



## **Fighting Against Forced Labour and Child Labour in Supply Chains Act (YE2023)**

The Hercules Tire & Rubber Company, (“Hercules Tires”), (BN 124576836), is committed to high standards and best practices as a key to our success. This is a single report which covers the fiscal period January 1<sup>st</sup>, 2023, to December 31<sup>st</sup>, 2023. We embrace rigor and discipline with a unified belief in transparency and responsibility.

We take action to sustain our company in a way that aligns with our commitments. That includes environmental and social goals, along with our regulatory compliance, and ethical standards. Hercules Tires values a strong company culture that promotes clear expectations, ethical behavior, trust, and confidence with its associates and suppliers.

### **Our Company, activities, and supply chain**

Hercules Tire imports passenger, light truck, medium truck, and bus tires. Hercules Tires builds long-term relationships with its direct and indirect suppliers, within its supply chain. It has built relationships with suppliers worldwide that are ethical corporate citizens and follow responsible labor practices. Hercules Tires holds its suppliers to a very high ethical standard, including, practices regarding forced and child labor in compliance with applicable labor laws. In 2023, Hercules Tires was not aware of any violations of child labor or forced labor resulting in remediation at any level of our supply chain.

### **Policies and Governance**

Hercules’ Code of Ethics & Business Conduct applies to all associates, including employees and officers of Hercules Tires. Failure to comply with the Code of Conduct will result in corrective action up to and including termination of employment.

We also expect our suppliers and business partners to conduct business with or on behalf of Hercules Tires in a manner that is consistent with our Code of Conduct and our core values.

With a dedication to human rights, Hercules is committed to conducting business in a manner that respects the human rights and dignity of all people. We do not tolerate any conduct that contributes to, encourages, or facilitates human trafficking, child labor, forced labor, prison labor or compulsory labor, or any other action that may constitute a human rights abuse. In addition, we seek to ensure none of our business partners and suppliers use coerced or forced labor in any aspect of our business around the world.

### **Training**

Hercules Tires mandates all employees to annually complete online training that details policies with the focus on Code of Ethics and Business Conduct, which incorporates direct awareness of

forced labor and child labor. This training provides an acknowledgement of the employee upon completion.

### **Reporting and Non-Retaliation Policy**

Hercules Tires associates have a responsibility to speak up when something doesn't seem right. Hercules Tires firmly advocates an expectation to speak up and report conduct that its associates, in good faith, believe violates applicable laws, regulations, or company policies. Hercules Tires associates who speak up when they have an ethics or compliance concern are doing the right thing and acting in line with the value of Hercules Tires.

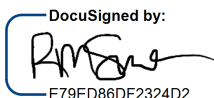
Hercules Tires has an Alert Line that is available 24 hours a day, seven days a week and administered and staffed by an independent, third-party company. Reports to the Alert Line may be made anonymously. All reports of suspected or actual violations of policies, or applicable laws or regulations are promptly investigated and treated confidentially to the extent possible and allowable by law. Where a violation is substantiated, Hercules Tires takes appropriate corrective action. All associates are expected to cooperate in any internal investigation of misconduct.

Associates and suppliers of Hercules Tires should never hesitate to raise a concern about matters related to a legal compliance issue or ethical business conduct. Hercules Tires strictly prohibits retaliation against any person who reports, in good faith, a suspected or actual violation to company policy or applicable laws or regulations. Hercules Tires also prohibits retaliation because of an individual's participation in a company investigation. Anyone who engages in retaliatory conduct will be subject to disciplinary action, up to and including termination of employment.

Hercules Tires is dedicated to ethical sourcing and maintaining the integrity of its supply chain and is an advocate for fair and globally recognized labor standards. We reaffirm our commitment to this cause, pledging to persistently strive towards upholding the dignity and rights of every worker within our supply chain.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Ms. Sinclair has the authority to bind The Hercules Tire & Rubber Company

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Rebecca Sinclair  
Chief People & Corporate Affairs Officer  
May 31, 2024