



SUPPLIER CODE OF CONDUCT

Titan International, Inc.
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www.titan-intl.com

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Shared Expectations – Upholding Titan’s Values

We at Titan International Inc. and its subsidiaries (“Titan”) have a commitment to our shareholders to do business with integrity, which means that we tell the truth and conduct our business with openness and honesty. Additionally, we honor the dignity and human rights of all individuals across the globe. As such, it’s critical that all suppliers doing business with Titan are equipped to do so in a manner that is consistent with these values.

Supplier Expectations

Titan strives for the highest ethical conduct in its interactions with others. We treat our suppliers, members of our distribution channel, our customers, and government agencies fairly and honestly, and we expect our suppliers to maintain high ethical standards, as well. When choosing suppliers, we consider not only how they can help us meet our business goals, but whether potential suppliers comply with the law and uphold values similar to Titan’s. We expect our suppliers to comply with this Supplier Code of Conduct, which addresses the following matters: labor and human rights, health and safety, environment, and ethics.

Compliance with Law

Titan is a U.S.-based company with global operations, and we follow the law of the places where we do business. It is incumbent upon our supply chain partners to similarly follow all applicable laws for the locations where they engage in business.

A Positive Environment of Diversity and Inclusivity

Titan values having a diverse range of backgrounds, talents, perspectives, cultures, and experiences, which allows us to make connections and understand our customer needs across the globe. We expect our suppliers to similarly embrace diversity and inclusivity.

Conflicts of Interest

Suppliers are not to engage in any activities that create or appear to create a conflict between the supplier’s and Titan’s respective interests.

Avoiding Improper Influence

Suppliers shall not offer, request, give or accept a bribe or kickback, make a facilitation payment or engage in any other form of improper payments that would reflect negatively on Titan or its reputation for high ethical standards.

International Trade Laws

Our suppliers must comply with all applicable local and international rules and regulations governing trade. Suppliers must understand and follow the applicable international trade, export controls and import laws while they conduct business with Titan.

Fair Competition

Suppliers should adhere to all applicable antitrust and competition laws. Furthermore, suppliers should never use misrepresentation, deception, or manipulation to collect information about their competitors, nor ask third parties to do so for them.

Confidential Information

Titan goes to great lengths to protect its confidential information – including trade secrets, intellectual property and confidential financial information – and we expect our suppliers to safeguard this type of information as though it were their own. To that end, Titan may require its suppliers to enter into non-disclosure agreements. Suppliers must not engage in any unauthorized disclosures of Titan’s confidential information. When making an authorized disclosure of Titan confidential information, the supplier must ensure that the appropriate protective measures are in place to safeguard Titan’s interests.

Human Rights

We honor the dignity and human rights of all individuals across the globe. We do not use, or condone the use of, any form of forced labor or human trafficking. Suppliers should follow all child labor laws and never use child labor in the locations where they work. Suppliers should offer a workplace that respects the human rights of all employees and shall not subject their employees to any form of discrimination, harassment or retaliation.

For more information regarding Titan’s expectations as related to human rights, please refer to our [Human Rights](#) and [Labor Management](#) policies.

Non-Discrimination

Titan expects its suppliers to choose employees and sub-suppliers based upon their qualifications, without regard to race, religion, national origin, color, gender, sexual orientation, age and/or disability. We expect all suppliers to obey applicable laws that prohibit discrimination.

A Safe and Healthy Environment

Titan expects its suppliers to be committed to providing a safe and healthy environment for their employees. Suppliers should promote the safety and health of everyone on their property by enacting and following safety policies, procedures, training and/or programs designed to safeguard their employees and Titan employees. Titan's commitment and requirement for safety extends throughout our supply chain.

For more information regarding Titan's expectations as related to health and safety, please refer to our [Occupational Health and Safety](#) policy.

Environmental Responsibility

Titan strongly believes that the environment is of the utmost importance to its customers and employees and, accordingly, expects its suppliers to conduct their operations pursuant to the highest environmental standards. Suppliers shall comply with all applicable environment laws and regulations while conducting business with Titan.

For more information regarding Titan's expectations as related to environmental responsibility, please refer to our [Environmental](#) policy.

Conflict Minerals

Suppliers are expected to uphold Titan's Conflict Minerals Policy, which states that Titan is a conflict minerals free company and does not include conflict minerals in any of its products, as they are not part of any formulation or recipe of any product manufactured by Titan.

For more information regarding Titan's expectations as related to conflict minerals, please refer to our [Conflict Minerals](#) policy.

Monitoring and Record Keeping

Titan expects its suppliers to maintain the requisite documentation to substantiate their compliance with this Supplier Code of Conduct and to allow Titan the right to review and/or inspect the documentation to ensure compliance.

Reporting Misconduct

If you become aware of a violation or the appearance of a violation of this Supplier Code of Conduct, you should contact Titan's Corporate Compliance Department at Compliance@titan-intl.com or Titan's Compliance Hotline at 800-461-9330 (inside the U.S.) or via the internet at www.convercent.com/report (individuals located outside the U.S. can also access a list of global hotline telephone numbers at this site). Your report may remain anonymous when you call from a country in which anonymous reporting is legally permitted.

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I hereby certify that I have read and understand the Supplier Code of Conduct of Titan International, Inc. and agree to comply with it.

Acknowledged on Behalf of: _____

Signature: _____

Printed Name: _____

Title: _____

Date: _____

Please scan and email completed form to supplychain@titan-intl.com or your purchasing representative.