

CODE OF CONDUCT

PURPOSE & APPLICATION

Kal Tire is an organization driven by a culture of values. Seven guiding principles known as the 'Aims of the Kal Tire Team' guide every decision we make. The Kal Tire Code of Conduct sets out clear provisions for how Kal Tire conducts business worldwide.

The Code of Conduct applies to all divisions, team members, volunteers and key contractors.

CORE PROVISIONS

Health, Safety & Environment

At Kal Tire, our first priority is to work safely, in accordance with our Health and Safety Policy, and actively encourage the improvement of our team members' health. We are conscious of our potential environmental impacts and take measures to ensure we are environmentally responsible across all our operations.

Compliance with Laws & International Standards

Kal Tire will conduct business in compliance with the laws of all countries in which it operates and will adhere to international standards based on the <u>OECD Guidelines for Multinational Enterprises</u>. In cases where national laws contradict the OECD Guidelines, the Guidelines will apply.

Bribery, Conflicts of Interest & Fraud

Bribery

Intentional offer of monetary or other benefits (e.g. gifts) to or from a Kal Tire team member, contractor or volunteer from or to another person, government official, organization or company in order to secure or attempt to secure an advantage in conducting business is strictly prohibited. This includes facilitation payments, which are unofficial payments (usually in a small amount) to secure or expedite a routine action or service that is normally permitted. However, we do not expect anyone to compromise their safety or security. If a payment is required to ensure safety or security, it must be reported.

Conflicts of Interest

Any transaction where a team member will personally benefit, or their independence could be questioned, must be disclosed.

Fraud

Kal Tire will not tolerate the facilitation of tax evasion, false representation, intentional deception, embezzlement or other forms of fraud.

Labour

Equal Opportunity

Kal Tire believes in equitable treatment for all team members. We will not discriminate on the basis of race, ancestry, place of origin, ethnic origin, citizenship, religion, gender, sexual orientation, age, marital status, family status, disability or any other difference.

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Forced Labour & Fair Working Hours

Kal Tire does not engage in or support forced labour. Threats, intimidation, or harmful, physical punishment to force people to act involuntarily will not be tolerated. Working hours and conditions will comply with applicable laws and industry standards.

Child Labour

Basic minimum age for work must not be below the age for finishing compulsory schooling, which is generally 15. Hazardous work must not be conducted by people under the age of 18.

Substance Abuse

Substance abuse is not tolerated at Kal Tire. Illegal drugs and alcohol consumption are prohibited on Kal Tire worksites. Alcohol or drug screening may be requested if consumption during regular business operations is suspected.

Violence, Harassment and Weapons

Kal Tire does not tolerate violence, threatening behaviours, sexual harassment or intimidation. Compliance with all Kal Tire policies that seek to name or identify and prohibit such behaviours is mandatory. Possession of weapons is strictly prohibited.

Human Rights

Kal Tire is fully committed to upholding international human rights standards, as referenced in the United Nations Universal Declaration of Human Rights.

Protection of Company Assets & Information

Team members have a duty to protect physical and intellectual assets from theft, misuse, damage, loss and misappropriation.

Community, Political and Religious Contributions

Contributions on behalf of Kal Tire to political parties and religious organizations and officials are prohibited without authorization from senior leadership in the region.

RESPONSIBILITIES IN NON-COMPLIANCE

Team members are encouraged to report non-compliant behavior to the nearest supervisor, or if there is reason to believe that this will be ineffective, to the next appropriate senior manager or the <u>Kal Tire</u> <u>EthicsPoints Portal</u>.

All complaints will be taken seriously and investigated where appropriate. There will be no retaliation for good-faith reporting of code violation or participating in the Company's investigation of a complaint. It is the responsibility of each Kal Tire manager to follow up on any issue and where appropriate, report it to the next senior manager. In the case of non-compliance with Kal Tire's Code of Conduct, there will be prompt disciplinary consequences ranging up to and including termination of employment.

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