



## **MICHELIN TYRE PLC**

### **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 110,000 employees and operates over 60 production plants in 17 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 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 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
- Michelin Conditions of Purchase including the right to audit all suppliers to ensure that our CSR programme is respected.

#### **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 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**

We have zero tolerance to slavery and human trafficking. 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:

Legal



Internal Control.

Human resources

Purchasing

## **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, we provide training to our staff.

## **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 2019.

Chris Smith  
Director

Date: 19<sup>th</sup> August 2019

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