outing.

If a contract is currently under negotiation with the supplier or if Goodyear is in the midst of a tender with the third party, you should discuss with your manager whether or not it is appropriate for you to attend. If competitors will be in attendance or if you have questions, you should consult with Compliance & Ethics or the Law Department prior to accepting any invitation.

MEALS AND ENTERTAINMENT



NOT PERMITTED

Goodyear strictly prohibits providing or receiving meals and entertainment that are:

- ✗ Inconsistent with any applicable government policy, Goodyear policy, corporate policy applicable to the other party, or law or regulation.
- ✗ A bribe or payoff, or given for the purpose of securing any improper advantage.
- ✗ Unreasonably expensive or luxurious.
- ✗ Inconsistent with Goodyear's commitment to mutual respect, such as adult-themed or sexually oriented entertainment.



PERMITTED

Goodyear permits the giving and receiving of meals and entertainment that are given in good faith, without any corrupt intent or expectation of a favor, and in accordance with this policy. All meals and entertainment provided or received must:

- ✓ Be directly related to a bona fide and legitimate business purpose.
- ✓ Be appropriate for the discussion of business and consistent with our commitment to workplace respect.
- ✓ Be reasonable, in terms of the value, number of attendees and frequency.
- ✓ Be customary under the circumstances and not embarrassing to either Goodyear or the recipient.
- ✓ Impose no sense of obligation or favored treatment on the giver or recipient.
- ✓ Be attended by at least one representative from whichever organization (Goodyear or the third party) is giving the meal or entertainment.
- ✓ Comply with any additional specific limits established by local Goodyear management.

If the value of the meal or entertainment exceeds U.S. \$250.00, or if it involves out-of-town travel or an overnight stay, it must be pre-approved, in writing, by both your first- and second-level reporting managers to determine if there is adequate business rationale for the event.

For any meal or entertainment provided to a third party, Goodyear Associates must record it promptly, fully, and accurately on the Company's financial books and records.

— Q & A —

Q: *Is it permissible for a supplier to pay for my airline tickets, hotel or registration for a conference? What if I am to be a presenter at the conference, and the supplier offers to pay all my expenses in return?*

A: It is not appropriate for a supplier to pay for your airline tickets, hotel or conference registration fees, even if they are paying expenses for other attendees. The supplier may pay for the registration fees for the conference if you are presenting at it, but Goodyear should still pay for your travel expenses such as airfare, car rental or hotel. If the conference at which you are presenting is sponsored or hosted by an independent association (not a customer or supplier), for example, American Bar Association or American Marketing Association, an exception may be allowed for the association to pay for your hotel. Please check with the Law Department before agreeing to present at any conference, as other requirements may apply.

TAKE NOTE

Gifts, meals and entertainment provided to government officials or other non-Goodyear individuals must also comply with the applicable sections of Goodyear's [Anti-Bribery Policy](#).



Examples of generally acceptable meals and entertainment, to the extent they are reasonable in value and nature and comply with all requirements, include:

- Refreshments before, during, or after a business meeting;
- Meals before, during, or after a business meeting or when otherwise business-related; or
- Infrequent business-related invitations to engage in activities such as sporting or cultural events (e.g., professional sports game, concert, theater show, etc.).

Examples of generally unacceptable meals and entertainment to give to, or receive from, a third party include:

- Event at an adult-themed venue;
- Dinner at an expensive luxury restaurant without proper approval;
- Tickets for a third party to attend a sporting event without any Goodyear Associates in attendance; or
- Tickets for a Goodyear Associate to attend a sporting event without any third-party representatives in attendance.

This policy is not intended to cover Goodyear dealer/distributor incentive trips or award programs. These should be reviewed by the Law Department prior to such trip or program being offered. This policy is also not intended to cover internal gift-giving from one Goodyear Associate to another Goodyear Associate, free-of-charge tires, or travel expenses provided to a third party; please consult with your manager or the Law Department for guidance on these activities.

Refer to the following for more information:

- [*Policy on Gifts, Meals & Entertainment \(External Giving and Receiving\)*](#)
- [*Gift & Entertainment Disclosure Form*](#)
- [*Anti-Bribery Policy*](#)
- [*International Anti-Bribery Compliance Operational Guide*](#)
- [*Conflict of Interest Policy*](#)

PROTECT OUR BUSINESS & ASSETS

TRAVEL AND EXPENSE

Goodyear Associates are expected to comply with Goodyear's Global Business Travel & Expense Policy. This policy governs all Associates' business travel and reimbursement of related expenses, such as lodging, air travel, transportation, and meals related to business travel. Associates must obtain authorization from their manager prior to the travel or before incurring the expense. Any exception to the policy must be approved by the Associate's manager pursuant to the exception process outlined in the Global Business Travel & Expense Policy. Associates must record all business travel and related expenses accurately and honestly in their expense reports. For further details about Associates' and Managers' travel and expense responsibilities, please refer to the Global Business Travel & Expense Policy and any applicable country addenda.

All business travel expenses related to third parties must comply with this policy as well as Goodyear's other policies, including the Anti-Bribery Policy, the Policy on Gifts, Meals and Entertainment (External Giving and Receiving), and the Global Procurement Card Policy.

Refer to the following for more information:

- [Global Business Travel & Expense Policy](#)
- [Anti-Bribery Policy](#)
- [Policy on Gifts, Meals & Entertainment \(External Giving and Receiving\)](#)
- [Global Procurement Card Policy](#)

TAKE NOTE

When traveling for business, be alert to local laws in the destination you are visiting. For example, some countries may have laws prohibiting certain items in airline luggage—such as laser pointers—even if they were permitted in the location where you started your journey, and in some countries you may be expected to carry identification documentation with you at all times.



ANTI-MONEY LAUNDERING

Goodyear is committed to doing business ethically, including complying fully with all applicable anti-money laundering laws throughout the world. We also implement appropriate procedures to comply with applicable reporting requirements for transactions that meet certain monetary thresholds established in those laws.

Failure to comply with these laws could subject the Company to civil and criminal penalties and hurt the Company's reputation.

"Money laundering" is the act of converting money or other monetary instruments (such as money orders, cashier's checks or traveler's checks) obtained from illegal activities by criminals, terrorists or others into money or investments that make the funds appear legitimate and prevent tracing them back to their original source.

Goodyear and its Associates must comply with:

- All applicable anti-money laundering laws throughout the world, including those that apply locally and to U.S. companies; and
- Applicable reporting requirements for transactions that meet certain monetary thresholds as required by applicable laws.

For further guidance on this topic, refer to your applicable local policies and procedures, the Law Department or Compliance & Ethics.

Refer to the following for more information:

- [Anti-Money Laundering Policy](#)
- [Goodyear U.S. Export and Foreign Transaction Controls Website](#)

Be Alert

Goodyear Associates should be alert to any colleagues or third parties with whom we do business that engage in the following activities (among others) that are frequently associated with money laundering:

- Payments provided or requested in the form of multiple money orders, traveler's checks, bitcoin, or large amounts of cash;
- A customer or other third party who is reluctant to provide complete information, provides false or suspicious information, is incorporated in an offshore jurisdiction and/or is anxious to avoid reporting or record-keeping requirements;
- Unusually favorable payment terms, or unusual fund transfers to or from countries or entities that are unrelated to the transaction (see [Accommodation Payments, p. 47](#)); or
- Structuring a transaction to avoid Company requirements, for example, conducting multiple transactions below the reportable threshold amounts or making an accommodation payment rather than making a single payment (see [Accommodation Payments, p. 47](#)).

If you become aware of any of these activities being carried out by an Associate, a customer, a supplier, or any other person or entity with whom we engage in business operations, please immediately alert your manager, the Law Department, Compliance & Ethics or the Goodyear Integrity Hotline.

ACCOMMODATION PAYMENTS PROHIBITED

Goodyear requires that payments be made only to the entity that earned them and only in the jurisdiction in which they were earned.

For example, never make a payment to an individual (even the owner of an organization) who is different from the organization with which Goodyear conducted business. Similarly, never make a payment to a bank account in a different country from the one in which an organization does business, is incorporated, or in which the goods or services were provided. Goodyear's policy also prohibits other "favors," such as providing an altered invoice or making a cash payment that is not reflected in Goodyear's records.

Some organizations may request that Goodyear make payments to an affiliated company or third party in another country for legitimate business reasons such as factoring or legal assignments of rights. Review any such requests, or other unusual requests for special treatment or exceptions, with the Law Department before agreeing to such payment arrangements. Documentation of this review must be maintained in accordance with Goodyear's business records retention requirements and [Record Management Policy](#).



TAKE NOTE

There are many indicators of fraud, bribery, money laundering or other suspicious behavior—like a request for an accommodation payment—that may alert you that something about a third party is not right. These are sometimes called "red flags." Some common examples of third-party red flags include:

- Company with a culture or history of fraud, misconduct or questionable behavior.
- Excessive fees, commissions, discounts or bonuses levied/proposed to be levied.
- Consulting agreements that include only vaguely described services.
- A third party in a different line of business than that for which it has been engaged.
- The third party is related to or recommended by a government official.
- The third party is merely a shell company incorporated in an offshore jurisdiction.
- The third party refuses to promise or certify in writing that it will abide by the FCPA, other applicable law or Goodyear policy.

For more information about third-party red flags, please refer to Goodyear's Anti-Bribery Policy and contact the Law Department or Compliance & Ethics.

CONFLICTS OF INTEREST BETWEEN GOODYEAR AND ASSOCIATES

Goodyear expects all of its Associates' actions and decisions to be made objectively and in the best interests of the Company. Associates must be free from any undue influence of personal or outside business interests that may appear to, or actually do, interfere with their working only in Goodyear's best interests.

Associates must not place themselves in any situation where they have a direct or indirect interest or connection with outside business activities that relate to any of Goodyear's businesses. Likewise, they must not compete with any Goodyear business, they must not take for themselves a business opportunity that rightfully belongs to the Company, and they must not use corporate property, information, or position for personal gain. Associates also must avoid personal or family relationships that conflict with their job responsibilities or the interests of Goodyear. For more guidance on this topic, please also refer to Goodyear's Global Workplace Personal and Family Relationships Policy. Associates who violate any of these restrictions have a conflict of interest that will be addressed at the direction of the General Counsel's Office.

Although Goodyear periodically solicits disclosures of conflicts of interest, Associates should not wait to be asked before disclosing a conflict of interest. Instead, as soon as an Associate discovers a possible conflict of interest with Goodyear (preferably before the conflict is actually created), the Associate must promptly report the situation to their manager, Human Resources, the Law Department, or Compliance & Ethics, or disclose it through the [Conflict of Interest Disclosure Form](#). Goodyear recognizes that individual situations may vary, and the Company will review each case fully and objectively. Violations will be subject to appropriate discipline, up to and including termination of employment and forfeiture of benefits.

— Q & A —

Q: *My brother-in-law is a landscaper and wants to bid on the landscaping contract at the plant where I am located. What should I do?*

A: Depending on your position at the plant, there could be a conflict of interest (for example, if you are the plant manager or finance director, work in the purchasing department, or have supervisory oversight for the landscapers).

As soon as you are aware of a possible conflict, you must contact the Law Department. A Goodyear lawyer will help determine if there is a conflict or not and document the situation. In addition, you should:

- Disclose this information to your manager and the purchasing department before the business is awarded; and
- Ensure that you have no influence over the decision on which landscaper will be chosen and—if your brother-in-law's business is chosen—ensure that you have no future influence over any decisions to retain or hire the landscaper.

It is important to avoid both an actual conflict of interest and the appearance of a conflict.

Conflict of Interest Examples

- Directly, or indirectly through a family member or agent, owning or holding a material interest (1% or more of stock assets, or other interests) in a company that is a Goodyear competitor, supplier, contractor, or subcontractor, or otherwise does business with Goodyear; or serving in any capacity with such a company as director, employee, consultant, or distributor;
- Serving on the board of directors of any company or organization, unless this is first approved in advance and in writing by the Law Department;
- Diverting business away from Goodyear;
- Using one's position within Goodyear to prevent or hinder Goodyear's ability to compete with others;
- Receiving a commission, or otherwise profiting, on a Goodyear transaction;
- Passing on or selling Goodyear's inside information;
- Acting on inside information to personally take advantage of a business opportunity or transaction offered to Goodyear, or that Goodyear has developed;
- Having a familial or romantic relationship with someone to whom the Associate reports or who reports to the Associate; or
- Other situations where an Associate's interest does, may, or appears to conflict with the interests of Goodyear.

Refer to the following for more information:

- [Conflict of Interest Policy](#)
- [Board of Directors and Executive Officers Conflict of Interest Policy](#)
- [Global Workplace Personal and Family Relationships Policy](#)
- [Insider Trading Policy](#)
- [Policy on Gifts, Meals & Entertainment \(External Giving and Receiving\)](#)

Q & A

Q: *I am a commercial sales representative and I have a retirement fund managed by a third party. The fund has stocks in many companies, including in one of my key accounts, a publicly traded OEM. Is this prohibited by the Conflict of Interest Policy?*

A: Without more information, this would not create a conflict under Goodyear's Conflict of Interest Policy. If you become aware of inside information that would impact the share value of the OEM, you are prohibited from trading on the stock and should review Goodyear's Insider Trading Policy for more information.

Moreover, as a sales representative for your key account, you cannot actively trade in the stock of that Goodyear customer. Likewise, a purchasing Associate cannot trade in stocks of suppliers with whom they do business.

Refer to the section [Avoiding "Insider" Trading](#) for more information.

ENDORISING SUPPLIERS, CUSTOMERS OR OTHERS

Goodyear generally does not endorse the products or services it may use or the people and companies that make and supply them.

The approval of the Intellectual Property Law Department, the Global Communications Department and the Vice President, Chief Procurement Officer is required to:

- Approve the use of any of our corporate names, marks or logos in another company's advertising or publicity;
- Offer or give any testimonial in support of an event, product or service; or
- Enter into any contract that requires a testimonial or endorsement by Goodyear.

Likewise, you may not use your job title or affiliation with Goodyear if you personally endorse an event, or the product or service of a supplier or a customer, unless you receive prior approval from the Intellectual Property Law Department, the Global Communications Department and the Vice President, Chief Procurement Officer.

Refer to the following for more information:

- [Endorsing Suppliers, Customers and Others Policy](#)
- [Social Media Policy](#)



USING COMPANY RESOURCES

Goodyear provides you with various assets and applications (for example, laptops, mobile devices, office supplies, tools, telephones, copiers, credit cards, automobiles) to carry out the Company's business. You are responsible for the careful, efficient and proper use of the assets and resources you are given to do your work, and you must protect them against misuse, damage, theft or other loss.

You may make limited personal use of Goodyear assets or applications if the use:

- Is only occasional;
- Does not result in more than nominal and incidental costs; and
- Complies with all applicable laws, the BCM and other Company policies.

You may not use Goodyear resources to conduct any outside business.

Goodyear has adopted strict security policies for Associates' use of Information Technology ("IT") resources. Failure to abide by policy requirements can make Company systems vulnerable to compromise, which can interfere with operations. Goodyear prohibits the use of Company computers, mobile devices and email systems to receive, create or transmit any illegal or improper materials (for example, pornographic, discriminatory, harassing or abusive messages). If you have any questions regarding the proper use of IT resources, contact the Intellectual Property Law Department in Akron or other members of the Law Department, your department's IT team or the Goodyear Global IT Security Management Department in Akron (send an email to "itsupport_email@goodyear.com").

Refer to the following for more information:

- [Acceptable Use of IT Resources Policy](#)
- [Social Media Policy](#)
- [Conflict of Interest Policy](#)

Q & A

Q: *I have been an Associate with Goodyear's Quality team for five years, and I also just started my own side business as an independent graphic designer in my free time. Sometimes if I have a slow day at work, I use Goodyear's printers to print copies of my graphic designs, and I make calls to graphic design clients on my office phone. Is that a problem?*

A: Yes, this is not an acceptable use of Goodyear's resources. Goodyear understands that Associates will occasionally need to use business equipment (copiers, phones, computer or mobile device, email, internet, etc.) on a personal basis.

Goodyear's policy states that resources may not be used to conduct any outside business, to compete in any way with Goodyear's business or to engage in an activity that would violate the BCM or any policy. Because your use of the printer and phone is related to an external business, this is prohibited by Goodyear's policy.

COMPETITION AND ANTITRUST LAWS

Goodyear is committed to compliance with antitrust and competition laws and regulations worldwide. "Antitrust law," and/or "competition law," refers to civil, administrative, and criminal competition laws regulating business conduct. Antitrust and competition laws aim to protect free competition in the marketplace. In the United States, Europe and other countries, these laws prohibit: agreements that intend to, or do, restrain competition; other activities that unduly restrict competition; and certain abuses of a dominant position or acts of monopolization.

All Goodyear Associates must comply with all U.S. antitrust and competition laws and other similar or comparable antitrust and competition laws in the European Union and elsewhere around the world.

Comply with the Law

Antitrust and competition laws promote vigorous, free and open competition in the marketplace. Routine business decisions involving prices, terms and conditions of sale, dealing with suppliers or customers, sales and purchases of assets or businesses, salaries and employment terms, and many other matters can present issues of great sensitivity under antitrust or competition laws.

These laws are vigorously enforced around the world. The penalties for violations can be severe, including large fines for companies and individuals, as well as other criminal penalties and consequences such as imprisonment for individuals and government debarment for companies. Violating these laws can harm an individual's career and severely impact Goodyear. Thus, it is vital that you become and remain familiar with these laws as they apply to your responsibilities and function.

Q & A

Q: *At dinner during a trade association meeting, sales representatives from a couple of our competitors began discussing their territories and the different types of customers they have. One of them suggested that each of our companies can serve a different category of customer in the territories. What should I have done in this situation?*

A: This conversation is prohibited because the participants are discussing how to divide customers by categories among the competitors, which violates competition laws. In this situation, you must make it clear that you will not participate in these acts. Excuse yourself to everyone at the table and leave. Immediately report the situation to Goodyear's General Counsel, an Associate General Counsel or the Goodyear lawyer responsible for your business or function. If this or something similar happens at a meeting, request that the meeting minutes record your departure.

PROHIBITED PRACTICES AND PENALTIES

This section provides a summary of some commonly prohibited practices under antitrust and competition laws. If you believe that you are facing an issue involving these laws, or if you have any other questions regarding competition-related conduct, you should immediately seek help from the Law Department.

The United States, European Union, and other jurisdictions (including but not limited to Australia, Brazil, China, Japan, and India) prohibit agreements, contracts, combinations and conspiracies—whether formal or informal—that restrain trade. In some cases, even information exchanges may be suspect under these laws. Laws in these countries also apply to acts of exclusionary or predatory conduct (even if such acts are not the result of an agreement) that are imposed by companies that have a monopoly or near-monopoly position or that are viewed as abuses of a dominant position. Associates should remain informed about applicable antitrust and competition laws and competition-related risks that are specific to their responsibilities, especially in geographic areas and business units where Goodyear could be viewed as having a dominant position.

Antitrust and competition laws and regulations govern the conduct of, and relationships among, competitors, as well as certain business activities between Goodyear and its customers and suppliers. Because of the number, complexity and integration of our businesses, it is vital that Associates recognize who our competitors actually are. Goodyear’s competitors are not simply other tire manufacturers. Competitors are firms that actually or even potentially compete with each other. Sometimes a complex analysis is required to determine whether or not a firm is a “competitor” for antitrust purposes, so it is important to be careful: contact the Law Department if you have questions. At a minimum, Goodyear’s competitors include firms that compete with Goodyear in the sale of goods and services, as well as firms with which Goodyear competes for the purchase of goods, materials, labor, and services.

Many competitors are obvious, but you must remember that a customer, distributor or supplier of one business may be a competitor of another business. For example, a customer of our tire manufacturing business could be a competitor of our distribution or retail businesses. Goodyear also competes with other companies (many of which are not even involved in the tire industry) for resources and inputs (including labor, raw materials, and services). **You must be careful to follow the laws and regulations in your dealings with all market participants (including not only competitors, but also customers and suppliers) for this reason.**

In some jurisdictions, even the mere exchange of competitively sensitive information (including on terms and conditions of sale or purchase), especially to the extent it could be viewed as adversely affecting competition, can be problematic.

Prohibited Practices

- Agreements, contracts or conspiracies—whether formal or informal—to fix or otherwise affect, influence or stabilize any element of price (including terms and conditions of sale that could affect the selling price, such as price factors and formulas, credit terms, discounts, rebates, advertising, warranties, profit margins or costs); to rig bids; or to restrain any other aspect of competition among Goodyear and its competitors.
- Exchanging with, giving to, or receiving from, a competitor any price lists or other information on prices, terms, or conditions of sale.
- Agreements, contracts or conspiracies to divide or allocate customers, suppliers, territories or products with a competitor, including dealers or franchisees in markets in which Goodyear retail outlets are operated.
- Agreeing or conspiring to restrict or limit production or output.
- Agreeing or conspiring with anyone to boycott or refuse to sell to a customer, to boycott or refuse to purchase from a supplier, or to “gang up” with one competitor against another.

LIMITATIONS ON DISCUSSIONS WITH COMPETITORS

Occasionally, you may come into contact with competitors, and that contact may raise competition law concerns. Therefore, you should limit contacts with competitors as much as is practical, and you must not discuss any information of competitive significance with any competitor.



— Q & A —

Q: *I recently joined Goodyear's Sales team, but before that, I worked as a sales representative for a competitor. I still have lots of friends from that company, and we frequently meet up for dinner. I am careful to abide by antitrust and competition laws, but sometimes we talk about work. At dinner, my friends start discussing the following topics:*

1. Product pricing submitted in a recent bid
2. Constrained products
3. A vendor's pricing
4. Whether to increase prices in a particular location due to increased costs to ship to customers there

Are any of these topics at risk of violating antitrust and competition laws? What should I do?

A: All of these topics are ones that should not be discussed with competitors. Discussing pricing or any other information of competitive significance with competitors is prohibited by Goodyear policy as well as antitrust laws. Even though these individuals may be your friends, they are also competitors, and you must make clear that you cannot be part of a discussion of any of these topics. Excuse yourself from the dinner table and leave. Immediately report the situation to the Law Department.

Associates who have personal relationships with employees of competitors should seek guidance from the Law Department on how to ensure compliance with Goodyear policy and applicable antitrust laws.

Dangers of Trade Association Activities

Numerous antitrust enforcement actions have occurred following the conduct of attendees at trade association meetings. Because of this sensitivity, always use caution when participating in trade associations.

If you are going to attend the meeting of any trade association:

1. Goodyear must be a member of the association, or you must obtain specific approval from the Law Department, and
2. If competitors are attending, either a Goodyear lawyer must be present with you, or a Goodyear lawyer must have reviewed the proposed agenda and approved your attendance (for example, following assurance that the trade association will have antitrust counsel present at the meeting) AND you must have received competition law compliance training.

If you attend a trade association or other meeting where you hear issues being discussed that are competitively sensitive, you must leave the meeting immediately. You should request that the meeting minutes record your departure, and you must immediately report the incident to the Law Department.

Associates can refer to the [Guidelines for Trade Association Participation](#) for additional information.

PRACTICES REQUIRING REVIEW BY THE LEGAL DEPARTMENT

Practices that raise competition law issues and require review and advice from the Law Department include:

- Minimum or maximum resale prices—forcing or trying to force a customer to advertise or sell our product at a particular price, or not to advertise or sell our product below or above a particular price;
- Trying to limit a customer or distributor to a certain territory or market, or helping one customer prevent another customer from entering into that customer’s territory;
- Discriminating in price between competing customers or providing advertising or other services to competing customers on a discriminatory basis;
- Requiring a customer to buy one product to get another;
- Requiring exclusivity from a customer, distributor or supplier;
- Requiring a supplier to purchase products or services from Goodyear as a condition of obtaining a supply contract;
- Offering rebates, incentive gifts or points to obtain rewards, or other programs to help sell or market product with distributors or retail outlets; or
- Participation in trade associations or other organizations involving the sharing of information with customers, suppliers, or competitors.

Because of the sensitivity of these relationships under competition laws, Goodyear’s policies, programs and practices relating to our customers, suppliers and distribution channels, as well as changes to such policies, must be reviewed by the Law Department.

REVIEW OF MERGERS, ACQUISITIONS AND JOINT VENTURES

Competition laws also regulate business combinations, such as mergers, acquisitions, divesting or disposing of assets or businesses, and the forming of joint ventures or strategic alliances. Before you start discussions or negotiations relating to any of these transactions, you must consult with the Law Department, which will evaluate:

1. Whether the proposed transaction may create risk under applicable laws and regulations,
2. Whether a premerger or similar filing(s) will be required, and whether other steps or precautions are necessary during the negotiation, due diligence and contract process stages (including the extent to which Goodyear can receive competitively sensitive information, and on what terms, from an acquisition target prior to consummation of the transaction).

WRITE CLEARLY AND DO NOT EXAGGERATE

In competition investigations or lawsuits, **Goodyear may be required to provide to the other party or government any Company document, including emails and other electronically stored documents and data, whether on computers or mobile devices.** Goodyear and its Associates may be harmed by internal documents, such as memoranda, emails, texts, chats or other mobile device communications, that could be misinterpreted or contain phrases intended only as exaggerations, emphasis, jokes or to provoke a response from the reader. Therefore, you must be careful and precise in your communications, including emails or other electronic messages, so that what you write and the resulting actions cannot be misinterpreted, even if taken out of context. Be careful to reread even routine emails or other communications before you send them to make sure that you are comfortable with and clear about everything you have written. See Careful Communications on [p. 64](#) for additional details.

Refer to the following policies for more information:

- [Antitrust & Competition Law Policy](#)
- [EU Guidelines: Gathering & Using Market Information & Pricing Behaviour](#)
- [Guidelines on Trade Association Participation](#)



FINANCIAL RECORDS, PUBLIC DISCLOSURES, ACCOUNTING, INTERNAL CONTROLS AND AUDITING

Goodyear relies on accurate information and reliable records to make responsible business decisions.

These records serve as the basis for managing Goodyear's business; for measuring and fulfilling Goodyear's obligations to shareholders, customers, Associates, suppliers and others; and for compliance with tax and financial reporting requirements, including Goodyear's public financial reporting. All Associates must:

- ✓ Maintain all books, records and accounts in accordance with regulatory and legal requirements and generally accepted accounting principles;
- ✓ Comply with Goodyear's accounting standards and policies and Goodyear's system of internal controls;
- ✓ Record and report information promptly, accurately, completely and honestly;
- ✓ Provide full, fair, accurate, timely and clear information in reports and documents that Goodyear files with the U.S. Securities and Exchange Commission ("SEC"), other securities exchanges or other governmental agencies and in all public communications made by Goodyear;
- ✓ Ensure that all financial entries and related disclosures accurately characterize the true nature of transactions and events;
- ✓ Never establish any undisclosed or unrecorded funds, assets or debts on behalf of the Company for any purpose; and
- ✓ Sign only those documents believed to be accurate and truthful.

Associates with concerns regarding questionable accounting or auditing matters or detected or suspected fraud may make a report to either the Vice President and General Auditor, Compliance & Ethics or to the Goodyear Integrity Hotline.

Refer to the following for more information:

- [Corporate Fraud Policy](#)

— Q & A —

Q: *It's November, and Jan has capital expenditure budget left over for the year. He knows budget cuts may be coming next year, and even though he knows that his plant does not require a new piece of equipment until at least one year from now, he decides to place the order now so he doesn't "lose" that money in next year's budget. Is this acceptable?*

A: Jan's conduct is inappropriate. As explained in Goodyear's "Managing Cash and Liquidity: Guidance for Leaders," Associates should not pre-pay for goods or services (including capital expenditures) in order to manage year-end cash flows. If the business wants to take this course of action, they must receive approval from the applicable regional VP Finance and the Vice President & Treasurer.

Q & A

Q: *To celebrate the holiday season, John’s team gifted a basket filled with several bottles of wine, boxes of chocolates, and a leather wallet to each of the three distributor representatives in his region. John paid for these items with his corporate credit card but asked the store not to itemize all of his purchases on the receipt but instead to just list them as “food products.” When he submitted the receipt to the Company for reimbursement, he described it as “marketing expenses—food for promotional event with local distributors” and told his manager that it should come out of his team’s marketing funds. Were John’s actions permissible?*

A: No. By requesting a receipt with inaccurate purchase details and describing the expense inaccurately when submitting it to Goodyear, John has violated Company policy and created inaccuracies in the Company’s financial records. It is a legal imperative for Goodyear to maintain accurate books and records that reflect the true nature of the Company’s transactions. Associates must submit accurate payment and expense information, and they should never request or submit a false invoice.

EXPORT AND IMPORT

The global nature of Goodyear’s business subjects the Company to a wide range of laws and regulations relating to cross-border activity, including:

- Tax and customs laws and regulations regarding valuation of goods, entry, clearance and duties;
- Currency control laws;
- U.S. export and foreign transaction controls regulating the export and re-export of U.S. goods or technology and imposing prohibitions or other restrictions on trade with certain countries, entities and individuals;
- The Foreign Corrupt Practices Act (“FCPA”), UK Bribery Act or other countries’ anti-bribery or anti-corruption laws (see Anti-Bribery section, beginning on [p. 30](#));
- Rules prohibiting participation in, cooperation with or support of an international boycott in which the U.S. does not participate;
- Rules prohibiting money laundering, and regulations related to reporting requirements for certain transactions; and
- Complex and often conflicting laws of other countries.

PROTECT OUR BUSINESS & ASSETS

Because Goodyear can be held accountable for the actions of non-Associate agents and representatives, all arrangements to use commission agents and sales consultants in export transactions must be detailed in written agreements approved by the Law Department. Such agents and certain other third parties must be properly screened under Goodyear's Anti-Bribery Policy. Goodyear is committed to the strict adherence to all applicable tax and import and export laws and regulations by all its Associates, agents and representatives. In particular, all imports must be accurately valued in all invoices and import declarations, and submissions to all governmental authorities (including tax authorities) must be accurate. For advice regarding import and export laws applicable to your business, refer to the Law Department.

Refer to the following for more information:

- [Goodyear U.S. Export and Foreign Transaction Controls Website](#)
- [Agreement of Visitor to Goodyear Facilities](#)
- [Anti-Bribery Policy](#)
- [International Anti-Bribery Compliance Operational Guide](#)

TAKE NOTE

U.S. export controls and sanctions may apply in everyday situations involving, but not limited to:

- Employment or assignment of Associates, including at specific Goodyear facilities;
- Goodyear or third-party visitors to Goodyear locations;
- Procurement of raw materials or banking, shipping or contractor services;
- Investments, banking, or corporate transactions (e.g., joint ventures) involving non-U.S. parties;
- Development of tires for the military or other federal agencies;
- Transfer of data to other Goodyear business units or locations; and
- Payments (including refunds or credits) to or from a customer or supplier.

Remember that other countries or regions (such as the EU and UK) have export controls or sanctions programs as well.



SAFEGUARDING INTELLECTUAL PROPERTY AND CONFIDENTIAL INFORMATION

Goodyear diligently protects its intellectual property and confidential information, as well as confidential and personal information entrusted to it by others with whom we do business.

PROTECTING TRADE SECRETS AND CONFIDENTIAL INFORMATION

Goodyear’s trade secrets and other confidential and proprietary information give us advantages in our industry. If Goodyear’s confidential and proprietary information is disclosed and used by others, Goodyear could be exposed to financial loss or competitive harm. Confidential and proprietary information is information that has not been disclosed to the general public. Common examples include formulas, business and manufacturing processes and trade secrets, as well as financial information, corporate strategies and information about relationships with our customers and suppliers. You may have access to this kind of information in your job, and protecting it against unauthorized disclosure is part of your responsibility.

TAKE NOTE

Safeguard our intellectual property by never allowing it to be used or shared outside the Company without first having the appropriate legal documents in place.

To protect Goodyear’s confidential and proprietary information, Associates should:

- ✓ Follow IT policies and guidelines for protecting Company confidential information (e.g., following all Company IT policies and standards, and employing cybersecurity best practices as described in the Be Alert web page);
- ✓ Never disclose confidential and proprietary information to other parties without an appropriate confidentiality agreement or the prior approval of the Law Department;
- ✓ Never discuss confidential or proprietary information in public places such as elevators, airplanes or restaurants;
- ✓ Be careful about transferring proprietary information; and
- ✓ Use confidentiality agreements where appropriate and as advised by the Law Department.

The Associate Confidentiality & Intellectual Property Agreement (“ACIPA”) or similar agreement you may have signed during onboarding contains more details concerning your obligations toward Goodyear trade secrets. The Law Department can guide you any time you have a question about what should be treated as confidential and proprietary information. In addition, you may have similar responsibilities regarding trade secrets of others with whom we do business. Failure to protect trade secrets may be a violation of the ACIPA or similar agreement and local law.

If you have questions, ask your manager, the Intellectual Property Law Department or the lawyer for your business or function.

Refer to the following for more information:

- [Release of Company Information Policy](#)
- [Confidentiality & Intellectual Property Agreements](#)
- [Generative AI Use Policy](#)
- [Goodyear U.S. Export and Foreign Transaction Controls Website](#)
- [Guidance for Collecting Competitive Intelligence](#)

PROTECTING THE PRIVACY OF CUSTOMERS, SUPPLIERS AND OTHERS WITH WHOM WE DO BUSINESS

Goodyear is committed to conducting its worldwide business operations in a manner that actively protects personal privacy and complies with all applicable privacy laws. When legal and business requirements make it necessary for Goodyear to acquire, record, store, use or otherwise process personally identifiable information, the information must be handled appropriately.

Goodyear’s [Global Privacy Policy](#), [Associate Privacy Policy](#) and [Online Privacy Policy](#) explain how Goodyear protects the PII that it processes in the course of business operations. As described in those policies, Goodyear will endeavor to process only those items of PII that are required for business and legal purposes, and will endeavor to use this PII only in ways that are compatible with the purposes for which the PII was collected or subsequently authorized by the individual.

Many jurisdictions, including the EU, Brazil, and certain U.S. states, have specific laws and requirements that govern how Goodyear may collect and process PII. Associates must be familiar with, and follow, all applicable laws and policies concerning privacy. There are additional obligations for protecting certain classes of data.

TAKE NOTE

There are U.S. laws regarding protection of certain medical or health information, including the requirements of HIPAA. Likewise, the EU’s laws apply special protections to “special categories of personal data,” which includes data that reveal racial or ethnic origin, sexual orientation, political opinions, religious beliefs, trade-union membership and health data (including genetic or biometric data). Other regulations include government-issued identification numbers, access to financial data, and geolocation as “sensitive” personal information.

If you have questions regarding the necessary procedure for data collection or handling PII, contact the Law Department or Compliance & Ethics for assistance.

Refer to the following for more information:

- [Global Privacy Policy](#)
- [Associate Privacy Policy](#)
- [Online Privacy Policy](#)
- [HIPAA Privacy Notice \(U.S.\)](#)
- [Confidentiality & Intellectual Property Agreements](#)

— Q & A —

Q: Ana’s department has collected a large amount of consumer Personally Identifiable Information (“PII”) as part of a customer survey. Matthew, who works in the Marketing Department, contacts Ana to ask for the files containing this PII so that he can develop targeted marketing emails. Should Ana provide the files to Matthew?

A: No. Although Matthew has what may seem like a legitimate business reason for using this PII, the individuals who participated in the customer survey may not have opted-in to allow Goodyear to use their information for marketing purposes. Under Goodyear’s Privacy Policy and many local laws, marketing emails may only be sent to customers who have opted-in to receive them. Therefore, Ana should consult with the Law Department to determine whether the information can be used for the targeted marketing emails.

USING CORPORATE NAMES AND LOGOS

You may use the name or logo and other marks of the Company only in carrying out the Company's business and for no other purpose, unless you have the approval of the Intellectual Property Law Department. Our policy prohibits the creation and use of any logo-type design, even for a business reason, without specific prior approval from both the Goodyear lawyer responsible for your business or function and the Intellectual Property Law Department in Akron.

Refer to the following for more information:

- [Endorsing Suppliers, Customers and Others Policy](#)

— Q & A —

Q: *One of Goodyear's major suppliers added Goodyear's name and logo to a section of the supplier's marketing website where they display a list of their big customers, but we never gave them permission to post our name there. Is this a problem?*

A: Goodyear does not permit its suppliers to use Goodyear's name and logo for marketing purposes without our express permission. Goodyear's policy regarding Endorsing Suppliers, Customers, and Others requires the IP Law Department, Global Communications Department, and Global Procurement to approve any use of Goodyear's name and logo. You should report this to the Law Department for review.

CAREFUL COMMUNICATIONS

All Associates must be careful, respectful and accurate when communicating with others in the course of Company business. It is sometimes easy to send out communications that may inadvertently contain inappropriate information or comments. Take time to prepare all documents and electronic communications thoughtfully and to review them thoroughly.

COMMUNICATIONS GUIDELINES

Follow these guidelines in your communications:

- Be clear, concise and accurate;
- Maintain a spirit of professionalism in all your communications;
- Stick to the facts; do not speculate, overstate or exaggerate;
- Ensure that advertising, packaging and promotions do not misstate facts or provide misleading impressions. Claims regarding the Company's products shall be factual and fully substantiated;
- Stick to your area of expertise;
- Never create threatening, sarcastic or demeaning communications about the Company, our Associates, competitors, customers or suppliers;
- Avoid phrases that may be misinterpreted as inappropriate or unethical;
- Select the most appropriate means of communication;
- Send communications only to Associates or other persons who have a need to receive the communications;
- Be careful not to disclose confidential information about Goodyear or others;
- Never speculate or offer an opinion regarding the legality of business conduct; and
- Do not state, suggest or imply in your personal communications that your views or opinions are those of Goodyear.

SOCIAL MEDIA/INTERNET POSTING

Goodyear recognizes that the internet provides many opportunities to instantaneously share opinions, experiences, photos and other information on a one-to-one, one-to-few or one-to-many basis using a wide variety of multimedia and social networking sites, platforms, applications, forums and other websites—for example, Facebook, LinkedIn, Yammer, Instagram, TikTok, WeChat and Skype; blogs and microblogs such as X (formerly Twitter) and Weibo; and wikis such as Wikipedia.

It is important for Associates worldwide to be aware of the risks inherently involved in such communications and understand the responsibilities that come with participation in social media.

- Use common sense—if you wouldn't say something in person, don't post it on the internet, put it in an email or post it on social media;
- Keep in mind that there is no such thing as anonymity on the internet; and
- Remember that electronic messages (including emails and text messages) are permanent, transferable records of communications.

All Goodyear Associates—especially those who participate in social media independently or as part of Goodyear's Associate ambassador program, Goodyear Voices—must read and adhere to the guidelines explained in the Company's Social Media Policy. Also, remember that you must follow the Social Media Policy and Release of Company Information Policy before posting any information or responding to any inquiries about the Goodyear business. Associates may be subject to additional guidelines or restrictions on certain uses of social media platforms depending on their location, business unit, or responsibilities.

If you have questions, contact Global Communications, the Law Department, Compliance & Ethics or your Human Resources representative.

Refer to the following for more information:

- [Social Media Policy](#)
- [Acceptable Use of IT Resources Policy](#)
- [Global Privacy Policy](#)
- [Release of Company Information Policy](#)



— Q & A —

Q: *I am an Associate on Goodyear's Global Information Technology team, and I recently received an email from a research institute offering to pay me in exchange for my spending a few hours of my time answering the institute's questions and serving as a consultant to provide them with my expertise on IT topics. Can I do this?*

A: Goodyear prohibits participation in consultations and research initiatives that involve the exchange of information without prior approval. Associates should not participate in "consulting inquiries" for two primary reasons:

- These consultant calls are sometimes used to seek competitive intelligence (i.e., a consultant may have been hired by a competitor and they solicit information that is of value to them).
- The information they are seeking is information that was obtained as part of your job for Goodyear, so accepting compensation from a third party in exchange for that information presents a conflict of interest.

If you have any questions about participating in such an opportunity, contact the Law Department or Compliance & Ethics.

RESPONDING TO THIRD-PARTY SURVEYS, QUESTIONNAIRES OR INQUIRIES

From time to time, Goodyear is contacted by outsiders about various matters. Regardless of what the survey, questionnaire, or question may be, or how it came to you, you must consult with the Global Communications Department for direction on how to respond to any outside inquiry. Inquiries that involve financial information, that relate to environmental, social or corporate governance topics, or that have legal or governmental implications may require additional approvals, so contact the Law Department.

Refer to the following for more information:

- [Release of Company Information Policy](#)
- [Social Media Policy](#)

RESPONSIBLE USE OF ARTIFICIAL INTELLIGENCE

When using artificial intelligence (AI), including generative AI, for business purposes, Goodyear Associates are expected to act responsibly, ethically, and in accordance with all applicable laws and Goodyear policies. As AI and its business uses continue to develop, laws and regulations governing the use of AI may also continue to develop. Associates should stay informed of applicable laws and regulations relating to their use of AI in the workplace, and should immediately contact the Law Department or Compliance & Ethics with any questions or concerns about AI or compliance with law or policy.

Refer to the following for more information:

- [Generative AI Use Policy](#)

AVOIDING “INSIDER” TRADING

This section contains a summary of key provisions of the [Insider Trading Policy](#). You should refer to the complete Insider Trading Policy for details on its restrictions as well as a list of people subject to quarterly blackout periods.

While working for Goodyear you may acquire material information about Goodyear and its subsidiaries, or the business of other companies, that has not yet been made available to the general public. You are prohibited from using this information for your own financial gain or disclosing it to others for their financial gain. If, for example, you learn of something that could reasonably be expected to affect the price of Goodyear’s common stock or other securities, or the stock or other securities of another company, you must not buy or sell that stock or those securities, or disclose that information to others, until after the information has been released to the public.

Examples of effective public disclosure include:

- Disclosure by Goodyear in filings with the SEC or securities exchanges on which securities of a Goodyear subsidiary or affiliate may be traded;
- Press releases; and
- Conference calls or webcasts that are open to the public.

The circulation of rumors, even if they are accurate and reported in the media, does not constitute effective public disclosure. Insider trading is a violation of both U.S. and foreign law and Goodyear policy. The consequences of insider trading are severe, including civil and criminal fines and imprisonment for up to 20 years. Insider trading is relatively easy for authorities to detect, and the SEC pursues insider trading cases vigorously.

If you are aware of material nonpublic information, you must not engage in transactions involving Goodyear securities (or the securities of other affected companies) until two full trading days after the day of the effective public disclosure of the material information.

Prohibited Transactions

When an Associate is aware of material nonpublic information about Goodyear, they, or anyone living in their household, **may not:**

- Buy, sell or transfer Goodyear securities;
- Advise others to buy, sell or hold Goodyear securities;
- Have others buy, sell or transfer Goodyear securities for them or for the benefit of their family members; this includes any securities held in any retirement or financial institution account;
- Establish, alter or cancel any standing order or limit order for the purchase or sale of Goodyear securities, including the exercise of any stock options or stock appreciation rights and instructions regarding transactions in the Goodyear stock fund of the 401(k) plan;
- Disclose the material nonpublic information to anyone else under any circumstances, including to family and friends (also known as “tipping”), other than to those persons whose position or relationship with Goodyear requires them to know the information; or
- Assist anyone in any of these activities.

Transactions that may appear necessary or justifiable for independent reasons (such as the need to raise money for an emergency) are not an exception to the prohibition on insider trading.

IMPORTANCE OF INFORMING YOUR FAMILY AND OTHER HOUSEHOLD MEMBERS ABOUT INSIDER TRADING

Associates are responsible for the transactions of their family members and other household members. In cases where a family member overhears confidential information, that family member becomes a “temporary insider” for the purpose of insider trading laws. Because insider trading is highly regulated with severe penalties for violators, it is advisable to speak with your family members about the Insider Trading Policy and request that they confer with you prior to making any transactions in Goodyear securities. You should treat all such transactions as if the transactions were for your own account for the purposes of this policy and applicable securities laws.

Transactions in Securities of Other Companies

The prohibitions against insider trading as previously described apply equally to transactions in our Goodyear subsidiaries’ or other companies’ securities (including those of customers or suppliers) if the Goodyear Associate is aware of their material nonpublic information.

Short Sales, Hedging, and Margin Accounts

Goodyear Associates, regardless of whether they are aware of material nonpublic information about the Company, are prohibited from engaging in short sales of Goodyear securities, other transactions predicated on a drop in the price of Goodyear securities or any hedging transactions. Goodyear Associates are also prohibited from holding Goodyear securities in a margin account or otherwise pledging Goodyear securities as collateral for a loan.

TRADING WINDOWS

Regular Quarterly Blackout Periods

A blackout period occurs each quarter in connection with Goodyear’s public reporting of its financial results. The quarterly blackout period begins on the 16th day of the last month of each quarter and ends on the second full trading day after the date on which the financial results are announced to the public. Any Associate who receives, or has access to, Company year-end or quarterly financial results is prohibited from trading in Goodyear securities during the quarterly blackout period. For a detailed list of Associates who cannot trade in Goodyear securities during the blackout periods, refer to the Insider Trading Policy.

TAKE NOTE

Before you trade, keep in mind this key guidance to protect you, your family and the Company from an insider trading violation:

- If you have important, non-public information about Goodyear or other companies that could affect the stock price when the information is announced, don’t share it or trade.
- If you are unsure whether important Goodyear news is inside information, don’t share it or trade.
- If you have advance information regarding Goodyear’s quarterly earnings or other significant announcements, don’t trade until two full trading days after our official public announcement of this information.

WHO TO CONTACT FOR GUIDANCE

For more information or guidance regarding the Insider Trading Policy, or for details regarding what may constitute insider trading (including whether or not you are aware of material nonpublic information), contact Goodyear’s Secretary and Associate General Counsel, Compliance & Ethics or the lawyer for your business or function.

Refer to the following for more information:

- [Insider Trading Policy](#)



