

## GERMANY

This country-specific appendix is an integral part of Bridgestone's Speak Up Policy and describes the local procedures under national law for the reporting of Local Concerns in Germany. The Speak Up Policy (including the protection from Retaliation) applies in full to the reporting under local procedures. In case of discrepancy, the rules set forth below shall prevail. Any capitalized terms not specifically defined in this sheet refer to the definitions in the Policy.

In addition to the definition provided in Appendix 2 to the Speak Up Policy, the term "Local Concerns" under German law includes **(i)** breaches of any criminal provision under German law, **(ii)** any violations of legislation that protects life, limb or health or protect the rights of employees or their representative bodies (e.g., legislation on occupational health and safety, health protection, minimum wage act, employee leasing act or legislation containing obligations to provide information to organs such as works councils, economic committees, etc) and that are subject to a fine and **(iii)** violations of national legislation implementing European legislation (e.g., legislation on money laundering, product safety, transport of dangerous goods, environmental protection, radiation protection, food and feed safety, quality and safety standards for pharmaceuticals and medical devices, consumer protection, data protection, security of information technology, public procurement law, and accounting regulations for corporations).

### 1. Internal Reporting

Pursuant to applicable laws, Bridgestone has set up a local reporting channel in the following German legal entities:

- Bridgestone Europe NV/SA, Niederlassung Deutschland
- REIFF Süddeutschland Reifen and KFZ-Technik GmbH
- Webfleet Solutions Development Germany GmbH

Reporters can submit their Local Concerns using the local reporting channel on the BridgeLine (bridgestone-integrityline.org), **in writing or orally** (via the BridgeLine's phone messaging system). The Reporter can request, in writing or orally through the BridgeLine, a meeting with the Speak Up Officer within 7 calendar days of the submission of the request. Local Concerns that are reported orally directly through BridgeLine's phone messaging system shall be documented through the recording of the message in a secure, durable and accessible format. Local Concerns that are reported orally during a meeting with the local Speak Up Officer shall instead be documented, with the consent of the Reporter, through a transcript. The Reporter shall have the opportunity to request amendments, if necessary.

Reports can be made **anonymously**. Both identified and anonymous Reporters (identifiable or identified at a later stage) shall be fully protected from Retaliation under applicable laws and Bridgestone policies.

The Speak Up Officer shall, within 7 calendar days as from the receipt of the Local Concern, (i) confirm receipt and (ii) provide to the Reporter, in a clear and accessible manner, information about the admissibility of the report and the procedure that will be followed.

Following the investigation, and within a reasonable period that shall not exceed 3 months from the date of confirmation that the Local Concern was received, the appointed Investigator shall provide to the Reporter (i) information on the outcome of the investigation (i.e., whether the Local Concern was found to be substantiated) and, to the extent applicable, (ii) an overview of the corrective actions defined, and the grounds for such actions.

A register of the Local Concerns received is maintained in the BridgeLine. Further requirements regarding the register and the data included in it may be defined by applicable laws in the future. This register (including the contents of the Concerns and investigation) shall be kept for at least five years from the receipt of the Local Concern and, regardless of such period, during any pending judicial or administrative proceedings relating to the reports. The details of the Local Concerns shall be destroyed if they are no longer necessary to meet the requirements of applicable laws.

### 2. External reporting

Reporters are always encouraged to report their Concerns internally first. Bridgestone is committed to address any reported Concerns and believes this can be done more effectively internally. However, if you feel that **(i)** internal measures are insufficient or **(ii)** if you fear retaliation, external reporting remains possible. In these cases, if you decide to report externally, you will be protected from Retaliation.

The German laws identify the following competent authorities to investigate external reports:

- **Bundesamt für Justiz** (criminal offenses, administrative offences of provisions which serve to protect life, limb or health or to protect the rights of employees or their representative bodies, product safety & compliance, road safety, environmental protection, radiation protection and nuclear safety, food and feed safety, animal health and welfare, public health, consumer protection, privacy, personal data and security of network and information systems, public procurement, tax law of corporations and commercial partnerships, protection of the European Union's financial interests, state aid and other internal market rules);
- **Bundesanstalt für Finanzdienstleistungsaufsicht** (banks, financial service providers, payment and e-money institutions, private insurance companies and pension funds);
- **Bundeskartellamt** (violations of German and European competition laws, infringement of enforceable orders and conditions imposed by the competition authorities, misconduct by large online platforms in digital markets).

Criminal reports can also be made to Public Prosecution Office or the criminal police bodies, and administrative offenses may also be reported to the competent administrative authorities or the police and supervisory authorities. Lastly, reporters can submit the Concerns to the external reporting channels of the competent federal states.

External Reports may be submitted in writing and/or verbally, also anonymously. Both identified and anonymous Reporters (identifiable or identified at a later stage) shall be fully protected from Retaliation under the applicable laws.