

## **Liberty Tire Recycling Code of Conduct**

### **A. Scope**

The Liberty Tire Recycling Code of Conduct is applicable to all employees, officers, and directors of Liberty Tire Recycling Holdco LLC and its controlled subsidiaries (the “Company” or “Liberty Tire”). This Code of Conduct is also applicable to all agents, contractors, consultants, and anyone we authorize to act on Liberty Tire's behalf and such third parties are expected to read, understand, and abide by this Code of Conduct in their performance of their duties on behalf of the Company.

### **B. Purpose**

Along with the Company's Vision and Value Statement, the Code of Conduct establishes the basic foundation of Liberty Tire's ethics by communicating our philosophy and commitment to all of our employees, customers, other stakeholders and the communities in which we do business.

This Code of Conduct will help guide your conduct in the course of our business. Many of the principles described are, however, general in nature, and the Code of Conduct does not cover every situation that may arise. Use common sense and good judgment in applying this Code of Conduct. If you have any questions about applying the Code of Conduct, it is your responsibility to seek guidance. This is not the exclusive source of guidance and information regarding the conduct of our business. You should consult applicable policies and procedures in specific areas as they apply.

Our Code of Conduct is designed to deter wrongdoing and to promote:

- Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- Full, fair, accurate, timely, and understandable disclosure in reports and documents we file with regulatory agencies and in our other public communications;
- Compliance with applicable laws, rules, and regulations;
- The prompt internal reporting of violations of this Code of Conduct; and
- Accountability for adherence to this Code of Conduct.

As members of Liberty Tire's team, we all have a personal responsibility to uphold and ensure the letter and spirit of our Code of Conduct in our individual roles, every single day.

### **C. Leadership Responsibilities**

Leaders, by virtue of their positions of authority, must be ethical role models for all employees. An important part of a leader's responsibility is to exemplify our corporate values and exhibit the highest standards of integrity. Leaders must communicate the seriousness of our company's expectations for ethical conduct and their own personal support of these expectations by holding everyone accountable for making sound ethical

**Question:** Suppose my boss asks me to do something that I think is wrong. What should I do?

**Answer:** Liberty Tire relies on you to use your best ethical judgment. Therefore, do not do anything that you believe may be wrong. A first course of action is to express your concerns directly to your supervisor. If you feel your supervisor has not adequately addressed your concerns or if you are uncomfortable raising the issue with your supervisor, you can take further steps to resolve this issue by speaking to his or her supervisor or to those listed below in “*Reporting Channels*.” The important thing is to not take any action that you know or believe to be against this Code of Conduct.

judgments. Leaders must be alert to any situations or actions that may be unethical or potentially damaging to the Company's reputation. They must take prompt action to address such situations and be careful to avoid even the appearance of implicit approval.

Employees who supervise others have an important responsibility to lead by example and maintain the highest standards of behavior. If

you supervise others, you should create an environment where employees understand their responsibilities and

feel comfortable raising issues and concerns without fear of retaliation. If an issue is raised, you must take prompt action to address the concerns and correct problems that arise.

You must also make sure that each employee under your supervision understands our Code of Conduct and the policies, laws and regulations that affect our workplace. Most importantly, you must ensure that employees understand that business performance is never more important than ethical business conduct.

## **D. Ethical Standards**

### *1. Avoiding Conflicts of Interest*

We have an obligation to make sound business decisions in the best interests of Liberty Tire without the influence of personal interests or gain. Our Company requires you to avoid any conflict, or even the appearance of a conflict, between your personal interests and the interests of our Company. A conflict exists when your interests, duties, obligations or activities, or those of a family member are, or may be, in conflict or incompatible with the interests of Liberty Tire. Conflicts of interest expose our personal judgment and that of our Company to increased scrutiny and criticism and can undermine our credibility and the trust that others place in us.

Should any business or personal conflict of interest arise, or even appear to arise, you should disclose it immediately to leadership for review. In some instances, disclosure may not be sufficient and we may require that the conduct be stopped or that actions taken be reversed where possible. As it is impossible to describe every potential conflict, we rely on you to exercise sound judgment, to seek advice when appropriate, and to adhere to the highest standards of integrity. [See Section 13 of the Policy and Procedure Manual for more information.](#)

**Question:** I sometimes hear that we should avoid even the appearance of a conflict of interest. What does that mean?

**Answer:** Generally, that means we should not get ourselves into situations where the average person would have good reason to question our objectivity or ability to be unbiased. For example, suppose you have helped your son and daughter start a decorating business by investing money in their new company. If you then cause Liberty to buy wall hangings from them for a company facility, most people would think you have a conflict of interest. Even though your children might be giving you a better deal than anyone else, everyone around you would wonder whether you are acting in name of the Company's best interests or trying to help your kids and protect your investment. If there are any arrangements like this they should be done in the open, with a written contract, and under a fair market contract.

### *2. Corporate Opportunities*

You are prohibited from taking for yourself opportunities that are discovered through the use of corporate property, information, or position without the consent of the CEO/President of the Company. No party may use corporate property, information, or position for personal gain, and no employee may compete with the Company directly or indirectly. You owe a duty to the Company to advance its legitimate interest whenever possible.

### *3. Fair Dealing*

We all have a duty to behave honestly and ethically at all times and with all people. We are obligated to act in good faith, with due care, and shall engage only in fair and open competition, by treating ethically competitors, suppliers, customers, and colleagues. No person should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair practices.

### *4. Compliance with Laws, Rules, and Regulations.*

Obedying the law, both in letter and in spirit, is the foundation on which the Company's ethical standards are built. In conducting the business of the Company you are required to comply with applicable government laws, rules, and regulations at all levels of government in the United States, Canada, and any other jurisdiction in which the Company does business. Although not all employees are expected to know the details of these

laws, it is important to know enough about the applicable local, state, and national laws to determine when to seek advice from supervisors, management or the legal department.

Given the highly regulated environment in which we operate, we must be vigilant in meeting our responsibilities to comply with relevant laws, regulations, and our various permits. We expect full cooperation of our employees with our regulators and to respond to their requests for information in an appropriate and timely manner. We are committed to maintaining an open, constructive and professional relationship with regulators on matters of regulatory policy, submissions, compliance, and product performance.

### *5. Proprietary and Confidential Information*

In carrying out Liberty Tire's business, employees, officers and directors often learn confidential or proprietary information about our Company, its customers, prospective customers, or other third parties. You must maintain the confidentiality of all information so entrusted to you, except when disclosure is authorized or legally mandated.

**Question:** How do I know if something is a company trade secret or confidential?

**Answer:** You should treat everything you learn about our Company and its business as a trade secret or confidential, unless it is obviously a matter of general public knowledge. A particular document or other material containing information does not need to be marked "trade secret" or "confidential" to be treated as such. If you have any questions, you should contact the legal department.

Confidential information includes non-public information that might be of use to competitors or harmful to Liberty Tire or its customers if disclosed, such as business, marketing and service plans, financial information, source codes, engineering and manufacturing ideas, designs, databases, customer lists, pricing strategies, cost data, personnel data, personally identifiable information pertaining to our employees, customers or other individuals (including, for example, names, addresses, telephone numbers

and social security numbers), and similar types of information provided to us by our customers, suppliers and partners.

You are expected to keep confidential and proprietary information confidential unless and until that information is released to the public through approved channels (usually through a press release, an SEC filing or a formal communication from a member of senior management). Every employee has a duty to refrain from disclosing to any person confidential or proprietary information about us or any other company learned in the course of employment here, until that information is disclosed to the public through approved channels. The obligation to preserve confidential information is ongoing, even after termination of employment.

You should also take care not to inadvertently disclose confidential information. Materials that contain confidential information, such as memos, notebooks, computer disks and laptop computers, should be stored securely. Unauthorized posting or discussion of any information concerning our business, information or prospects on the Internet is prohibited. All Company emails, voicemails and other communications are the property of the Company and presumed confidential and should not be forwarded or otherwise disseminated outside of Liberty Tire, except where required for legitimate business purposes.

**Question:** I will soon be leaving Liberty Tire. What restrictions do I have about talking about the company and my job after I leave?

**Answer:** Your responsibility is the same as when you were still working at our company. You may not talk about or share any information that is confidential, sensitive, and proprietary or is material and has not been made public. Contact the legal department if you need guidance or have specific questions.

## 6. Workplace Safety and Violence Prevention

Our Company strives to provide a safe and healthy workplace for employees, customers and visitors to its premises. All supervisors have responsibility for ensuring proper safety and health conditions for their employees. Management is committed to maintaining industry standards in all areas of employee safety and health, including industrial hygiene, ergonomics and safety. To support this commitment, you are responsible for observing all safety and health rules, practices and laws that apply to your job, and for taking precautions necessary to protect yourself, your co-workers and visitors. Employees are also responsible for immediately reporting accidents, injuries, occupational illnesses and unsafe practices or conditions to their supervisor.

[Please see Section 6 of the Policy Manual](#) for additional information.

Threats, acts of violence and physical intimidation are strictly prohibited. Possession of weapons on the job or on Liberty Tire premises is prohibited, unless permitted by law. No talk of violence or joking about violence will be tolerated. As is the case with any violation of the Code of Conduct, employees have a responsibility to report any unsafe behavior or condition regardless of whether they are directly involved or a witness.

## 7. Environmental Stewardship

We are committed to conducting business in an environmentally responsible manner and strive to improve our performance to benefit our employees, customers, communities, shareholders, and the environment. We use energy wisely and efficiently and employ technology to minimize any risk of environmental impact.

Employees whose work affects environmental compliance must be completely familiar with the permits, laws, and regulations that apply to their work. All employees are responsible for making sure that Liberty Tire's business is conducted in compliance with all applicable laws and in a way that is protective of the environment.

[See Section 8E of the Policy Manual](#) for more information.

**Question:** We had a small spill recently that we took care of quickly, but I'm pretty sure nobody notified management. No one wants the paperwork, the aggravation or the possible expense of a government fine. What's our stance on this?

**Answer:** We will obey the law. We are responsible for being good environmental citizens – and this means not only prompt, effective clean-up but also accurate and honest reporting of any problems. Any event that threatens the environment or our reputation must be reported to your management.

## 8. Physical Assets and Resources

All employees must protect our Company assets, such as equipment, inventory, supplies, cash, and information. Treat Company assets with the same care you would if they were your own. Use our Company resources only to conduct Company business. No employee may commit theft, fraud or embezzlement, or misuse Company property.

Liberty Tire provides an array of information and technology resources intended to maximize our efficiency in carrying out your job such as: e-mail, computers, computer applications, networks, the internet, the intranet, facsimile machines, telephones, and voice mail systems. Please remember that these tools are Company property and must be used in a manner that is in compliance with the Code of Conduct and reflects positively on Liberty Tire and all who work here.

Occasional, limited personal use of these resources is permitted, but cannot interfere with your work performance, or the work performance of your colleagues. Such personal use cannot result in additional cost to the Company. We cannot tolerate inappropriate or illegal use of these assets and reserve the right to take appropriate disciplinary actions, as needed, up to and including termination of employment. Such inappropriate use of these resources can include the following:

- Hacking
- Pirating software or video/audio files

- Soliciting
- Distributing literature for outside entities
- Sending inappropriate e-mail
- Accessing inappropriate web sites (such as those advocating hate, violence, sexually explicit material, or promoting illegal activities)
- Distributing confidential, proprietary or trade secret information of Liberty Tire outside the Company

Liberty Tire reserves the right to monitor and inspect, without notice, the use of its information and technology resources.

**Question:** What constitutes misuse of our company assets and resources? How do we know if personal use of our company assets and resources crosses the line of reasonableness?

**Answer:** The following examples are provided as illustrative of misuse and unreasonableness:

- Use of our company facilities for personal gain;
- The excessive use of the telephone or facsimile long-distance for personal purposes;
- The taking of office supplies or equipment for personal consumption or use at home, e.g., using our company equipment to repair personal property;
- The personal use of our company vehicles without express authorization;
- The unauthorized copying of computer software programs;
- Taking of tires for personal use; and
- Taking of tires for sale to others.

## 9. Discrimination

We are committed to the principles of equal employment opportunity, inclusion and respect.

All employment-related decisions must be based on Company needs, job requirements and individual qualifications. Take full advantage of what our team members have to offer; listen and be inclusive. We do not tolerate discrimination against anyone – employees, team members, customers, business partners or other stakeholders – on the basis of race, color, religion, creed, gender, pregnancy or related medical conditions, age (40 and over), national origin or ancestry, physical or mental disability, genetic information or any other consideration protected by federal, state or local laws.

**Question:** Sometimes my supervisor favors certain employees with overtime and good job assignments. I think I am being discriminated against. What should I do?

**Answer:** Discuss this with your supervisor. Tell your supervisor that you feel you are not being treated fairly in terms of job assignments and overtime. Give him or her specific examples. If your supervisor is unresponsive or if you have any fear of retaliation, contact your supervisor's manager.

We comply with laws regarding employment of immigrants and noncitizens and provide equal employment opportunity to everyone who is legally authorized to work in the applicable country. [See Section 3Q of the Policy Manual for more details.](#)

Whenever possible, we provide reasonable accommodations to individuals with disabilities and remove any artificial barriers to success.

Employees are expected to report discrimination right away and never retaliate against anyone who raises a good faith belief that unlawful discrimination has occurred. Retaliation will not be tolerated. [See the Employee Handbook for additional information.](#)

## *10. Harassment*

Every employee has a right to a work environment free from harassment, regardless of whether the harasser is a co-worker, supervisor, officer, manager/director, or Board of Directors member. Harassment can include any behavior (verbal, visual or physical) that creates an intimidating, offensive, abusive or hostile work environment. In addition, any harassment that either impacts or influences wages, hours, working conditions or employment advantages is specifically prohibited. Unlawful harassment includes harassment based on race, color, religion, creed, sex, age, disability, national origin or ancestry, as well as citizenship, marital, veteran, and family and medical leave status, or any other status protected by law. Sexual harassment includes harassment of a sexual nature of a person of the same or opposite sex as the harasser.

**Question:** My co-worker makes repeated rude comments about my personal appearance that make me very uncomfortable. I've asked him/her to stop, but he/she won't. What should I do?

**Answer:** You should report your co-worker's behavior to your supervisor. If your supervisor is unresponsive, contact his or her supervisor.

As is the case with any violation of the Code of Conduct, you have a responsibility to report any harassing behavior or condition regardless of if you are directly involved or just a witness. Retaliation for making a complaint or for assisting in the investigation of a discrimination or harassment complaint is prohibited. More information concerning information about allegations of harassment can be found in [Section 3L of Liberty Tire's Policy and Procedure Manual](#).

## *11. Fair Wages*

We are committed to complying fully with all applicable laws and regulations dealing with wage-and-hour issues, meal and rest breaks, overtime pay, minimum-wage requirements, and other subjects related to wage and hour practices. As Liberty Tire employees, we must:

- Comply fully with all corporate policies and procedures related to wage-and-hour issues;
- Comply fully with all applicable federal, state, and local laws and regulations pertaining to wage-and-hour issues;
- Report any violations of wage-and-hour laws or policies to management.

We properly compensate in a variety of ways, salary, hourly, and piece rate pay. It is a violation of law and Liberty Tire policy for you to work without compensation or for a supervisor (hourly or salaried) to request that you work without compensation in some appropriate form. If you believe you are not being compensated properly, you should raise this with your supervisor or HR representative.

## *12. Substance Abuse*

Liberty Tire strives to maintain a workplace that is free from illegal use, possession, sale, or distribution of alcohol or controlled substances. Legal or illegal substances shall not be used in a manner that impairs a person's performance of assigned tasks. Working while under the influence is a hazard to yourself and others, and it will not be tolerated at Liberty. Disciplinary measures will be taken including up to termination. Refer to the [Drug and Alcohol Policy in section 5 of the Policy and Procedure Manual](#) for more information.

## *13. Intellectual Property and Protecting IP*

Our intellectual property is among our most valuable assets. Intellectual property refers to creations of the human mind that are protected by various national laws and international treaties. Intellectual property includes copyrights, patents, trademarks, trade secrets, design rights, logos, expertise, and other intangible industrial or commercial property. We must protect and, when appropriate, enforce our intellectual property rights. We also respect the intellectual property belonging to third parties. It is our policy to not knowingly infringe upon the intellectual property rights of others.

As an employee, the things you create for Liberty Tire belong to our Company. This "work product" includes inventions, discoveries, ideas, improvements, software programs, and works of authorship. This work product

is our Company's property (it does not belong to individuals) if it is created or developed, in whole or in part, on Company time, as part of your duties or through the use of Company resources or information. Employees must promptly disclose to Liberty Tire, in writing, any such work product and cooperate with our efforts to obtain protection for our Company. To ensure that our Company receives the benefit of work done by outside consultants, it is essential that an appropriate agreement or release be in place before any work begins.

#### *14. Antitrust and Fair Competition*

It is our policy that all directors, officers, and employees comply with antitrust and competition laws. International, US federal and state antitrust and competition laws prohibit efforts and actions to restrain or limit competition between companies that otherwise would be competing for business in the marketplace.

You must be particularly careful when you interact with any employees or representatives of Liberty Tire's competitors. You should use extreme care to avoid any improper discussions with our competitors, especially at trade association meetings or other industry or trade events where competitors may interact. Under no circumstances should you discuss customers, prospects, pricing, or other business terms with any employees or representatives of our competitors. If you are not careful, you could find that you have violated antitrust and competition laws if you discuss or make an agreement with a competitor regarding:

- Prices or pricing strategy,
- Discounts,
- Terms of our customer relationships,
- Sales policies,
- Customer selection,
- Allocating customers or market areas, or
- Contract terms and contracting strategies.

**Question:** A salesperson for a competitor and I are friends.

Occasionally, we talk about marketing plans. Should I be concerned?

**Answer:** Yes. You are revealing confidential information that the Company has invested time and money to develop. You also may be violating antitrust laws that ban discussions of marketing and pricing.

Agreements with competitors do not need to be written in order to violate applicable antitrust and competition laws. Informal, verbal, or implicit understandings, i.e., knowing winks, are also violations. Antitrust violations in the U.S. may be prosecuted criminally as felonies and can result in severe penalties for Liberty Tire and any associate or other person who participates in a violation. [See Liberty Tire's Anti-Trust Policy in Section 1D of the Policy Manual.](#)

#### *15. Honest Advertising and Marketing*

It is our responsibility to accurately represent Liberty Tire and our products in our marketing, advertising and sales materials. Deliberately misleading messages, omissions of important facts or false claims about our products, individuals, competitors or their products, services, or employees are inconsistent with our values. Sometimes it is necessary to make comparisons between our products and our competitors. When we do, we will make factual and accurate statements that can be easily verified or reasonably relied upon.

#### *16. Anti-Money Laundering*

Money laundering is a global problem with far-reaching and serious consequences. Money laundering is defined as the process of converting illegal proceeds so that funds are made to appear legitimate, and it is not limited to cash transactions. Complex commercial transactions may hide financing for criminal activity such as terrorism, illegal narcotics trade, bribery, and fraud. Involvement in such activities undermines our integrity, damages our reputation and can expose Liberty Tire and individuals to severe sanctions. Our Company forbids knowingly engaging in transactions that facilitate money laundering or result in unlawful diversion.



### *17. Anti-corruption / Anti-bribery*

The United States and many other countries have laws that prohibit bribery, kickbacks, and other improper payments. No Liberty Tire employee, officer, agent, or independent contractor acting on our behalf may offer or provide bribes or other improper benefits in order to obtain business or an unfair advantage. A bribe is defined as directly or indirectly offering anything of value (e.g., gifts, money, or promises) to influence or induce action, or to secure an improper advantage.

The Foreign Corrupt Practices Act and other U.S. laws prohibit payment of any money or anything of value to a foreign (outside the U.S.) official, foreign political party (or official thereof), or any candidate for foreign political office for the purposes of obtaining, retaining or directing of business. We expect all employees, officers, agents, and independent contractors acting on behalf of Liberty Tire to strictly abide by these laws.

### *18. Gifts and Entertainment*

We believe that no gift, favor, or entertainment should be accepted or provided if it will obligate, or appear to obligate, the receiver. The giving or accepting of bribes, inappropriate, lavish or repeated gifts, or other benefits is always prohibited, even if acceptable by local custom. Similarly, requesting or soliciting gifts or services, or requesting contributions from vendors, suppliers or other business partners for yourself, your family member, or for Liberty Tire, is prohibited, except with regard to charitable organizations specifically sanctioned or supported by our Company. The only permitted exception is providing or accepting normal sales promotion items, occasional meals, or other non-cash items not exceeding of de minimis value provided that the value of the gift is in line with accepted business practices and could not be construed as improperly influencing good business judgment. The offer or acceptance of cash gifts by any party is strictly prohibited.

### *19. Government Customers / Contracting*

When doing business with federal, state, or local governments, we must ensure all statements and representations made to government procurement officials are accurate and truthful, including costs and other financial data. If your assignment directly involves the government or if you are responsible for someone working with the government on behalf of Liberty Tire, be alert to the special rules and regulations applicable to our government customers. Additional steps should be taken to understand and comply with these requirements. Any conduct that could appear improper should be avoided when dealing with government officials and employees. Failure to avoid these activities may expose the government agency, the government employee, our Company, and you to substantial fines and penalties. For these reasons, any sale of our products or services to any federal, state, or local government entity must be in accordance with our Company policy.

### *20. Maintain Accurate Records / Internal Accounting Controls*

Accurate and reliable records are crucial to our business. We are committed to maintaining accurate Company records and accounts in order to ensure legal and ethical business practices and to prevent fraudulent activities. We are responsible for helping ensure that the information we record, process, and analyze is accurate, and recorded in accordance with applicable legal or accounting principles. We also need to ensure that it is made secure and readily available to those with a need to know the information on a timely basis.

**Question:** A former employee called and requested that I send her a copy of a non-public proposal she worked on before she left the Company. May I send it to her?

**Answer:** No. This proposal or record is Liberty Tire's confidential information and belongs to the Company. It may not be released to an unauthorized individual outside of the Company, not even to the individual who created the material.

Company records include booking information, payroll, timecards, travel and expense reports, e-mails, accounting and financial data, measurement and performance records, electronic data files, and all other records maintained in the ordinary course of our business. All Company records must be complete, accurate,



and reliable in all material respects. There is never a reason to make false or misleading entries. Undisclosed or unrecorded funds, payments, or receipts are inconsistent with our business practices and are prohibited. All such records are the property of Liberty Tire.

### *21. Political Activities and Contributions*

You may support the political process through personal contributions or by volunteering your personal time to the candidates or organizations of your choice. These activities, however, must not be conducted on Company time or involve the use of any Company resources such as telephones, computers or supplies. You may not make or commit to political contributions on behalf of Liberty Tire. [See Section 8O of the Policy Manual.](#)

### *22. Media Relations*

We are committed to building and maintaining effective and ongoing communications with our key stakeholders through the media. This helps ensure the Company's public statements express clear and factual representations. To this end, all media inquiries should be forwarded to the President / CEO or legal department unless otherwise instructed. [See Section 8N of the Policy Manual.](#)

### *23. Social Media*

The use of social media has grown significantly in recent times. If used appropriately, social networking websites may be new channels for sharing information regarding our products and services. However, if not done properly, use of the websites may expose you and the Company to additional risk. Never officially post information about or discussing any product, service or other Company business unless approved by your manager or the Legal Department. When making purely personal posting on social media sites, employees must use the following disclaimer when discussing job-related matters, *"The opinions expressed on this site are my own and do not necessarily represent the views of LTR."* If you see anything posted on a social networking website that may include misinformation or a product complaint, notify your manager or the Legal department immediately.

## **E. Waivers**

Management will regularly reassess this Code of Conduct and recommend changes to the CEO/President of the Company or the Board of Directors for approval. In extremely limited circumstances, the Company may find it appropriate to waive a provision of this Code. All such waivers may be granted by the Board of Directors or appropriate designated party. All waivers granted to executive officers or directors will be disclosed as required by law.

## **F. Violation of Ethical Standards**

### *1. Asking Questions and Reporting Concerns*

Liberty Tire aims to conduct business with the highest standards of ethics, honesty and integrity, and recognizes that you have an important role to play in maintaining this aim. If you have questions about any subject matter covered in this Code please discuss it with your management or contact the legal department. Any employee or worker providing services to Liberty Tire concerned about any form of illegality, improper action, or wrongdoing by our Company, its employees or its customers is strongly encouraged to report the matter.

Liberty Tire believes that any employee with knowledge of wrongdoing should not remain silent. We take all matters of illegality, improper action or wrongdoing very seriously, and you are strongly encouraged to raise incidents or behaviors that are not in accordance with the Code of Conduct, or the policies to which it refers.

### *2. Commitment to Non-Retaliation*

Any employee who reports a violation will be treated with dignity and respect and will not be subjected to any

form of discipline or retaliation for reporting in good faith. Retaliation against anyone who provides information or otherwise assists in an investigation or proceeding regarding any conduct that the employee believes in good faith constitutes a violation of applicable laws or regulations, our Code of Conduct, or Liberty Tire's related policies is prohibited and will, in itself, be treated as a violation of our Code of Conduct.

### *3. Reporting Channels*

If you think the law or our Code of Conduct is being violated you have several options (in this order):

- a) Discuss the issue with your supervisor
- b) Discuss the issue with your supervisor's manager
- c) Contact Liberty Tire's 24-hour Ethics and Compliance Hotline via the Internet: by clicking the "*Ethics and Compliance Hotline*" link on the left hand side of our Intranet home page (or by going to <https://secure.ethicspoint.com/domain/media/en/gui/38251/index.html> outside of our Intranet) or toll-free from the United States and Canada: **855-749-9976**

### *4. Consequences of Violations*

Violations of the Code of Conduct will not be tolerated. Any employee who violates the standards in the Code of Conduct may be subject to disciplinary action, which, depending on the nature of the violation and the history of the employee, may range from a warning or reprimand to and including termination of employment and, in appropriate cases, civil legal action or referral for regulatory or criminal prosecution.

Any employee who knowingly makes a false allegation is subject to discipline. Additionally, anyone who deliberately provides false information or refuses to cooperate in an investigation will be subject to disciplinary action, up to and including loss of employment.

Any leader who fails to take appropriate actions after receiving a report of a suspected violation of our Code of Conduct may be subject to disciplinary action.

## **G. Ethical Decision Making**

In addition to complying with the requirements contained in the Liberty Tire policies, in specific situations, before taking any action you should consider the following questions, and unless the answer to each question is "yes," you should not take such action:

1. Is this action legal and ethical?
2. Does this action comply with both the spirit and the letter of our Code of Conduct?
3. Will this action appear appropriate?
4. Is it clear that our Company would not be embarrassed or compromised if this action were to become known within our Company or publicly?

## **H. Annual Review**

To assure conformance to the Code of Conduct, each manager and other appropriate personnel shall be required to review the Code once each year and to attest that he or she has conducted the affairs of the Company in conformance with these standards.

## **I. Company Policy Manual**

For additional information on the various subjects covered in this Code of Conduct please see the [Company Policy and Procedure Manual](#).