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|  | SECTION: GLOBAL POLICIES SUBJECT: HUMAN RIGHTS POLICY ISSUE DATE: MARCH 2, 2021 |
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TITAN INTERNATIONAL, INC.

Human Rights Policy

Introduction

Titan International Inc. and its subsidiaries (“Titan”) are committed to respecting and upholding all internationally recognized human rights. In creating this policy, we adhere to the principles stated in the International Bill of Rights (the Universal Declaration of Human Rights and the two international covenants) and the International Labor Organization’s Declaration on the Fundamental Principles and Rights at Work. We are also committed to becoming signatories to the UN Global Compact and have incorporated those principles into our policies. This statement aligns with our Code of Business Conduct and Supplier Code of Conduct, which reflect these principles, and is approved by senior management and the Board of Directors.

Scope of Policy

This policy applies to all entities worldwide in which Titan has a controlling ownership interest or management responsibility. This includes subsidiaries, joint ventures, affiliated companies and distributors.

Titan is establishing procedures and guidelines to monitor and evaluate suppliers and partners in order to ensure their compliance with this policy in the future.

A Workplaces That Promotes:

Dignity and Respect

We treat our employees with dignity and respect and will not use punishment or threats of violence, or any form of physical, sexual, psychological, or verbal harassment or abuse.

Inclusivity

We maintain an inclusive working environment at all of our locations and will not tolerate any harassment or discrimination, including, in the recruitment and hiring, training, or pay based on gender, race, age, religion, disability, ancestry, national origin, sexual orientation, social origin, or on any other basis prohibited by law.

Safety and Health

Our facilities must provide a safe and healthy environment for our employees, and we must comply with all safety and health laws and regulations.

Voluntary Employment

We are committed to using only voluntary employment and we prohibit the use of any forced labor, including prison labor, military labor, indentured labor, bonded labor, or human trafficking. We prohibit any practices that limit an employee’s ability to leave his or her workplace. Once the Company establishes compliance procedures in the future, all parties involved in the supply chain will be required to follow these standards.

Freedom of Association

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We respect our employees’ right and freedom to associate and no Titan employee will be subject to discrimination, harassment, intimidation, or retaliation due to a membership in a lawful workers’ association or union. To promote and enforce these rights, Titan relies on the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights.

Fair Compensation

We follow all applicable wage, work hours, overtime and benefits laws. Furthermore, we commit to provide a fair and livable wage to all employees paid in legal tender at regular intervals.

Zero Tolerance for Child Labor

We maintain a zero tolerance for the use of underage labor and will never use child labor in any of our facilities or locations. Child labor is defined as employing any person younger than the minimum age, as legally permitted in the jurisdiction in question. However, in no event will we knowingly employ anyone younger than sixteen (16) years of age.

Free, Prior, Informed Consent

We will consult with external community stakeholders and indigenous populations where necessary to gain their free, prior, informed consent (FPIC). FPIC means that consent is given free from manipulation and coercion, is sought sufficiently in advance of any activities being commenced or authorized, and is given with satisfactory information on the key points of the project such as the nature, size, pace, reversibility, the scope of the project, the reason for it, and its duration.

Assistance

All Titan employees are required to comply with the provisions in this policy and the human trafficking and slavery laws throughout the world.

If you become aware of any action that you believe is not consistent with this policy, the applicable law, or the Titan Code of Business Conduct, you are required to seek assistance. You can seek assistance by contacting your local Human Resources Manager or:

Ethics and Compliance Function: Kara Espera
 Director of Compliance
Kara.Espera@titan-intl.com
 630-234-8473

If you do not know whom to contact, send an email to:

compliance@titan-intl.com

Report

Anyone who witnesses a violation of this or any other Titan policy is encouraged to report it through one of the following reporting opportunities:

- Titan’s Compliance Hotline: U.S.: 1-899-461-9330
- Internet: www.convercent.com/report

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|  The logo for TITAN, featuring a stylized globe icon with a red and blue color scheme and the word "TITAN" in a bold, blue, serif font. | SECTION: SUBJECT: ISSUE DATE: | GLOBAL POLICIES HUMAN RIGHTS POLICY MARCH 2, 2021 |
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- Individuals outside the U.S. can find international hotline telephone numbers by visiting our hotline reporting site and selecting the appropriate country.
- Individuals may remain anonymous when reporting from a location in which anonymous reporting is legally permitted.