

# Compliance

## Basic Approach

The Yokohama Rubber Group Action Guidelines define the actions to be taken by members of the Yokohama Group not only to comply with laws and regulations but also to observe social norms.

In addition, to respond to expanding risks due to globalization, in July 2017 the Yokohama Rubber Group Competition Law Compliance Policy and Anti-Corruption Policy were established by approval of the Board of Directors. By declaring these policies in Japan and abroad, defining regulations and guidelines that embody them, and presenting these requirements to members of the Yokohama Group, we have put in place a system that prevents violations of competition law and corruption.

By combining the Global Whistle-Blowing System introduced from February 2018 with these initiatives and expanding them to our subsidiaries in each country and region, we aim to further raise the level of compliance in the Yokohama Group.

## Compliance System

Yokohama Rubber has established a Corporate Compliance Committee chaired by the director in charge of the CSR Div. and a Corporate Compliance Dept. as the department that handles implementation. The committee meets four times a year for ongoing implementation of various measures related to the Yokohama Group's compliance, and to report on its activities to the Board of Directors and the Audit & Supervisory Board. The Corporate Compliance Dept. also plans and promotes compliance training for Group members, distributes educational materials depending on the recipients and information required, and conducts group learning and training activities at workplaces.

In addition, by assigning a person from each division to be a concurrent member of the Corporate Compliance Dept., and Compliance Promotion Managers at affiliated subsidiaries, we have established a network connecting compliance-related complaints and consultations to

### ■ Compliance Workplace Training Themes (2021)

The Yokohama Group uses its own educational materials to conduct group training on compliance at each workplace monthly. In fiscal 2021, the following themes were covered.

- January Revisions to the whistleblowing regulations
- February Sexual harassment
- March Power harassment
- April Misappropriation of company assets
- May Human rights
- June The Antimonopoly Act
- July Reverse power harassment
- August Power harassment of affiliate companies and suppliers
- September Protection of personal information
- October Paid leave
- November Improper conduct regarding quality
- December Giving and receiving parting gifts, gifts of thanks, etc.

the Corporate Compliance Dept. The Yokohama Group's Corporate Philosophy and Code of Conduct have been disseminated to all Group companies, including those overseas, and serve as guidelines for the execution of duties by the directors and employees of each company.

## Whistle-Blowing System

In Japan, we have established two types of whistleblowing and consultation services, the Corporate Compliance Hotline and the General Counseling Room. Contact details (telephone numbers, email addresses) for these services are disseminated through Corporate Compliance Cards distributed among all members of the Yokohama Group to respond to the need for employees to make whistleblowing reports or seek consultation.

There are two Compliance Hotlines, one internal and one external. All reports are treated as anonymous in accordance with the Whistle-Blower Protection Act. The external Compliance Hotline is set up at a law firm to ensure independence.

The General Counseling Room has been set up as a service for anyone to consult over doubts regarding compliance, and as a general rule is not treated as anonymous. In fiscal 2021, the Compliance Hotline and General Counseling Room fielded 149 reports or consultations in total.

For overseas subsidiaries, a Global Whistle-Blowing System where the Compliance Dept. directly ascertains violations of competition law or bribery through the external Compliance Hotline has been set up. Coordinating with local law firms and companies that provide whistleblowing systems, phased introduction has been completed in China, the Philippines, Thailand, North America and Europe. Going forward, introduction will also be pursued for production sites in Vietnam and Indonesia.

### ■ Whistle-Blowing System

