

# POLICY STATEMENT OF GOODYEAR GERMANY GMBH – SUPPLY CHAIN DUE DILIGENCE ACT

## Introduction and Scope

As of January 1, 2023, the **Act on Corporate Due Diligence Obligations in Supply Chains** (*Lieferkettensorgfaltspflichtengesetz*, or LkSG), also referred as “SCDDA,” was put in place for companies who employ, including via affiliates, more than 3,000 people in Germany. The SCDDA outlines a corporation’s responsibility, in scope of the law, for compliance with human rights and environmental issues in the global supply chain.

This statement, prepared and published pursuant to the SCDDA, covers the activities of Goodyear Germany GmbH and its subsidiaries, for the period January 1, 2024, to December 31, 2024.

Goodyear Germany GmbH, through this disclosure, is communicating its efforts to address human rights- and environmental-related risks in its own operations and supply chain.

## 1. Goodyear Germany GmbH’s commitment to human rights and management of environmental risks

**The Goodyear commitment to acting with integrity, honesty and respect is the foundation for our commitment to human rights**, embodied in our [Policy on Global Human Rights](#).

At The Goodyear Tire & Rubber Company (“Goodyear”), our commitment to human rights is a reflection of how we work. Our human rights policies and standards encompass our entire value chain. Goodyear’s human rights policy is incorporated in our [Business Conduct Manual](#), [Zero Tolerance Policy](#), [Natural Rubber Procurement Policy](#), [Sustainable Soybean Oil Procurement Policy](#), Retention of Identity Documents Policy, Responsible Recruiting Policy and [Supplier Code of Conduct](#). Supporting these policies and standards are various due diligence processes, including vendor management programs and grievance and remedy mechanisms, like the [Goodyear Integrity Hotline](#). Additionally, all Procurement, Legal, Human Resources and Internal Audit associates globally are provided annual training on human rights.

### Strategy and Governance

Goodyear’s Human Rights Steering Committee—formed in 2021, sponsored by our Chief Human Resources Officer and General Counsel is responsible for Goodyear’s human rights strategy. This strategy aligns with the UN Guiding Principles on Business and Human Rights and includes active workstreams focused on the following:

- Educating our leaders and associates on human rights standards.
- Identifying and managing human rights risks throughout our value chain through due diligence and remedy processes.
- Communicating our efforts to address human rights.
- Aligning and working with key stakeholder groups to help carry out our work.

The scope of this strategy includes evaluating potential risks and opportunities to reduce risk in Goodyear's operations and supply chain, represented by the pillars of Goodyear's corporate responsibility framework— Sustainable Sourcing, Responsible Operations, Advanced Mobility and Inspiring Culture.

A cross-functional team of associates, representing Legal, Procurement, Communications, Learning and Development and Sustainability, is advancing our human rights strategy. In 2022, they:

- Developed a Human Rights Leadership education module that launched in early 2023.
- Increased internal communications, focused on leader and associate education and engagement, on the topic.
- Implemented the Retention of Identity Documents and Responsible Recruiting policies.
- Developed an expanded plan for enhanced supplier screening with a focus on identifying suppliers in high-risk categories for monitoring the implementation of corrective action plans, if required. The execution of the first phase of this plan has begun in 2023.

The team worked on and implemented an updated [Policy on Global Human Rights](#) in March 2023. This policy outlines Goodyear's commitment to the UN Guiding Principles on Business and Human Rights. Goodyear will report on policy implementation and updates in future reports. More information on our commitment to human rights can also be found at <https://corporate.goodyear.com/us/en/commitments.html>.

For us, respect for human rights and management of environmental risks is a continuous process in which Goodyear considers the human rights- and environmental-related risks and due diligence obligations of the SCDDA as the guideline for our actions.

At Goodyear Germany GmbH, the management board is responsible for the risk management and delegates the corresponding tasks to the responsible SCDDA Committee. The SCDDA Committee is responsible for SCDDA human rights- and environmental-related due diligence obligations. The SCDDA Program Lead is responsible for monitoring the risk management in the human rights- and environmental-related due diligence obligations. The SCDDA Subject Leads are responsible for the operational execution of the due diligence obligations.

The SCDDA Committee shall meet at least biannually. Goodyear Germany GmbH's SCDDA Committee is responsible for overseeing the establishment and maintenance of a risk management system with the aim of identifying, preventing, ending, or at least minimizing, risks to and infringements of human and environmental rights along its supply chain.

## **2. Our approach to Human Rights and Environmental Due Diligence**

### **2.1 Risk analysis Process**

According to Section 4 of the SCDDA, Goodyear Germany GmbH has established a risk management system to identify, prevent, mitigate or eliminate human rights or environmental-related risks and violations.

Goodyear Germany GmbH conducts a risk analysis once a year and on an ad hoc basis, as per Section 5 (4) of the SCDDA, with dedicated resources allocated. This risk analysis allows Goodyear Germany GmbH to understand, identify and evaluate the human rights and environmental risks in its own business area and within its supply chain, and to prioritize these risks for further processing. The results of this yearly risk analysis will be considered as part of

the decision-making process regarding how Goodyear Germany GmbH manages and works with its suppliers.

### ***Risk Analysis in Goodyear Germany GmbH's own operations***

The following process steps have been implemented by Goodyear Germany GmbH to identify risks in its own business area:

- **Determination of "concrete risks"**: identification of the risk scenarios and the creation of a detailed catalog of risks per key Goodyear Germany GmbH's processes (Human Resources, Environment, Health, & Safety, Sustainability, Procurement, Legal)
- **Assessment of identified "concrete risks"**: assessment of relevance of each risk scenario, then evaluation of each identified risk by probability of occurrence and severity of the violation
- **Documentation of the results in the risk inventory**

### ***Risk Analysis for Goodyear Germany GmbH's Direct Suppliers (Tier-1)***

The following process steps have been implemented to identify risks in the supply chain for the suppliers that have a direct business relationship with Goodyear Germany GmbH:

- Conducting an **"abstract risk assessment"** of Goodyear Germany GmbH's direct suppliers. This includes the compilation of information on every Goodyear Germany GmbH direct business partner and all its subsidiaries (Tier-1 Suppliers), as well as the identification of possible high-risk suppliers by considering sector- and country-specific risks.
- Conducting a **detailed Tier-1 risk analysis**, which includes, amongst other procedures, a questionnaire focused on human rights- and environmental-related issues, third-party database searches, etc.; all potential high-risk suppliers are screened thoroughly and risk is identified and evaluated by probability of occurrence and severity of the violation (for information on identified risks, please refer to section 2.4).

### ***Ad Hoc Risk Analysis in Goodyear Germany GmbH's Own Operations and Supply Chain***

An ad hoc risk analysis is carried out in Goodyear Germany GmbH's own business area and for direct (Tier-1) suppliers when the company expects a "significantly changed or significantly expanded risk situation in the supply chain...", as per Section 5 (4) of the SCDDA, or when Goodyear Germany GmbH has factual indications that a violation of a human rights-related or environmental-related obligation appeared to be possible within its supply chain.

The ad hoc risk analysis process contains the following steps:

- Goodyear Germany GmbH's risk management system requires that any trigger should be reported immediately to the Compliance & Ethics department.
- If the Compliance & Ethics department determines the materiality of the change, or identifies a relevant violation within Goodyear Germany GmbH, or by one of its direct or indirect suppliers, the risk owner is informed.
- The risk owner evaluates the risk as defined above.
- The risk owner implements preventive measures and remedial action as appropriate.

## 2.2 Preventive Measures

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

Goodyear requires all new suppliers to abide by Goodyear's Supplier Code of Conduct or provide their own code of conduct that Goodyear must review and accept. Goodyear may decline to make future purchases from a supplier that does not certify to the Goodyear Supplier Code of Conduct or does not provide an acceptable version of their own code of conduct.

Goodyear's global tool for vendor onboarding also includes a screening function that alerts Goodyear's Global Procurement team in case findings related to the suppliers are raised, including human rights or environmental-related issues. These findings are then reviewed internally, and the vendor onboarding process can be stopped based on the severity of the finding.

## 2.3 Complaints Procedures

### **Integrity Hotline**

Goodyear has established a group-wide and cross-thematic reporting system for internal and external complaints with various contact channels. All associates are required to report any actual, suspected, or potential misconduct to management or through the [Company's Integrity Hotline](#).

Available 24 hours a day, 7 days a week from anywhere in the world via a toll-free telephone (Germany 08001822669) or via a dedicated website in 23 languages ([www.goodyear.ethicspoint.com](http://www.goodyear.ethicspoint.com)), our Integrity Hotline (NAVEX) allows Goodyear associates and third parties to report a concern or ask a question, including anonymously (where allowed by law).

All reported indications and reasonable suspicions including possible human rights or environmental-related risks or violations within Goodyear's own business or Goodyear's supply chain are addressed within a process that is designed to be transparent, balanced and comprehensible for all parties involved. The reports submitted within the complaints procedure are treated confidentially.

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

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

The Integrity Hotline is one option to report concerns, including anonymously where allowed by local law; however, associates are also encouraged to bring concerns to their managers or representatives across HR, Legal, Compliance & Ethics and Internal Audit.

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

Additional information related to our Complaint Mechanism can be found on the Integrity Hotline [website](#). The Complaints Mechanism process is also described in our [Rules of Procedure on our Corporate Website](#).

## Investigations Process

Goodyear conducts investigations in response to allegations of risks or violations related to Goodyear's own business or Goodyear's supply chain. The allegations might be for a variety of different misconduct including violations of law, policy, procedure, the Business Conduct Manual or ethical obligations. An investigation is intended to help Goodyear identify and understand the facts relevant to the allegations, assess the situation, and come to a conclusion about how to resolve the issue and address any risks or misconduct that may have occurred.

Like all associates, those responsible for conducting internal investigations are expected to maintain the highest ethical and legal standards. In 2023, we developed an Investigator's Code of Conduct to inform investigators about their obligations and help all associates understand the obligations of those entrusted with conducting internal investigations. Fairness, confidentiality, an unbiased approach and a commitment to our non-retaliation policy underlie these principles and are essential to an effective investigative process.

Trust is a critical element of the Compliance & Ethics mission, and we build trust through transparency. Compliance & Ethics conducts ongoing data analysis to better understand our investigations data and confirm the effectiveness of the process. This includes reviewing the types of allegations reported, locations involved, substantiation rates and anonymity rates. This data is shared with Goodyear's executive leadership, Board Committee on Corporate Responsibility & Compliance, and Global and Regional Compliance & Ethics Committees.

## 2.4 Priority risks identified

All human rights- and environmental-related risks were considered with the same level of priority.

### Own Business Area

Based on the risk analysis conducted for Goodyear Germany GmbH's own operations, we have not identified any significant or high risk.

### Direct Suppliers

Based on the risk analysis conducted for Goodyear Germany GmbH's direct suppliers supported by the questionnaires filled by potential high-risks suppliers, we have identified the following risks:

- **22 medium risks** related to working safety, working conditions, freedom of association, hazardous waste, persistent organic pollutants, security forces, unequal treatment, including **1 violation** related to unequal treatment (unequal wages). Appropriate preventive and remedial actions have been taken related to this violation.

### Indirect Suppliers

Goodyear Germany GmbH identified no human rights- or environmental-related risk or violation committed by a Tier-2 supplier in 2024.

## 2.5 Remediation Process

Any suspicion or confirmed violation of a human rights- or environmental-related obligation in our own operations or in our supply chain will be carefully investigated, and prompt remedial measures will be taken as appropriate to mitigate / eliminate the violation.

Based on the outcome of our risk analysis and the potential alerts raised through the different channels such as our Integrity Hotline, Compliance & Ethics will coordinate to take remedial measures with our suppliers, which may include additional trainings and review of our Supplier Code of Conduct or other measures.

In case these remedial measures are not generating sufficient results, we may decide to end the business relationship with the supplier.

The appropriateness and effectiveness of our remediation process will be reviewed and assessed on a yearly basis and on an ad hoc basis, if necessary.

## 3. Human Rights- and Environmental-related expectations on Goodyear Germany GmbH's employees and suppliers in the Supply Chain

### Associates

Goodyear expects every associate to know and understand our compliance and ethics policies and to abide by them. Goodyear requires almost all global salaried associates and new hires to complete online training covering the Business Conduct Manual and key compliance policies.

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

Throughout the year, we conduct training across all strategic business units as well as focused compliance campaigns in many countries and plants on various subjects, such as respect in the workplace (including harassment and discrimination), conflicts of interest, competition law, speaking up, preventing and detecting fraud and bribery, gift and entertainment policies, and privacy. Additionally, over the course of the last two years, Goodyear has rolled out modern slavery/forced labor training to all Legal and Human Resources personnel globally.

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

Goodyear strives to contribute to sustainable economic development and environmental protection while seeking to improve the quality of life of our associates, families, communities, and society in general. Goodyear wants our associates and contractors to have work environments that are safe and secure.

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

Goodyear's Policy on Global Human Rights applies to the company's operations worldwide and is part of our commitment to ethical and socially responsible business practices.

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

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

As stated in Goodyear's Policy on Global Human Rights, Goodyear supports the following principles:

- Commitment to maintaining an inclusive workplace free of unlawful harassment and discrimination.
- Employment is voluntary; all forms of compulsory labor or human trafficking are prohibited.
- Workers' freedom of movement must not be restricted through conditions of employment, the retention of identity or immigration documents, holding of deposits, or any other action aimed at restricting mobility.
- Exploitation of children, including child labor, is not permitted.
- Employees have the right to join organizations (such as unions) of their choosing or to refrain from joining organizations.
- Compliance with all applicable laws and regulations dealing with wages and hours worked,
- Providing a safe and secure workplace.

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

### **Suppliers**

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

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

Goodyear takes active steps to engage with our suppliers and to support our suppliers to prevent adverse human rights- and environmental-related risks. Goodyear Corporate guidelines constitute a framework for action for our associates and expectations of our business partners, including our suppliers. These guidelines include the following:

- [Policy on Global Human Rights](#)
- [Business Conduct Manual](#)
- [Supplier Code of Conduct](#)
- [Environmental, Health & Safety \(EHS\) Policy](#)
- [Natural Rubber Procurement Policy](#)
- [Sustainable Soybean Oil Procurement Policy](#)

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

Together with other Goodyear teams, our Procurement team oversees and implements policies, programs, supplier assessments and audits. Goodyear also provides employee training on topics

such as human trafficking, forced and child labor, anti-corruption, compliance, and strategic sourcing processes.

As part of Goodyear's onboarding procedure for new vendors, suppliers are required to go through a risk assessment and due diligence process that covers all aspects of the SCDDA, such as Supplier Code of Conduct review and acknowledgment, Anti-Bribery Due Diligence process, and an audit of waste disposal companies. Goodyear may decline to make future purchases from a supplier that does not certify to the Goodyear Supplier Code of Conduct.

All suppliers that certify to the Goodyear Supplier Code of Conduct may be subject to compliance verification processes at any time. Goodyear does expect that our suppliers be strictly compliant with local laws.

Goodyear performs periodic supplier audits on an ongoing basis for validation of material quality and supplier conformance to certain regulatory requirements.

Topics covered in the Supplier Code of Conduct include human rights, health and safety, environmental practices and anti-corruption/anti-bribery.

#### **4. Documentation and Reporting**

We will regularly review and adapt the policy statement to reflect changes in circumstances and processes. We document the fulfilment of our human rights- and environmental-related due diligence obligations on an ongoing basis. The documentation will be stored for at least seven years. The report, in accordance with the requirements of the SCDDA, has been established for the first time for the year 2023 and has been submitted to the Federal Office for Economic Affairs and Export in accordance with the legal requirements and has been published on our [Corporate website](#). The Goodyear Tire & Rubber Company also reports annually on sustainability performance, including human rights and environmental matters, in the company's [Corporate Responsibility Report](#) and other reports, which is published on the corporate website.