



Yokohama Europe GmbH Modern Slavery Act Statement 2025

Introduction

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps taken by Yokohama Europe GmbH (hereafter "the Company"), a European subsidiary of The Yokohama Rubber Co., Ltd., during the financial year ending 31 December 2025 to prevent modern slavery and human trafficking in its business operations and supply chains.

The Yokohama Rubber Co., Ltd. and its affiliated companies, including our company (hereinafter referred to as "The Yokohama Rubber Group"), recognize that respect for human rights is fundamental to all its business activities. We are committed to preventing acts of modern slavery and human trafficking within our business and supply chain and we do not tolerate any form of forced labor, child labor, or human trafficking.

Our Organization, Business, and Supply Chains

Organization and Business Overview

Yokohama Rubber Co., Ltd., headquartered in Kanagawa Prefecture, is one of the world's leading manufacturers of tires and rubber products. Our business comprises two main segments. The first is the "Tire Business", which develops, manufactures, and sells various tires and tubes for passenger cars, trucks and buses, light trucks, construction vehicles, industrial vehicles, and agricultural and forestry machinery, as well as aluminum wheels and automotive accessories. The other is the "MB (Multiple Business) Business", which provides a wide range of products including high-pressure and resin hoses, couplings, conveyor belts, fenders, marine hoses, and aerospace components (water tanks). Additionally, we engage in other businesses such as the manufacture and sale of golf equipment and IT services.

For the fiscal year ending 31 December 2025, consolidated sales reached 1 trillion 235 billion yen, with consolidated employees numbering 34,198 (the employee number as of 31 December 2024). Its business activities span the globe, including the Americas, Europe, and Asia. Operations in Europe form a vital part of this global network.

Yokohama Europe GmbH is a wholly-owned subsidiary of Yokohama Rubber and is responsible for European business and import, marketing, and distribution of YOKOHAMA tires in Europe. Yokohama Europe GmbH does not manufacture tires locally; all products are imported from Japan and other Yokohama global production sites and sold to customers and retailers throughout Europe.

Supply Chain Structure and Risks

The Yokohama Rubber Group's supply chain is global, diverse, and complex in structure. Taking the tire business as an example, we source key raw materials such as natural rubber, synthetic rubber, carbon black, various chemicals, and steel cord from suppliers worldwide, including Asia, Europe, and the Americas. These raw materials are supplied to production sites across the globe. Once processed into finished products, they are delivered to customers worldwide via our logistics network.

The Yokohama Rubber Group is particularly aware of the human rights risks within the natural rubber supply chain. We understand that natural rubber is largely produced by smallholder farmers, and that risks potentially linked to modern slavery, such as child labor and forced labor, exist within the working conditions on farms and throughout the distribution process involving dealers and processing factories.

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We promote responsible procurement activities, considering risks not only among our direct primary suppliers but also among secondary and subsequent tiers of suppliers.

Our Policy on the Prevention of Slavery and Human Trafficking

The Yokohama Rubber Group has established the following policies which form the foundation of our commitment to ensuring respect for human rights throughout our business activities, and preventing modern slavery and human trafficking.

Yokohama Rubber Group Action Guidelines

The Yokohama Rubber Group endorses the Ten Principles of the UN Global Compact across four areas (Human Rights, Labor, Environment, and Anti-Corruption) and has established the "Yokohama Rubber Group Action Guidelines" to ensure compliance. These Guidelines are a code of conduct to be observed by all officers and employees, and clearly state in section 1 the "Respect for Human Rights" ("We shall respect human rights inside and outside the company"). Furthermore, in section 2, "We shall create workplaces that are safe and healthy," our basic stance is defined: "We shall not tolerate child labor or compulsory labor at any of our member companies or suppliers." As actions to practice this basic stance, we state: "We shall be on guard against the supply of labor by children who have not yet reached the employable age prescribed in the laws and regulations of the host countries, not only at member companies of the Yokohama Rubber Group but also at our suppliers." and "In the realization that all labor must be supplied voluntarily and that all workers may freely quit their jobs, we shall be on guard against the compulsory or forced supply of any labor." All policies and initiatives in this statement are based on these Action Guidelines.

Reference URL: <https://www.y-yokohama.com/sustainability/outline/pdf/english.pdf>

Yokohama Rubber Group Human Rights Policy

Based on the UN Guiding Principles on Business and Human Rights and the Yokohama Rubber Group Action Guidelines mentioned above, this is our fundamental policy for respecting the human rights of all individuals involved in our business activities. This policy respects the human rights defined in international human rights instruments and the ILO's core labor standards, and explicitly prohibits all forms of modern slavery, including forced labor, human trafficking, and child labor. This policy applies to all officers and employees of the group, including Yokohama Europe GmbH. We also expect all business partners, including suppliers, to understand and support this policy.

Reference URL: https://www.y-yokohama.com/sustainability/people/human_rights/policy220428_en.pdf

CSR Procurement Guidelines

These guidelines outline the Yokohama Rubber Group's commitment to respecting human rights throughout its entire supply chain. They specifically request that suppliers respect human rights (including the prohibition of forced labor and child labor), ensure occupational health and safety, protect the environment, and strictly comply with regulations. Regarding respect for human rights, section 4 of these guidelines, "Our expectations for our business partners," states that suppliers are expected to understand and support the "Yokohama Rubber Group Human Rights Policy" and strive to realize their commitment to human rights in their business activities. Section 5, "Explanation of Important CSR Items," provides more specific explanations on "Prohibition of Child Labor" and "Prohibition of Forced Labor," requesting suppliers to take clear steps toward further improvement. We seek agreement to these guidelines when initiating new business relationships with suppliers and incorporate compliance requirements into contracts, thereby promoting the fulfilment of social responsibilities within the supply chain.

Reference URL: https://www.y-yokohama.com/global/sustainability/pdf/CSR_Procurement_Guidelines_202506.pdf

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Sustainable Natural Rubber Procurement Policy

As a founding member of the Global Platform for Sustainable Natural Rubber (GPSNR), the Yokohama Rubber Group actively participates in its activities. The Yokohama Rubber Group has established this policy specifically focused on natural rubber procurement within the supply chain, which aligns with the principles championed by GPSNR: "Respect for Human Rights", "Prevention of Deforestation", "Water Management", and "Enhancing Supply Chain Transparency and Traceability". This policy stipulates that the Yokohama Rubber Group is committed to respecting human rights throughout its supply chain and prohibits child labor and forced labor in compliance with laws and regulations. Based on this policy, we collaborate with all stakeholders, including the tire industry, automotive manufacturers, NGOs, and smallholder farmers, to reduce the risk of human rights violations and environmental destruction throughout the supply chain and aim to realize a sustainable natural rubber supply chain.

Reference URL: https://www.y-yokohama.com/global/sustainability/pdf/SNR2.1_English.pdf

Due Diligence and Risk Assessment

The Yokohama Rubber Group, based on the above Yokohama Rubber Group Human Rights Policy, has established a human rights due diligence framework to identify and assess adverse human rights impacts arising from its business activities, and is working to prevent and mitigate these impacts.

Risk Identification and Assessment

All new suppliers are required to complete a CSR questionnaire prior to commencing business. This questionnaire includes items concerning human rights, such as "Respect for Human Rights," "Prohibition of Child Labor," and "Prohibition of Forced Labor," serving as a screening tool during the supplier selection phase.

Furthermore, we assess the impact of our business activities on human rights and identify "material human rights themes" requiring particular attention. These include: "working conditions for foreign workers within Japan"; "working conditions for workers at natural rubber sourcing sites and impacts on neighboring communities"; and "working environments for employees at subcontractors (manufacturing, logistics, etc.)".

For identified "material human rights themes," we regularly conduct "Human Rights Impact Assessments" in collaboration with external specialist organizations to identify and evaluate the potential and actual negative impacts of our business activities on human rights. For "working conditions for workers at natural rubber sourcing sites and impacts on neighboring communities," which is considered a particularly high-risk area, we began "farm surveys" in 2019 to voluntarily inspect for issues such as illegal deforestation and human rights violations at natural rubber farms in Surat Thani province, Thailand—a major natural rubber producing region and the location of a Yokohama Rubber Group natural rubber processing company. As of December 2025, we have conducted over 1,000 surveys. In June 2024, with the cooperation of a third-party organization, we conducted an impact assessment, engaging in dialogue with a wide range of stakeholders, including rights-holders in the supply chain, such as farm owners, farm workers, raw rubber dealers, and transport drivers, as well as local village heads, school principals, and hospital directors.

Prevention and Mitigation of Risks, Tracking Effectiveness

For identified risks, specific prevention and mitigation measures are implemented. Continuous monitoring is conducted to verify the effectiveness of our initiatives. This includes progress tracking of corrective action plans, regular communication, and follow-up assessments. These activities are reported to senior management on a regular basis.

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Remediation and Grievance Mechanisms

As a mechanism enabling individuals affected by adverse human rights impacts to access effective remedies, we have established a compliance hotline accessible to all Group employees. Reports can be made anonymously, and the protection of whistleblowers is rigorously ensured.

In addition to our internal systems, the Yokohama Rubber Group is a full member of Japan Center for Engagement and Remedy on Business and Human Rights (JaCER). JaCER is a neutral platform operated collaboratively by companies, NPOs, and experts, enabling external stakeholders, including supply chain workers, to raise concerns regarding human rights issues related to the Yokohama Rubber Group's business activities. Participating in such an independent third-party body, rather than relying solely on internal reporting systems, demonstrates our accountability and sincere commitment to providing redress for those in vulnerable positions.

Training on Modern Slavery and Human Trafficking

Effectively preventing modern slavery risks requires all relevant employees to understand these risks and recognize their roles and responsibilities. The Yokohama Rubber Group promotes human rights awareness throughout the organization via multi-tiered training programs tailored to individual roles.

Employee Training

The Yokohama Rubber Group regularly conducts human rights training for all directors and employees. These sessions deepen understanding of the risks of modern slavery and human trafficking, and thoroughly communicate the importance of respecting human rights in our business activities. For procurement department personnel, the Yokohama Rubber Group also provides training specifically focused on human rights risks within the supply chain.

Supporting Supplier Capacity Development

The Yokohama Rubber Group is also focusing on collaboration with suppliers to raise the level of human rights respect throughout the entire supply chain. The Yokohama Rubber Group/ Yokohama Europe GmbH regularly holds explanatory meetings for suppliers, providing opportunities to directly explain our human rights policy, procurement guidelines, and expectations regarding respect for human rights. This is an important activity for building partnerships through dialogue, rather than simply imposing unilateral requirements.

Measuring Effectiveness

The Yokohama Rubber Group continuously evaluates and reviews the effectiveness of our initiatives through the human rights due diligence process. Using metrics such as supplier questionnaire response rates and progress on corrective actions for identified risks, the Yokohama Rubber Group/Yokohama Europe GmbH strives for improvement through the PDCA cycle.

Future Steps

The Yokohama Rubber Group will continue to prioritize dialogue with our stakeholders and contribute to realizing a society where human rights are respected throughout the entire supply chain. In the coming fiscal year, we will continue to conduct impact assessments on key human rights themes and follow-up surveys on previously conducted impact assessments.

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This will enable us to identify risks and monitor progress on corrective actions for identified risks.
We pledge to enhance transparency and further strengthen and expand our human rights due diligence efforts.

This statement has been approved by the Board of Directors of Yokohama Europe GmbH.

A handwritten signature in black ink, appearing to read 'P. Scalzo', written over a horizontal line.

Pierfrancesco Scalzo
CEO
Yokohama Europe GmbH
March 1st 2026

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