

This statement is made pursuant to Section 54(1) of the United Kingdom's Modern Slavery Act 2015 and constitutes the human trafficking statement made for Titan International, Inc. and its subsidiaries for the fiscal year ending December 31, 2018.

## **Titan Europe Limited**

Titan Europe Limited is based in United Kingdom and is the holding corporation for operational entities throughout Europe, Asia, and South America. Titan Europe's ultimate parent company is Titan International, Inc., which is headquartered in Quincy, Illinois, U.S.A. Titan International's group of companies operates production facilities in over 15 countries and has more than 6,000 employees. In this Statement, Titan International, Inc. and its subsidiaries are referred to as "Titan."

## **Our Business**

Titan is a leading global manufacturer of off-highway wheels, tires, assemblies, and undercarriage products. Headquartered in Quincy, Illinois, the Company globally produces a broad range of products to meet the specifications of original equipment manufacturers (OEMs) and aftermarket customers in the agricultural, earthmoving/construction, and consumer markets.

## **Our Policies**

Titan is committed to upholding the human rights of all individuals and seeks to eradicate all forms of modern slavery and human trafficking from its business and supply chains. This commitment is reflected in our global policies, including our [Code of Business Conduct](#) and [Supplier Code of Conduct](#), which are available on our website.

The Code of Business Conduct, which applies to all employees, directors, subsidiaries, and controlled affiliates, prohibits any of our businesses or suppliers from engaging in human trafficking or using any form of forced labor or child labor.

Titan's Supplier Code of Conduct states our expectations for suppliers on matters related to labor rights, anti-discrimination, health and safety, environment, and ethics. The Supplier Code of Conduct prohibits suppliers from using forced labor or engaging in human trafficking.

In conjunction with approving this statement, Titan's Board of Directors has also recently approved its Human Rights Policy, which considers the principles stated in the International Bill of Rights and the International Labour Organization's Declaration on the Fundamental Principles and Rights at Work and provides further details about our commitment to upholding human rights as stated in our other policy documents.

## **Reporting**

Titan provides a telephone hotline and internet reporting tool that allows employees and affiliates to report violations of Titan policies. All reporting parties are guaranteed freedom from retaliation pursuant to Titan's Whistleblower Policy.

## **Our Suppliers**

Titan's seeks to do business only with reputable suppliers that demonstrate a commitment to upholding human rights. This is reflected in Titan's Supplier Code of Conduct, which states our expectations for suppliers on matters related to labor rights, anti-discrimination, health and safety, environment, and ethics. Titan reserves the right to review and inspect documentation to ensure compliance with the Supplier Code of Conduct.

Titan has already incorporated compliance with the Supplier Code of Conduct in its standard purchase order in North America and in its tire facility in Brazil, and will be expanding this in purchase orders and contractual terms throughout the company in 2019.

Titan performs due diligence at the group and local level, when appropriate, of its top suppliers to ensure that we are conducting business with suppliers who comply with our values and our prohibition on human trafficking and forced labor. These due diligence efforts are currently being expanded to ensure that all suppliers are covered in the coming year.

Titan will cease doing business with any supplier that is found to be engaging in human trafficking, using slave labor, or is otherwise violating our Supplier Code of Conduct.

## **Assessment**

In 2019, we will be performing a detailed analysis into this risk in all of our supply chains.

## **Training**

In addition to required annual training on the Code of Conduct, Titan employees who work with suppliers will be administered human trafficking and forced labor awareness training beginning in 2019.

## Accountability

Any employees, suppliers or other stakeholders are encouraged to report any human rights concerns or other violations of Titan policies to Titan through one of the following reporting opportunities:

- Email: [Compliance@titan-intl.com](mailto:Compliance@titan-intl.com)
- Titan Corporate Compliance Department (U.S.): 217-221-4724
- Titan's Compliance Hotline: U.S.: 1-899-461-9330
- Internet: [www.convercent.com/report](http://www.convercent.com/report)
- Individuals outside the U.S. can find international hotline telephone numbers by visiting our [hotline reporting site](#) and selecting the appropriate country.

This statement was approved by the Titan International, Inc. Board of Directors on March 25, 2019.



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Paul G. Reitz,  
Director, President, & CEO