

MICHELIN TYRE PLC MODERN SLAVERY STATEMENT 2023

This is the Modern Slavery Statement for Michelin Tyre Plc's financial year ending 2023 in accordance with the Modern Slavery Act 2015. It sets out the steps we have taken and continue to take as a business to prevent modern slavery and human trafficking in our operations and supply chains both at Local and Group level.

We are committed to continuous improvement and development throughout the organisation and our supply chain. We remain proud of the steps we have taken to combat modern slavery and human trafficking and to source and trade responsibly and ethically. Our efforts and key initiatives to eliminate modern slavery and human trafficking are described in this statement. We regularly review the measures taken to ensure that our policies remains robust and appropriate.



MODERN SLAVERY STATEMENT 2023

ORGANISATION'S STRUCTURE

We are a part of the Michelin Group and our ultimate parent company is Compagnie Générale des Établissements Michelin. Headquartered in Clermont-Ferrand, France, the Michelin Group has a commercial presence in 170 countries, employs 125,000 people worldwide and operates 123 production sites in 26 countries.

As an internationally active group and globally leading tyre manufacturer, we are aware of the consequences of our actions and our responsibility for the people who work for and with us. We believe that respecting human rights and contributing to the application of these rights is not only critical to the sustainable operation of our business, but also the right thing to do. Our respect for human rights is reflected in the values of the Michelin Group and in its Code of Ethics. It is part of the corporate DNA and established practice of the group.

The Michelin Group is dedicated to respecting the fundamental principles of human rights as laid down in the Universal Declaration of Human Rights (UDHR), the United Nations Guiding Principles for businesses and Human Rights, the International Charter of Human Rights, as well as their specification in the conventions of the International Labour Organization (ILO). It undertakes to respect them and to enforce them with in all activities of the Michelin Group. Furthermore, Michelin group has pledged to support the UN Global Compact since 2010, which also contains principles on human rights.



OUR BUSINESS



Michelin is dedicated to sustainably improving mobility solutions for goods and people by manufacturing and marketing tyres for every type of vehicle, including airplanes, cars, bicycles/motorcycles, earthmovers, farm equipment and trucks, as well as other associated goods and services. We also offer electronic mobility support services on ViaMichelin.com and publish travel guides, hotel and restaurant guides, maps and road atlases.



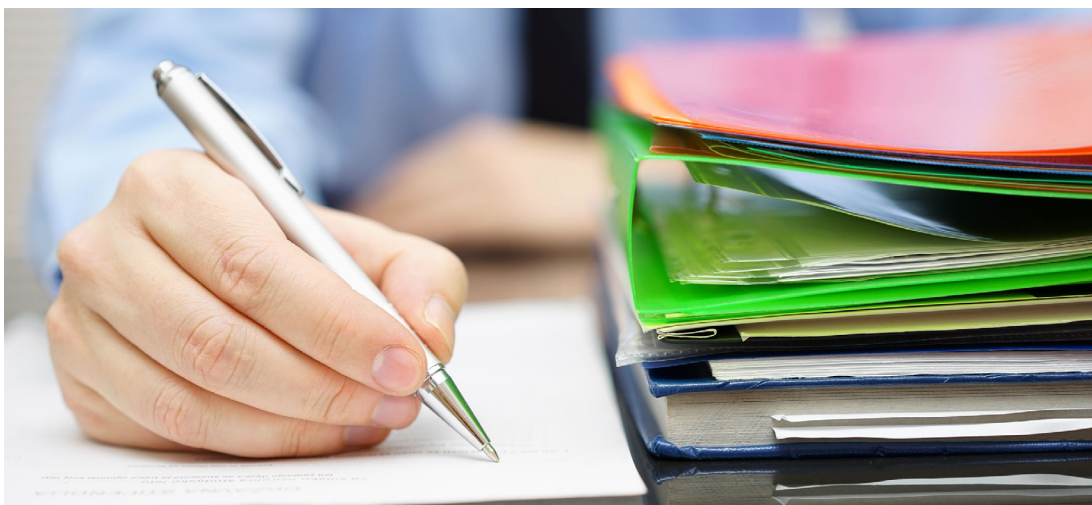
WRITTEN POLICIES

We are committed to ensuring that neither modern slavery, nor human trafficking, exist in our supply chains or, in any part of our business. Our policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

The “All Sustainable” strategy that governs all Michelin activities advocates balance between People, Planet and Profit, and respect for all the stakeholders with which it interacts: employees, business partners, suppliers, local communities, etc. One of the cornerstones of our Corporate and Social Responsibility programme and an essential core value in the Michelin Performance and Responsibility Charter “A Better Way Forward” is **Respect for People** – this is fundamental to our approach to business, our suppliers, employees and customers.

Every year since 2017, the Michelin Group has published its Duty of Care Plan. This document details the main Human Rights risks associated with its operations and with those of its suppliers, along with the measures introduced to prevent them – this includes risks associated with modern slavery. In 2023, the Michelin Group published the Michelin Master Policy on Human Rights. While several of Michelin’s founding documents already set out the company’s undertakings on some subjects coming under human rights, the Group wished to present a clear and accessible summary of the main actions taken and required on this important matter in a single document.

We expect the same standard and behaviour from all our suppliers. The Michelin Purchasing Principles, provide current and potential suppliers with information about the requirements and expectations regarding human rights, health and safety, environment and business ethics. The Michelin Purchasing Principles are embedded in contracts and in the General terms and conditions of purchase.



WRITTEN POLICIES CONTINUED

Further to this, to ensure all those in our supply chain, including, employees, contractors and third-party partners comply with our values, we have in place a rigorous compliance programme.

This includes:

- An awareness and commitment by all employees to abide by and comply with our Michelin Code of Ethics including the decision to deploy further resource in providing trainings to those employees who are not office based and without access to computers. It is planned that these trainings will be completed by Q2 2024;
- All suppliers agreeing to comply with our Michelin Code of Ethics, Purchasing Principles and standard Supply of Services Agreements with clauses specifically covering the Modern Slavery Act 2015;
- Michelin requires compliance with the Michelin Code of Ethics and the Modern Slavery Act 2015 and /or International Labour Convention within its Standard Conditions of Sale which govern many of our contractual relationships as well as incorporating these areas by bespoke clauses in commercial contracts;
- Michelin's Conditions of Purchase including the right to audit all suppliers to ensure that our Corporate Social Responsibility programme is respected; and
- Internal controls and audits regarding forced labour.
- Grievance policy by the implementation of an Ethics Line and whistleblowing procedure accessible worldwide internally and externally to all third parties.



DUE DILIGENCE & AUDITS

Due diligence is undertaken at a Group or local level (as appropriate) when selecting suppliers, which addresses the corporate social responsibility policy of potential suppliers.

We have systems in place to:

- Identify and assess potential risk areas in our supply chains using supplier onboarding checklists and due diligence questionnaires.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains by identifying those suppliers who may have a higher risk of modern slavery.
- Monitor potential risk areas in our supply chains through training and the use of an Ethics Line that can be used anonymously.
- Protect whistle blowers (see section on Whistleblowing below).



Within Michelin's own work force (including contractors), Michelin carries out internal controls and audits on personnel processes to ensure that certain indicators of forced labour (including some of those established by the International Labour Office) are controlled through onboarding processes such as checking that employees have their identity documents freely at their disposal and that recruitment or temporary employment agencies do not charge any fees or commissions to applicants.

We continue to review these controls to ensure that they are adequate in our pursuit to prevent modern slavery and human trafficking and our commitment to continuing its improvement and development in this area.



PROGRESS IN 2023

Michelin is committed to increasing its efforts in raising awareness on modern slavery and takes a zero-tolerance approach to slavery and human trafficking throughout its business operations. Through our Ethics Committee and Human Rights Governance, Michelin Group has implemented internal bodies to monitor compliance with human rights at both group and regional levels.

As part of this governance, Michelin in the UK has established a Modern Slavery Steering Committee which consists of involvement from the following departments:

- Legal
- Internal Control
- Personnel (Human Resources)
- Purchasing
- Tender & Sustainability
- Sales (B2B, B2C, SES)
- Environmental, Health and safety



This year we have made progress in strengthening our approach, including:

- Continuing to identify risks and gaps across our operations, supply chain and workforce. We aim to increase and improve monitoring and awareness within the business of modern slavery and human trafficking and implement further controls where necessary. This exercise included identifying where particular audits of suppliers and third-party partners may be required and internal training opportunities.
- Streamlined focus on developing a risk assessment of Michelin Tyre PLC against the [IASC maturity framework](#) with its four clearly defined stages. As a result of this, we have scored ourselves in the “Meeting Basic Expectations” with some activity in “Evolving Good Practice.” We were able to consider and implement further controls that were identified and continue to build on some areas. We are committed to continuous improvement and this work shall continue in 2024.
- Engagement with the Marketing Team to assist in an overhaul of the look and feel of our Modern Slavery Statement in line with the Group’s commitment to People, Profit, Planet and an increased collaborative approach within the business.



WHISTLE BLOWING



Respect for People is one of the Michelin Group's core values – caring for every person inside and outside of our organisation, to earn their trust through our integrity. One way we aim to stay true to this core value is to actively encourage a 'speak up' culture, inside and outside of the organisation.

We maintain a 'whistleblowing' line with an independent third party, known as our 'Ethics Line' to allow any non-ethical behaviour to be reported, in an anonymous way or not. All employees are advised of this facility and third parties, such as our customers and suppliers, can access the facility via our website, www.michelin.co.uk.

We also have a robust procedure to ensure that all incidents reported are handled promptly and in a timely manner and with the level of expertise, impartiality and confidentiality required to safeguard the integrity of the Ethics Line. Confidentiality and protection of whistle blowers is specifically covered in our Michelin Code of Ethics and in such procedures.

In 2023, Michelin published a new version of the Group Whistleblowing Procedure, accessible on the group internet website. In 2023, no reports regarding Modern Slavery topics in connection with Michelin Tyre PLC were reported through the Ethics Line.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, annual training is provided to Directors, senior managers and key personnel involved in personnel, procurement and supplier selection, as well as those with oversight across various sections of the business where we engage with third party partners.

In 2024, it is anticipated that the broader work force shall be invited to a broader training on Human Rights including forced labour, modern slavery and human trafficking.

The Modern Slavery Steering Committee has a fixed agenda point to discuss and review how best to increase awareness of Modern Slavery within the workforce to ensure that the topic is really embedded as part of the DNA of the organisation.



VIOLATIONS

Michelin takes disciplinary action against any employee found to be involved in breaking the law in relation to child labour, forced labour, modern slavery and human trafficking.

Michelin shall also take any appropriate and proportionate measures regarding its clients, suppliers and any business partners, including up to termination of business relationship, against anyone found to be involved in breaking the law in relation to human rights.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015, constitutes our slavery and human trafficking statement for the financial year ending 2023 and has been approved by the board of directors of Michelin Tyre PLC.

John Howe
Michelin Tyre Public Limited Company



Managing Director
Date: May 2024

