



## **Speak Up Policy**

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<b>Policy Owner</b>	VP, Global Compliance & Ethics

### **PURPOSE**

The Goodyear Tire & Rubber Company and its affiliates (collectively, “Goodyear” or “we”) are committed to conducting our affairs responsibly, ethically, and in compliance with applicable laws and Company policies in all of our worldwide operations and locations. All Goodyear directors, officers, and salaried and hourly employees of the Goodyear family of companies worldwide (collectively, “Goodyear Associates”) are responsible for being familiar and complying with the Business Conduct Manual, seeking guidance if they have questions about these obligations, and raising concerns in compliance with this Speak Up Policy.

Goodyear depends on every Associate to do the right thing, every day and everywhere we do business. Violations of law, the Business Conduct Manual, or other Company policies erode the trust we have built with each other, and with our shareholders, customers, suppliers, and other stakeholders. For this reason, Associates are required to promptly Speak Up if they become aware of a potential or suspected violation of law, the Business Conduct Manual, or other Company policy. Associates also must cooperate fully with any internal investigation.

This Speak Up Policy describes the obligations to Speak Up, the ways reports can be made, how investigations are conducted, and what steps Goodyear may take at the conclusion of an investigation.

We know that it takes courage to Speak Up, especially about sensitive issues and ethical dilemmas, but it is always in your and Goodyear’s best interest to Speak Up, and we commend Associates who do so.

### **SCOPE**

This Policy applies to all Goodyear Associates. Certain Goodyear entities, functions, or business units may have adopted policy addenda that provide additional Speak Up guidance consistent with local legal requirements, and Associates are responsible for complying with any applicable local addenda and the additional guidance therein.

Non-Goodyear Associates can also submit reports via Goodyear’s Integrity Hotline, and reports from non-Goodyear Associates will be handled in accordance with this Policy.

### **POLICY**

#### **Reporting Responsibility**

It is the responsibility of all Goodyear Associates to comply with the Business Conduct Manual, all Company policies, and all applicable laws and to report violations or suspected violations in accordance with this Speak Up Policy.

Managers have an even greater level of responsibility and must lead with integrity and reinforce the Company’s ethical culture. They are often the first resource for Associates who have questions on ethical issues or concerns about potential violations of Company policy. When managers become aware of potential violations of law or

Goodyear policy, they should not conduct their own investigation. Instead, managers are required to report these concerns to the appropriate Company resource, such as Compliance & Ethics, Internal Audit, Human Resources, or the Law Department. Managers may also report the issue through the [Open Door Form](#), which is a streamlined form that allows managers to report a matter directly to the Integrity Hotline (see the "Reporting Procedure" section below). Simply telling the reporter to contact the Hotline or to report the matter to another Company resource does not satisfy a manager's obligation to escalate issues. Managers may be held accountable for their failure to report potential violations of law or Goodyear policy or their failure to follow appropriate steps to address or remediate an issue.

### **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. "Good faith" means raising a question or concern that you believe to be true, even if those concerns are later found to be unsubstantiated.
- Participate and cooperate truthfully and completely in an investigation.

"**Retaliation**" is conduct by anyone at the Company (including not just supervisors but also peers or coworkers who do not have authority to fire or demote the victim of retaliation) that is done not for a legitimate performance or business reason but instead to penalize an individual for, or dissuade them from, raising concerns, asking compliance-related questions, or cooperating with an investigation in good faith. Retaliation can be overt and include actions such as:

- demotion or change in responsibilities,
- denial of advancement opportunities,
- loss of benefits or perks,
- termination or threats of termination, or
- direct or indirect threats of violence or physical harm.

Retaliation can also be less obvious, and include conduct such as:

- bullying,
- spreading rumors,
- withholding information needed to perform a job, or
- isolation or ostracization.

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 identified in the "Reporting Procedure" section of this Policy.

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.

## Reporting Procedure

If you have a concern regarding a compliance and ethics issue or a violation of any law or Company policy, you should report it through one of the below channels:

1. Your manager or any other Goodyear manager;
2. Human Resources;
3. The VP, Global Compliance & Ethics at 1-330-796-7288 (GTN 446-7288); the Director, Global Compliance & Ethics Operations at 1-330-796-0375 (GTN 446-0375); the Director, Global Compliance & Ethics Investigations and Analytics at 1-330-796-7972 (GTN 446-7972) or a Regional Director, Compliance & Ethics (see Compliance & Ethics Website: <https://goodyear.ethicspoint.com> for contact information);
4. The VP, Internal Audit at 1-330-796-0719 (GTN 446-0719); or
5. The Goodyear lawyer responsible for your business or function or the Office of the General Counsel.
6. You may also report a concern or ask a question by using the Company's Integrity Hotline, which is operated by a third-party provider (NAVEX) that accepts reports, including anonymous reports, by telephone or online and then shares the reports with Compliance & Ethics. Reports made via the Hotline can be made orally or in writing and supporting materials can be uploaded by the reporter.
  - Goodyear Integrity Hotline (website): <https://goodyear.ethicspoint.com>
  - Goodyear Integrity Hotline (by phone): In the United States and Canada, you can call toll-free: 1-888-GY-HOTLINE (1-888-494-6854); from all other countries, you can access dialing instructions at: <https://goodyear.ethicspoint.com> or place a reverse charge/collect call to +1-503-726-2371
  - If you call the Integrity Hotline by telephone, translation services are available. The Integrity Hotline web portal is available in 23 languages. Even if your preferred language is not available as an option, you may still submit information and reports in that language.

We encourage individuals to report complaints through one of Goodyear's internal channels listed above, so that the Company can review and address them. Nothing in this Policy is intended to limit or discourage any individual from exercising their rights under applicable law to report complaints to government agencies.

Reports may be made anonymously, and Goodyear endeavors to protect the confidentiality and anonymity of reporters to the greatest extent possible. Goodyear encourages reporters to provide their name and contact information so that they may be contacted directly if necessary and to better enable the satisfactory resolution of the matter. Goodyear encourages reporters to provide as much information as possible when making a report. Providing detailed information will help Goodyear determine the best way to address the matter. Where reports have been made anonymously through the Goodyear Integrity Hotline, the reporter may provide follow-up information, and Goodyear may communicate with the reporter, anonymously, using the Hotline's functionality. Goodyear encourages reporters who prefer to remain anonymous to maintain communication with the Company in this way.

## Who Can Report

Goodyear invites anyone who has knowledge or concerns about unethical or illegal conduct to report these concerns to Goodyear. Goodyear's Integrity Hotline is meant to be used by all individuals, including Associates and non-Associates, who have knowledge of, or concerns about, unethical or illegal conduct relating to Goodyear.

## What Can Be Reported

Reporters may raise concerns about any unethical or illegal conduct related to Goodyear. This includes any and all conduct that is protected under local whistleblowing regimes, including but not limited to the EU Whistleblowing rules (i.e., Directive (EU) 2019/1937 on the protection of persons who report breaches of Union Law and its implementing laws in EU Member States).

## Receipt and Review of Complaint

When Goodyear receives a report regarding a violation or suspected violation, Compliance & Ethics (or an individual whom Compliance & Ethics designates to investigate the complaint) will notify the sender and acknowledge receipt of the complaint promptly (normally within seven days, unless a shorter time is required by applicable local law). Reports of suspected misconduct will be appropriately, timely, and thoroughly investigated and treated confidentially to the extent possible in light of Goodyear's need to conduct an investigation and follow up on any concerns. In certain circumstances it may not be possible or appropriate to fully investigate a report. For example, if there is insufficient information to complete an investigation and there is no reasonable means of obtaining further information, Goodyear will not be able to conduct a thorough review of the matter.

If you have a concern about a potential violation of law or Company policy, you should not conduct your own investigation. Instead, you should report it to one of the resources identified in the "Reporting Procedures" section of this Policy. This allows the matter to be investigated by the Company Associates designated to conduct investigations. You and other Associates may be asked to cooperate with the investigation. When Goodyear conducts an investigation, you are expected to cooperate fully by providing complete, accurate and truthful information. You also are expected not to interfere with the investigation, offer false information, or alter or destroy records. If anyone asks you to interfere with or impede an investigation, this is a violation of Goodyear's policies and should be immediately reported to Compliance & Ethics.

We will exercise discretion to avoid disclosing the sources and subjects of complaints we receive to the extent possible while ensuring we appropriately investigate and address each complaint. We will register the receipt of each complaint in accordance with applicable law and Company procedures (including applicable data protection and privacy laws and the Company's policies concerning such data). We treat all parties involved in an investigation—including subjects, reporters and witnesses—fairly and respectfully, and we let the facts produced by the investigation determine what, if any, remediation steps should be taken. Based on the findings of the investigation, Goodyear will take appropriate remediation steps as necessary.

## Reporting Results of the Investigation

Following the 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 violation; and/or
- withholds information from, refuses to cooperate with, or provides false information during an investigation of a possible violation (or asks another individual to do so)

is subject to appropriate discipline, 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.

Following completion of an investigation, Goodyear will assess and consider the root cause of any issues found, lessons learned, whether other remedial actions are necessary, and any improvements that can be made to the Company's processes and procedures to ensure that similar issues do not occur again in the future.

Goodyear will endeavor to inform the reporter when the investigation is concluded, and appropriate details will be shared with this individual. In the EU and certain other jurisdictions where required by law, Goodyear will provide the reporter, within three months of the date of acknowledgement of receipt of the report, written information about measures taken or contemplated to review the allegations, and, where appropriate, to remedy the subject matter of the report. The reporter will be further updated upon closure of the investigation.



Goodyear may also report the results of the investigation to appropriate internal and/or external parties—including Goodyear's Compliance & Ethics Committees, senior management, the Board of Directors, law enforcement or other regulatory authorities, and/or certain other entities or individuals— as appropriate based on the nature of the complaint and the investigation findings, in accordance with applicable law, and at the direction of Compliance & Ethics and the Law Department. The Company will endeavor to maintain the confidentiality of individuals who report violations or suspected violations and will not tolerate retaliation against good-faith reporters.

### **Retention of Records**

Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Creating and maintaining accurate and complete data is essential for our ability to meet our investigation and business needs as well as legal and regulatory requirements. We retain business records in accordance with the law, to the extent needed for business purposes, or longer if required by tax, regulatory, or other standards. Documents required for an audit, investigation, or other legal action are retained pursuant to laws and other legal or contractual requirements and pursuant to Company policies and procedures.

### **POLICY VIOLATIONS**

Any associate who violates, or requests that someone else violate, this Policy or applicable law is subject to appropriate discipline, up to and including termination of employment, forfeiture of benefits, and civil and criminal prosecution.

### **HOW TO RAISE CONCERNS OR QUESTIONS**

If you have any questions or concerns about the Speak Up Policy, you may contact:

- Your manager;
- Your Human Resources representative;
- The VP, Global Compliance & Ethics at 1-330-796-7288 (GTN 446-7288); the Director, Global Compliance & Ethics Operations at 1-330-796-0375 (GTN 446-0375); or a Regional Director, Compliance & Ethics (see Compliance & Ethics Website: <http://go.goodyear.com/ethics/> for contact information);
- The VP, Internal Audit at 1-330-796-0719 (GTN 446-0719);
- The Goodyear Integrity Hotline at: <https://goodyear.ethicspoint.com>. In the United States and Canada, you can call toll-free: 1-888-GY-HOTLINE (1-888-494-6854). From all other countries, you can access dialing instructions at: <https://goodyear.ethicspoint.com> 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.

Remember that 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 who participate and cooperate truthfully and completely in an investigation.

### **RELATED POLICIES AND PROCEDURES**

- [Business Conduct Manual](#)
- [Record Management Policy](#)
- [Associate Privacy Policy](#)
- [Global Privacy Policy](#)
- [Online Privacy Policy](#)