



***MICHELIN TYRE PLC***  
***MODERN SLAVERY STATEMENT 2024***

# **INTRODUCTION FROM THE MANAGING DIRECTOR OF THE UK**

**This is Michelin Tyre Plc's Modern Slavery Statement for the year ending 2024 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.**

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.

Globally this year has been very challenging with rising social inequality and crises around the world. We recognise that modern slavery continues to be a growing issue with world unrest increasing the risk of human trafficking and forced labour.

## **Progress**

This year we have made great progress in reinforcing our approach including:

- Running our first ever Ambassador led Anti-Slavery Day on 18<sup>th</sup> October 2024, where the Voice of Hope charity were able to provide valuable insights and awareness of local policing issues and modern slavery concerns to the business driving engagement
- The deployment and review of KPIs meaningful to the business in ensuring modern slavery awareness, transparency and supply chain due diligence
- Reviewed our risk assessment of the UK business and reduced those risks by implementing further control measures
- Updating employee credit card and expense policies to ensure further controls and awareness of ethical purchasing and modern slavery,
- Updating the policies on our employee travel portal to remind colleagues to be vigilant to modern slavery when travelling

I am clear in our commitment to our customers and suppliers; we will continue to have people at the heart of the group's decisions. Respect for people is a fundamental Michelin value and we continue to reaffirm this.



John Howe

**Managing Director**

Michelin Tyre public limited company

Date: March 2025

## **OUR BUSINESS**

**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 footprint in 175 countries, employs 129,760 people worldwide and operates 86 production facilities and 45 plants.**

As an internationally active group and global leader in tyre manufacturing, 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.

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. Michelin wants to be a supplier of value-creating composite solutions for demanding applications, and thus expand in the fields of flexible composite products, Engineered Polymers, and even hydrogen.



# ***POLICIES AND GOVERNANCE***

**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. The Michelin Human Rights Policy and the Group Human Rights training highlights respect for people as a fundamental Michelin value placing Human Rights at the heart of our activities throughout the world as we continue to strive and nurture an inclusive culture.

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.

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.

Further to this, to ensure all those in our supply chain, including, 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**;
- 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.

In 2024, we also tabled a new draft Modern Slavery Constitution and Policy document within the Modern Slavery Steering Committee. This document is to be finalised in 2025.



## ***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. At the Modern Slavery Steering Committee, we discussed learnings from recent prosecutions in other businesses to consider if Michelin would have also spotted the key red flags and where any gaps were identified small working groups were assigned to review and remedy these areas.

In 2024 we also identified the need for further controls not only within our direct procurement processes but also with our service partners and those with whom we partner on our tyre sales. Further contractual controls have been implemented in relation to these parts of the business and further work will continue in 2025 to ensure the appropriate level of due diligence and audit on these third parties are undertaken.

# **IDENTIFYING AND MANAGING RISK AND ACTIONS TAKEN**

**Potential Modern Slavery hazard situations are identified through a Risk Assessment process where the team identify what could cause modern slavery situations (hazards), decide how likely it is that it could happen and how serious it could be (the risk) to take action and eliminate the hazard, or, if this is not possible, reduce and control the risk.**

The enigma of modern slavery is complex, so our risk assessments include assessing the following situations:

1. Sexual exploitation
2. Forced labour
3. Forced criminality
4. Domestic servitude
5. Organ harvesting
6. Child exploitation
7. Exploitation

As part of our risk assessment in these areas, we graded the risks from 1-5 (1 minimal hazard and 5 major hazard), listed existing control measures, noted any further actions that need to be taken and categorised any residual risks.





## ***KEY PERFORMANCE INDICATORS***

**In 2024 we launched our first year of KPIs on modern slavery which included:**

1. The number of modern slavery incidents reported
2. Ethics training completion rate
3. Modern Slavery training
4. Attendance at local modern steering meetings
5. Supplier audit checks

Our results at the end of the year gave an average of 91% across the above KPIs. We were extremely satisfied with this as a landing position. However, the modern slavery steering committee considered the value in the metrics and agreed that we would continue to evolve the KPIs to ensure the most meaningful set of key performance indicators to achieve awareness, transparency and effectiveness.

# WHISTLEBLOWING

**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](http://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 2024, no reports regarding Modern Slavery topics in connection with Michelin Tyre PLC were reported through the Ethics Line.



# TRAINING AND AWARENESS

**We recognise that our people and suppliers play a key part in helping us identify and prevent modern slavery.**

## Colleague training

In November 2024 we launched modern slavery training on anti-slavery day and invited the whole UK population. The training was held by an external charity called "The Voice of Hope" who are based in Staffordshire. Voice of Hope raise awareness of modern slavery and human trafficking and aim to eradicate this social atrocity through training the general public and businesses in the local area. The session illustrated case studies of modern slavery and human trafficking that had taken place in the area local to the Head Office in Stoke On Trent and helped colleagues to understand how the things they see and the places they go to on a daily basis can impact people, signs to look out for and what to do if they notice anything.

## Management 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 2025, 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.

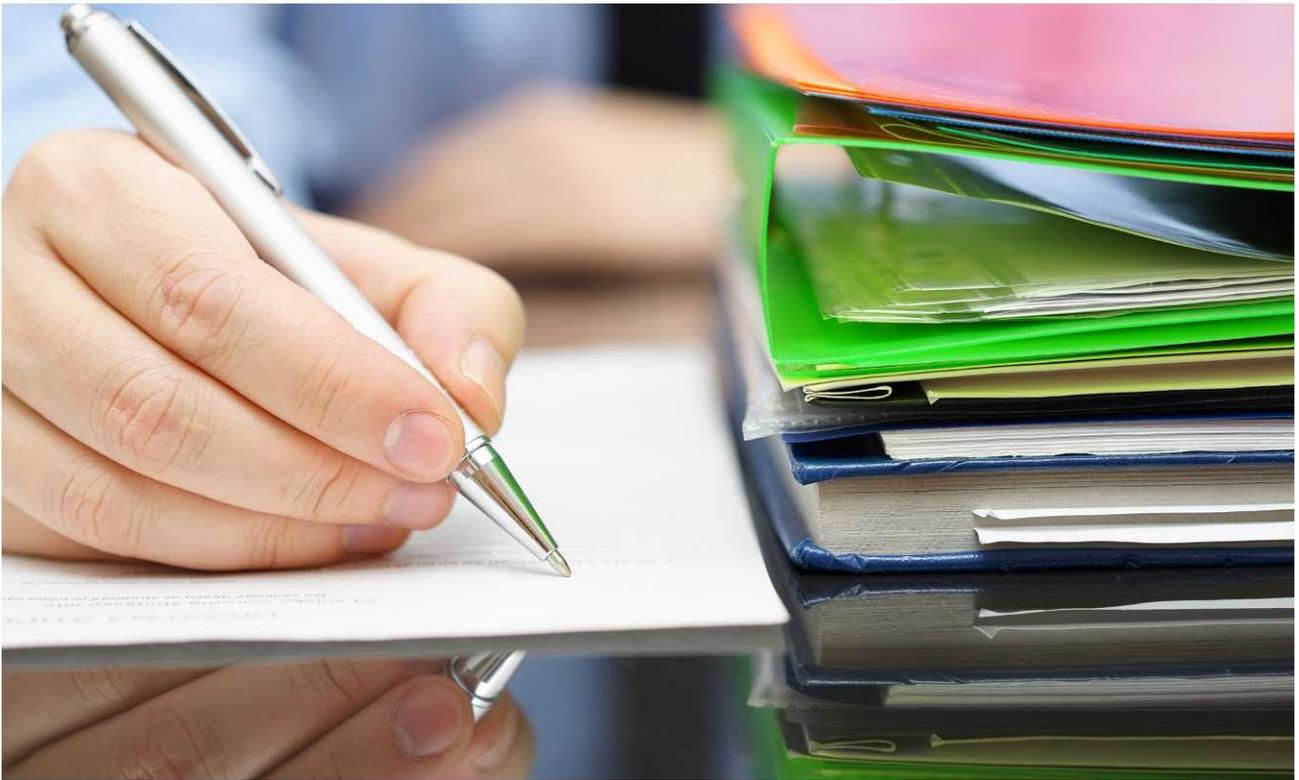
## Modern Slavery Steering Committee Meetings

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.

## Third Party Training

Michelin aims to be able to partner with local charities to be able to offer further training to those with whom it does business including service partners. Michelin will continue to explore this in 2025.





## ***VIOLETIONS***

**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 2024 and has been approved by the board of directors of Michelin Tyre PLC.

