

SPAIN

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 Spain. 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 Spanish law includes any acts or omissions that may constitute a criminal offence or a serious or very serious administrative infringement, including those that involve financial loss for the Treasury and for the Social Security.

1. *Internal Reporting*

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

- Bridgestone Hispania Manufacturing
- First Stop Southwest S.A.U.
- Webfleet Solutions Spain S.L.
- Bridgestone Europe NV/SA, succursal en España

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 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 review the minutes and 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, unless this could jeopardize the confidentiality of the communication and within 7 calendar days 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.

The identity of the Reporter will be kept confidential and shall only be disclosed at the request of the judicial authority, the Public Prosecutor's Office or other relevant authority, requiring in any case that third parties be prevented from accessing it.

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 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. In cases of special complexity that require an extension of the term, the 3 months period could be extended for up to three (3) additional months.

The appointed Investigator will guarantee at all times the right of the affected persons to be informed of the actions or omissions attributed to them, and to be heard at any time. Such communication shall take place in the time and manner deemed appropriate to ensure the proper conduct of the investigation and with full respect for the presumption of innocence and the honour of the persons affected.

A register of the Local Concerns received is maintained in the BridgeLine. This register shall be kept confidential and shall only be made accessible in whole or in part at the justified request of a court, by means of an order within the framework

of a judicial proceeding. Further requirements regarding the register and the data included in it may be defined by applicable laws in the future. The personal data included in the register shall be kept only for as long as necessary and proportionate to meet the requirements of applicable laws. In particular, the data shall be kept for the time necessary to decide whether to initiate an investigation into the Local Concern: if it is proven that the information provided is not truthful, it shall be immediately deleted, unless such untruthfulness may constitute a criminal offense, in which case the information shall be kept for the time necessary to be used during the judicial proceedings. In any case, once three (3) months have elapsed since the receipt of the Local Concern without any investigation having been initiated, the information shall be deleted, unless the purpose of the storage is to leave evidence of the internal information system's operation. In this cases, the information may only be recorded anonymously. In any case, the retention period can never exceed ten years.

Moreover, on the terms of Spanish law, the local Speak Up Officer must immediately forward the information to the Public Prosecutor's Office when the reported facts may be indicative of a crime. If the facts affect the financial interests of the European Union, the information shall be forwarded to the European Public Prosecutor's Office. In these cases, the identity of the Reporter may be disclosed to the Public Prosecutor's Office within the framework of a criminal or disciplinary investigation.

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 **(i)** you feel that internal measures are insufficient or **(ii)** you have exhausted all internal procedures and the Local Concern was not addressed, external reporting remains possible.

The Spanish laws identify *Autoridad Independiente De Protección Del Informante, A.A.I.* and the respective regional authorities or bodies as the competent authorities to receive external reports. Some autonomous communities also identified authorities to deal with Concerns relating to fraudulent use or destination of public funds, illicit exploitation arising from actions involving conflicts of interest or the use of privileged information, or in general conduct contrary to integrity (i.e., [Anti-Fraud Office of Catalonia](#), [Valencian Anti-Fraud Agency](#), [Office for Preventing and Combating Corruption in the Balearic Islands](#), [Office of Good Practices and Anti-Corruption of Navarre](#), [Andalusian Office against Fraud and Corruption](#) and [Good Governance and Anti-Corruption Office of Asturias](#)). This list may be extended in the future.

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.