



***MICHELIN TYRE PLC***

*MODERN SLAVERY STATEMENT 2025*

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

**This is Michelin Tyre Plc's Modern Slavery Statement for the year ending 2025 in accordance with the Modern Slavery Act 2015. It sets out the initiatives we have undertaken, and continue to take, as a business to prevent modern slavery and human trafficking in our operations and supply chains.**

Michelin is dedicated to driving continuous improvement and development across our organisation and supply chain. We take pride in the progress we've made to combat modern slavery and human trafficking, and in our commitment to sourcing and trading responsibly and ethically. This statement outlines the actions and key initiatives we have implemented to help eliminate modern slavery and human trafficking. We endeavour to ensure the measures we have in place, and our policies remain robust, effective, and fit for purpose.

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

### ***OUR PROGRESS***

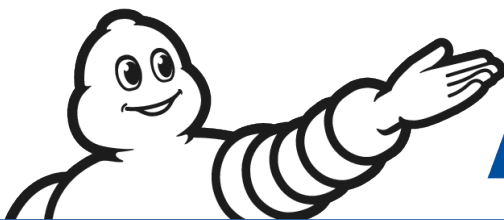
We have made great progress in reinforcing our approach in the following ways:

- Our employee led ambassador team hosted an awareness and training session held on Anti-Slavery Day. The charity Voice of Hope delivered an in-person seminar, providing attendees with valuable insights into local policing issues and modern slavery concerns affecting businesses. It was an inspiring and engaging event that sparked meaningful conversations about the reality of modern slavery in the world around us.
- We have deployed a revised Michelin Group Code of Ethics to all employees, now incorporating a dedicated section on modern slavery, forced labour, and human trafficking. This update reinforces Michelin's commitment expectations regarding employee conduct in identifying and combating modern slavery.
- Updated our Human Rights Master Policy that was first established in 2022. This strengthened our commitment against all forms of modern slavery. Michelin group is built around a profoundly humanist project for and by people, Michelin reaffirmed this belief of putting the development and fulfilment of people at the heart of its sustainable growth ambitions.
- Our employee expenses and travel portal now includes a permanent notice to remind colleagues to be vigilant to modern slavery when travelling. By introducing this we upheld our strengthened employee credit card and expense policies ensuring further controls and awareness of ethical purchasing and modern slavery.
- We carried out our dedicated modern slavery training to targeted employees this alongside the mandatory Code of Ethics training deployed to all of the Michelin population, highlighted real world examples and called attention to any potential warning signs.
- We reviewed and evolved our Key Performance Indicators with the aim of establishing metrics that are meaningful and measurable. With a focus on training rates, committee meetings and Ethics Line reports & investigations, we will continue to consider our approach to this throughout 2026.

Respect for people, respect for the environment, respect for shareholders, respect for customers and respect for facts are values fundamental to Michelin. These pillars are always at the heart of the Michelin Group's decisions, and we continued to reaffirm these throughout 2025.



John Howe  
**Managing Director**  
Michelin Tyre public limited company  
April 2026



**MICHELIN**

## **OUR BUSINESS**

Michelin Tyre PLC (“Michelin”) is part of the Michelin Group and our ultimate parent company is Compagnie Générale des Établissements Michelin, headquartered in Clermont-Ferrand, France. As set out in the Universal Registration Document, the Michelin Group operates in 63 countries and it employs 122,600 people worldwide. In 2025, the MICHELIN brand broke two historic records – it joined the Top 10 Strongest Brands Worldwide and its financial value exceeded \$10 billion. For the ninth year running, it consolidated its undisputed leadership as the most powerful and financially valuable tyre brand.



As an internationally active group and global leader in tyre manufacturing, we are aware of the potential impact of our actions and our clear responsibility for the people who work for and with us. Contributing to the application of Human Rights is not only critical to the sustainable operation of our business but is also the right thing to do.

Our respect for human rights is reflected in the values of the Michelin Group, in its Code of Ethics and in our Human Rights Master Policy. It is part of the corporate DNA and established practice of the group. In 2025 our Code of Ethics was updated to further strengthen Michelin’s commitment in this area.

The Michelin Group is dedicated to honouring 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, the 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 aeroplanes, 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 dedicated to ensuring that neither modern slavery, nor human trafficking, exist in our supply chains or, in any part of our business. Our policies show our commitment to acting ethically and with integrity in all that we do and to implementing and enforcing effective systems and controls.

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 was enhanced and re-deployed in 2025. Alongside this, the Michelin Group Human Rights training highlights consideration for people as a fundamental Michelin value, placing Human Rights at the heart of our already established inclusive culture. Michelin Group’s Code of Ethics and also our Human Rights Master Policy establish a framework of integrity for all employees and partners, centred on the groups five core values: respect for people, customer, shareholders, the environment and facts. It mandates anti-slavery practices, prohibits discrimination, and promotes sustainable, ethical business behaviour.

Since 2017, the Michelin Group has annually published its Duty of Care Plan. This document sets out 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 also demand 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, and more specifically the dedicated section 'Modern Slavery, Forced Labour and Human Trafficking' which was implemented in the revised code published in 2025;
- 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 Conditions of Purchase including the right to audit all suppliers to support our Corporate Social Responsibility programme;
- Internal controls and audits regarding forced labour; and
- Grievance policy by the implementation of an Ethics Line and whistleblowing procedure accessible worldwide internally and externally to all third parties.

Throughout 2025 we continued to work on the draft Modern Slavery Constitution and policy document within the Modern Slavery Committee. This is due to be finalised in 2026. The committee is made up of representatives from a range of cross functional departments including sustainability, legal and compliance, purchasing, operations and HR. We have consistently had and commit to a minimum of 2 committee meetings per annum.

## ***DUE DILIGENCE & AUDITS***

Due diligence is undertaken at a Michelin 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.

- Report on and investigate 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. Our aim 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 continuous improvement and development in this area. Michelin closely follows the Michelin Group's Purchasing Principles. As such supply chain due diligence processes are defined by the group and are deployed locally using the EcoVadis platform and bespoke third party screening. Our dedicated Service Provider Network Manager joined the Modern Slavery Committee in 2025 leading to an updated onboarding process for new and existing service providers and modern slavery policies are now requested as part of this process. Additionally all suppliers engaged in a competitive tender must complete a due diligence questionnaire which partly focuses on modern slavery.

Positive progress has been made on the controls within the direct procurement processes, including with our service providers and those who we partner on our tyre sales. Michelin aims to continue to raise awareness amongst those with whom it does business including suppliers, customers and service partners. Michelin will explore further awareness opportunities in this area in 2026.

## *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 the situation could happen and how serious it could be (the risk), then take action and eliminate the hazard, or, if this is not possible, reduce, mitigate and control the risk.

The enigma of modern slavery is complex, so our risk assessment includes 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. Our aim is to review the existing risk assessment in 2026 as part of our ongoing focus on reducing the risks of modern slavery and ensuring that we have the appropriate control measures in place.

## *WHISTLEBLOWING*

Respect for People is one of the Michelin Group's core values – caring for every person inside and outside of our organisation, to secure their trust through our clear integrity. One way we 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, known as our '**Ethics Line**' to allow any non-ethical behaviour, corruption or ethics code violations 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). The line is managed by an independent third party and the secure system operates all year round. This tool is the recommended method for any reports of modern slavery concerns. The Code of Ethics training covered our whistleblowing policy and the practical way in which concerns should be reported, in 2026 we will continue to reinforce this policy. We have a robust procedure to ensure that all incidents reported are investigated and resolved 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 the Group Whistleblowing Procedure (accessible on [www.michelin.com](http://www.michelin.com) website). In 2025, we received no reports regarding modern slavery topics in connection with Michelin Tyre PLC through the Ethics Line, or otherwise.

## *TRAINING AND AWARENESS*

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

Michelin's Code of Ethics training was deployed in 2025 for all Michelin Group employees on a two-year cycle. For UK based employees the training completion rate was 91%. During this training all employees confirm that they understand and will adopt and apply ethical principles to their daily activities. The training directly addressed the issue of modern slavery, forced labour and human trafficking as a new section of the Code of Ethics.

Further to this, 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 employees 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. This specialised training covers identifying indicators of modern slavery such as forced labour and includes real examples of modern slavery. Employees were encouraged to consider their area of responsibility and highlight any risk areas. In 2026 we aim to expand this training further to capture more of our 'front line' workforce, reinforcing our focus on remaining a unified, vigilant workforce dedicated to ethical practice.

To strengthen our training offer further, in October 2025 we launched our second modern slavery awareness session accessible to all our employees. The session was held by an external local charity '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 presented case studies of modern slavery and human trafficking that occurred near the Michelin Head Office in Stoke-on-Trent. It helped colleagues understand the impact of modern slavery, recognise warning signs, and follow the correct procedure if they notice anything concerning.

Going forward, Michelin will continue to raise awareness amongst those with whom it does business including suppliers, customers and service partners. Michelin aims explore training opportunities in this area in 2026.

## VIOLATIONS



Michelin takes violation of its policies and the law extremely seriously. Disciplinary action would be taken against any employee found to be involved in breaking the law in relation to modern slavery, human trafficking child labour and forced labour, as well as any violations of its policies, procedures and practices in this area.

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 2025 AND HAS BEEN APPROVED BY THE BOARD OF DIRECTORS OF MICHELIN TYRE PLC.*