#### MANAGEMENT FUNDAMENTALS

## Compliance, Fair Competition

#### **MISSION**

# Ensure excellence through compliance and integrity

### We build trust with all stakeholders by ensuring that ethical decision-making guides responsible business practices across our operations.

The Bridgestone Group's commitment to compliance and integrity is a competitive advantage that informs all its activities and helps achieve its overall Mission of "Serving Society with Superior Quality." Foundational to this commitment is its <a href="Code of Conduct">Code of Conduct</a> that gives employees, suppliers and others worldwide practical guidance for handling a wide range of ethical issues, including anti-corruption, competition/antitrust, conflicts of interest, and corporate charitable and political donations.

In 2019, the Group continued its global roll-out of the Code of Conduct, introduced in 2018, to ensure that all employees understand that ethical behavior and compliance is expected of everyone. The Group also continued introducing the Code of Conduct to business partners, sharing its expectation of integrity in all interactions.

The Bridgestone Group is simultaneously pursuing multiple channels to ensure compliance with its Code of Conduct, including:

- Focusing on education and employee engagement.
   These efforts start at the top, with business leaders regularly speaking about the importance of ethics and compliance and playing active roles in the Group's compliance training and awareness programs. This keeps the Code of Conduct top of mind and creates the desired culture where people are comfortable speaking up if they have concerns.
- Conducting regular global e-learning on the <u>Code of Conduct</u> and the <u>Global Human Rights Policy</u>. The Group reached nearly 49,000 employees, 89.5% of its target audience, in 2019.

- Encouraging employees around the world to use the different channels and resources outlined in the Code of Conduct for speaking up, including the BridgeLine web-based reporting system and phone hotlines available worldwide.
- Introducing compliance risk assessments to proactively identify and mitigate risks. To help minimize risks associated with third parties with which the Group does business, the Group introduced a third-party screening tool.

As a global company, the Bridgestone Group operates in countries with a wide range of risk profiles, making anti-bribery a central focus of its global compliance program, along with regional compliance education efforts. In mid-2020, the Group will launch a Global Anti-Bribery Policy that builds upon the Code of Conduct. In addition to the guidance and requirements in the Code of Conduct, all regions currently have their antitrust policies in place for their respective regions. In 2020, the Group is working to consolidate existing regional antitrust policies into a Global Antitrust Policy, which is planned to be launched in 2021.

The Group also seeks to mitigate third-party risk by conducting appropriate due diligence, including screenings, based on the risks posed by each third party and geographic region among other considerations.

More information on the Bridgestone Group's global ethics and Compliance program is available  $\underline{\text{online}}$ .



