

## Yokohama Rubber Group Competition Law Compliance Policy

### 1. Observance of this Policy

1.1 The Yokohama Rubber Co., Ltd. and the respective companies of the Yokohama Rubber Group (including domestic and overseas companies; hereinafter collectively referred to as the "Yokohama Rubber Group") hereby declare, and officially announce, to observe the "Yokohama Rubber Group Code of Conduct".

1.2 The Yokohama Rubber Group will familiarize its directors and employees (collectively, "Members") of the "Yokohama Rubber Group Code of Conduct" and this Policy, as well as encourage Members to observe the same through education and disciplinary programs, and manage and supervise Members on their observance of the same.

### 2. Prohibition of cartel and other acts of competitive restriction

2.1 Members shall understand that cartel and other acts that restrict competition ("Prohibited Acts") are harmful acts that obstruct efficient economic activities and are acts that will inflict brutal loss on the Yokohama Rubber Group, and shall refrain from engaging in such Prohibited Acts whether in Japan or other countries.

2.2 The Prohibited Acts include, but are not limited to, the following acts.

#### 2.2.1 Prohibition of cartel and information exchange with competitors

Members must not reach any agreement with competitors regarding price, bid rigging (adjustment of orders), production/sales volume, sales territory, or assignment of customers. Furthermore, Members must not exchange information on prices, or exchange information regarding other matters and secrets which are important in competing with competitors. Exchange of information is prohibited in any manner or form, including by way of written agreement, verbal agreement, or unspoken agreement.

#### 2.2.2 Restriction of resale price

Members must not restrict business partners from freely deciding their selling price such as by forcing business partners to sell the products of the Yokohama Rubber Group at designated prices, or imposing economic disadvantage on business partners that refuse to sell products at designated prices.

#### 2.2.3 Transactions with tie-in provisions

Members must not conduct transactions by imposing conditions that would unfairly restrict the business activities of business partners such as by unfairly restricting sales outside the designated territory, or designating the selling method and causing business partners to observe such selling method without due cause.

#### 2.2.4 Dumping

Members must not sell products and services at unjustifiably low prices that disregard profit.

### 3. Contact with competitors

3.1 As a general rule, Members shall not contact competitors irrespective of the country or territory where the competitor is located, and irrespective of the means or method including by way of meeting, interview, phone, fax or email.

3.2 If it is inevitable to hold a meeting with a competitor, Members to participate in the meeting shall obtain the prior approval of the approver regarding the holding of and participation in the meeting, and, after the meeting is held, report the agenda of the meeting and other necessary information to the approver. The approver will be prescribed in the "Yokohama Rubber Group Competition Law Compliance Rules" ("the Rules").

### 4. Membership in an industry group

4.1 No business division or subsidiary of the Yokohama Rubber Group shall become a member of an industry group, irrespective of the country or territory where the industry group is located, unless a prior approval is obtained by taking the procedures set out in the Rules.

5. Measures to be taken in the occurrence of Prohibited Acts

5.1 When a Member discovers or learns of the possibility that a Prohibited Act has been conducted, such Member shall use the Whistle-blowing System and notify the Whistle-blowing Hotline.

5.2 The Yokohama Rubber Group will impose strict disciplinary action against any violator of this Policy based on its Work Rules and other internal rules and regulations.