



C O D E O F C O N D U C T

Yokohama TWS

Code of Conduct

Dear Colleague,

Yokohama TWS designs and manufactures tire and wheel solutions made for a more productive and sustainable future with the clear aim of supporting our customers in being more productive and efficient in their daily operations.

We pair the expertise and power of our global reach with the care and knowledge of local proximity, delivering innovation that supports the specific needs of our global customers. You, as part of our global team, take ownership to deliver on this promise every day, in alignment with our Code of Conduct.

The Yokohama TWS Code of Conduct forms an integral part of our Company corporate culture, permeating throughout our organization. It guides our actions in accordance with laws, regulations and internal policies, procedures, and guidelines.

Our Code of Conduct gives each of us greater clarity and security in everything we do by ensuring our core values can be seen in all our interactions whether they're with shareholders, co-workers, customers, or suppliers.

I invite you to always keep our Code of Conduct foremost in mind when managing your daily business and to always refer to our Legal and HR department for any doubts you may have when conducting your day-to-day activities.

Thank you for your strong commitment in supporting our mission, and for applying our TWS Code of Conduct in every situation you may meet.

Yokohama TWS Executive Team

HOW TO APPLY THE CODE OF CONDUCT

The Code of Conduct emphasizes and summarizes existing Yokohama TWS Policies and should be applied as a support tool laying down the basic rules and principles on which day-to-day work is based, and to help resolve issues we may face.

- Our Code of Conduct sets the framework of rules and the boundaries for our business decisions and behavior.
- Our Core Values describe the business mindset of Yokohama TWS and its People.

Our continued success will depend on how we all apply this behavior and mindset – **both conduct and values** – within our business environment.

Obviously, breaching applicable laws or the Code of Conduct can result in severe penalties for our Company, or any individual involved, and may have damaging effects for the reputation of the entire Company.



PLEASE KEEP THE FOLLOWING IN MIND:

Where do I find?

The current version of the Code of Conduct, as well as all our policies, manuals, and recommendations, can be found on our Yokohama TWS Portal.

Is it enough for me to know the Code of Conduct?

The Code of Conduct is a summary. You will find more information about each of its topics in the more detailed Yokohama TWS Policies, Recommendations, Guidelines and Principals.

What else is required of me?

Although you are not expected to know all the details of every legal requirement applicable to our business, you are indeed responsible for understanding requirements that are directly applicable to your position & role and employment.

When do I seek help?

You need to understand the business environment in which your part of the Yokohama TWS operates well enough to know when to seek internal advice or inform your immediate manager.

How do I get training?

It is the duty of Yokohama TWS managers to include Code of Conduct in employee training. Every new employee should be given the opportunity to read and discuss the Code of Conduct. Yokohama TWS regularly conducts training, in e-learning format as well as in classic classroom format and provides information to support and comply with the Code of Conduct.



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1. ETHICS & COMPLIANCE



ANTI-BRIBERY
AND CORRUPTION



COMPETITION



TRADE
COMPLIANCE



HUMAN
RIGHTS



DIVERSITY
AND INCLUSION



NON-DISCRIMINATION
AND HARASSMENT



CONFLICT
OF INTEREST



SUPPLIERS



DATA
PRIVACY



OPEN
COMMUNICATION



WHISTLEBLOWING

1.

ETHICS & COMPLIANCE

Our business activities and relations with customers, business partners and authorities are characterized by sound business ethics and respect for human rights.

We promise to abide by all the regulations related to our business. At Yokohama TWS we are committed to becoming a sustainability leader in our industry.

For all the matters referred above we promote awareness of and compliance by all people employed with respect to company policies through appropriate dissemination of these policies, including through training programs on continuous basis.



ANTI-BRIBERY AND CORRUPTION



ANTI-BRIBERY AND CORRUPTION

WHY?

Yokohama TWS truly believes in the concept of having a fair and transparent marketplace. Therefore, we have zero tolerance for the offering, solicitation, or acceptance of any form of bribes or other corrupt behaviors.

WHAT?

A bribe includes any type of payment, kickback, or gift regardless of value if it is made to gain a business advantage, it violates applicable laws or is contrary to customary business practice. It covers payments made indirectly, through a third party, or to a family member or friend. Gifts, entertainment, compensation, or personal favors may be offered to/received from a third party only if they are modest in value and consistent with applicable laws and customary business practice. The remuneration of agents shall be appropriate and for legitimate services only.

HOW?

We use continuous training and proactive information measures to prevent bribery and corruption, and we train and follow up our activities to combat bribery and corruption, as well as money-laundering and extortion in a transparent manner.



COMPETITION



COMPETITION

WHY?

We believe that fair competition is in the best interest of our Company, our customers and society as a whole.

WHAT?

Agreements or understandings with a competitor regarding prices (to fix, raise, stabilize, or lower prices, or to eliminate or reduce competition) or regarding allocation of customers (groups of customers, lines of business, products, or geographic areas) are unlawful. Even an informal, unwritten understanding about a common purpose might be illegal.

HOW?

We train and support our employees to ensure that they are knowledgeable about applicable competition law. Agreements that are particularly sensitive with regard to competition law must not be negotiated or entered into without the approval of Yokohama TWS Legal.



TRADE COMPLIANCE



TRADE COMPLIANCE

WHY?

Trade sanctions and embargoes are commercial and financial penalties imposed by countries or by different (EU, US, UN) Authorities. As a Company, we are involved in business in all parts of the world, and we respect and follow applicable sanctions and rules related to cross-border trade.

WHAT?

We must at all times comply with applicable trade compliance requirements, such as sales to countries affected by sanctions/ embargoes or other import and export laws and regulations.

HOW?

Anyone involved in any such type of business activity needs to adhere to our internal Export Trade Approval process. We work to ensure awareness of trade compliance requirements and also our by offering training sessions, by assessing exports to sanctioned countries and conducting checks on third parties and by continuous monitoring the overall situation.

For business opportunities in ongoing conflict zones, due diligence is required to avoid any association with infringements of human rights by either side.



HUMAN RIGHTS



HUMAN RIGHTS

WHY?

Human rights reflect the minimum standards necessary for people to live with dignity and give people the freedom to choose how they live and how they express themselves. In addition, human rights protect people against abuse by those who are more powerful. Therefore, Yokohama TWS respects internationally recognized human rights wherever we operate.

WHAT?

No children under the compulsory school age of 15 years (or higher in certain countries) are allowed to work, also indirectly, for Yokohama TWS, and no hazardous work is allowed for those under 18 years of age. Our suppliers and sub-contractors must adhere to these same standards. We do not tolerate illegal, forced, or bonded labor in our own operations, in the operations of our suppliers or any other parties with whom we cooperate.

HOW?

We continuously assess risks of human rights infringements, and act to prevent them within our supply chain. We acknowledge that forced labor and human trafficking is a growing issue to be addressed.



DIVERSITY AND INCLUSION



DIVERSITY AND INCLUSION

WHY?

For Yokohama TWS, diversity and inclusion is a strength as it benefits the organization and our business. Diversity is the collective mix of differences and similarities in perception and approach that enables diverse thinking to take place. Inclusion is the active process of inviting and valuing the unique characteristics and contributions of each employee.

WHAT?

Our aim is that all our employees feel involved and empowered – to help them achieve their full potential. The combination of inclusion and diverse thinking is one of the important factors that leads to excellent performance.

HOW?

We actively train our employees in diversity matters, including awareness and respect for cultural differences. We work to achieve a well-balanced mix in our company. Therefore, we strive to hire and develop local employees and managers, as well as to increase the percentage of female managers.



NON- DISCRIMINATION AND HARASSMENT



NON-DISCRIMINATION AND HARASSMENT

WHY?

We respect our People and their human rights.

WHAT?

Employment or assignment decisions must be based on individual merit and business needs, irrespective of gender, race, religion, age, disability, sexual orientation, nationality, political opinions, or social or ethnic origin. We define harassment – including sexual harassment – as all unwelcome conduct which reasonably makes a person feel offended, humiliated, or intimidated. Employees shall not harass or discriminate against any colleague or business partner for any reason.

HOW?

With the help of training, we actively work to promote non-discrimination and harassment. All complaints of harassment will be taken seriously and treated with respect and in confidence.

Any person found to have harassed another will face disciplinary action.

We refrain from discriminatory or disciplinary action or otherwise engaging in reprisals against workers who make bona fide reports to management or, as appropriate, to the competent public authorities, on practices that contravene the law, the Guidelines or the enterprise's policies.

For this reason, we implemented an effective Whistleblowing Systems at a worldwide level capable of guaranteeing the protection and confidentiality of reporting persons.



CONFLICT OF INTEREST



CONFLICT OF INTEREST

WHY?

Actual or potential conflicts of interest may corrupt the motivation or decision-making of an individual or organization.

WHAT?

Employees shall avoid all situations in which there is a potential conflict of interest, such as family financial interests in, or indebtedness to, enterprises that have significant business relations with Yokohama TWS, or family relationships with Government officials.

Employees should also avoid situations where business judgment could be affected by hospitality and entertainment, gifts, charitable contributions, political contributions, sponsorships, and close relationships with an entity that competes with or engages in business with the Yokohama TWS.

HOW?

At the managerial level, Yokohama TWS does not accept outside employment without specific approval from the head of the business function concerned, in accordance with the “Grandparent Principle” (i.e. an approval from the level above). With the help of training, we work to create awareness about conflicts of interest. As soon as you become aware of facts giving rise to a conflict of interest you must notify your manager. A failure to do this could be considered a breach of the Code of Conduct.



SUPPLIERS



SUPPLIERS

WHY?

We require our suppliers to adhere to the principles in our Code of Conduct.

WHAT?

We insist that suppliers follow legal, ethics as well as human rights requirements and that they work actively to reduce negative environmental and health impacts from processes, services, and products. We encourage suppliers to implement certifiable environmental management systems.

HOW?

We continuously assess our suppliers from a corporate responsibility perspective. If a supplier is found to be non-compliant, we demand corrective measures where we also provide support. Serious non-compliances will eventually lead to termination of the relationship.



DATA PRIVACY



DATA PRIVACY

WHY?

For the sake of integrity and in order to maintain and protect the fundamental rights and freedoms of individuals, we are at all times committed to respecting the privacy of any personal data which we process. As employees, we are all required to follow applicable rules and contractual commitments on confidentiality.

WHAT?

We are always careful regarding our critical information and information that may be confidential, including any information that could potentially affect our value. We will secure that any information related to an identified or identifiable natural person is handled in a compliant manner.

HOW?

When handling personal data or confidential information about the Yokohama TWS as part of your responsibilities, you must be aware of and comply with non-disclosure agreements, local regulations, and all applicable Yokohama TWS Policies.



OPEN COMMUNICATION



OPEN COMMUNICATION

WHY?

Our communication shall be based upon clarity and strong ethics.

WHAT?

Our corporate culture is characterized by open communication at all levels within the organization and between employee groups.

External communication is subject to certain disclosure restrictions given legislation, standards and agreements relating to the stock exchange, customers, other third parties and employment.

HOW?

With transparent communication, our employees become involved in the company's development. Knowledge of our values, business objectives and strategies is enhanced, thereby strengthening employee commitment.

Use of the common Yokohama TWS Portal to share information is encouraged.



WHISTLEBLOWING



WHISTLEBLOWING

Every employee should, without fear of retaliation from anyone, use the Yokohama TWS Whistleblowing System if there is reason to suspect that laws, regulations and/or our internal rules, such as our Code of Conduct, are being violated.

External third parties (such as suppliers, customers and other external stakeholders) that have business relationship or are involved with the Yokohama TWS Company, may as well report suspected violations using the Yokohama TWS Whistleblowing System.

The Yokohama TWS Whistleblowing system is available on Yokohama TWS Portal and on our website at: www.yokohama-tws.com/Whistleblowing.



1. ETHICS & COMPLIANCE



ANTI-BRIBERY
AND CORRUPTION



COMPETITION



TRADE
COMPLIANCE



HUMAN
RIGHTS



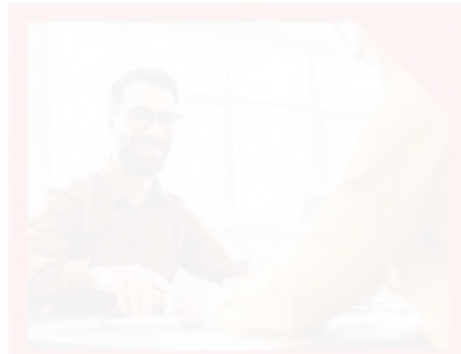
DIVERSITY
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WHISTLEBLOWING

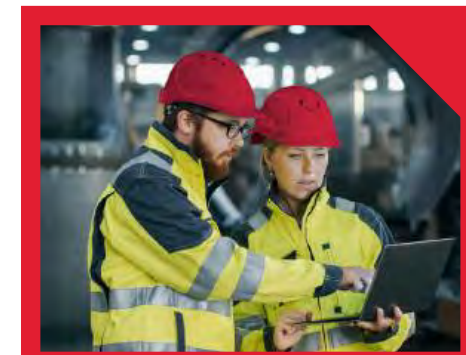
2. SUSTAINABILITY



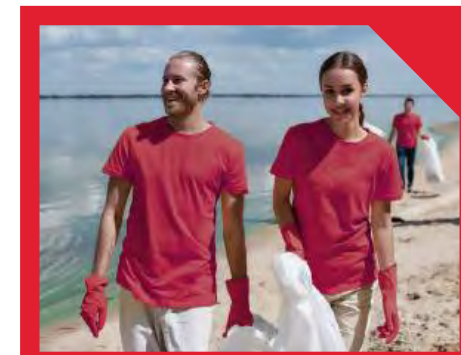
OUR
PLANET



OUR
PRODUCT



OUR
PEOPLE



OUR
COMMUNITIES

2.

SUSTAINABILITY

Yokohama TWS has long believed that fostering a Company-wide culture of sustainability focused on the planet, innovating smart products, supporting people and the communities in which we operate, is the right thing to do and is good for business.

Sustainability is a responsibility of all and every one of our employees. Through our sustainability initiatives, we collaborate with each other, as well as with our customers and suppliers, to drive positive change within our four key focus areas.



OUR PLANET



OUR PLANET

WHY?

Yokohama TWS really believes that the commitment to fulfill our share of the responsibility to minimize the impact of our global operations and supply chain structure on the environment is the right thing to do.

WHAT?

Our long-term commitment is to be a CO2 neutral Company by 2035.

HOW?

We transition our operational sites from traditional tire manufacturing facilities to sites using alternative energy, new technologies and green processes.

We set factual based targets to reduce carbon emissions and energy consumption, reduce the use of fossil fuel through efficiency improvements and the use of alternative and renewable sources of energy. We also manufacture our products with the aim to improve quality and sustainability by reducing total CO2 emissions, VOC utilization in operations, water consumption in all our operation sites and waste.



OUR PRODUCT



OUR PRODUCT

WHY?

For Yokohama TWS, ensuring continuous material and product innovation is more than important. We engage with our stakeholders, experts, customers, and employees to encourage the innovative development of our products and services to continually enhance their sustainability performance.

WHAT?

Our commitment is to develop a fully recyclable tire as our long-term goal.

HOW?

We inform our customers about the functional, environmental and safety performance of our products. We also develop through our expertise, innovation, and commitment to sustainability superior and more sustainable products that reduce their negative impact on the planet mainly by increasing percentage of bio- material content as well as increasing percentage of re-cycled materials content in the tires.



OUR PEOPLE



OUR PEOPLE

WHY?

As a Company, we comply with all applicable legal and regulatory requirements. Our primary focus is on the Health and Safety, and wellbeing of our people, ensuring that Yokohama TWS is a safe and healthy place to work.

WHAT?

Our goal is to reach and maintain zero “Lost Work Cases” globally.

HOW?

We are committed to eliminating workplace risks by continually monitoring performance, identifying, and mitigating risks, and implementing best practices. We are focused to achieve the lowest possible “Lost Work Cases” and the highest possible people engagement and performance”.



OUR COMMUNITIES



OUR COMMUNITIES

WHY?

Yokohama TWS believes in people coming together to make a positive contribution to the communities near our operations. The main target of our social engagement and volunteering program is to help where needed.

WHAT?

Our long-term goal is to encourage and enable all our employees to deliver at least one volunteering day per year.

HOW?

We help others, communities, and our planet to be a better place for ourselves, our children, and future generations. We truly believe that little things can make a big difference and therefore, we are primarily focused on our People First Volunteering Program and Social Engagement Activities.





WWW.YOKOHAMA-TWS.COM