

Diversity Policy

1. Objective of this Policy

Fostering, cultivating and preserving a culture of diversity and inclusion at Cooper Tire & Rubber Company and its affiliates and subsidiaries ("Cooper").

2. Applicability of the Policy

This policy applies to:

- All Cooper legal entities worldwide owned directly or indirectly by Cooper, including all of its operating
 units, subsidiaries, joint ventures and affiliates.
- All Cooper people worldwide. For the purposes of this policy, "Cooper people" include the Board of Directors, officers, employees, contractors and temporary workers of each entity.
- All third parties acting for or on behalf of Cooper, wherever they are located.

3. Statement of the Policy

Our human capital is the most valuable asset we have. The collective sum of the individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities and talent that Cooper people invest in their work represents a significant part of not only our culture, but our reputation as well.

We embrace and encourage Cooper people's differences in age, color, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, physical and mental ability, political affiliation, race, religion, sexual orientation, socio-economic status, veteran status, and other characteristics that make each of them unique.

Cooper's diversity initiatives are applicable—but not limited—to our practices and policies on recruitment and selection; compensation and benefits; professional development and training; promotions; transfers; social and recreational programs; and the ongoing development of a work environment built on the premise of diversity that encourages and enforces:

- Respectful communication and cooperation.
- Teamwork and participation, permitting the representation of all Cooper people and their perspectives.
- Contributions to the communities we serve to promote a greater understanding and respect for diversity.

All Cooper people have a responsibility to treat others with dignity and respect at all times. Cooper people are expected to exhibit conduct that reflects inclusion during work, at work functions on or off the work site, and at all other company-sponsored and participative events.

4. Preventing Violations of the Policy

Every Cooper person plays a role in preventing violations of this policy and is expected to bring any questionable situation to his or her manager, Human Resources, the Cooper Law Department or anonymously through the EthicsPoint Helpline. Reports will be kept confidential to the extent allowed by law. Anyone who makes a good faith report will be protected from retaliation in accordance with Cooper's Code of Conduct and policies.