



# **SUSTAINABILITY REPORT**

## **GOODYEAR NORGE AS 2024**

## About the Sustainability Report

This Sustainability report has been prepared for Goodyear Norge AS in order to comply with the newly implemented Transparency Act. The Transparency Act came into effect in July 2022 impacting large Norwegian entities as defined by Norwegian Accounting standard.

The intention of the Act is to promote enterprises' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services.

### Ownership structure and Business Model

Goodyear Norge AB sells tires for cars, trucks, and other work vehicles, as well as motorcycles, to dealers, car dealers and wholesalers, who in turn sell the products to their end customers. Examples of brands included in the product range are Goodyear, Dunlop, Fulda, Debica and Sava.

Goodyear Norge AS is a pure sales organization that sells tires in the Norwegian market. Manufacturing and inventory of the products sold is not carried out by Goodyear Norge AS, as this is managed by other companies in the Goodyear global group.

Goodyear Norge AS is a fully owned subsidiary of Goodyear Sverige AB, registered in Stockholm Sweden, and the ultimate parent company is The Goodyear Tire & Rubber Company. The Goodyear Tire & Rubber Company annually publishes a Corporate Responsibility Report covering the entire global group's operations. The global Corporate Responsibility Report for financial year 2023 is made in accordance with GRI and was published in June 2024 and can be found in its entirety via below link.

<https://corporate.goodyear.com/us/en/responsibility.html>

The 2024 report will be publicly available on the group's website in mid-2025.

In 2024, all of Goodyear Norge AS total tire purchases for resale on the Norwegian market were made from Goodyear Operations SA, a Goodyear entity registered in Luxembourg. Goodyear Operations SA purchases tires from various manufacturing Goodyear entities who in their turn purchase all raw and other materials needed to produce our products. The tires sold by Goodyear Norge AS in 2024 were mainly manufactured in the Goodyear group's factories in Poland and Germany.

Other suppliers of services within the Goodyear group are Goodyear Sverige AB, who Goodyear Norge AS procures headquarter services from including accounting, marketing, HR, IT, credit & collection, and supply management services. Goodyear Sverige AB is fully owned by the Goodyear company Goodyear Europe BV, registered in The Netherlands, with the ultimate parent company The Goodyear Tire & Rubber Company listed on the US stock exchange.

## **Human rights and working conditions**

Goodyear's global Human Rights Policy is part of our commitment to ethical and socially responsible business practices. Goodyear is committed to respecting and protecting fundamental human rights, in compliance with the laws and regulations of each country in which we operate and in line with internationally recognized human rights standards including the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the International Labor Organization's Declaration of Fundamental Principles and Rights at Work and related conventions.

We will comply with all applicable laws and regulations concerning human rights and labor standards. Where there is no law or regulation covering a human rights issue described below, or where conflicts exist between our policies and applicable laws or regulations, Goodyear will comply with applicable laws and regulations while seeking ways to honor internationally recognized human rights and the principles set forth in our policy.

This Global Human Rights Policy and our Business Conduct Manual applies across Goodyear's global operations including Goodyear Norge AS and all internal suppliers Goodyear Norge AS relies on in the supply chain. Goodyear also require our external suppliers to comply with similar standards through our Supplier Code of Conduct.

### ***Prohibition of Forced Labor***

Goodyear prohibits all forms of forced or compulsory labor, including prison labor, indentured labor (including debt bondage), slave labor, and human trafficking. Consistent with our commitment to freely chosen employment:

- Recruitment must be conducted in a manner that respects and protects internationally recognized human rights.
- No individual shall be required to pay recruitment fees or related costs to secure employment with Goodyear.
- Agreement to terms and conditions of employment must be voluntary and free from deception or coercion.
- Workers' freedom of movement must not be restricted through conditions of employment, the retention of identity or immigration documents, holding of deposits, or any other action aimed at restricting mobility.

### ***Prohibition of Child Labor***

Goodyear prohibits the use of child labor. We comply with applicable child labor laws, limiting employment to workers who meet the applicable minimum legal age requirement for their respective locations. In the absence of local law setting a higher age, we will not employ children under the age of 15. Where young workers above the Minimum Age but below the age of 18 are employed, they must not be permitted to perform work that is hazardous or that may otherwise jeopardize their physical or psychological well-being.

### ***Working Conditions***

Goodyear is committed to creating safe workplaces in which the human rights of all associates and contractors are respected. As described in the Business Conduct Manual:

- Workplace health and safety is a core value in every facility and for all Goodyear associates.
- We prohibit all forms of violence, threats, intimidation, and sexual or other harassment.
- We do not tolerate any acts of discrimination, based on race, color, ethnicity, religion, national origin, sex (including pregnancy), sexual orientation, gender identity, age, disability, veteran status, genetic information, ancestry, citizenship status, or other characteristics protected by applicable law.
- We respect our associates' personal privacy and comply with applicable data privacy laws.

- We also comply with applicable laws, regulations, and collective agreements (whichever provides greater protection) related to wages and hours worked.

Goodyear Norge AS comply with applicable laws and regulations in Norway. There is no collective bargaining agreement applied in the company, however local praxis conditions are offered such as an eight-hour working day and forty hours per week, excluding a daily break of 30 minutes, twenty-five vacation days earned per year, sick pay, occupational pension benefits etc. All employees employed by the Norwegian entity are working in sales, based from their home offices. Goodyear has a policy stating what ergonomic furniture and fixtures are allowed to purchase on the company's expense to avoid ergonomic injuries.

There have been no instances of workplace accidents or workplace related sick leaves during 2024.

#### *Freedom of Association*

Goodyear recognizes and respects the rights and freedom of workers to join and collectively bargain through organizations (such as unions) of their choosing or to refrain from joining such organizations. No associate will be subject to dismissal, discrimination, harassment, intimidation, or retaliation due to membership in a lawful workers' association or union or participation in the lawful activities of such organizations.

#### *Reporting Concerns and Remedy*

Any individual who has a grievance or concern regarding a potential violation of this Policy may contact Goodyear's confidential Integrity Hotline, which is available 24 hours a day, 7 days a week. Goodyear associates world-wide may also report concerns via the internal channels set forth in the Business Conduct Manual. Each report is reviewed by the Goodyear Compliance & Ethics Department to determine how the Company should best review the matter.

Norwegian employees are provided regular trainings in this policy and information is frequently shared on methods to be used to report any suspected violation without retribution.

Appropriate action will be taken where violations of this Policy are identified, which may include steps to remedy adverse impacts on individuals, discipline of associates, or other steps.

Goodyear strictly prohibits any threatened or actual retaliation against any person who, in good faith, reports concerns to Goodyear or participates in an investigation regarding a possible violation of this Policy.

#### **Supplier Due Diligence**

The management of Goodyear Norge AS assess the following suppliers to be the key suppliers to the entity:

##### **Internal suppliers**

- **Goodyear Operations SA, Luxembourg**

All tires sold on the Norwegian market are purchased as finished goods from this intra group company.

Goodyear Operations SA, as well as its internal suppliers, are forced to comply with the above-described Goodyear adopted policies and guidelines. All its external suppliers are forced to comply with our Supplier Code of Conduct, which needs to be reviewed and signed off by the potential vendor before they can be onboarded.

#### *Environmental impact from manufacturing and transport*

Goodyear Operations SA purchase tires from Goodyear entities mainly in Poland and Germany for supply to EMEA markets, including Goodyear Norge AS, hence Goodyear Norge AS has an indirect environmental impact through the production in the global group's factories of the products that Goodyear Norge AS sell.

This environmental impact mainly consists of energy use, greenhouse gas emissions, water use, waste and the use of solvents. The global group works continuously to minimize the environmental impact of manufacturing and to report this impact in the annual sustainability report for the Goodyear group. The majority of the global group's factories have environmental management systems that are ISO 14001 certified. The transport agreements that exist between suppliers and companies in the group state that the freight supplier within Norway must have the ISO 14001 and ISO 9001: 2000 quality standards.

#### *Social conditions in manufacturing*

One of the social issues that is most important regarding the manufacturing process in the Goodyear group's factories is personnel issues, including work environment, health and safety and diversity. The global group works continuously to enable a safe, inclusive, and attractive work environment. Several of the global group's factories also comply with the quality standard for the working environment OSHAS 18001. For the raw materials used in manufacturing in the global group's factories, a risk assessment is carried out annually with regards to materials and countries of origin in the supply chain. Due to the war in Ukraine, it can be highlighted that Goodyear does not have manufacturing operations in Russia, Ukraine, or Belarus. However, some of the raw materials used in the manufacturing are sourced from the affected area, these include carbon black, polyisoprene, butyl, PBD and rubber chemicals. The EMEA and Global Business continuity team is working to ensure continued supply of these raw materials - from other source of origins.

The choice of raw material suppliers is based on their ability to live up to the global group's code of conduct for suppliers, which includes areas such as working conditions, the environment and anti-corruption. This work also aims to minimize indirect risks of human rights violations in the supply chain as outlined in the Supplier Code of Conduct.

#### **- Goodyear Sverige AB, Sweden**

Functions supporting the Norwegian business such as accounting, HR, IT, customer service, credit and collection and supply management are managed by the Swedish Goodyear entity located in Stockholm, Sweden. Expenses are recharged from the Swedish entity to the Norwegian entity on a quarterly basis using Net Sales as allocation key.

Goodyear Sverige AB, as well as its internal suppliers, are forced to comply with above-described policies and guidelines. All its external suppliers are forced to comply with our Supplier Code of Conduct, which also needs to be reviewed and signed off by the potential vendor before they can be onboarded.

#### **External suppliers**

- All potential external vendors of Goodyear Norge AS need to go through a rigid validation process to be able to provide their services or goods. Amongst many things, the vendor needs to review and sign off on our Supplier Code of Conduct. If they will or cannot, Goodyear Norge AS will not be able to procure services or goods from this vendor.

This Goodyear Supplier Code of Conduct helps to ensure that Goodyear does business with suppliers that share Goodyear's commitment to ethical and sustainability standards and business practices. People and companies that supply goods and/or services to The Goodyear Tire & Rubber Company or any of its subsidiaries or affiliates, including Goodyear Norge AS, must comply with the principles set out in the Code. Generally, suppliers must operate in full compliance both with all applicable local laws and regulations at a minimum. Where local laws are less stringent than our policies, we expect our suppliers to apply the more stringent standards. Suppliers must also comply with all other Goodyear policies that apply to their operations, including, as applicable, Goodyear's Natural Rubber Procurement Policy and Goodyear's Sustainable Soybean Oil Procurement Policy.

Suppliers must comply with all applicable labor and human rights laws, regulations, and standards, including, but not limited to: Compliance with applicable child labor laws, limiting employment to workers who meet the applicable minimum legal age requirement for their respective locations. In the absence of local law setting a higher age, suppliers must not employ children under the age of 15, except in limited circumstances and subject to strict criteria in the Family Farm context. For this purpose, a Family Farm is a small-sized, family run farm characterized by family-focused motives such as favoring the stability of the farm household system, using mainly family labor for production, and using the produce as a means of family income. Criteria applied in the Family Farm context include that: (i) work does not interfere with compulsory schooling; (ii) work is appropriately supervised by a parent or guardian; (iii) work does not damage health or personal development, based on hours and conditions of work, the child's age, activities performed and hazards involved; and (iv) if asked, the minor freely reports their wish to help and learn at the Family Farm.

Compliance with applicable wage and hour labor laws, including those related to minimum wage, overtime, and legally mandated benefits. No unlawful discrimination or harassment in the workplace including on the basis of gender, nationality, race, or any other characteristic protected by law, and compliance with applicable laws concerning discrimination, hiring and employment practices.

No use of forced or involuntary labor, including, but not limited to, prison labor, indentured labor, slave labor, human trafficking, or other forms of compulsory labor. Suppliers must avoid the following practices: restricting worker movement, isolating workers, intimidating, or threatening workers, allowing abusive working, and living conditions, retaining identity documents, withholding wages, allowing excessive or involuntary over time and charging recruitment fees (either directly, or indirectly through business partner activities).

Recognition of and respect for the freedom of association of workers to join organizations of their choosing or to likewise refrain from joining such organizations. This includes the rights of workers to collectively bargain through representatives of their choosing where a union has been established/chosen in accordance with applicable local law.

Health and Safety Suppliers must provide a safe and healthy work environment. This includes identifying, evaluating, and controlling worker exposure to safety and health hazards, providing personal protective equipment, conducting mandatory training on hazards and emergency procedures in a language workers can understand and anticipating and planning for emergencies, for example by conducting fire and other emergency evacuation drills.

Environment Suppliers must comply with applicable environmental laws in the jurisdictions in which they operate. Suppliers are expected to: (i) identify, and minimize or eliminate, the use, in their manufacturing processes and products, of substances restricted under applicable laws and regulations, including hazardous or toxic substances, and ensure full regulatory compliance, including proper management, storage and disposal; (ii) be aware of any use of reportable substances in their manufacturing processes and products, and actively investigate suitable substitutes; and (iii) obtain all necessary environmental permits or similar consents, and comply with all conditions. Suppliers must also consider the impact their operations have on the environment and reduce that impact where practicable to protect the environment, such as by:

- Tracking and documenting energy use and greenhouse gas emissions at a facility and/or corporate level, implementing a comprehensive energy reduction strategy and management program and increasing use of renewable energy. Suppliers are encouraged to look for cost effective ways to minimize energy consumption and greenhouse gas emissions.
- Effectively reducing, reusing and recycling water with responsible treatment of wastewater discharges to protect the environment and improve overall water quality. Suppliers are encouraged to implement water risk assessments, establish a baseline and set goals and initiatives and conservation projects for water reduction.
- Routinely monitoring, controlling, minimizing, and to the extent feasible eliminating, emissions contributing to local air pollution and waste sent to landfills.

- Encouraging and supporting the use of sustainable, renewable natural resources while reducing waste and increasing reuse and recycling. Suppliers are encouraged to set targets for waste reduction and establish a waste management hierarchy.

Conflict Minerals Suppliers must source minerals, derivatives of minerals and other raw materials in compliance with applicable laws and regulations and in a manner that respects human rights. Suppliers must avoid directly or indirectly financing or benefiting armed groups in the Democratic Republic of Congo (DRC) and/or its adjoining countries. Suppliers are required, from time to time, (i) to certify that all materials and products supplied to Goodyear do not contain tantalum, tin, tungsten, gold or cobalt or (ii) if they do contain those elements, to cooperate with Goodyear to conduct appropriate due diligence, including determining the country of origin and the source (including the applicable smelter) and chain of custody of those elements.

In addition to compliance with applicable laws, Goodyear expects its suppliers at all times to adhere to high standards of integrity, and to conduct themselves in a manner that will help protect Goodyear's good name in the marketplace. These requirements include, but are not limited to, the following: Gifts, Gratuities and Entertainment No gifts, gratuities, other personal inducements ("gifts"), or entertainment, may be provided to any Goodyear associate unless expressly permitted by this Section and in accordance with Goodyear's Business Conduct Manual. Suppliers should be aware that:

- Gifts, gratuities, entertainment, or other personal inducements are unnecessary in the context of obtaining or retaining Goodyear's business.
- Excessive gifts, gratuities, entertainment, or other personal inducements are contrary to good business practices, are detrimental to the interests of our shareholders, customers and associates and violate both Goodyear policy and the Supplier Code of Conduct. In general, suppliers should refrain from providing gifts to Goodyear associates. Gifts of cash or cash equivalents, such as gift cards or gift certificates, are absolutely prohibited. A gift of nominal value (less than \$100 USD or its equivalent) is not prohibited, as long as it (i) is customary and would not appear extravagant, improper or inappropriate to the recipient or an objective observer, (ii) is not linked to any business decision by Goodyear and imposes no sense of obligation on the giver or recipient, (iii) does not result in any special or favored treatment between the giver and recipient, (iv) complies with any additional specific limits established by Goodyear, (v) does not otherwise violate the internal policy of the giver or recipient and (vi) is otherwise in accordance with the Goodyear Business Conduct Manual. Entertainment, such as meals and, if infrequent, events, that are business-related and occur under appropriate circumstances for the conduct of business may also be permitted, provided they comply with the requirements listed above and, in addition, are attended by supplier and held at a venue appropriate for business discussions.

Anti-Corruption/Anti-Bribery Suppliers must comply with all applicable laws regarding bribery and corruption, including, but not limited to, the U.S. Foreign Corrupt Practices Act and UK Bribery Act, and Goodyear's Anti-Bribery Policy. Suppliers must never offer or pay any money or anything of value to a government official or any other person for the purpose of obtaining or retaining business, gaining favorable treatment, or for any other improper purpose. This includes a prohibition on facilitating or "grease" payments intended to expedite or secure performance of a routine governmental action. Suppliers must maintain a written accounting of all payments (including any gifts, meals, entertainment, or anything else of value) made in connection with work done for Goodyear and must provide a copy of this accounting to Goodyear upon request.

Competition Laws Suppliers must conduct their business in accordance with all applicable competition and antitrust laws. Conflicts of Interest Goodyear associates are required to act in the best interest of Goodyear.

Accordingly, suppliers must avoid any relationship with a Goodyear associate that might conflict, or appear to conflict, with the associate's obligation to act in the best interest of Goodyear. For example, suppliers must not employ or otherwise retain Goodyear associates, and must ensure that any gifts and entertainment provided to Goodyear associates comply with Goodyear's requirements. If a supplier employee or contractor is a family relation (spouse/partner, parent, sibling, child, grandchild) or shares a household with a Goodyear associate, the supplier must disclose this fact to Goodyear. Reporting and protection against retaliation Suppliers must provide a complaint reporting mechanism, including for anonymous reporting, for supplier workers to report workplace grievances or

other compliance concerns, in accordance with local laws and regulations. Suppliers must maintain reporter confidentiality and prohibit retaliation against workers who report matters in good faith.

Privacy and data protection suppliers must maintain the confidentiality of information entrusted to them by Goodyear. Suppliers must comply with applicable privacy and information security laws and Goodyear policies and must implement appropriate measures to protect confidential information and personal data against loss and unauthorized access or use. Goodyear may, from time to time, request information or access for purposes of verifying suppliers' compliance with this Code. In the event Goodyear provides such a request and is not reasonably satisfied with a supplier's response, Goodyear may decline to make further purchases under any agreement between Goodyear and the supplier, terminate any such agreements and/or terminate its business relationship with the supplier, in addition to exercising any other available remedies.

All Goodyear suppliers must ensure that any person who performs services for them or on their behalf in any capacity, including employees, agents and representatives, complies with this Code. This Code also applies to each supplier's subcontractors and sub suppliers for work that is directly related to Goodyear, and each supplier must ensure such subcontractors and sub suppliers comply with the provisions of this Code as if they were the supplier itself.

#### **Employee awareness**

For employees at Goodyear Norge AS to take ownership of issues in sustainable business, several trainings were conducted during 2024. Topics included Anti-Bribery, Modern Slavery and the Code of Conduct.



## Significant risks and remediations taken

Significant risks	Description of risk management	Outcome for the year
<b>Social conditions including personnel issues</b>		
<b>Diversity</b> Workplace discrimination based on gender, age, origin, belief, sexual orientation or other is illegal and deficiencies in this regard can result in deteriorating reputation, deteriorating workplace environment with reduced productivity as well as difficulty in recruiting and retaining staff	Goodyear Norge AS has zero tolerance for discrimination regardless of basis and strives for a culture that is characterized by equality and diversity. This is clearly expressed in the company's Code of Conduct and the global Group's zero tolerance policy in the area. During 2024, employees at Goodyear Norge AS underwent mandatory training with regards to the Code of Conduct and Cultivating a Respectful and Inclusive Workplace	As the company's training in the area is mandatory for all employees to complete, the goal for the participation rate in these is 100%, this goal has been achieved during the year.
<b>Work environment and health</b> Goodyear Norge AS had an average of 10 employees in the business, of which 10 are employed with roles as salesmen. Risks related to the work environment and health of the staff include the presence of stress and sedentary. Stressful situations in the business can partly be the result of Goodyear Norge AS being part of a global organization with staff and managers in several geographical areas, which means that parts of the communication take place remotely. Overtime occurs to a certain extent but is not considered to be extensive. If risks related to employees' work environment and health are not managed, they can, among other things, lead to sick leave and difficulty recruiting and retaining staff	Goodyear Norge AS and the HR department work actively to promote employee health in the workplace. An engagement survey is regularly conducted at a global level, last performed in EMEA in October 2024. The next one is planned for second half of 2025.	The results from the employee survey are compiled by the global group and presented to Goodyear Norge AS compiled for the entire EMEA and Nordic region. Goodyear Norge AS does not have access to the results for the Norwegian entity stand alone, but the results have been presented to, and discussed with all employees. Online training in Environment, Health & Safety (EHS): Accident and Incident reporting was conducted in 2024. There was no workplace or work-related accidents reported in 2024

Human rights		
Goodyear Norge AS follow the Global Goodyear Human Rights Policy.	Our Human Rights Policy encompasses zero tolerance against human rights violation and has been communicated to all employees. Goodyear Norge AS's employees receive annual training in the company's Code of Conduct and in the areas relating to Human rights to increase awareness and minimize the risk of non-compliance.	<p>Goodyear Norge AS has not had any confirmed incidents related to human rights violation in 2024</p> <p>As the company's training in the area is mandatory for all employees to undergo, the goal of the degree of participation in these is 100%. This goal was reached in 2024. In 2024, specific trainings undertaken were Preventing Global Modern Slavery and Human rights Leadership</p>

Oslo June 2025

Sturmius Wehner  
Chairman of the Board

Elise Fournier  
Member of the Board

Claes Hedström  
Member of the Board



