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BRIDGESTONE INDIA PRIVATE LIMITED

WHISTLE BLOWER POLICY

1. Introduction

- 1.1 Bridgestone Asia Pacific Pte. Ltd. and all its Affiliates which include Bridgestone India Private Limited (together referred as “**BSCAP**”) are committed to Ethics and Compliance. This commitment by BSCAP, its senior management, and its employees is to Do the Right Thing, including Speaking Up for Compliance.
- 1.2 Bridgestone India Private Limited (hereinafter referred as “**BSID**”) is committed to foster a culture of transparency and accountability and to create an environment where questions can be raised without fear of retaliation and where Employees feel comfortable to speak up, ask questions when unsure and report in good faith concerns about non-compliance or misconduct.

2. Scope of Application

- 2.1 BSID Whistle Blower Policy (the “**Policy**”) is the policy intended to set direction and expectations relating to the reporting of compliance violations or concerns about integrity and compliance.
- 2.2 BSID is committed to compliance with all applicable laws and regulations in every jurisdiction where it operates. Accordingly, this Policy shall be applied in compliance with and subject to the provisions of all applicable laws, rules and regulations, including but not limited to employment, labour and privacy laws. In any case where applicable local law contradicts with a provision of this Policy, the applicable law shall prevail and pre-empt this Policy.
- 2.3 This Policy applies to all reporting procedures such as reporting of incidents through your manager, your Human Resources department, BridgeLine, or person of trust.
- 2.4 BSID expects its Employees and Third Parties to maintain high standards, ensure compliance with applicable laws and regulations and to report any violations and or concerns about non-compliance and or integrity. This Policy applies to:
 - i. members of the board of directors and employees of BSID, including its contracted employees and expatriates seconded to the Company (“**Employees**”); and
 - ii. Third Parties to the extent they have been informed of the Policy. “**Third Parties**” means a person or entity who engages or had engaged in the business with the Company, including but not limited to customers, vendors, suppliers, distributors, consultants, and agencies.

Employees and Third Parties, individually or collectively, may be referred to as “**you**”.

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3. **Effective Date**

3.1 This Policy revises and replaces the existing Whistle Blower Policy no. BSID-WBP-01 and shall be effective from 17th October, 2018 (“Effective Date”).

4. **Means of reporting violations**

4.1 If you become aware of, or suspect, any unethical or unlawful conduct, non-compliance, violation, including law, Bridgestone Code of Conduct, Company policies and/or guidelines, that may lead to damage to the Company or its employees or any violations which may harm the interest of the Company, you are strongly encouraged to do the right thing and speak up. You can make a verbal or written report through any of the means set out below (the “**Report**”):

- i. inform your supervisor, or any member of management, as appropriate;
- ii. inform the in-house Legal Counsel or Human Resources (HR) Manager;
- iii. Report to the Chairman of the Company acting as Vigilance officer at:

Bridgestone India Pvt. Ltd.
Attn: Mr. Michihiro Suzuki, Chairman
Plot No. A43, Phase-II, MIDC Chakan, Village Sawardari,
Taluka Khed, Dist. Pune, Maharashtra – 410501, India
Email: wbcompliance@bridgestone.co.in

- iv. Report via BridgeLine as described in more detail in Section 6 below.

4.2 To facilitate consistency and efficiency in handling reports as well as tracking case management, in the event you receive a report through any of the channels in 4.1 (i) through (iv) above, you are strongly encouraged to enter such report in the BridgeLine platform.

5. **Protections for Reporting in Good Faith**

5.1 Confidentiality and Anonymity

- i. The identity of the **Reporter** (means a person who makes the Report), the **Reported Person** (means a person or entity who is the subject of the Report), as well as any other person mentioned in your Report or witnesses, will remain confidential, unless the relevant person has consented to disclose his/her identity or disclosure is necessary to allow the Company to comply with applicable law.
- ii. Where BSID decides to use the support of external investigators, we ensure that they have agreed to confidentiality prior to their involvement.
- iii. After submitting your Report through BridgeLine, you can choose to start a confidential dialogue with the recipient of your Report. This allows the recipient to ask you important questions to improve our investigation as necessary. BridgeLine permits anonymous reports to the extent allowed by applicable laws.
- iv. In certain cases, the Company is legally obliged to inform the Reported Person about the accusations that have been made against them in a Report. This will only take place once the Reported Person can no longer endanger the investigation. Of course, the Company will not

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disclose the identity of the Reporter (if known) in such a case unless required by law. The Company would like to assure you once again that all your personal details and, above all, your identity will be treated with the utmost confidentiality.

5.2 Non-Retaliation

- i. BSID does not tolerate harassment or victimization and will take appropriate action to protect the Reporter who raised concern in good faith.
- ii. No Reporter who, acting in good faith, reports a violation or concern within the scope of this Policy will be subjected to any adverse consequence, discrimination, retaliation, disciplinary action or harassment of any kind as a result of reporting such incident, regardless of whether the concern is substantiated or not.
- iii. Any misuse of this Policy is prohibited and Reports that are made frivolously, maliciously, for personal gain or where they are known by the Reporter to be untrue may result in disciplinary action. BSID will also consider its options to initiate other applicable proceedings.
- iv. If you believe you have been retaliated against, or if you witness retaliation against someone else, you should immediately report the situation using any of the channels listed in paragraph 4.1 above.

6. Reporting through BridgeLine

- 6.1 In addition to other Reporting channels listed in paragraph 4.1 above, BridgeLine is a secure reporting platform provided by BSCAP which provides you with a secure and, if desired, entirely anonymous reporting channel for submitting information on any alleged misconduct, non-compliance, a situation that you know or suspect to violate the law, Bridgestone's code of conduct, Company policies and/or guidelines that may lead to damages to the Company or its individuals or any violations which may harm the interest of the Company.
- 6.2 BSID shall take necessary and appropriate actions to ensure all users, including Employees and Third Parties, are trained on how and when to use BridgeLine.
- 6.3 You can access BridgeLine worldwide, 24 hours a day, seven days a week at <https://bridgestone-integrityline.org>. Reports can also be made by telephone (the contact numbers are displayed on the above website).
- 6.4 The categories in which Reports can be made via BridgeLine are as follows:
 - i. Antitrust Issues;
 - ii. Bribery, Corruption, Kickbacks;
 - iii. Data Protection and IT Security Issues;
 - iv. Discrimination, Harassment;
 - v. Other serious labor and employment issues;
 - vi. Fraud, Embezzlement, Misappropriation, Theft;
 - vii. Environment, Safety and Health;
 - viii. Export and Import Regulation Issues;
 - ix. Conflict of Interest, Fair Dealing;
 - x. Accounting Manipulation;

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- xi. Tax Issues; and
- xii. Other.

- 6.5 Once you have submitted your Report, it is possible to communicate with the recipient of your Report via a safe mailbox. However, for the most efficient handling of the case, we encourage you to disclose your identity on the system as this will mean that the investigation can be carried out in a more efficient manner. In any case, provide as many details as possible to help the investigators investigate your concern.
- 6.6 After receipt of your Report, we will follow up with you and keep you informed about the status of the review of your Report. We have procedures in place to carry out necessary verifications or investigations. All concerns raised under this Policy will be treated seriously.
- 6.7 BSCAP Privacy and Data Protection Notice applicable to BridgeLine is on Attachment 1.
- 6.8 BSCAP is committed to properly investigating all the Reports received through BridgeLine. BSCAP reserves the right not to fully investigate Reports that appear irrelevant or groundless from the outset.

7. **Investigations**

BSID is committed to properly investigating all the Reports. BSID reserves the right not to fully investigate Reports that appear irrelevant or groundless from the outset.

8. **Monitoring and Review**

The Chairman of BSID has overall responsibility of the operation of this Policy and review the effectiveness of this Policy on as needed basis.

9. **Modifications**

BSID may modify this Policy to maintain compliance with applicable laws and regulations or accommodate organizational changes.

10. **Further Queries**

For any questions in relation to this Policy contact:

The Chairman
 Bridgestone India Pvt. Ltd.
 Plot No. A43, Phase-II, MIDC Chakan, Village Sawardari,
 Taluka Khed, Dist. Pune, Maharashtra – 410501, India
 Email: wbcompliance@bridgestone.co.in

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Attachment 1 - BSCAP Privacy and Data Protection Notice

Data Protection Notice

This section explains how the Bridgestone Asia Pacific Pte. Ltd. (hereinafter referred to as “**BSAP**”) Compliance Organization and its reporting system for Bridgestone Group Companies protect your personal details and the content of your report. We assure you that we will treat the information you submit with the utmost confidentiality.

In this Data Protection Notice, the following terms have the meanings set out below:

“**BSCAP-SBU Group Companies**” means BSAP and BSCAP-SBU group companies (including their subsidiaries).

“**Bridgestone Diversified Business Group Companies**” means the Bridgestone group companies in China and Asia Pacific region except for BSCAP-SBU Group Companies.

“**Bridgestone Group Companies**” means BSCAP-SBU Group Companies and Bridgestone Diversified Business Group Companies.

Purpose of the reporting system

The BridgeLine reporting system (hereinafter referred to as “**Integrity Platform**”) provides you with a secure and, if desired legally permitted under local law, entirely anonymous reporting channel for submitting information about indications of compliance violations such as crimes, violations of legal requirements and/or of relevant Bridgestone Group Company’s guidelines and policies that may lead to damages to the Company or its employees. After submitting your report, you can choose to start a confidential dialogue with us; this dialogue can also be maintained if you may choose to remain anonymous. This allows us to ask you important questions to improve our investigation if necessary. You are welcome to disclose your name if you wish. Of course, we will treat your identity with the utmost confidentiality. We will never disclose your name or any other personal data unless disclosure is necessary to allow Bridgestone to comply with applicable law.

Where legally prohibited, anonymous reporting will be disabled.

We encourage every person to use the Integrity Platform to report violations of law, legal infringements or related suspicions that are concerning Bridgestone Group Companies and their employees. We guarantee that no reporter using the system with good intentions will be subjected to repercussions, provided that BSAP can influence this within legal means. This also applies if an investigation of a reasonable suspicion finds that no crime has been committed. The use of the Integrity Platform is completely voluntary: no employee of Bridgestone Group Companies is required to use it.

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Abuse of the system is not tolerated. If the Integrity Platform is willfully abused to submit false allegations, we will immediately consider options for initiating legal action. In general, please do not provide us with information if this is subject to legal prosecution in your country.

Controller representatives and security

BSAP is represented by the CEO:

Mr. Yoshikazu Shida
83 Clemenceau Avenue #08-01/ 08,
UE Square Singapore 239920

This system is operated by Integrity Line GmbH, located at Am Wasser 55, 8049 Zurich, Switzerland (hereinafter referred to as **Integrity Line**). Integrity Line acts as a contracted data processor on behalf of BSAP. For all data storage purposes, Integrity Line uses server systems of DataHub AG, Bahnhofplatz 1a, 8304 Wallisellen, Switzerland (hereinafter referred to as "**DataHub**"). These servers are located exclusively in Switzerland. They are protected from unauthorized access by various technical security measures. All confidential data are transmitted and stored with encryption. Only employees of the BSAP Compliance Organization and its designated personnel in Bridgestone Group Companies have access to these data. Neither Integrity Line, DataHub nor third parties can view the stored information.

All information that we or you (the **reporter**) exchange with the Integrity Platform is transmitted and stored encrypted. No IP addresses, MAC addresses, individual computer configurations, locations or any other information are captured or stored. With the exception of the manually entered information and time of submission, no information is collected. It cannot be ruled out that accessing the reporting system is captured by technology from our company intranet. We assure, however, that we do not analyze if and how the reporting system is used from our company intranet and we do not use any technological means to try and determine the identity of an anonymous reporter at a later date.

Processing and confidential handling of reports

The information submitted through the Integrity Platform are evaluated and verified for validity by the BSAP Compliance Organization. If this yields a reasonable suspicion of violations that are punishable under criminal law or will lead to potential damage to Bridgestone Group Company and its employees (incl. reputational loss), we will initiate the necessary measures for clarifying the situation. Within the scope of the investigation, we may have to forward the submitted information internally to the competent employees. Please note that we may be obliged to cooperate with law enforcement authorities and/or other specialist departments of relevant Bridgestone Group Company as well as external investigation specialists for the prosecution of an offence in order to put a stop to ongoing misconduct and initiate sanctions against the accused person; external specialists will be bound to confidentiality obligations with regards to the information provided.

Bridgestone Group Companies are obliged to prevent crimes and severe legal infringements committed by its employees. If any crimes or severe legal infringements have taken place, we must do our utmost to investigate these cases and ensure that no similar incidents occur in

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the future. BSAP, on behalf of Bridgestone Group Companies, therefore has a justified interest in collecting and processing personal data within the scope of the Integrity Platform.

Storage period

Your submitted personal data will only be stored for as long as the investigation of the situation and applicable legal regulations require. After that period, all personal data are either anonymised, i.e. all information that can be used to identify persons involved is removed, or deleted irreversibly.

Information towards accused person

In certain cases, we are legally obliged to inform the accused person about the accusations that have been made against them in a report. This will only take place once the accused person can no longer endanger the success of the investigation. Of course, we will not disclose the identity of the reporter (if known) in such a case. We would like to assure you once again that all your personal details and, above all, your identity will be treated with the utmost confidentiality.

Further information

You can always request insight in to the personal data we have stored about you. This right also applies to amendments to or deletion of your data. You can further request for your data to be processed to a limited extent only, oppose the use of your data entirely, or request that the stored data are provided to you in a digital format. You are further free to file a complaint with the competent regulatory authority.

If you have any further questions or suggestions, please contact:

For BSCAP-SBU Group Companies:

Sham Sabnani
 General Counsel, Legal & Compliance, Legal Department
 Bridgestone Asia Pacific Pte. Ltd.
bscap.compliance@bridgestone.com

For Bridgestone Diversified Business Group Companies:

Kazuki Furukawa
 General Counsel, Diversified Business (China, Asia Pacific Region) Legal Department
 Bridgestone Asia Pacific Pte. Ltd.
compliance.bsap-ro@bridgestone.com

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Revision History Form

Revised On	Article No.	Addition / Deletion / Amendment	Contents / remarks	Reviewed / Approved by
21 April 2014	4	Nomination of Vigilance officer	Nomination of Vigilance officer	Board of Directors
17 October 2018	Policy re-drafted	Policy re-drafted and change in Vigilance Officer	Policy re-drafted	Board of Directors