MICHELIN TYRE PLC

MODERN SLAVERY STATEMENT

(PURSUANT TO THE MODERN SLAVERY ACT 2015)

Michelin is proud of the steps we take to combat slavery and human trafficking. Michelin's efforts to eliminate slavery and human trafficking are described in this statement. We will regularly review the measures we take to ensure that our policy remains robust and appropriate.

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 is present in 177 countries, employs 124,760 people and operates 68 tyre factories that, together, produced approximately 173 million tyres in 2021.

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. It also offers electronic mobility support services on ViaMichelin.com and publishes 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.

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.

To ensure all those in our supply chain, contractors and third party partners comply with our values we have in place a rigorous compliance programme. This consists of:

- All employees complying with our Code of Ethics;
- All Suppliers agreeing to comply with our Code of Ethics, Purchasing Principles and standard Supply of Services Agreements with clauses 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 CSR programme is respected; and
- Internal controls and audit regarding forced labour.

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 through the use of 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 anonymous ethics hotline.

- Protect whistle blowers.

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. Further internal controls are being considered for 2022/2023.

Risk Assessment, Ongoing Monitoring and KPIs

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.

Michelin has established a Modern Slavery Steering Committee which consists of involvement from the following departments:

- Legal
- Internal Control
- Human resources
- Purchasing
- Public Affairs
- Sales
- Environmental, Health and Safety

The Modern Slavery Steering Committee is working to identify any risks and gaps across the business including its operations, supply chain and workforce. Its aim is to increase and improve ongoing monitoring efforts and awareness of slavery and human trafficking. This exercise includes identifying where audits of suppliers and third party partners may be required as well further monitoring and training opportunities internally.

WHISTLEBLOWING

We maintain an anonymous 'whistleblowing' line with an independent third party. All employees are advised of this facility. Employees are actively encouraged to raise concerns with their managers, human resources or via the whistleblowing 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 human resources, procurement and supplier selection, as well as those with oversight across various sections of the business where we engage with third party partners.

The Modern Slavery Steering Committee is considering what further awareness and training is required amongst the rest of the workforce on this topic in 2022.

VIOLATIONS

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

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 2021.



John Howe
Director

Date: May 2022