

BRIDGESTONE EMEA
SPEAK UP POLICY

*Est. reading time: 12 min
(policy) and 3 min (Q&A)*

POLICY AT A GLANCE

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1. PURPOSE

BRIDGESTONE'S COMMITMENT TO COMPLIANCE

Bridgestone is committed to ensuring compliance with applicable laws, regulations, and Company policies in each of the countries where we operate. We take our responsibilities seriously and count on our teammates and other stakeholders to uphold our culture of ethics & compliance. We must hold ourselves and our co-workers to the highest standards in our daily efforts to secure Bridgestone's global success.

WHY DO WE NEED THIS POLICY?

Open reporting is a key pillar of our commitment to ethics & compliance. It allows us to stop unwanted behaviour and prevent similar wrongdoing from occurring in the future, continuously improve our processes and systems, and clarify expectations and standards when they are not clear for our Employees or other stakeholders. In short, it makes us stronger as an organization.

If you have reason to believe that applicable laws, regulations, or Bridgestone policies have or are being breached, report it immediately. You should not try to deal with it alone. This Speak Up policy ("Policy") provides guidance on how to report concerns in good faith and outlines the process for internal investigations. It is binding for teammates involved in the receipt and investigation of Concerns.

2. SCOPE

This Policy applies to all Reporters who report a Concern to the Company in good faith, as described below. When the Reporter acts on behalf of another person, both the Reporter and the person they represent are protected under this Policy. Any agreement or contractual clause which limits or denies a Reporter the right to report a Concern as described below, is null.

3. KEY TAKE-AWAYS

WHY SHOULD I REPORT?

Bridgestone expects you to report Concerns. It is **SAFE** as we do not tolerate Retaliation. It is **TRUST-WORTHY**, investigations will be handled professionally and fairly. It is **BENEFICIAL** as it provides the Company with an opportunity to be better by helping alleviate a difficulty you or other teammates may be facing.

WHAT SHOULD I REPORT (AND WHAT NOT)?

We strongly encourage **good faith reporting of any Concerns**. **Do not** use these channels to **report personal grievances** (e.g., personal incompatibilities, unwelcome performance reviews), unless you have good reason to believe they constitute a breach of law or company policies. Do not report **information that you know is untrue or misleading**.

WHEN SHOULD I REPORT?

Report your Concern **as soon as you have reasonable suspicions** it has occurred, is occurring or is likely to occur. This will enable the Company to thoroughly investigate and mitigate the issue in accordance with this Policy.

HOW CAN I REPORT?

You can use the **BridgeLine**, our centralised, secure, internal reporting channel, available in all Bridgestone entities in EMEA. In the locations listed in Appendix 2, you can also use the BridgeLine to report locally.

WHAT HAPPENS NEXT?

Bridgestone takes every Concern seriously. When an allegation merits investigation, the Speak Up Officer will assign it to the **appropriate Investigator** for follow-up. The identity of the Reporter, as well as that of any persons mentioned in the report and of any witnesses, shall remain **confidential**, unless such person(s) expressly consents to the disclosure of their identity, or if the disclosure is required by applicable laws.

NO RETALIATION

Bridgestone does **not tolerate any form of Retaliation** against Reporters who raise a Concern in good faith. Reporters will be protected against Retaliation even if the investigation does not substantiate the Concern reported in good faith.

4. TERMS USED IN THIS POLICY

This Policy frequently uses terms that have specific meanings. Please carefully review these terms, as they will help you understand this Policy:

<i>Concern</i>	Any information (including reasonable suspicion) that applicable law, regulation, or Bridgestone policy has been, is being, or is likely to be breached by an Employee or by someone acting in the interest of Bridgestone, or that an existing practice or procedure of Bridgestone breaches applicable law, regulation, or Bridgestone policy. This definition also includes information on attempts of breach.
<i>Company or Bridgestone</i>	Bridgestone Europe NV/SA and any other legal entity or branch of the Bridgestone group located in the territory of EMEA (Europe, Middle East and Africa).
<i>Employee</i>	Anyone employed by Bridgestone, working full-time or part-time, under a permanent contract or on a temporary basis, including (paid or unpaid) interns, persons with self-employed status and volunteers. In this Policy, the term “Employee” includes persons belonging to an administrative, management, or supervisory body of Bridgestone.
<i>HQ E&C Team</i>	The West Ethics & Compliance team, who oversees the Ethics & Compliance program throughout Bridgestone West, including Bridgestone EMEA.
<i>Investigator</i>	The person who leads the investigation. The Investigator (i) determines whether the allegations merit investigation and defines any interim measures that may need to be taken immediately to safeguard the investigation, (ii) leads the investigation and documents its outcome and any necessary mitigation actions, and (iii) liaises with the Reporter.
<i>Reporter or you</i>	An Employee, shareholder, or person working under the supervision and direction of contractors, subcontractors, customers, and suppliers of Bridgestone. A person can be a Reporter even if their work-based relationship has ended or is yet to begin.
<i>Retaliation</i>	Any direct or indirect act or omission in the work context which causes (or may cause), as a result of good-faith reporting of a Concern, unjustified damage to (i) the Reporter, (ii) any person(s) who facilitate the reporting (including advisors or legal representatives), or (iii) anyone else connected to the Reporter (including any legal entities that the Reporter owns, works for or is otherwise connected with). Retaliation can take many forms and can occur both during and after an investigation. Examples of Retaliation include firing or demoting an employee, removing an employee from a project, and verbally or physically threatening an employee who has reported, threatened to report, or otherwise taken action to address conduct that is illegal or inconsistent with this Policy, Bridgestone’s Code of Conduct, or any policy in your location.
<i>Speak Up Officer</i>	The person who receives the Concern through the BridgeLine and – depending on the specifics of the Concern – takes on the role of Investigator or assigns it to a different Investigator.

5. PROCEDURE

CONSIDER DISCUSSING IT FIRST

Employees are strongly encouraged to discuss their suspicions directly and openly with their **line manager, local management, legal & compliance** or **HR**. This will allow these persons to provide their views, clarify the context, and advise the Employee on whether said suspicions constitute Concerns that should be reported. If that is the case, the line manager, local management, legal & compliance, or HR teammate shall: (i) ensure the confidentiality of the information they received, (ii) advise the Employee on how to report it in accordance with this Policy, and (iii) refrain from undertaking any independent investigation. If you feel uncomfortable discussing your Concern, you can report it directly as described below.

5.1. *What channels are available?*

CENTRAL REPORTING CHANNEL

The central reporting channel is available via the BridgeLine. The BridgeLine is the Company's web-based, mobile-friendly, internal reporting channel. It is accessible 24hr/day, 365days/year in several languages, at <https://bridgestone-integrityline.org>. Through the BridgeLine, you can report a Concern anonymously and will be able to communicate with the Speak Up Officer and Investigator(s), without revealing your identity. However, Bridgestone encourages Reporters to reveal their identity, to facilitate the effective gathering information for the investigation.

When you report through the central reporting channel, the HQ E&C Team acts as Speak Up Officer. The HQ E&C Team will assign the case to the appropriate Investigator, considering the location, subject matter expertise, availability, and the need to avoid potential conflicts of interest. Reporting via the central reporting channel allows the HQ E&C Team to maintain oversight of the issues that may arise in different locations, identify areas of improvement, and ensure that all Concerns are investigated timely.

LOCAL REPORTING CHANNEL

In the locations listed in Appendix 2, you can choose to use the BridgeLine to report to the HQ E&C team, or to report at the local level. If you choose to report locally, the Speak Up Officer will be someone from the entity to which you are reporting.

EXTERNAL REPORTING CHANNELS

We prefer to hear your Concerns directly, so we can investigate and address them timely and effectively. However, Reporters can also report their Concerns to the competent authorities, as permitted by law. Appendix 2 provides further information on external reporting channels in specific countries.

5.2. *What information should an internal report include?*

PROVIDE AS MUCH DETAIL AS POSSIBLE

When reporting a Concern, make sure the information you provide is as concrete as possible. It is helpful to provide: (i) a detailed description of the facts (who, what, when, how and where), (ii) an indication of the law, regulation or policy you believe

may have been breached, and (iii) any evidence you have to support your suspicion (e.g., copies of documents, names of witnesses, or electronic communications). You are not required to prove your Concern. However, general or vague allegations without specific information or supporting evidence may be difficult to investigate, especially if you report anonymously. In these cases, it is possible that the investigation will be discontinued. You should not gather supporting evidence in a way that is in itself illegal under local law, or reveal facts, information or documents covered by national security, medical confidentiality, or attorney-client privilege. You may only choose to do so if the information belongs to you (e.g., privileged communications with your lawyer, or your personal medical information).

5.3. How does Bridgestone process my report?

The Speak Up Officer will receive and carefully evaluate your Concern. Within seven (7) calendar days, the Speak Up Officer will acknowledge receipt of the Concern and, if the report does not include enough actionable information or evidence, ask you to complete it. Concerns that are irrelevant or lack actionable details will not be assigned or investigated. As soon as there is enough information to initiate an investigation, the Speak Up Officer will assign the case to an Investigator in the function that is competent to investigate. Typically, cases will be investigated by the following functions:

TRIAGE

Nature of Concern	Investigator (team)
Discrimination, Harassment	HR
Other serious labour and employment issues	
Environment, Health & Safety	
Conflicts of Interest, Fair Dealing	Legal & Compliance
Bribery, Corruption, Kickbacks	
Data Protection & IT Security	
Antitrust	
Export and Import Regulation Issues	
Fraud, Embezzlement, Misappropriation, Theft	Finance
Accounting Manipulation	
Tax Issues	

The Speak Up Officer may also investigate Concerns directly or assign the investigation to a different function than that illustrated above, where deemed appropriate. To ensure an effective investigation, the Investigator may request the support of other functions or persons (internal or external to Bridgestone).

5.4. What principles guide Bridgestone's internal investigations?

Three principles guide our internal investigations: (i) Timeliness & Effectiveness, (ii) Objectivity & Professionalism, and (iii) Confidentiality.

TIMELINESS & EFFECTIVENESS

Investigators shall strive to finalise investigations as soon as possible, to effectively stop ongoing wrongdoing or clear unsubstantiated suspicions against anyone who is wrongly accused, and to drive prompt remediation or improvement efforts. The Company aims to complete investigations within a maximum of 60 calendar days from receipt. To achieve this, it is critical that the Reporter responds to any requests the Investigator may have during the process. Bridgestone encourages Reporters to reveal their identity so Investigators may easily obtain clarifications or additional information from them. When a Reporter reports their Concern anonymously, they should frequently log-on to their secure inbox on the Bridgeline platform to check for any communications or updates from Investigators.

OBJECTIVITY & PROFESSIONALISM

Investigators shall conduct investigations fairly and objectively. Actions taken by Investigators must be reasonable and proportionate to maintain the integrity of the investigation. No information shall be obtained through unprofessional means. Investigators are required to recuse themselves from an investigation if they have a conflict of interest.

During an investigation, Bridgestone Employees who get involved (as witnesses or in any other capacity) must cooperate fully and honestly with the Investigator and keep strict confidentiality. Any Employee who fails to cooperate (e.g., by not providing complete and truthful information or intentionally providing misleading information) or discloses any information regarding the investigation without authorisation may be subject to disciplinary action.

CONFIDENTIALITY

Confidentiality is critical to prevent Retaliation, protect the reputation of anyone wrongly accused of wrongdoing, protect Bridgestone, and maintain the investigation's integrity (and that of any investigations conducted by authorities or regulators on the same facts). The Investigator shall ensure that the information obtained during the investigation is kept strictly confidential. This applies in particular to the identity and other personal data of any persons involved. Without prejudice to the principle of confidentiality, and in line with Bridgestone's commitment to ensure maximum oversight of serious compliance issues throughout the organization, the Speak Up Officer may share information on significant investigations with the relevant persons in the West Legal & Compliance team, and/or the Company's executive management, when necessary. The identity of the Reporter will not be disclosed without their consent.

When Concerns are reported through a local reporting channel, and upon consent from the Reporter, the Speak Up Officer will share the content of the Concern with

the HQ E&C Team. This allows Bridgestone to deal with the Concern effectively and ensure oversight of breaches throughout the organization, while maintaining confidentiality.

The principle of confidentiality is subject to any legal and regulatory disclosure and reporting requirements.

5.5. What may be the outcome?

Once the investigation is finalized, the Investigator will document the outcome and the Company will define any follow-up actions that may be required to counter identified risks or breaches, including additional training, process improvements or disciplinary actions (subject to applicable legal and HR requirements).

FEEDBACK TO REPORTER

The Investigator shall provide feedback to the Reporter regarding the outcome of the investigation without delay (and in any case within the maximum deadline set forth by law, if any), through the BridgeLine. If an investigation is particularly complex or is justifiably delayed and cannot be completed within the deadline, the Investigator will inform the Reporter as soon as possible. While feedback will be as transparent as possible, it may not contain details on specific findings or mitigation actions that need to remain confidential (e.g., for data protection or other legitimate grounds).

5.6. No retaliation

Bridgestone will not tolerate any form of **Retaliation**, even if the initial Concern is unsubstantiated. Bridgestone takes this commitment very seriously and will take immediate action if it confirms any Retaliation occurred.

Conversely, reporting Concerns that the Reporter knows to be **untrue or misleading is in itself a breach of the Code of Conduct**. In such situations, the Reporter may be subject to disciplinary action.

Moreover, this Policy does not excuse Employees from the consequences of their own misconduct. Employees who report a Concern may still be disciplined for misconduct they engaged in.

6. POLICY GOVERNANCE

EFFECTIVENESS, MONITORING AND REVIEW

This document is a revision of the prior Speak Up Policy which has been in force since January 1, 2018. This version shall be effective and substitute the prior version as of October 1, 2024.

The CFO, CHRO, and functional VPs of any other department in charge of internal investigations shall, with the support of the Directors of Legal & Compliance, monitor adherence to this Policy. The HQ E&C Team has overall responsibility for this Policy and shall review it every two (2) years and update it if needed.

TRAINING AND AWARENESS

The Plant Managers, Regional Managing Directors, and functional VPs of each department, with the support of the Heads of Legal & Compliance, shall ensure this Policy – as well as specific information on how to reach the internal reporting channels – is easily accessible to all Employees. The HQ E&C Team shall organize training on this Policy to all Bridgestone teammates who are Speak Up Officers or Investigators. The training may consist of e-learning courses or virtual or face-to-face sessions and will be carried out when the Employee takes on the relevant role and at least once every two years thereafter. This Policy is further published on the corporate website of Bridgestone.

CONSEQUENCES OF VIOLATION

Failure to comply with this Policy may cause harm to the Company and may lead to disciplinary actions against the Employee(s) who violated the Policy, up to termination of employment.

EXCEPTIONS

The requirements set forth in this Policy may not be deviated from.

ADAPTATIONS

In addition to the country-specific rules referred to in Appendix 2, in some countries additional mechanisms or processes for logging grievances may exist. In such event, this Policy may be adapted at local level, to the extent required, after prior consultation with the E&C Team.

DATA PROTECTION

Any personal data regarding (i) the Reporter, (ii) any persons mentioned in the reported Concern or investigation, and (iii) any other persons involved, shall be processed exclusively as needed to detect and address potential compliance violations and to ensure protection against Retaliation, as described in the [Privacy Notice](#).

APPENDIX 1: Questions and Answers

Q. The Policy encourages Reporters to reveal their identity to facilitate the investigation. Why is that?

A. As the person that allows a Concern to be brought to light, the Reporter is an important source of information. Not being able to contact the Reporter can result in significant information gaps. If you report anonymously, Investigators can try to contact you through the BridgeLine platform, but the advancement of the investigation depends on how diligent you are in going back and checking for requests: because you are not identified and your contact details are not known, it is not possible to send you notifications that there are requests for you on the platform. This is one of the main reasons why, statistically, Concerns which are reported anonymously are significantly less likely to be considered substantiated and why Bridgestone encourages Reporters to identify themselves. However, the choice ultimately is yours. If you decide to report anonymously, you can also choose to provide your name and contact details to the Investigator at a later time. Whether you report anonymously or not, all Concerns will be treated with the utmost confidentiality and you will be protected from Retaliation.

Q. I have strong reasons why I want to stay anonymous. Can the Company trace my report back to me if I use the BridgeLine?

A. No. All information reported or exchanged via the BridgeLine is encrypted before it is transmitted and stored. No IP addresses, MAC addresses, individual computer configurations, or any other information are captured or stored by the BridgeLine provider or otherwise made known to Bridgestone.

Q. I submitted a case via the BridgeLine anonymously. How will the Investigator be able to contact me and how will I be able to know the outcome of the investigation?

A. When you submit a Concern, you will receive an individual case number and will be requested to create a password to access the secured inbox created for you on the Platform. Please take **good note of these credentials**: you will need to enter them to access the inbox for your case on the BridgeLine and follow up on the Concern. If you reported anonymously, this is the only way the Investigator can contact you (and vice-versa), so it is essential for the investigation that you go back to the platform regularly and check for any updates or questions from the Investigator.

Q. What if I forget my access credentials? How can I retrieve my access to the secured inbox via the BridgeLine?

A. We cannot retrieve a Reporter's access credentials. If you lost or forgot your credentials, it is no longer possible for you to access the secure inbox related to the Concern you submitted. You should submit a new report indicating that you have lost your login details and want to open a new (secure) communication channel.

Q. I don't have access to a company computer. Can I still use the BridgeLine?

A. Yes. The BridgeLine is not connected to Bridgestone's IT infrastructure. You can access it from any device connected to the internet, including smartphones.

Q. I used the BridgeLine because I don't want anybody locally involved in the investigation of my Concern. Is this possible?

A. If you use the BridgeLine, and unless you expressly select the option to report locally (in one of the locations listed in Annex 2), your case will be received by the HQ E&C Team. This team assigns the case to the appropriate Investigator, who will typically ask their local team to support the investigation, as it is more effective to investigate the facts closer to where they occurred. However, if you have strong reason to believe your Concern should not be investigated at local level (e.g., because there might be a conflict of interest), indicate this in your report. The HQ E&C Team will take it into consideration when assigning the case, to ensure the investigation is carried out without any conflicts.

Q. I want to raise a Concern about the HQ E&C Team. How should I do this?

A. You can raise it directly to Internal Audit or HR. Do not use the BridgeLine to report about the HQ E&C Team, unless you do not mind them knowing about it.

Q. A colleague shared information with me which I believe needs to be thoroughly investigated. Can I submit a case on behalf of my colleague?

A. Yes. Both you and your colleague will be protected against any Retaliation under this Policy.

Q. Are there any records of the Concerns raised?

A. All Concerns raised are recorded on the BridgeLine.

Q. I have a question about this Policy. Who can I contact?

A. You can reach out to your local Head of Legal & Compliance or to the HQ E&C Team via compliance@bridgestone.eu.

APPENDIX 2: Country-specific rules

The following countries have adopted specific laws on the protection of Reporters:

[Belgium](#)

[Italy](#)

[Hungary](#)

[France](#)

[Germany](#)

[Ireland](#)

[Poland](#)

[The Netherlands](#)

[Spain](#)

These laws protect Reporters from Retaliation when they raise “Local Concerns” following the local procedure and either use (i) the Company’s local reporting channel, or, in certain circumstances (ii) a national external reporting channel identified in the local law. “Local Concerns” means any breach (or suspected breach) in the following areas:

- i) Public procurement, for instance bribery or corruption during public procurement;
- ii) Financial services, products and markets, and prevention of money laundering and terrorist financing;
- iii) Product safety and compliance;
- iv) Transport safety;
- v) Protection of the environment (e.g., damage to the environment resulting from the release of toxic substances or environmental waste, and violations of applicable environmental laws or regulations);
- vi) Radiation protection and nuclear safety;
- vii) Food and feed safety, animal health and welfare;
- viii) Public health;
- ix) Consumer protection;
- x) Protection of privacy and personal data, and security of network and information systems;
- xi) Breaches affecting the financial interests of the EU or your country of residence; or
- xii) Breaches relating to the EU internal market, such as breaches of competition and state aid rules and corporate tax rules.

Some countries have extended the list of what constitutes a Local Concern for the purposes of protection under national law. You can access this information, along with the process for local internal reporting and identification of the external reporting channels by clicking on the relevant country name in the list above.

The country-specific rules are **in addition** to our EMEA-wide Policy. In case of discrepancies between the Policy and the country-specific rules, the country-specific rules shall prevail. Reporters in these countries **can chose to report their Concerns (including any Local Concerns) via the BridgeLine to either the HQ E&C Team or the local Speak Up Officer**. The terms of the **Policy (including protection from Retaliation) are fully applicable** regardless of whether the Reporter choses the central reporting channel or the local reporting channel of the BridgeLine.

Regardless of the channel used to report Concerns, when (i) they are reported in accordance with this Policy in any of the countries identified above, (ii) the Reporter has justified reasons for considering that reporting the Concern is necessary in order to disclose a violation of law and (iii) unless the action constitutes a criminal offence under locally applicable regulations, the Reporter shall not incur any liability, including civil or administrative liability, for acquiring or accessing information on Concerns, and shall not be liable for defamation, breach of copyright or legal or contractual obligations of professional secrecy or data protection rules, or for the disclosure of trade secrets.