

BUSINESS CONDUCT GUIDELINES

Introduction

The Bridgestone Way, our company philosophy is the base for our way to make business and shall be fully understood and respected by all employees of the Group, whatever is their position and wherever they work.

In line with our Management stances, Bridgestone Europe, its Group companies, their employees and representatives must comply with all applicable European, Belgian and foreign laws, which ever are applicable, and act with high standards of business integrity.

The below guidelines outline a non comprehensive list of business integrity principles. Its aim is to clarify what is expected from employees and representatives of BSEU Group in such matters.

More generally, if in doubt as to whether they are in compliance with BS Way business conduct principles, employees should ask themselves whether they would be proud/happy to report and explain their behaviour to the upper management, media, relatives or friends. BS HR Europe Department is also available for guidance.

MAIN PRINCIPLES OF BUSINESS INTEGRITY (non-exhaustive list)

Important: No BS manager or other BS employer has the authority to engage in, order or approve any violation of applicable laws and/or of business conduct principles.

Business gifts and entertainment

Employees may provide gifts and entertainment (such as occasional drinks and meals) in the course of business provided that they are modest and permissible under the applicable law and Bridgestone Europe's specific policies. They may never have a material effect on any business transaction. Employees must promptly report to their management any gifts given or entertainment performed by them by submitting the appropriate form (expense report), is proposed or received gifts which are not of nominal value, he/she shall bring back this gift to the company, and report the fact to his manager.

Competition law

It is the responsibility of the management to ensure that employees are fully acquainted with applicable competition laws, and in particular with the competition law manuals and Q&A available from Bridgestone Europe Legal department. Price-fixing among competitors is one of the most serious offences, with very severe penalties. If in doubt about whether a particular business practice complies with competition law, employees are to directly contact Bridgestone Europe Legal department.

Conflicts of interest

Conflicts of interest are situations such as an employee's spouse working for the competition, close family or personal relationships between fellow employees (in particular when one reports to the other), having a personal or financial interest in a customer's or supplier's business etc. A conflict of interest can be defined as a position in Bridgestone Europe or one of its related companies¹ presenting an opportunity for personal gain other than normal remuneration or for employees to give preference to their personal interests above those of Bridgestone Europe. Employees must disclose any (potential) conflict of interest to Bridgestone Europe HR department.

Bribery

Employees and Bridgestone Europe's representatives may not provide or accept any benefit of any kind for the purpose of obtaining or providing any improper business or other advantage.

Information handling

In this Code of Conduct, "Inside Information" is defined as information which is not publicly available and which, if disclosed to any third party, could prejudice the interests of Bridgestone Europe. It also includes trade secrets and any information of a confidential nature.

Within Bridgestone Europe and its related companies¹, employees may only provide access to Inside Information to those employees who need such information for the proper performance of their function.

Employees shall not use Inside Information for their own advantage (such as...) or for the advantage of a relative, friend or other third party.

Employees may not disclose Inside Information to any third parties without the prior approval of upper management. If in doubt, the employee must obtain such prior approval. Employees may not retain Inside Information without taking adequate precautions to protect the security of that Inside Information.

Insider trading

Employees aware of Inside Information (as defined above) shall not deal in shares (whether Bridgestone shares or shares in another company) or other financial instruments the value of which might be affected by access to or knowledge of Inside Information. Employees may not acquire nor dispose of these shares or financial instruments, nor even attempt to do so, directly or indirectly, for their own account, or for the account of any third party. Employees aware of Inside Information are also prohibited from encouraging any third party to engage in such activity.

Money laundering

Transforming illegally obtained money into apparently respectable money or assets in order to hide its origin is referred to as "Money Laundering".

Bridgestone Europe and its employees must:

1. refrain from any operation they know or suspect to involve the proceeds of any criminal activity;
2. refrain from being involved in any Money Laundering; and
3. take measures to minimise the risk that they inadvertently become involved in Money Laundering.

Sponsoring

In accordance with the Bridgestone Europe Group Authority Schedule, Bridgestone Europe may have recourse to sponsoring in order to support charitable organisations, sporting events, educational events etc. that may or may not have a direct link with the tyre business or in order to influence the debate on issues affecting Bridgestone Europe and/or its related companies¹. Any such sponsoring must be permissible under the applicable law, not for the personal benefit of any individual and not intended to achieve any improper business and shall be approved according to BS Authority Schedule.

Terrorist activities

Bridgestone Europe and its employees must ensure that they refrain from assisting, financing or otherwise being involved in any terrorist activity. They must also take measures to minimise the risk that they inadvertently get into terrorist activity.

In particular, Bridgestone Europe shall set up checks to avoid dealing with any terrorist entity that is listed as such by competent authorities.

Trade restrictions

Bridgestone Europe shall avoid supplying and purchasing products knowingly in contravention of any lawful trade embargo, export control or other applicable trade restriction.

Behaviour at work

Bridgestone Europe Group Employees and representatives, when being at work, must exercise respect, honesty, impartiality and care in carrying out their work and must not discredit Bridgestone Europe Group and related companies (1) in any manner. They are required to behave in a way which is in line with normal social practices, according to circumstances, whether they have to perform their duties inside Company premises, or outside.