



Human Rights/Human Trafficking Statement

Cooper Tire & Rubber Company and its global subsidiaries and affiliates (“**Cooper**” or the “**Company**”) recognizes that human trafficking, also known as modern slavery, is a serious human rights issue impacting millions of people in virtually every country and every industry’s supply chain. Human trafficking may take many forms, including among others forced labor, indentured servitude, and sexual exploitation.

As part of our commitment to corporate social responsibility (CSR) and upholding responsible business practices, Cooper monitors and addresses workforce matters within our own operations and direct workforce as well as within our supply chain. This statement outlines the steps Cooper has taken to ensure that slavery and human trafficking is not taking place in any part of our business or our supply chain. Cooper’s Code of Conduct explicitly prohibits forced and child labor within our own operations. The complexity of our supply chain, however, makes it challenging to effectively manage business and sustainability issues. Respecting human rights issues in the supply chain is ultimately the responsibility of our suppliers. Still, as customers, we can and do play an active role in supplier selection and management and have adopted various means to clearly communicate our expectations to our suppliers.

One of those means is the development and enforcement of formal policies. Cooper’s commitment to addressing the risk of human trafficking in our supply chain is grounded in our Code of Conduct, our Human Rights Policy and our Global Supplier Code of Conduct. These policies set forth our commitment to upholding our values and respecting human rights in our operations and business relationships, including the supply chain. Cooper strongly encourages our third party vendors to provide fair and safe working conditions for all workers and to treat their employees with dignity and respect. These values are clearly communicated during the vendor selection and onboarding processes and we make general training available to our employees on CSR issues such as human rights and trafficking.

In our standard procurement processes we enter into contracts or issue purchase orders that incorporate our Terms and Conditions (“T’s & C’s”). These T’s & C’s establish Cooper’s standards and expectations for those businesses in our supply chain, including compliance with all laws. We also require compliance with the Cooper policies referenced above or alternatively encourage all businesses throughout our supply chain to adopt and enforce their own similar policies. We seek to identify and do business with companies that have aligned their standards with our values, including working to cascade these expectations throughout their own operations and supply chains. Our standard T’s and C’s also give us the right to audit our vendors on these issues.

Eradicating human trafficking requires strong action and collaboration from governments, business, international organizations, and civil society. Cooper is committed to regularly reviewing and continuously improving our approach to human rights, including fighting human trafficking and modern slavery, and strengthening our approach, as needed, to align with emerging laws and regulations, including the UK Modern Slavery Act of 2015 and the California Transparency in Supply Chains Act.

The board of directors of Cooper has delegated approval and publication of this statement on its behalf to the executive management of the Company.

A handwritten signature in black ink, appearing to read "Bradley E. Hughes", is written over a horizontal line.

Bradley E. Hughes
President & Chief Executive Officer
Cooper Tire & Rubber Company

December 18, 2018