

BRIDGESTONE EUROPE NV/SA

MODERN SLAVERY STATEMENT: FINANCIAL YEAR 2022

1. Introduction

As a global organisation, the Modern Slavery Act 2015 (Act) applies to the following UK entities within the Bridgestone Corporation:

- **Bridgestone Europe NV/SA, UK Branch.**
- **Bulldog Remoulds Limited.**
- **ETB Tyres Limited and Exhaust Tyres and Batteries (Worcester) Limited.**
- **Webfleet Solutions sales B.V., UK Branch.**
- **Bridgestone Aircraft UK Tyres.**

2. Bridgestone's Corporate Mission Statement & Global Sustainability and management commitment

The Bridgestone Corporation remains one of the largest manufacturers of tyres and rubber products worldwide and continues to be regarded as a mobility solutions provider with the continuing message of "*solutions for your journey.*"

Bridgestone's mission statement of "*Serving Society with Superior Quality,*" is complimented by our global sustainability as well as management commitment, the "*E8 Commitments*"

The E8 Commitments advance Bridgestone's mission to ensure that Bridgestone maintains a sustainable organisation through the following eight core values – ***Energy, Ecology, Efficiency, Extension, Economy, Emotion, Ease and Empowerment.***

Through this mission, we strive to be a company trusted by you, our customers and suppliers across the world. Within our commitments it includes our focus on anti-slavery and human trafficking as outlined below.

3. This Annual Statement

This statement is made pursuant to section 54 of the Act and relates to the financial year ending December 2022

It sets out the steps that we at *Bridgestone Europe NV/SA, Belgium (BSEU)* and its UK based subsidiaries listed below have taken and continue to take to ensure that modern slavery and human trafficking is mitigated within the organisation and supply chains.

4. Bridgestone Europe NV,SA business structure

BSEU is a subsidiary within the Bridgestone Corporation and is the parent company for all subsidiaries belonging to the Bridgestone Europe, Middle East, India and Africa (“BSEMIA”) strategic business unit. Its UK subsidiaries listed here are subject to the Act.

- **Bridgestone UK Branch**, is a sales branch entity of BSEU, engaged in the wholesale of tyres produced by Bridgestone to a range of customers for both consumer and commercial vehicles. The UK branch imports tyres from factories in the EU and elsewhere across the world as well as sourcing retread tyres from the UK based re-tread plants, for sales in the United Kingdom. The UK branch also provides mobility solutions.
- **Bulldog Remoulds Limited** is engaged in the business of producing retread tyres, a process which extends the life of tyres by applying new tread to worn tyres. The worn tyres are procured from a variety of sources and new tread materials are supplied by Bandag, the Bridgestone retread organisation, part of the Bridgestone Corporation.
- **ETB Tyres Limited and Exhaust Tyres and Batteries (Worcester) Limited** are our prominent tyre dealer and service provider across the United Kingdom, servicing our retail customers and sourcing Bridgestone tyres from BSEU as well as sourcing competitor tyres from competitor manufacturers.
- **Webfleet solutions sales B.V.,UK Branch**, a telematics business providing transformational mobility solutions including vehicle tracking services.

5. Other UK Bridgestone entities

As a diverse global organisation, the following UK Bridgestone entity also forming part of the Bridgestone Corporation, (but not a BSEU subsidiary) is subject to the Act. As a Bridgestone Corporation entity, Bridgestone Aircraft’s statement remains consistent with the BSEU commitments detailed here.

- **Bridgestone Aircraft Tire (UK) Limited** a subsidiary active in the handling of new or retreated aircraft tyres for the civil commercial aviation. The entity is providing those services to Bridgestone Aircraft Tire (Europe) SA on the UK territory through a site near Heathrow airport, England.

6. Bridgestone’s approach to human trafficking and modern slavery

Bridgestone corporation has a zero-tolerance approach to any form of modern slavery and is committed to acting ethically, with integrity and transparency in all business dealings. Our employees at BSEU operate under a number of global policies to ensure a high standard of social, governance and ethical compliance. These include:

- **Group Global Human Rights Policy**

Bridgestone Group’s Global Human Rights Policy updated in 2022, remains fundamental to fulfilling our E8 commitment, by contributing to a society that ensures accessibility and dignity for all; prohibits forced/compulsory labour in our organisation and in our supply

chain. Our Global Human Rights Policy can be accessed here:
https://www.bridgestone.com/responsibilities/human_rights/

- **Bridgestone Code of Conduct**

Our Code of Conduct, which was updated in December 2022 to bring it in line with our E8 Commitments, expressly refers to our Group Global Human Rights Policy and explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

The Code of Conduct forms part of our mandatory online-learning for new employees and we require all of our employees to undertake refresher training on the Bridgestone Code of Conduct as one of our key cultural foundations. On a yearly basis, we ask all of our employees to confirm their commitment to our Code.

The Bridgestone Code of Conduct can accessed here:

<https://www.bridgestone.com/responsibilities/code/index.html>

- **Human Rights due diligent process in the Bridgestone organization**

Bridgestone regularly conducts human rights due diligence activities across its operations and supply chain. Regarding its operational sites, in partnership with third-party experts and in alignment with the UN Guiding Principles on Business and Human Rights (UNGPs), the Group is significantly expanding and accelerating these efforts to ensure it is meeting and exceeding societal expectations, and continually strengthening its overall due diligence process.

In the process of strengthening its human rights due diligence system, the Bridgestone Group identified salient human rights risks across its global operations through two different risk evaluations conducted by independent third-party organizations, [Verisk](#), [Maplecroft](#) and [Business for Social Responsibility \(BSR\)](#), in 2021. These evaluations incorporated external industry and geographic human-rights risk data, along with the Group's management systems, policies and practices, to give a holistic picture of key industrial, geographical, and operational risks to which its business should pay particular attention based on the location and nature of operations conducted at its facilities.

Based on the results of these two external evaluations, Bridgestone has identified salient human rights risks: working hours, non-discrimination and equal opportunity, workplace harassment, forced labour, child labour, and occupational health and safety. These are the human rights domains that Bridgestone believes, based on a combination of geographical, regulatory, industrial and operational factors, require the highest priority across its operations and are the primary focus of the human rights due diligence process at its operational sites.

Based on the 2021 evaluation results, Bridgestone prioritized locations and developed data-driven plans for human rights risk assessments in its operational sites, and conducted two types of human rights risk assessment in cooperation with a third-party expert, BSR. The first type of assessment was a deep-dive online investigation into the salient issues at the prioritized locations based on the 2021 evaluation outcome. The second type of assessment was a Human Rights Risk Assessment Survey (HRRAS). This survey was utilized to enable

Bridgestone to very broadly assess potential risks and management processes across the Group's operations for two highly impactful human rights risk domains: child labour and forced labour.

To achieve our human rights and labour practices mission, Bridgestone established the following goals and KPIs in 2022:

- To conduct Human Rights Risk Assessment Surveys (HRRAS) at 80% of the Group's operational sites by the end of 2022.
- Based on the outcome of the assessments, ensure mitigation plans are in place for 100% of any identified risks by 2023.

Bridgestone surpassed our 2022 goal by conducting HRRAS at 100% of its operational sites in 2022. There were no material risks identified from HRRAS.

From the two types of human rights risk assessment conducted in 2022, Bridgestone was able to 1) verify that there were no human rights violations at the three representative sites assessed in-depth, 2) confirm there were no incidents of child labour or forced labour among its own operations, and 3) identify key areas to improve and reinforce in its management system to minimize human rights risks across its operations.

- **Respect, dignity and diversity at Bridgestone.**

Bridgestone promotes respect, dignity and diversity at all times and promotes this through campaigns and dedicated awareness days.

In our Code of Conduct employees must not discriminate against other employees; differences in opportunities and/or treatment must be based only on elements relating to an employee's ability, competence, and achievement. We do not allow any discrimination on the basis of race, ethnicity, nationality, birthplace, colour, age, gender, sexual orientation, disability, religion, political affiliation, union membership, marital status or any other characteristic that may be protected by law.

- **Bridgestone Recruitment policy**

Bridgestone has a robust recruitment policy, including checks of all prospective employees on their eligibility to work in the UK, to safeguard against human trafficking or individuals being forced to work against their will.

7. Our suppliers

Bridgestone recognises that addressing human rights issues is crucial to sustainability. Our Global Sustainable Procurement Policy, released in 2021 affirms our respect for international standards for human rights. The policy can be accessed here:

https://www.bridgestone.com/responsibilities/procurement/pdf/Policy_English.pdf

As part of the policy suppliers are required to:

- meet at least certain minimum requirements defined in the policy in order to do business with a Bridgestone entity. In addition, suppliers are required to meet certain Preferred practices.

- to comply with all laws and regulations regarding human rights in their country and/or region of operation;
- to use their best efforts to have full knowledge of the source of the products and services they supply to enhance the traceability of products and services,
- to identify potential human rights impacts.

8. Due diligence processes in relation to supplier management

Bridgestone Corporation has a very large and complex supply chain.

BSEMIA has approximately 13,400 suppliers and whilst all suppliers must comply with our Global Sustainable Procurement Policy, we carry out additional due diligence on suppliers operating in areas of higher risk, such as suppliers of raw materials. High risk suppliers are assessed annually and scored by Ecovadis, an independent third party specialised in monitoring sustainability in global supply chains.

The Ecovadis methodology framework assesses companies' policies and actions as well as their published reporting related to the environment, labour and human rights, ethics and sustainable procurement. Their team of international sustainability experts analyse and crosscheck companies' data in order to create reliable ratings, taking into account each company's industry, size and geographic location.

To date, 91% of our BSEMIA suppliers in scope as being high risk have undertaken a sustainability assessment.

In addition to Ecovadis, BSEMIA also undertakes screening of third party suppliers through a cloud-based platform operated by a third party provider, GAN Integrity. The GAN platform uses RDC, a screening database that contains more than 500 sanctions and watch lists and +200, 000 media sources to screen suppliers for sanctions violations, criminal prosecutions, Bribery and corruption, and more.

Furthermore, during 2022, BSEU subsidiaries developed a modern slavery questionnaire to specifically establish the level of compliance by suppliers that are subject to the Modern Slavery Act.

9. Grievance procedure for natural rubber supply chain

The Bridgestone Group believes all stakeholders throughout its natural rubber supply chain play a constructive role in improving its sustainability. To support implementation of our Global Sustainable Procurement Policy, Bridgestone is committed to managing a grievance mechanism which allows stakeholders to raise grievances related to its policy. Bridgestone is committed to an open and transparent process where all grievances will be dealt with fairly and in a timely manner. Results of this process will be publicly disclosed. The Bridgestone grievance mechanism will align with the United Nations Guiding Principles on Business and Human Rights criteria for effective and non-judicial grievance mechanisms: legitimacy, accessibility, predictability, equitability, transparency, rights-compatible, a source of continuous learning, and based on engagement and dialogue. Bridgestone's grievance mechanism serves as a guide to review, address, and monitor the outcome of any grievance from any external stakeholder concerning the Global Sustainable Procurement Policy across Bridgestone's global supply chain. To address non-compliances, Bridgestone will

support upstream engagement with natural rubber supply chain actors and collaborate in industry efforts aimed at addressing social and environmental issues in rubber supply chain

Bridgestone received one grievance on November 18, 2022, and is engaging with the grievance raiser to investigate the specific information required for the validation step described in the standard operating procedure (as of the middle of Mar.). As for the Grievance Mechanism for Natural Rubber supply chain, it can be accessed here:

[Grievance Mechanism | Social | Sustainability | Bridgestone Corporation](#)

10. Whistleblowing

As a corner stone to our Code of Conduct, Bridgestone adopted a Speak Up policy, encouraging our employees to report their concerns or misconduct they may have observed, including violations of law, Bridgestone’s code of conduct, policies and/or other company guidelines. Pursuant to this policy, Bridgestone has established BridgeLine, a web-based reporting system and phone hotline managed by third party specialists to allow reporters to confidentially and anonymously report such concerns and suspected misconduct or raise questions. BridgeLine is available 24/7 in all regions and in multiple languages. It can be accessed here: [Integrity Platform \(bridgestone-integrityline.org\)](https://bridgestone-integrityline.org).

During 2022 we received no reports of human trafficking or slavery through Bridgeline.

11. Continuous Improvement

Acting with the support of BSEU’s Supervisory Board, we are committed to making improvements as we evolve as a Mobility Solutions Provider and further our E8 Commitment. We remain committed to:

- A. To broadening our working committee that will see further collaboration amongst all of the UK entities within the Bridgestone Corporation that remain subject to the Act.
- B. Seeing opportunities to enhancing our due diligence and reporting levels such that the opportunity to identify risks is broadened.
- C. Improving awareness of staff and suppliers of the importance of whistleblowing and how to identify human trafficking and slavery.
- D. Further our cross functional collaboration between legal, procurement, Sustainability and HR to mitigate against slavery and human trafficking.

This Statement is approved by the Supervisory Board of Bridgestone Europe NV/SA

Thomas J. Higgins
Thomas J. Higgins (Jun 26, 2023 03:13 CDT)
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Chairman

DATE 26-Jun-2023
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