



## **MICHELIN TYRE PLC**

### **MODERN SLAVERY STATEMENT**

**(PURSUANT TO 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 more than 170 countries, has 123,600 employees and operates over 71 production plants in 26 different countries.

#### **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](http://ViaMichelin.com) and publishes travel guides, hotel and restaurant guides, maps and road atlases. The financial period of Michelin Tyre Plc runs from 1 Jan – 31 December.

#### **OUR SUPPLY CHAIN**

Our supply chain covers a number of areas connected to the operation of the manufacturing and sales business, including amongst other things IT services, marketing, design & construction and employment agencies.



## **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 program 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 and contractors comply with our values we have in place a rigorous supply chain compliance programme. This consists of:

- All employees complying with our Code of Ethics
- All Suppliers agreeing to comply with our Purchasing Principles; and
- All Supplier agreeing to contractual clauses regarding Modern Slavery and trafficking; and
- Michelin Conditions of Purchase including the right to audit all suppliers to ensure that our CSR programme is respected.

## **RISK ASSESSMENT**

A local level risk assessment has been undertaken with a view to incorporating this within a broader regional risk portfolio. Modern Slavery and human trafficking are also discussed by the Senior Leadership Team and at Board Meetings. KPIs will form part of the ongoing development of Modern Slavery work within MTPLC in 2021.

## **DUE DILIGENCE & AUDITS**

Due diligence is undertaken at a Group or local level (as appropriate) when selecting suppliers. This addresses the corporate social responsibility policy of potential suppliers. We also provide training to employees which advises them on basic checks that could be carried out on suppliers and third-party contractors who may be new to Michelin.



We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

#### **SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS**

Supply contracts incorporate appropriate provisions regarding compliance with our corporate standards and the Modern Slavery Act 2015.

We have a comprehensive approach to ensuring compliance, which consists of involvement from the following departments:

- Ethics Committee
- Legal
- Internal Control
- Quality
- Personnel
- Purchasing
- Health, Safety and Environment

#### **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, training is carried out with those employees and managers who are most directly affected by and in contact with suppliers. It is likely this training will be given to a broader employee audience in future years.

## **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 31 December 2020.

A handwritten signature in black ink, appearing to read "Chris Smith", written in a cursive style.

Chris Smith  
Director

Date: 25 May 2021

Approved by Board Meeting  
25 May 2021