

BRIDGESTONE EUROPE NV/SA

MODERN SLAVERY STATEMENT: FINANCIAL YEAR 2023

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

Bridgestone 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 Commitment."*

The E8 Commitment advances 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 2023

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 and Africa ("BSEMEA") 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 sources 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 (ETB)** 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 in the UK, 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 subsidiary of BSEU) is subject to the Act. As a Bridgestone Corporation entity, Bridgestone Aircraft's statement remains very 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.

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

Bridgestone 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 Bridgestone policies to ensure a high standard of social, governance and ethical compliance. These include:

- **Global Human Rights Policy**

The Bridgestone 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:

[Human Rights, Labor Practices | Social | Sustainability | Bridgestone Corporation](#)

- **Bridgestone Code of Conduct**

Our Code of Conduct, which was updated in December 2022 to bring it in line with our E8 Commitment, expressly refers to our 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 is one of our key cultural foundations and therefore forms part of our mandatory online-learning for new employees. In 2023, we required all of our employees with a company account to undertake refresher eLearning on the Bridgestone Code of Conduct

At the end of 2023, the overall completion rate for Bridgestone entities in EMEA was 95%, including completion rates of 92% for Bridgestone UK branch, 100% for ETB, 94% for Bulldog Remoulds Limited and 96% for Webfleet UK branch.

The Bridgestone Code of Conduct can be accessed here:

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

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

Bridgestone regularly conducts human rights due diligence activities across its operations and supply chain. In partnership with third-party experts and in alignment with the UN Guiding Principles on Business and Human Rights, Bridgestone is significantly expanding and accelerating these due diligence efforts at its operational sites 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, Bridgestone 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 Responsibilities (BSR), in 2021. These evaluations incorporated external industry and geographic human-rights risk data, along with Bridgestone'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, we identified a number of 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, based on a combination of geographical, regulatory, industrial and operational factors, are the primary focus of the human rights due diligence process at our 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 primary attention areas at the prioritized locations. The second type of assessment was a Human Rights Risk Assessment Survey (HRRAS). This survey enabled Bridgestone to broadly assess potential risks and management processes across our operations for two highly impactful human rights risk domains: child labour and forced labour.

To achieve our human rights and labor practices mission, Bridgestone established the following goals and KPIs in 2022 and 2023:

- To conduct HRRAS for 80% of Bridgestone's operational sites by the end of 2022, and, based on the outcome of the assessments, implement mitigation plans for all identified risks by the end of 2023.

- To strengthen the human rights due diligence system and processes throughout its operations. We expect this commitment to result in improved evaluation scores by several external indices.

Bridgestone surpassed its 2022 goal by conducting HRRAS at 100% of its operational sites, with no material risks identified in this process as a result of actions taken to address the risks. At Bridgestone we have also developed an Implementation Guideline for the Global Human Rights Policy to ensure concrete actions are taken to further strengthen our human rights management system and ensure that the system is embedded in the day-to-day operations of our sites. This Guideline was distributed to 100% of Bridgestone's operational sites in 2023 and Bridgestone also assessed 107 group companies to verify the implementation status of the Guidelines in 2023. No critical risks were identified. Bridgestone aims to achieve full implementation of the Guideline at 100% of our group companies by the end of 2024.

- **Bridgestone Recruitment**

Bridgestone has robust recruitment standards, including checks of all prospective employees on their eligibility to work in the UK, to help 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 2018, revised in 2021 with final revisions made in January 2024) 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.
- 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; and
- to identify potential human rights impacts.

8. Due diligence processes in relation to supplier management

Bridgestone has a very large and complex supply chain.

BSEMEA 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, 95% of our BSEMEA suppliers in scope as being high risk have undertaken a sustainability assessment.

In addition to Ecovadis, BSEMEA 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.

9. Grievance procedure for natural rubber supply chain

Bridgestone believes it is fundamental to work with our trusted partners as a team throughout our value chain and co-create value towards society. Especially in the natural rubber industry, which tends to be exposed to the risks of deforestation and child & forced labour. The Grievance mechanism is an effective tool, which allows us to collect voices of stakeholders around our operations, help us to engage with our suppliers, and understand where our potential risks and opportunities are, to improve the sustainability practice across our value-chain. We have therefore set up a Grievance Mechanism for natural rubber supply chain in 2022, which covers human rights issues and environmental issues and guarantees confidentiality and anonymity of grievance raisers as needed. It is available and accessible to all internal and external stakeholders involved in the natural rubber supply chain and facilitates the resolution of issues through cooperation with direct suppliers and third parties in accordance with the Global Sustainable Procurement Policy. As necessary, Bridgestone coordinates with the Grievance Mechanism of the Global Platform for Sustainable Natural Rubber . To ensure transparency, Bridgestone is disclosing the standard operating procedure, grievance windows, and the status of each grievance report on the Group global website here: [Grievance Mechanism | Social | Sustainability | Bridgestone Corporation](#)

Bridgestone received a grievance against one of its suppliers in 2023. With the support of an International NGO, (Earthworm Foundation), Bridgestone engaged with the partner who was the subject of the grievance, to confirm the current status, the result of the investigation by the third party, and the action plan for improvement. Based on the dialogue, Bridgestone published the grievance list on its website in June 2023, and have been updating quarterly.

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: <https://www.bridgestone.com/responsibilities/governance/compliance/bridgeline/>

During 2023 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.

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


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