

Human Rights Disclosure
The Goodyear Tire & Rubber Company – 2021

Whereas: The Goodyear Tire & Rubber Company (Goodyear) is the largest U.S. tire manufacturer. The natural rubber supply chain is vast, with 6 million smallholder farmers, industrial plantations, rubber processors, and intermediaries.¹

Child labor and forced labor persist in the natural rubber supply chain due in part to poor traceability and accountability.² For example, in Vietnam, over 10,000 children were found working on rubber farms, nearly half of whom were under 15.³ Low wages for rubber farmers may contribute to children working instead of attending school.⁴ Rubber tapping is labor-intensive and hazardous work that requires using sharp tools and exposure to toxic pesticides. Rubber also drives deforestation, biodiversity loss, land grabs, and indigenous rights violations.⁵

Demand for natural rubber dropped by 6% during the COVID-19 pandemic, negatively impacting farmer livelihoods and delaying sustainable sourcing initiatives.⁶

Goodyear's human rights statement does not explicitly prohibit child labor. Goodyear's Supplier Code of Conduct and Natural Rubber Procurement Policy permits suppliers in "developing countries" to employ children under 15.

Goodyear's operations may also contribute to negative human rights impacts. In 2018, Goodyear workers in Mexico were subject to freedom of association violations, low wages, insufficient health and safety protections, gender-based discrimination, and harassment.⁷

Investors lack relevant information to assess Goodyear's risk exposure or the effectiveness of its human rights due diligence.⁸ The Sustainability Accounting Standards Board (SASB) identifies disclosure on high risk materials, types of risks, and mitigation strategies as financially material disclosure topics. Yet, Goodyear provides no evidence of effective implementation of measures to identify and address supply chain risks. Goodyear's Tier 1 supplier audits and hotline do not mitigate or prevent severe human rights violations on smallholder farms. Goodyear's sourcing disclosures do not even identify human rights risks associated with other inputs. For example, carbon black used in tires is potentially carcinogenic and may pose health risks to workers.⁹

¹ <https://www.worldwildlife.org/stories/a-small-scale-farmer-leads-the-way-for-big-changes-to-rubber-farming-in-myanmar>

² <https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods>

³ <https://www.verite.org/project/rubber-3/>

⁴ <https://www.verite.org/project/rubber-3/>

⁵ <https://www.mightyearth.org/stretching-the-possibilities-for-a-sustainable-rubber-industry-in-2020/> ; <https://e360.yale.edu/features/turning-the-tide-on-the-relentless-destruction-of-cambodias-forests>

⁶ <https://www.eco-business.com/news/can-natural-rubber-be-farmed-sustainably-in-the-time-of-covid-19/>

⁷ <https://www.business-humanrights.org/en/mexico-alleged-bad-working-conditions-at-goodyear-plant>

⁸ https://www.sasb.org/wp-content/uploads/2018/11/Auto_Parts_Standard_2018.pdf

⁹ <https://publications.iarc.fr/publications/media/download/3802/d9266a1d7101e445cc148f7e64134d0ad0251791.pdf>

Goodyear cannot rely only on its participation in the Global Platform for Sustainable Natural Rubber to fulfill its human rights risk management responsibilities.¹⁰ A comprehensive study concluded that multi-stakeholder initiatives are not effective tools to hold corporations accountable for abuses, protect rights holders against human rights violations, or provide access to remedy.¹¹

Goodyear may face legal, reputational, business continuity, and financial risks if the company fails to effectively identify and manage human rights risks in its supply chain. Regulatory actions such as issuance of Withhold Release Orders by U.S. Customs and Border Protection or future enforcement of the Uyghur Forced Labor Prevention Act may also impact Goodyear.¹²

Resolved: Shareholders request that the Board of Directors prepare a report, at reasonable cost and omitting proprietary information, assessing the effectiveness of Goodyear's systems to embed respect for human rights across company-owned operations and through business relationships, and where appropriate, to provide access to remedy for human rights impacts.

¹⁰ <https://www.gpsnr.org/>

¹¹ https://www.msi-integrity.org/wp-content/uploads/2020/07/MSI_SUMMARY_REPORT.FORWEBSITE.FINAL_.pdf

¹² <https://www.cbp.gov/trade/programs-administration/forced-labor/withhold-release-orders-and-findings> ; <https://www.congress.gov/bill/116/house-bill/6210>