2025

TAX TRANSPARENCY REPORT

MICHELIN

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GLOSSARY

APA:
an Advance Pricing Agreement (or arrangement) on transfer prices negotiated with tax authorities, whether on a unilateral, bilateral or multilateral basis.

Contribution to Group income before tax:
portion of income before taxes generated by a given country in relation to the income before taxes generated by the Group.

Contribution to income tax:
portion of the income tax due by a given country in relation to the income tax due by the Group.

Country-by-country reporting (CbCR):
arge multinational enterprises are required to publish a summary statement on the allocation of their taxes and profits among their different tax jurisdictions on an annual basis. This statement (previously reserved solely for the tax authorities until last year) must now be made public starting from 2025.

Customs duties:
indirect taxes levied on goods when they enter a country.

Environmental tax:
taxes and duties levied on energy products, measured or estimated emissions into the air or water, ozone-depleting substances, and certain sources of diffuse pollution of water, land, forests and biodiversity.

Financial transaction tax:
a financial transaction tax is legally defined as being an indirect state tax levied on the acquisition value of certain equity securities or similar securities issued by certain French companies and admitted for trading, due for payment by market intermediaries or account holders in proportion to the acquisition for value of these securities.

Global tax contribution:
all the direct and indirect taxes, duties and levies borne by the Group in its capacity as an economically liable taxpayer organization. These include income tax, taxes on goods and services such as customs duties, payroll taxes, withholding taxes and environmental taxes. The global tax contribution does not include taxes collected by the Group on behalf of the tax authorities, nor employer social security contributions borne by the Group.

Income tax accrued:
tax due on the taxable income of an entity or group of entities within a country. This category also includes taxes other than income tax that are also based on income (the sum of taxable income less deductible expenses), such as the business tax on value added (Contribution sur la Valeur Ajoutée des Entreprises – CVAE) in France and the regional production tax (Imposta Regionale sulle Attivita Produttive – IRAP) in Italy.

Number of employees:
the number of employees registered in the relevant tax juridisction as of December 31 of the fiscal year.

Payroll taxes:
all the various taxes paid by employers, employees and the self-employed, as a percentage of wages or as a fixed amount per person. Example: wage taxes in France or payroll taxes in other countries.

Profit (loss) before tax:
the sum of the profit or loss before tax of all the constituent entities resident for tax purposes in the relevant tax jurisdiction. Profit or loss before tax, restated for intra-group dividends, includes all non-recurring income and expenses.

Revenue:
the sum of the gross sales of all companies before elimination of intra-country transactions, plus income from participating interests, excluding dividends received from affiliated undertakings, income from other capitalized investments and loans, other interest receivable and similar income.

Social security contribution:
these are legally mandated contributions payable by the employer and calculated based on various elements of compensation. They typically cover employee participation in statutory and mandatory pension, healthcare and welfare schemes. Social security contributions are distinct from taxes levied on wages. They are presented here on a due basis for the year under review in this report.

Tangible assets:
the sum of the net book values of the physical assets, excluding cash and cash equivalents, and right-of-use assets (such as property leases) of all the constituent entities resident for tax purposes in the relevant jurisdiction.

Tax on goods and services:
all taxes levied on the production, extraction, sale, transfer, leasing or delivery of goods and the rendering of services, or on the use of goods or permission to use goods or to perform activities. In particular, these include non-recoverable value-added tax, sales taxes, property taxes, excise duties, duties levied on the import and export of goods, and customs duties.

Tax ruling:
a formal position taken by a tax authority on a matter referred to it by a private or corporate taxpayer concerning how a tax rule applies to their specific circumstances. It is an instrument used by governments to provide legal certainty.

Withholding tax:
tax levied on the payment of certain transactions (royalties, interest or dividends) conducted as part of a cross-border relationship.

"In 2025, the Michelin Group made progress in its drive to become a world-leading manufacturer of life-changing composites and experiences. Our unique approach to achieving this goal is based on a sustainable growth model that recognizes the ways in which human, economic and environmental dimensions interconnect. Our belief in this interconnection underpins Michelin's All Sustainable approach and structures the way we define, manage and measure the Group's performance".

Florent **MENEGAUX**

(extract from the Michelin Group's 2025 Universal Registration Document).

FOREWORD

The following tax transparency report has been prepared in accordance with the guidance provided in the "GRI 207: Tax 2019" standard, a voluntary reporting methodology that enables a company to report on its approach to taxation and the link between its business and its tax contribution.

Its content is based on the consolidated scope of Compagnie Générale des Établissements Michelin (CGEM; hereafter, the "Group" or "Michelin"). The reporting cycle is annual, with this year's reported data covering the 12 months from January 1 to December 31, 2025.

Some of the figures in this report, including the global tax contribution, the social security contribution and certain figures in the country data sheets, have been subject to limited assurance procedures carried out by the Company's Statutory Auditors.

The report was authorized for issue by the Managers on May 21, 2026.

MESSAGE FROM THE GENERAL MANAGER AND CHIEF FINANCIAL OFFICER

Yves
CHAPOT

Bénédicte
DE BONNECHOSE

In 2025, Michelin made further progress towards tax transparency in an increasingly challenging economic, regulatory and social environment.

A combination of geopolitical strains and ongoing tax reforms is reshaping the context in which we operate for the foreseeable future. Our priority in these circumstances is to reconcile economic performance with tax responsibility and long-lasting roots in the countries in which the Group operates.

A RESILIENT GROUP RESOLUTELY GEARED TOWARDS THE LONG TERM

In 2025, higher customs duties in North America took a toll on the Group's performance by both increasing its supply costs and reducing its volumes. These new customs duties constituted a significant expense for the Group.

Despite the instability surrounding these tariffs, Michelin nevertheless delivered another solid performance:

- segment operating margin: 10.5% of sales;
- free cash flow (before M&A): €2.1 billion;
- return on capital employed: 9.2%.

These results were achieved thanks to robust fundamentals:

- an industrial footprint in 63 countries;
- sustained investments in innovation (€1.2 billion in R&D);
- and the roll-out of the "Michelin in Motion 2030" strategy which takes a coherent approach to delivering economic performance, environmental impact and societal contribution.

Michelin also remains central to France's economy and research thanks to its leading industrial and technological footprint: 13 production plants in operation, over €400 million spent on R&D each year, and a total tax contribution of around €215 million made in 2025.

A PROFOUND TRANSFORMATION IN THE INTERNATIONAL TAX LANDSCAPE

2025 marked another step forward in the transformation of the international tax landscape, including various changes affecting Michelin directly:

- increased transparency requirements (public country-by-country reporting or CbCR);
- application of Pillar 2 (global minimum tax of 15%) in a large number of jurisdictions;
- intensification of controls, particularly in the area of transfer prices.

Michelin is addressing these changes by incorporating these new regulatory frameworks into its internal processes, always with a view to cooperating with the tax authorities.

A TAX POLICY ALIGNED WITH OUR PRODUCTION MODEL

Our tax policy continues to be driven by a set of clear and stable principles:

- compliance with local legislation in all the countries in which we operate;
- zero use of artificial tax arrangements or structures without any economic substance;
- prudent, measured and transparent use of common law mechanisms (research tax credits, ecological transition incentives, tax consolidation, etc.) in cases where they are fully compatible with our actual activities;
- efforts to allocate profits according to where the Group's functions, risks and assets are located, particularly in the areas of R&D, intellectual property and decision centers.

As in previous years, our global tax contribution extends beyond income tax alone. It also includes taxes on goods and services (including customs duties), payroll taxes, environmental taxes and other different types of taxes.

The Group's effective tax rate in 2025 came to **26.3%**, compared with 22.7% in 2024.

The Group's total tax contribution for the year (excluding financial transaction tax) amounted to €1.337 billion, which is above the €1.238 billion paid in 2024.

Its social security contributions, meanwhile, came to **€1.059 billion** in 2025, compared with €1.030 billion in 2024.

GREATER TRANSPARENCY TO BUILD TRUST

Our Group sees taxation as a component of its social responsibility in the countries in which it operates. With this in mind, the relations it builds with the various tax authorities are based on a continuous and transparent form of dialogue in which arguments are presented clearly, including in cases where laws and regulations are subject to interpretation.

Michelin's Tax and Customs Department actively continues to establish structured partnerships with tax authorities under cooperation or "trust-based relationship" schemes. Such partnerships help to promote transparency and secure the Group's position based on various shared principles, such as clear information, availability and responsiveness.

Michelin has been a signatory of France's "trust-based relationship" protocol since 2019 and also applies this approach in other countries offering similar mechanisms. In 2025, Michelin Italy joined Italy's trust-based relationship scheme, Michelin Spain's Annual Transparency Report was officially endorsed by the country's tax administration, and Michelin Brazil applied to join the Confia program.

Meanwhile, Michelin was brought before a senatorial committee of inquiry in France. The hearing covered three topics: production plant closures, state aid received (competitiveness and employment tax credits, research tax credits, contribution exemptions) and the quality of the tax and social information made available to the public. In keeping with its transparency principles, the Group provided all its data on the state aid it had received.

In addition, the Group chooses to secure its operations upstream by making use of tax rulings or advance pricing agreements (APA) on transfer prices. Given the risk of double taxation inherent in international tax systems, the Group also makes use of the mutual agreement procedures provided for in tax treaties and, where applicable, the European Union Arbitration Convention.

> We hope this latest edition of the report will help to maintain and enhance the trust that our partners (customers, public authorities, shareholders and other stakeholders) have placed in us by offering them a transparent and extensive presentation of our tax matters, as regards both the tax contributions we have paid and the principles that shape our tax policy.

Yves **CHAPOT** and Bénédicte **DE BONNECHOSE**


MICHELIN

01

MICHELIN, A GLOBAL INDUSTRIAL FOOTPRINT, AN INNOVATION AND PERFORMANCE-DRIVEN STRATEGY

1.1 OUR KEY FIGURES

2025 KEY FIGURES

PEOPLE

122,600
employees including 6,000 in R&D

84.4%
engagement rate

PROFIT

10.5%
segment operating margin

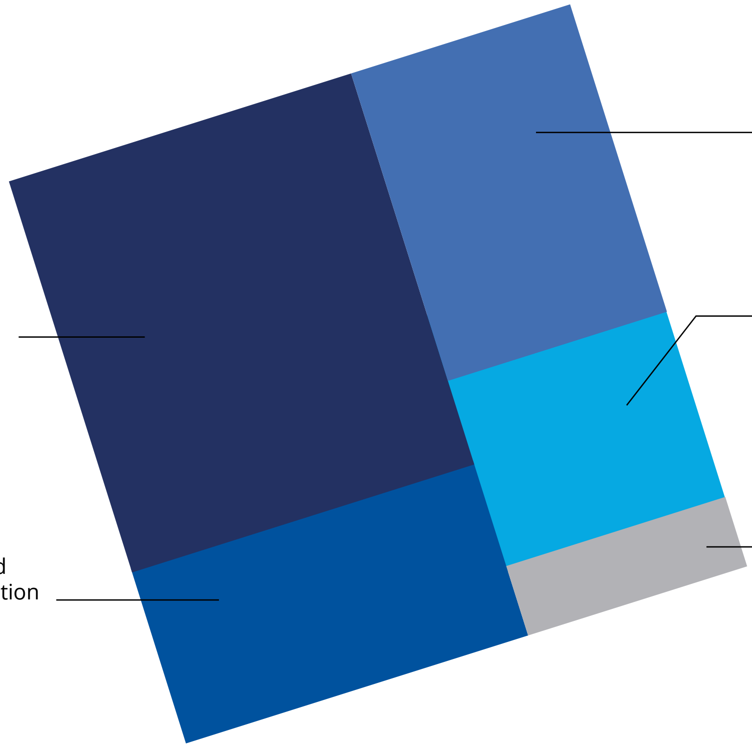
€2.1BN
free cash flow before M&A

PLANET

-17%
CO_2 emissions in 2025 vs 2024 (scopes 1 & 2)

32%
renewable and recycled materials content in tires

BREAKDOWN OF SALES BY BUSINESS



47%
Automotive and Two-wheel tires (1)

18%
Long Distance and Urban Transportation tires (2)

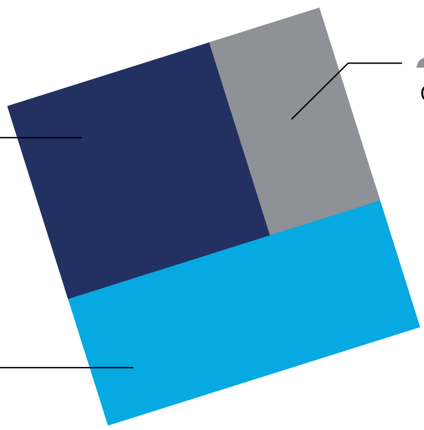
17%
Specialty tires (3)

13%
Connected Solutions (2), Retail & Distribution (4) & Lifestyle (1)

5%
Polymer Composite Solutions (3)

GEOGRAPHIC BREAKDOWN OF SALES AND EMPLOYEES

Sales
€26BN



37%
Europe

37%
North America

26%
Other regions

Global workforce
122,600

EUROPE
60,600

NORTH AMERICA
22,700

OTHER REGIONS
39,300

(1) Reporting segment 1.
(2) Reporting segment 2.
(3) Reporting segment 3.
(4) Allocated pro rata to each of the three reporting segments.

1.2 OUR STRATEGY

A global environment shaped by lasting uncertainties, calling for forward-looking thinking, adaptation and transformation

Faster pace of climate change and increased pressure on resources

The issue: Recent years have been among the warmest ever observed worldwide, with average global temperatures exceeding pre-industrial levels by more than 1.5°C over a three-year period for the first time. As extreme events multiply, ecosystems continue to deteriorate, biodiversity continues to be depleted and resources are becoming scarcer, putting severe strain on global supply chains.

WHAT THIS MEANS FOR MICHELIN

This situation increasingly calls for trade-offs between financial performance, sobriety and sustainability. For Michelin, these developments make it all the more necessary to continue transforming its businesses in order to reduce its impact on nature, use resources more efficiently and meet the expectations of its customers and partners in terms of environmental performance over the entire product life cycle.

THE MAIN TRANSFORMATION INITIATIVES

- Step up the pace of innovation to develop solutions incorporating more renewable and recycled materials, and reduce dependence on critical resources.
- Enhance the environmental performance of products and industrial processes, particularly in terms of their carbon footprint, resource consumption and tire and road wear particle emissions.
- Make environmental excellence a factor of brand differentiation and preference, recognized by customers, partners and independent bodies.

Geopolitical fragmentation and uncertain trading conditions

The issue: Rising geopolitical tensions, challenges to certain multilateral balances and the resurgence of protectionist policies are contributing to a more fragmented and less predictable economic environment. These developments, which affect trade, financial and industrial flows, are taking place against a backdrop of increasingly divergent economic trajectories between the world's different regions.

WHAT THIS MEANS FOR MICHELIN

The developments described above add to the complexity of Michelin's business environments, requiring it to continuously adapt its manufacturing organizations and operating methods. In a more fragmented world, the challenge for the Group is to continue to serve its customers in a competitive and reliable manner, while taking into account specific local conditions and market trends.

THE MAIN TRANSFORMATION INITIATIVES

- Deploy a balanced industrial model, favoring local presence close to markets and customers.
- Craft more resilient and agile organizations capable of coping with a volatile geopolitical and economic environment.
- Increasingly integrate geopolitical and territorial dimensions into strategic thinking, in conjunction with the development of local ecosystems and regional support.

Regulatory pressure and increasingly complex standards and frameworks

The issue: Regulatory frameworks are evolving rapidly and becoming increasingly burdensome, whether in terms of environmental, technical, social or societal standards. The trend has been accompanied by stricter transparency, compliance and reporting requirements, causing further difficulties due to the lack of regulatory consistency across the world's regions.

WHAT THIS MEANS FOR MICHELIN

This growing complexity means that the Group is under increasing pressure to anticipate and adapt. It influences the conditions under which products and services are placed on the market, and can create differentiated effects according to the geographical area. For Michelin, the challenge consists of continuing to do business within these frameworks while remaining competitive and guaranteeing high levels of stakeholder confidence.

THE MAIN TRANSFORMATION INITIATIVES

- Use proven monitoring, anticipation and institutional dialogue systems to integrate regulatory changes as early as possible.
- Make compliance a cornerstone of Michelin's credibility and stakeholder confidence, particularly with institutional customers and partners.
- Transform Michelin's expertise in regulatory compliance into a lever for differentiation and sustainable value creation.

Rapid transformations of end markets

The issue: In a globalized, hyper-connected world, customer expectations are evolving rapidly and increasingly differ depending on the region and local practices. Awareness of issues related to sustainable development, overall performance, and value in use is increasingly influencing purchasing decisions, but without erasing differences in needs and behaviors.

WHAT THIS MEANS FOR MICHELIN

As a global player serving a wide variety of markets, Michelin is constantly adapting its offerings and business models to meet changing local needs and expectations. Against a backdrop of heightened competition and the arrival of new players, the challenge facing the Group is to continue to create value beyond the product itself, based on a laser-sharp understanding of customer needs and innovative solutions.

THE MAIN TRANSFORMATION INITIATIVES

- Adapt offers and solutions to the specific characteristics of markets and customers in each region of the world.
- Develop innovative solutions based on data, digital technology and artificial intelligence to improve value in use and overall performance.
- Pursue a continuous innovation dynamic, geared towards ever more sustainable, efficient and value-creating solutions.

OUR BUSINESS MODEL

MACRO-TENDS

FASTER PACE
OF CLIMATE CHANGE

RESOURCES

OUR TEAMS

122,600 employees in **63** countries
84.4% engagement rate

OUR INNOVATIONS

11,800 active patents in the portfolio
170+ new partnerships per year
9 established joint laboratories
and **8** joint laboratories opened

OUR NATURAL CAPITAL

98% of natural rubber assessed as deforestation-free
32% of renewable and recycled materials content in tires

OUR BRAND

$10.3 BN BRAND VALUE
9th strongest brand worldwide
(Brand Finance, 2026)
125 YEARS of fine dining and travel experiences

OUR FINANCIAL CAPITAL

€18.1 BILLION in equity
A long-term credit rating from the solicited agencies
(Standard & Poor's, Fitch, Scope)
4 complementary shareholder profiles:
- **17.9%** French institutional shareholders,
- **68.4%** non-resident institutional shareholders,
- **10.7%** individual shareholders,
- **3.1%** employees.

STRATEGY

BUILDING SUSTAINABLE GROWTH ON DIFFERENTIATED
PRODUCTS, SERVICES AND EXPERIENCES

GROWING IN MARKETS WITH HIGH TECHNOLOGICAL REQUIREMENTS
SUCH AS AEROSPACE, ENERGY AND HEALTHCARE

GEOPOLITICAL FRAGMENTATION

REGULATORY PRESSURE

RAPID TRANSFORMATION OF END MARKETS

RESPONDING TO THE CHALLENGES FACING ALL MOBILITY ENABLERS AND MANUFACTURERS

PERSONAL SAFETY, OPERATING PERFORMANCE AND ENVIRONMENTAL IMPACT

VALUE CREATED

FOR EMPLOYEES

20% more shares subscribed by employees compared with 2024

44 hours of training per employee in 2025

FOR SOCIETY

27% lower particulate emissions[1] than the average premium competitors

21,000 employee volunteering initiatives in 2025

FOR THE PLANET

17% cut in CO_2 emissions *vs 2024 (Scopes 1 and 2)*

33% of energy consumption from renewable sources

FOR CUSTOMERS AND PARTNERS

45.5 PTS Net Promoter Score awarded by customers and partners

28% of annual sales derived from products or services launched in the last three years

FINANCIAL VALUE CREATED

9.2% return on capital employed (ROCE) in 2025

57% of 2025 net income to be distributed as dividends (submitted to the vote of the Annual Shareholders Meeting)

(1) Result of the independent benchmarking study conducted by ADAC.

OUR STRATEGIC ASSETS

Michelin, a powerful and well-recognized brand

$ **10.3** BN
THE FINANCIAL VALUE OF THE MICHELIN BRAND
(Brand Finance, 2026)

9th
STRONGEST BRAND WORLDWIDE
(Brand Finance, 2026)

TOP 3
CAC 40 COMPANY
(AI Reputation barometer Vectors & Trickster, 2026)

Highly engaged teams that set Michelin apart in the market

ENGAGEMENT RATE
84.4%

Innovation, a strategic lever for sustainable value creation

6,000
PEOPLE DEDICATED TO INNOVATION

€ **60.8** M
OPEN INNOVATION PORTFOLIO (1)

237
PATENTS FILED IN THE YEAR

Building trust through the excellence of our products and services

103
J.D. POWER PRIZES

99.99%
OF MICHELIN TIRES WORLDWIDE ARE NOT RETURNED BY CUSTOMERS

(1) Average annual portfolio of open innovation R&D initiatives over the 2023-2025 period, including expenditure incurred as part of partnerships with external players.

4 BUSINESS LINES

BUSINESS LINE
TIRES

AUTOMOTIVE AND TWO-WHEEL

ROAD AND URBAN TRANSPORTATION

SPECIALTY

BUSINESS LINE
POLYMER COMPOSITE SOLUTIONS

BUSINESS LINE
CONNECTED SOLUTIONS

CREATING VALUE THROUGH AN INTEGRATED APPROACH

BUSINESS LINE
LIFESTYLE

PURSUING OUR 2030 STRATEGIC VISION

In 2021, Michelin launched the 2030 Michelin in Motion strategic plan, which lays the foundations for sustainable growth through the rest of the decade in seamless alignment with the Group's All Sustainable commitment.

It embeds social, economic and environmental issues deep in the heart of the Group's growth dynamic.

Caring for people and communities

Using artificial intelligence as a driver of transformation and innovation

Reducing our environmental impact

TAPPING INTO A SOLID GOVERNANCE STRUCTURE

SUPERVISORY BOARD

Chair:
Barbara Dalibard

GENERAL PARTNERS

with unlimited joint and personal liability for the Company's debts

THE MANAGERS ADMINISTER AND MANAGE THE COMPANY

Managing Chairman and General Partner:
Florent Menegaux

General Manager
Yves Chapot

NON-MANAGING GENERAL PARTNER (SAGES)

Chair:
Vincent Montagne

STATUTORY AUDITORS
Deloitte & PwC

Collaborate on Manager compensation and succession planning; make recommendations

SHAREHOLDERS
Limited partners, with liability proportionate to their investment

1.3 THE VARIOUS ELEMENTS OF OUR TAX AND SOCIAL SECURITY CONTRIBUTIONS

The Group generates operational and financial flows worldwide in its dealings with customers, suppliers, financiers and other partners.

From a regulatory standpoint, national and international tax laws provide for various types of levies for which the taxpayer may be liable depending on:

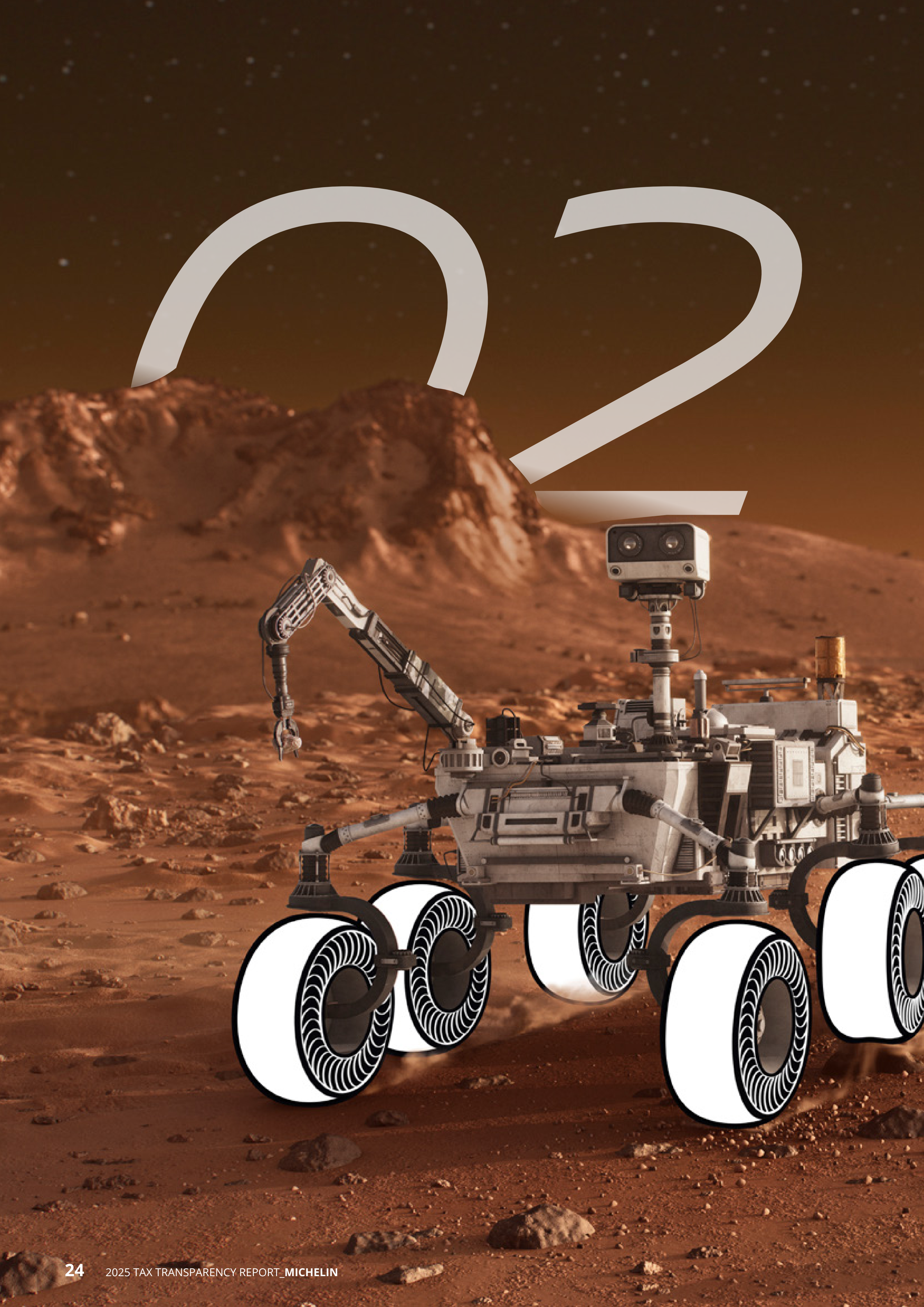
- what the taxpayer owns (property taxes);
- what it produces and sells (taxes on goods and services);
- the income it generates (income tax);
- what it transfers, for example, customs duties and withholding taxes;
- or the people who make it possible to carry out its activities (payroll taxes).

As the world's leading tire manufacturer, the Michelin Group is liable for tax in the broadest sense of the term, either:

- economically, by directly bearing the cost of the taxes (e.g., income tax); or
- legally, by acting on behalf of governments as the collector of pass-through levies on other economic actors (e.g., VAT, payroll taxes, withholding tax).

The Group's tax responsibility is to calculate and pay the various levies borne in respect of its many business activities, in compliance with the diversity of legislation to which it is subject as a result of its global footprint.

Michelin's global footprint and organization make it a major taxpayer.


02

02

A TAX POLICY IN LINE WITH OUR BUSINESS

2.1 OUR TAX POLICY APPROACH

Faced with the increasing globalization of trade and an ever-changing regulatory environment, Michelin has defined its tax policy in an internal tax procedures guide. This guide defines how the Group manages its tax affairs across all of its host communities.

It also identifies the cardinal tax and customs rules that the Group must observe when executing its strategy and conducting its business activities. The members of the Tax and Customs Department are tasked with ensuring compliance with these rules, which are outlined in the following paragraphs.

NB: This report has been prepared on the basis of the GRI 207: Tax 2019 standard, a voluntary reporting methodology that enables a company to report on its approach to taxation and the link between its business and its tax contribution.

2.2 OUR COMMITMENT TO SUSTAINABLE, TRANSPARENT AND RESPECTFUL TAXATION

2.2.1 General principles

The Michelin Group undertakes to comply with local legislation in all its host jurisdictions. For this purpose, the Group becomes a taxpayer in every country where it does business, preferably by setting up local subsidiaries to house the human, physical and financial resources required to conduct said business.

In so doing, the Group is committed to observing all local tax obligations and accurately declares its business activities and the bases for calculating the taxes for which it is economically or legally liable. It also makes the corresponding payments.

The Michelin Group's tax policy is consistent with its industrial and business strategy, with the result that financial transactions, the designation of operating entities and the choice of host communities are always justified on operational grounds. This means that the tax impacts resulting from these industrial and business choices in no way reflect the use of aggressive tax policies, tax optimization schemes or artificial transactions.

Our business activities generate a substantial amount of taxes both in France and in other countries, representing a major portion of our economic contribution.

In particular, the Group pays income tax, withholding taxes, import taxes and customs duties, stamp duties and other taxes in the territories hosting its operating activities.

It also collects and pays taxes on the salaries paid to its employees, as well as indirect taxes such as VAT and certain sector-specific taxes.

In every country where the Group operates, it is committed to exemplary behavior in tax matters, which is notably reflected in its efforts to nurture cooperation with local tax authorities (such as in France, Italy and Spain).

This relationship is governed by the Michelin Anti-Corruption Code of Practice, which specifically bans any facilitating or expediting payments to public officials.

2.2.2 Pillar 2

On December 20, 2021, the OECD released its Two-Pillar Solution (Pillar 1; Pillar 2) to tackle base erosion by multinational enterprises.

After Pillar 2 came into force in 2024, effective application of this new regulation began in 2025 with the first reports and, where applicable, payments of top-up taxes aimed at ensuring a minimum tax rate of 15% in each jurisdiction.

This mechanism mainly concerns the Group's ultimate parent entity. An effective tax rate is calculated for each jurisdiction, in accordance with OECD rules; if this rate is below 15%, a top-up tax then becomes due.

The Michelin Group, which is based in France, has applied these rules since January 1, 2024. Under this standard, the minimum tax may be paid either by the parent entity or by the subsidiaries themselves where they are based in jurisdictions that have introduced their own domestic minimum tax.

The Group Tax Department acts both centrally and locally to support the tax teams in each jurisdiction in applying the Pillar Two rules transparently and in a spirit of cooperation with the tax authorities.

In 2025, the impact of Pillar 2 on the Group's income tax expense was €8 million, compared with €16 million in 2024.

2.3 KEY ELEMENTS OF OUR TAX POLICY

2.3.1 Vision of compliance

This vision is based on strict compliance with applicable rules and prohibits all practices involving tax fraud or evasion.

The Michelin Group's tax policy:

- aims to apply the international, regional and local tax rules defined by governments or their representatives;
- condemns all forms of tax fraud and evasion;
- states that the Tax and Customs Department does not seek to take advantage of controversial tax schemes.

Likewise, the Group refrains from making use of financial transactions or arrangements without any operational or economic substance the sole purpose of which is tax optimization.

2.3.2 Links between business and taxation

Level of substance in each legal entity

The Michelin Group ensures that each entity demonstrates a level of substance that is consistent with its business operations, i.e., that it can muster all the necessary human, physical and financial resources.

A Group legal entity must house all the functions required to conduct its business. The Group makes every effort to ensure compliance with this rule.

Each tax manager ensures compliance with this cardinal rule within their geographic remit, in liaison with all the other Group departments concerned.

Management of legal entities

Each legal entity is a taxpayer in its country of tax residency, in compliance with local legislation.

The Group strives to ensure that no key industrial or business function can be performed by a legal entity in a country other than its country of tax residency.

In addition, the Group ensures that any permanent establishment risks are managed and that its place of effective management is coherent.

2.3.3 Summary organization chart

The Michelin Group prioritizes the creation of subsidiaries over the presence of branches to ensure greater clarity and transparency within the Group.

Accordingly, the Group strives to make sure that each legal entity assumes the role of unique taxpayer corresponding to its geographical location.

In recent years, the Tax and Customs Department has been overseeing, with the legal, financial and operational teams, a program to streamline the Group's organizational structure, by limiting the number of legal entities as much as possible at a time of sustained external growth. For example, 18 entities were removed from the organization chart in 2025 after being wound up or merged with other Group subsidiaries. These operations were carried out to streamline the Group's operations and had no impact on the number of employees.

2.3.4 Approach to uncertainty and risk appetite

Analysis and documentation of tax positions

The Michelin Group makes every effort to comply with and apply the tax regulations of the jurisdictions in which it operates.

The Group is committed to complying with the letter and spirit of all laws and regulations.. In this regard, it might – when it believes it has solid and relevant technical arguments – adopt a tax position that could be interpreted differently by the tax authorities.

In all cases, these tax positions are subject to a technical analysis and supporting documentation.

In the event that the outcome is deemed uncertain, the accounting consequences of this uncertainty are assessed:

- for income tax, in accordance with IAS 12 – Income Taxes, and in particular its interpretation IFRIC 23 – Uncertainty over Income Tax Treatments;
- for other taxes, in accordance with IAS 37 – Provisions, Contingent Liabilities and Contingent Assets.

Analysis of favorable tax regimes

The Michelin Group makes use of the favorable tax policies available to all economic operators, in accordance with the specific rules that apply to it, whenever these policies are in line with its own manufacturing and/or operating objectives and are consistent with the economic substance of its investments.

These favorable tax regimes are a key feature of the development of economic policies which countries use to stimulate growth and attract investment in support of national policy.

They generally take the form of a reduction in long-term tax liabilities (tax reduction) or simply a temporary deferral of tax payments.

Members of the Tax and Customs Department analyze the tax regimes available in the Group's countries of residence and verify that our business activities are effectively eligible. Their analyses cover the full range of classic and specific regimes, from tax consolidation to research and investment incentive regimes.

For example, the R&D function at Michelin employs around 6,000 people worldwide, with innovation-related expenditure (broadly defined) in the region of €1.2 billion in 2025. As a result, the Group receives approximately €56 million in research tax credits globally.

We also operate in countries that, today, are sometimes said to benefit from certain advantageous tax regimes. Nevertheless, these operations correspond to real economic activity with the human, physical and financial resources needed to serve the local market.

2.4 MICHELIN'S PRESENCE IN NON-COOPERATIVE JURISDICTIONS FOR TAX PURPOSES

The European Union (EU) reviews the list of non-cooperative jurisdictions for tax purposes each year when it updates the black and gray lists.

Countries on the **BLACK LIST** have refused to cooperate with the EU or to remedy shortcomings in their disclosure of tax information and in good tax governance practices.

Countries on the **GRAY LIST** have committed to disclosing tax information and applying other principles of good tax governance and have begun implementing necessary reforms.

To identify Michelin's presence in non-cooperative jurisdictions for tax purposes, we referred to the lists drawn up by the European Union and adopted by the Council on October 10, 2025.

PANAMA	present since **2000**	**1** subsidiary	**7** employees	Liquidated on December 2, 2025. The Company is home to the Sales & Marketing Department for the Central America (excluding Mexico) and Caribbean region and leverages the port infrastructure of Panama. Michelin Panama was dissolved and liquidated on December 2, 2025.
RUSSIA	present since **2023**	**1** subsidiary	**0** employee	Liquidated on June 18, 2025. When Michelin acquired Flex Composite Group in 2023, it inherited a dormant company in Russia. The liquidation of this company was completed on June 18, 2025.

TURKEY	present since **1995**	**3** subsidiaries	**86** employees	Michelin has been present in Turkey since 1995. At end-2025, we had three subsidiaries employing 86 people. Two are distribution companies serving the domestic market and the third is a sales & marketing company serving the Cypriot market.
MOROCCO	present since **2001**	**2** subsidiaries	**9** employees	Michelin has sales & marketing operations in Morocco. These operations were established in order to meet demand from the country's local customers (car manufacturers in particular) more effectively.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OUR TRANSFER PRICING POLICY

3.1 GENERAL PRESENTATION

Michelin applies OECD guidelines on transfer pricing[(1)] and ensures that all transfer pricing policies in force comply with both the arm's length principle and local transfer pricing rules.

These transfer pricing policies by transaction type are defined by the Group Tax Department as part of Michelin's global policy, which is then adapted at the regional level.

3.1.1 Types of intra-group transactions and amounts involved

In 2025, intra-group transactions amounted to €28.0 billion, including €20.1 billion in transactions involving finished and semi-finished products.

As a reminder, the Group's consolidated sales totaled €26.0 billion in 2025.

The main types of intra-group transactions include:

- brand and technology licenses granting rights to use intangible assets;
- sales of raw materials, semi-finished and finished products between manufacturing subsidiaries;
- the provision of research, development, and process engineering services by Michelin's research centers to other subsidiaries;
- the provision of management services, including entrepreneurial services, by the Group's decision centers, business lines and regional organizations to other subsidiaries;
- the provision of support services by the Group's Shared Services Centers to other subsidiaries;
- sales of manufacturing equipment between subsidiaries;
- the provision of financial services.

3.1.2 Principles of profit allocation by country

The principles governing compensation for intra-group transactions are defined in compliance with (i) the arm's length principle, in application of the OECD guidelines[(1)] and (ii) applicable local legislation.

Transfer pricing methods are applied consistently and uniformly across all regions where the Group operates, with no attempt to artificially shift profits.

3.2 CHANGES IN THE TRANSFER PRICING POLICY INTRODUCED IN 2023

In 2023, Michelin carried out a major overhaul of its transfer pricing policy in Europe, North America and Asia, involving the Group's historical entities in the tire segment, by introducing a residual profit split method.

Implementation of this policy was completed in 2024 after China and Brazil were incorporated into the new model.

There were two main reasons for changing the transfer pricing policy applied to Michelin's historical entities in the tire segment:

a) First of all, Michelin's introduction of a new organizational structure that has been rolled out since 2018. This transformation has gradually brought in an operational model whereby strategic priorities are decided at a more centralized level; subsidiaries now operate under the enhanced governance of Michelin's various headquarters (Corporate, Regional and Business Line headquarters).

b) Changes to the regulatory framework for transfer pricing, in particular the OECD's updates to its guidelines in 2017 and again in 2022 following on from BEPS Actions 8 to 10 aimed at aligning the allocation of taxable profits with value creation. These changes prompted Michelin to conduct a more detailed value chain analysis to confirm the location of its high value-added functions.

Consequently, and because the analysis showed that Michelin's operations were highly integrated, the Group decided to evolve its historical transfer pricing policy toward a residual profit split method to ensure that intangible assets and high added-value functions are appropriately remunerated in accordance with the arm's length principle, in line with the changes in the OECD guidelines.

(1) "OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations" (January 2022 version).

3.3 IMPACT OF CHANGES IN THE TRANSFER PRICING POLICY

The new transfer pricing policy introduces variable compensation for high value-added activities (such as the Corporate, Regional and Business Line headquarters, the R&D centers and entities that own and manage intellectual property). The compensation amount varies according to overall economic profit. At the same time, this new policy maintains fixed and limited compensation for routine activities (such as those performed by the Shared Services Centers).

3.4 DOCUMENTARY COMPLIANCE AND OPERATIONAL ORGANIZATION

3.4.1 Operational organization

The Tax Department and its regional network of transfer pricing experts ensure that transfer pricing methods are properly applied in each subsidiary by regularly performing value chain analyses of the activities carried out by the various organizations and tracking intra-group transactions and the underlying allocation of profits among subsidiaries.

In this process, the type of activity – manufacturing, sales & marketing, decision center, holding company, financing, R&D, etc. – matters.

The Tax Department periodically analyzes how and where the activities are carried out and whether the received compensation was suitable.

3.4.2 Documentation

Intra-group transactions are documented in each country and are regularly audited by local tax authorities. In accordance with OECD recommendations, Group subsidiaries subject to documentation requirements under their domestic regulations prepare transfer pricing documentation every year at three levels:

- a master file presenting the Group's business, its organizational structure, a functional analysis of its processes and assets, and a description of intra-group financial transactions;
- local documentation presenting the subsidiary's activities and the results of its main intra-group transactions;
- a country-by-country report (CbCR) filed each year with the French tax authorities, presenting aggregate financial and tax information for each country in which Michelin operates.

3.5 ADVANCE PRICING AGREEMENTS

In addition, Michelin regularly signs advance pricing agreements (APAs) with national tax authorities, which help to secure Michelin's transfer pricing policy. The agreement may be unilateral (between the tax authorities of the country of residence and the local Michelin entity), bilateral (with the tax authorities of the countries of residence of two Michelin entities), or multilateral (with the tax authorities of the countries of residence of at least three Michelin entities).


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CAT

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GOVERNANCE, CONTROL AND MANAGEMENT OF TAX RISKS: AN INTEGRATED CROSS-FUNCTIONAL ORGANIZATION

4.1 GENERAL PRINCIPLES OF GOVERNANCE

The tax policy and any significant changes are reviewed and approved by the General Manager and the Chief Financial Officer, and are also presented to the Supervisory Board's Audit Committee.

Procedures are in place to manage cross-functional risks.

Internal Audit, Risk Management, Internal Control and Quality activities have been brought together within a single Corporate Department. A specific team within this department is dedicated to risk management.

This organization provides a shared vision of the primary challenges for the Group in terms of identifying and managing risk.

It also promotes efficient monitoring between the second (Internal Control and Risk Management) and third (Internal Audit) lines of defense across all time horizons and across all Group units.

The prevention and management of tax risks is fully integrated into the general risk management and internal control process. As part of this process, the Tax and Customs Director, reporting to the Finance Department, oversees implementation of the tax policy and reports regularly to the Supervisory Board's Audit Committee on Michelin's tax position.

4.2 ORGANIZATION OF THE TAX AND CUSTOMS DEPARTMENT

The Group has a globally integrated Tax and Customs Department comprising a Corporate Department based at Group headquarters and regional departments based in their respective regional headquarters.

The Tax and Customs Department relies on a network of qualified, regularly trained in-house experts, at corporate level as well as in the different regions and countries. These experts operate across all key areas: direct and indirect taxation, transfer pricing, customs and export control.

Taxation is necessarily based on a taxation territory and on legal entities (taxpayers), so the Tax and Customs Department is organized accordingly with:

Regional tax managers together covering all the locations in which the Group operates. These locations are grouped into six major regional clusters:

- North America and Central America,
- South America,
- Europe,
- Africa/Middle East,
- Asia, excluding China,
- China.

These regional tax managers may if necessary be supported by country tax managers depending on the size, complexity or structure of local operations.

Corporate tax managers cross-functionally manage issues in their respective areas of expertise. To date, five such areas have been identified:

- Tax governance,
- Taxation of mergers, disposals and acquisitions,
- Transfer pricing,
- Tax reporting,
- Customs and export control.

In general, tax teams are allocated across the Group's different legal entities in such a way that they meet local operational requirements and offer expertise specific to each location.

The customs teams are organized in a similar fashion, by regional cluster and by area of expertise.

4.3 GOVERNANCE FOR MANAGING RISKS ASSOCIATED WITH THE TAX PROCESS

The Group's tax policy has been prepared and implemented in accordance with its operating objectives and with its aim of supporting its responsible and sustainable industrial and business development strategy.

The Tax and Customs Department performs its duties with a proactive mindset in order to anticipate the tax issues and risks that could impact the Group. It maintains regular dialogue with the operational teams so as to support the Group's growth objectives as effectively as possible. To do so, the members of the Tax and Customs Department keep abreast of developments both nationally and internationally, enabling it to anticipate and plan for the impacts of any major changes to tax regulations.

When tax regulations are unclear or subject to interpretation, the Tax and Customs Department conducts an in-depth analysis in-house and, where necessary, seeks the opinions of external advisors in order to support the decision-making process. Where necessary or if deemed appropriate, the Tax and Customs Department may also decide to secure either its transfer price positions through advance pricing agreements (APAs) or its other positions through tax rulings.

Last of all, the Tax and Customs Department refers to a set of fundamental principles (see section 2 above) established to secure its positions and ensure that each entity fairly pays all of the taxes due in its host communities.

4.4 INTERNAL CONTROL OF THE TAX PROCESS

The Group has an internal control process in place, with the following core objectives:

- compliance with laws and regulations;
- application of the instructions and guidelines issued by the Managers and the Group Executive Committee;
- the proper functioning of internal processes, particularly those relating to the protection of corporate assets;
- the reliability of financial information.

It comprises a set of resources, procedures, practices and actions aligned with the characteristics of the Group's businesses, which:

- contribute to the control over its activities, the efficiency of its operations and the efficient utilization of its resources;
- enable it to assess all of its material operational, financial and compliance risks appropriately.

In general, the risk management process has been designed in seamless alignment with the values of responsibility, integrity and ethical behavior embraced by the Michelin Group.

The Internal Control system covers substantially all the Group's operations, including every operating region and every business unit (manufacturing, sales and dealership networks). In the event of an acquisition, a dedicated internal control system is deployed in the new unit. The scope of internal control is broad and extensive, covering areas of major risk.

Internal control aims to protect the Group against the following tax risks:

- failure to comply with tax instructions and procedures;
- risk of profit-shifting (e.g., failure to comply with the transfer pricing policy);
- VAT (incorrect classification, failure to file or late filing);
- risk of double taxation;
- permanent establishment risk.

Internal control draws on the following standards and guidelines:

- OECD transfer pricing guidelines;
- tax regulations in the countries in which Michelin operates including tax treaties between states;
- transfer pricing documentation;
- the tax procedures and policy guide of the Tax and Customs Department.

4.5 CUSTOMS DUTIES

The Michelin Group paid €505 million in customs duties in 2025, compared with €199 million in 2024.

The amount of customs duties paid increased in 2025 mainly because of the new "punitive" tariffs introduced in the United States as well as the reciprocal measures applied in Canada:

- an increase in US tariffs from an average effective rate of 2% in 2024 to 12% in 2025;
- a nine-fold increase in Canadian tariffs compared with 2024.

In general, two main legal mechanisms are used to manage customs duties:

- preferential origin rules under more than 20 free trade agreements;
- customs procedures: bonded warehouses, temporary admission for R&D, or Board of Investment (BOI) schemes.

4.6 EXPORT CONTROL

4.6.1 Regulations

The Michelin Group undertakes to comply with all regulations relating to trade sanctions and export controls.

All Michelin employees involved in international trade must therefore ensure that such transactions comply with export (and import) control laws and regulations as well as international economic sanctions. These regulations may affect various functions, especially those responsible for the sale and shipping of products, but also other functions such as procurement.

Michelin groups all of these regulations under the umbrella term “export control”.

4.6.2 The Michelin process

As part of its commitment to regulatory compliance, Michelin’s Tax and Customs Department maintains a worldwide policy of export control compliance, covering transactions with sanctioned or embargoed countries and territories, the export or import of controlled goods, and transactions with restricted parties.

Michelin’s Tax and Customs Department deploys the necessary procedures, tools and training to achieve these aims.

Export control risk is overseen by the Group Ethics Committee.

4.7 MICHELIN CODE OF ETHICS

The Code of Ethics applies to all Group employees without exception, as well as to all persons working on our sites or acting on behalf of a Group entity, anywhere in the world.

Michelin also encourages its customers, suppliers and other partners to adhere to the contents of the Code.

Compliance with the Code is a prerequisite for doing business with the Group.

In terms of ethics, the Group considers compliance with all applicable national and supranational laws to be a minimum requirement. The Code outlines the Group's fundamental values and describes the related principles and requirements. It sets out the guidelines that should govern employee and stakeholder decisions, specifying the behaviors to adopt in typical situations for each work environment.

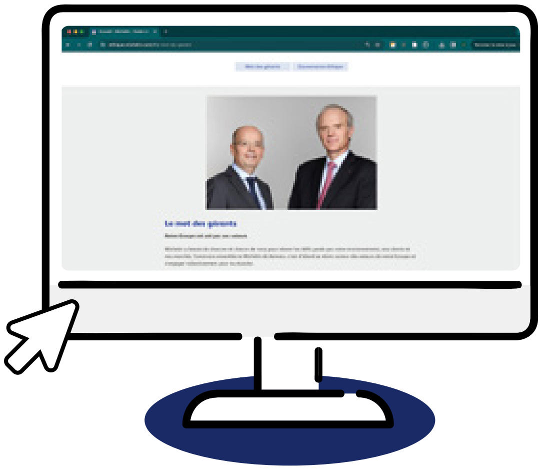
Beyond the scenarios presented in the Code, every employee, partner or supplier should exercise good judgment and common sense and act in good faith when faced with any other situations that may arise.

The Code is designed to help Group employees and our partners adopt appropriate conduct in relation to certain situations that may pose a risk to themselves or to Michelin, including anti-corruption, anti-fraud, legal and regulatory compliance, anti-harassment and anti-discrimination.

Whistleblowers can use the Michelin Group's ethics hotline to report issues, confidentially and securely. They may remain anonymous if they wish.

Click on the link for more information on the Code of Ethics:

https://ethique.michelin.com/en



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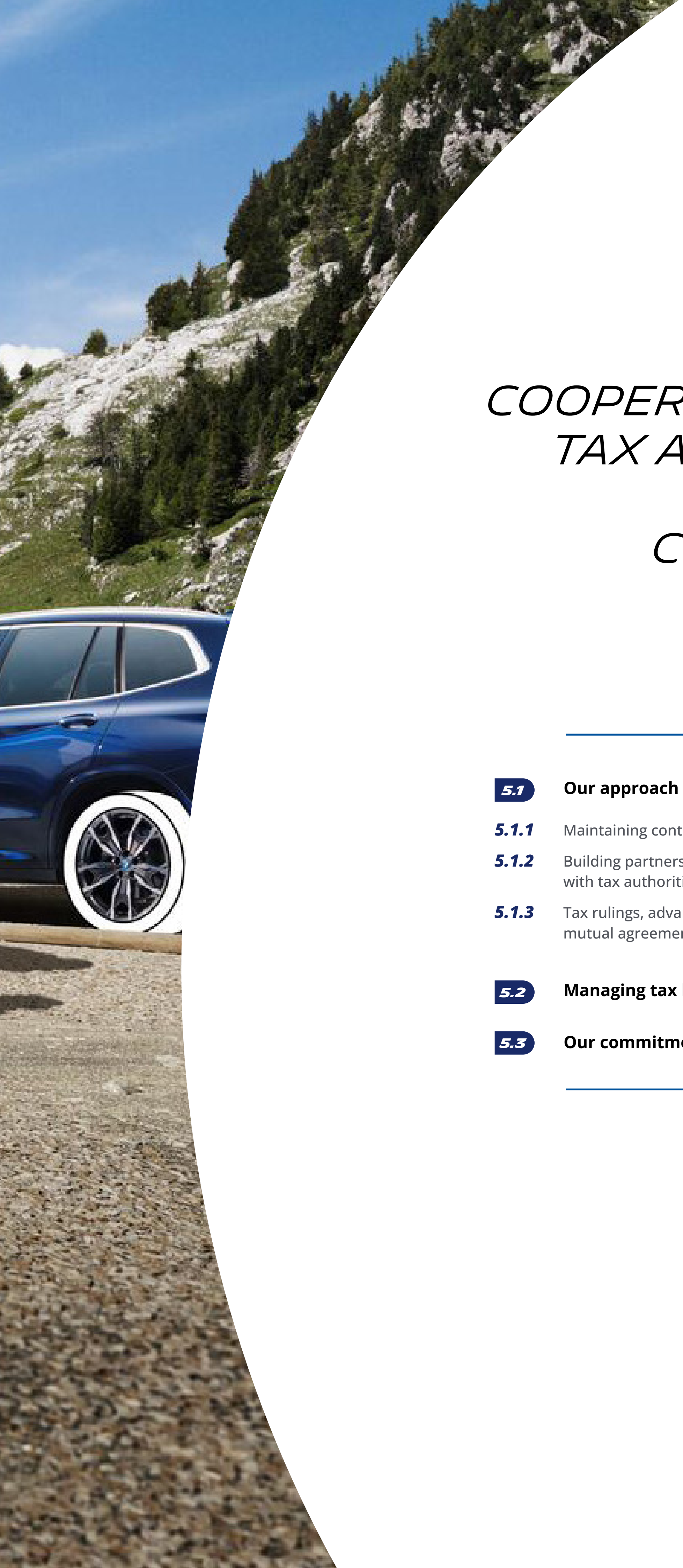


05

COOPERATION WITH TAX AUTHORITIES BASED ON CONTINUOUS DIALOGUE

5.1 OUR APPROACH

5.1.1 Maintaining continuous, transparent dialogue

The Michelin Group has a social responsibility to make tax contributions in the various countries in which it operates. In this regard, we believe that relationships with the tax authorities should be transparent and supported by continuous dialogue.

Governments also implement appropriate resources to verify that the prevailing rules are correctly applied by taxpayers. Even though our technical position may sometimes differ from that of the tax authorities, we maintain constant and transparent dialogue with them based on thorough, well-founded technical analysis.

5.1.2 Building partnerships with tax authorities

The Tax and Customs Department encourages the development and implementation of partnerships with tax authorities in countries where cooperation or "trust-based relationship" schemes apply. Such partnerships seek to improve transparency and secure the Group's legal position in a framework built around the concept of mutual trust.

In May 2019, Michelin signed a corporate tax partnership agreement with the French tax authorities under the "trustbased relationship" protocol. This custom-tailored support solution establishes a long-term working relationship between the Company and the tax administration, with the aim of clarifying and securing the treatment of sensitive or complex tax issues. Both parties undertake to observe a number of essential cooperation principles: the sharing of clear and transparent information, availability and rapid response, pragmatism, and consideration for each other's operational constraints.

More generally, the Tax and Customs Department endeavors to identify and develop this type of relationship in countries where such mechanisms exist.

Accordingly, it has set up a working group specifically to examine existing frameworks, engage in dialogue with the relevant authorities and, where applicable, prepare and follow up on requests to join any schemes available.

In 2025:

- Michelin Italy officially joined the trust-based relationship scheme set up by Italy's tax administration;
- Michelin Spain's Annual Transparency Report was officially endorsed by Spain's tax administration and received a letter of commendation;
- Michelin Brazil applied to join the Brazilian government's Confia program, an initiative seeking closer cooperation between the federal tax administration and the country's biggest taxpayers;

Prior to 2025, other Group subsidiaries had already joined similar schemes, for instance in Indonesia (the Golden Tax Payer scheme).

5.1.3 Tax rulings, advance pricing agreements (APA), mutual agreement procedures

To secure certain international or domestic transactions, the Group prioritizes dialogue with authorities and, as such, seeks to obtain tax rulings, advance pricing agreements or other decisive tax agreements to avoid double taxation or confirm the proper interpretation and application of a standard.

In terms of transfer pricing, for example, Michelin systematically seeks to secure its policy through advance pricing agreements (APAs). Wherever possible, Michelin prefers to enter into bilateral or multilateral APAs to ensure tax certainty for its transactions in all of the relevant jurisdictions.

In 2025, Michelin was involved in four bilateral APA applications.

Due to the complexity of the various tax systems, multinational groups are very often faced with potential "double taxation" scenarios, where the same economic profit is taxed in two different jurisdictions. In responding to this type of situation, Michelin relies on MAPs or other mechanisms stipulated in the tax treaties signed by its host countries, or else on the EU Arbitration Convention.

5.2 MANAGING TAX LITIGATION

Michelin's objective is not to systematically initiate tax litigation. However, in the changing and complex environment of tax rules, their interpretation can be subject to debate. As a result, the Group does not rule out the possibility of challenging, through administrative proceedings and/or litigation, any notified rulings that it believes run counter to its good faith interpretation of tax rules.

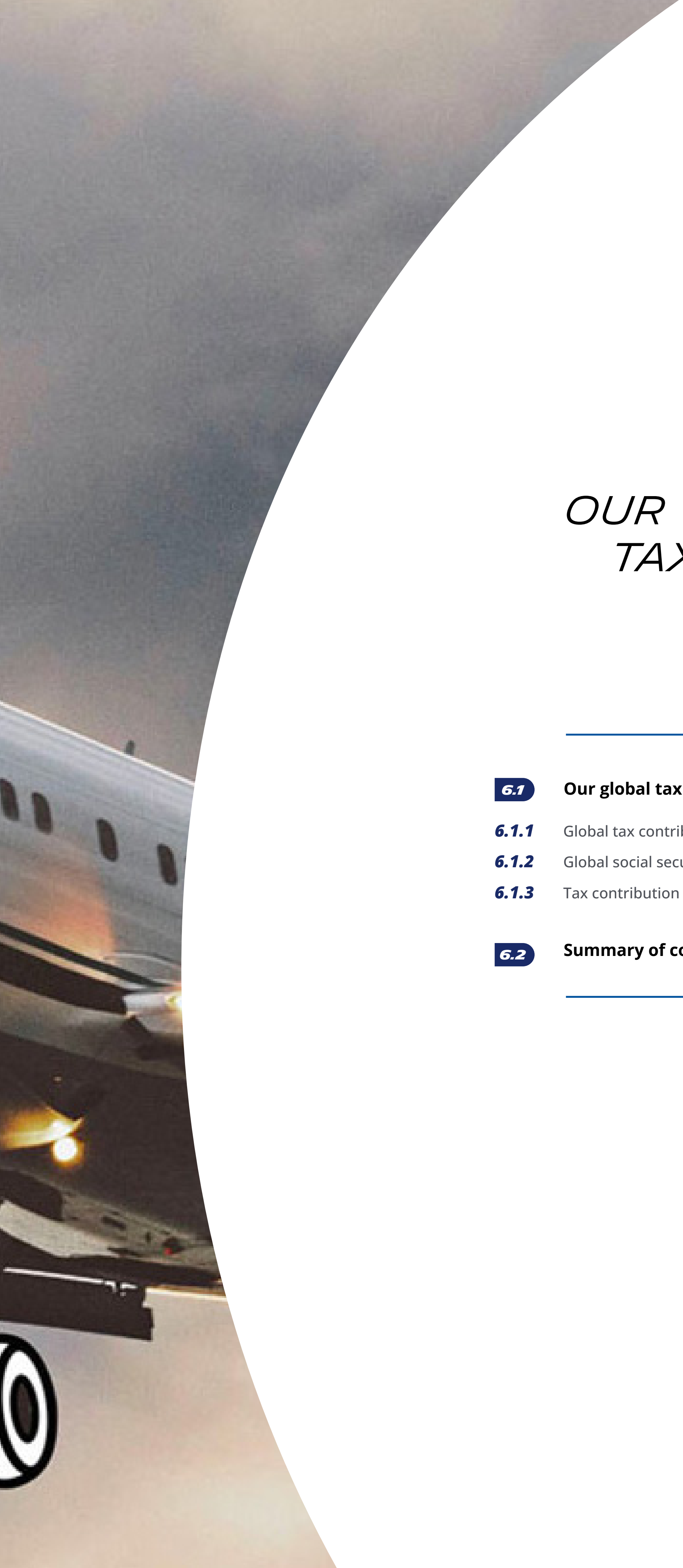
Action of this kind is only considered and, if necessary, implemented if an in-depth, in-house technical analysis concludes that there is a sufficient probability of success.

In all cases, and in line with our commitment to build a trust-based relationship with the authorities, this challenge is preceded by a series of discussions with the authorities concerned.

5.3 OUR COMMITMENTS

- Make any and all necessary tax filings and payments on time.
- Communicate with local tax authorities in a transparent and cooperative manner.
- Do everything in our power to meet our legal obligations in a timely manner in the various countries in which we operate.
- Work with the tax authorities to secure the Group's tax positions and prevent any misunderstandings or differences of interpretation during tax audits.
- Provide tax authorities with the material resources needed to conduct their work during on-site tax audits.
- Participate actively, directly or through professional associations in public consultations initiated by governments, tax authorities and international organizations, with the aim of supporting the development of tax policies.
- Explain to the public and all stakeholders concerned the Group's approach to taxation, its economic contribution and its tax burden.


06



06

OUR WORLDWIDE TAX FOOTPRINT

6.1 OUR GLOBAL TAX CONTRIBUTION

The Michelin Group has created a total tax contribution (TTC) dashboard which presents all the taxes accrued worldwide by its legal entities. The dashboard also makes it possible to measure the Michelin Group's total contribution to public finances beyond corporate income tax. It presents corporate income taxes accrued and taxes on goods and services borne by Group companies.

We have not applied any materiality threshold, in order to offer a global view of the taxes paid by the Group that is as accurate and as comprehensive as possible.

Our total tax contribution breaks down into the following tax families: income tax accrued, payroll taxes, taxes on goods and services, environmental taxes and other taxes.

We will look at the following countries in more detail: Australia, Brazil, Canada, China, France, Germany, Hungary, Indonesia, Italy, the Netherlands, Poland, Romania, Singapore, Spain, Switzerland, Thailand and the United States.

THE MICHELIN GROUP'S GLOBAL TAX CONTRIBUTION

17 COUNTRIES
accounted for
at December 31, 2025

87%
of total revenue, including revenue from independent and related parties

88%
of the Total Tax Contribution

PICTOGRAM DEFINITIONS

1 – Manufacturing, including the production of polymer composite products in all grades, in all forms and for all uses, such as the manufacture of tires, tracks and related systems, and the production of elastomers.

2 – Sales, including the sale of polymer composite product solutions through wholesale, retail and online channels.

3 – Corporate or regional headquarters and/or global business line.

4 – Fundamental research, applied research and/or process engineering.

5 – Testing activities.

6 – Vehicle services and solutions.

7 – Production of latex and other natural resources and/or purchases of natural and synthetic rubber.

8 – Internal Group financing.

6.1.1 *Global tax contribution in figures*

The figures presented in this report are taken from the data used to prepare the Group's consolidated financial statements in accordance with IFRS. Definitions of the metrics used are available in the glossary provided on page 4 of this report.

MICHELIN GROUP KEY FIGURES	2025	2024
Legal entities	332	341
Employees[(1)]	122,586	129,832
Sales	€25,992m	€27,193m
Income before tax	€2,258m	€2,445m
Income tax (including deferred tax)	€(594)m	€(555)m
Income tax accrued (excluding deferred tax)	€(546)m	€(753)m
Financial transaction tax	€(2.7)m	€(1.5)m

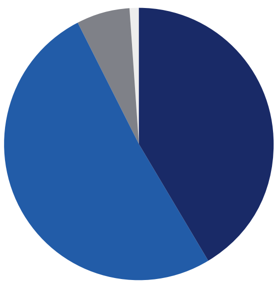
The information above, used in the preparation of the Group's consolidated financial statements in accordance with IFRS, also forms the basis for the country-by-country report (CbCR, as defined in Article 223 quinquies C of the French General Tax Code) presented in part in the following section of this tax transparency report.

CbCR KEY FIGURES	2025	2024
Total revenue[(2)]	55,735	58,504
Tangible assets	13,199	13,956
Profit (loss) before tax[(3)]	1,277	2,283
Global tax contribution	(1,337)	(1,238)

GLOBAL TAX CONTRIBUTION

(1,337)
MILLION EUROS[(4)]

8% higher than in 2024.



(554) Income tax accrued

(683) Tax on goods and services including €505m of customs duties

(86) Payroll taxes

(13) Environmental and other taxes

(1) As stated in the glossary section, the number of employees refers to the registered headcount as of 12/31/25.
(2) Includes intra-group transactions.
(3) Includes miscellaneous adjustments recognized in preparing the consolidated financial statements.
(4) Excludes financial transaction tax.

6.1.2 Global social security contribution in figures

In 2025, the Michelin Group's tax contribution amounted to €1,337 million, along with social security contributions accrued of €1,059 million.

Social security contributions refer to legally mandated contributions payable by the employer and calculated based on various elements of compensation. They typically cover employee participation in statutory and mandatory pension, healthcare and welfare schemes. Social security contributions are distinct from taxes levied on wages. They are presented here on a due basis for the year under review in this report.

SOCIAL SECURITY CONTRIBUTION (1,059) MILLION EUROS

COUNTRY	TAX CONTRIBUTION	SOCIAL SECURITY CONTRIBUTION
GERMANY	(10)	(65)
AUSTRALIA	(27)	(3)
BRAZIL	(49)	(29)
CANADA	(78)	(19)
CHINA	(124)	(47)
SPAIN	(56)	(130)
UNITED STATES	(466)	(111)
FRANCE	(215)	(451)
HUNGARY	(9)	(5)
INDONESIA	(8)	(3)
ITALY	(26)	(62)
NETHERLANDS	(4)	(9)
POLAND	(10)	(30)
ROMANIA	(18)	(7)
SINGAPORE	(7)	(1)
SWITZERLAND	(35)	(5)
THAILAND	(39)	(2)
OTHER	(156)	(83)
TOTAL	(1,337)	(1,059)(1)

DEFINITIONS

Income tax: consists of income tax accrued, adjusted for deferred tax benefit or expense.

Income tax accrued: tax due on the taxable income of an entity or group of entities within a country. Deferred tax is excluded from this metric in the country-by-country report.

Tax on goods and services: all taxes levied on production activities (e.g., the extraction, sale, transfer, leasing or delivery of goods and the rendering of services), or on the use of goods or permission to use goods or to perform activities (e.g., VAT, customs duties, etc.)

Payroll taxes: all the various taxes paid by employers, employees and the self-employed, as a percentage of wages or as a fixed amount per person.

(1) Rounding difference of €3m.

6.1.3 *Tax contribution by country*

GERMANY

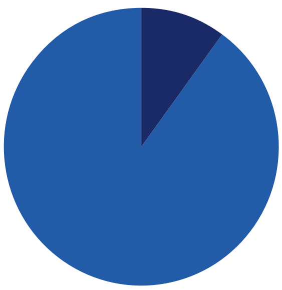
13 COMPANIES
whose main activities are:

Michelin Germany's income was affected in 2024 by provisions set aside to restructure the country's manufacturing operations. Its 2025 income reflected a more typical performance.
Taxes decreased in 2025 owing to the reversal of the restructuring provisions recognized the previous year.

KEY FIGURES	2025	2024
Legal entities	13	13
Employees	5,315	6,045
Total revenue	€2,916m	€3,159m
Tangible assets	€332m	€356m
Profit (loss) before tax	€55m	€44m
Income tax accrued	€(1)m	€(15)m

RATIOS	2025	2024
Contribution to Group income before tax	4.3%	1.9%
Contribution to Group income tax	0.1%	1.9%

TAX CONTRIBUTION (10) MILLION EUROS



(1) Income tax accrued

(9) Tax on goods and services

NS Payroll taxes

NS Environmental and other taxes

NS: Non-significant

AUSTRALIA

MACKAY

14 ***COMPANIES***
whose main activities are:

Income before tax generated in Australia fell by €8.4m in 2025 due to the recognition of a non-tax-deductible loss on equity investments.

KEY FIGURES

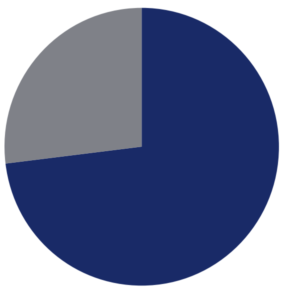
KEY FIGURES	2025	2024
Legal entities	14	18
Employees	1,529	1,515
Total revenue	€1,037m	€1,058m
Tangible assets	€122m	€128m
Profit (loss) before tax	€44m	€53m
Income tax accrued	€(19)m	€(17)m

RATIOS

RATIOS	2025	2024
Contribution to Group income before tax	3.5%	2.3%
Contribution to Group income tax	3.4%	2.3%

TAX CONTRIBUTION

(27) MILLION EUROS



(19) Income tax accrued

NS Tax on goods and services

(7) Payroll taxes

NS Environmental and other taxes

BRAZIL

6 ***COMPANIES***
whose main activities are:

KEY FIGURES

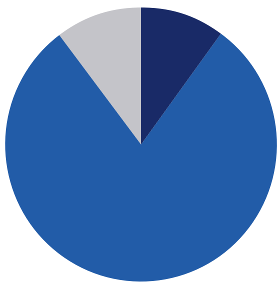
KEY FIGURES	2025	2024
Legal entities	6	7
Employees	7,979	8,391
Total revenue	€1,375m	€1,431m
Tangible assets	€442m	€443m
Profit (loss) before tax	€45m	€93m
Income tax accrued	€(5)m	€(26)m

RATIOS

RATIOS	2025	2024
Contribution to Group income before tax	3.5%	4.1%
Contribution to Group income tax	0.9%	3.5%

TAX CONTRIBUTION

(49) MILLION EUROS



(5) Income tax accrued

(39) Tax on goods and services

NS Payroll taxes

(5) Environmental and other taxes

Michelin's income before tax in Brazil was lower in 2025 than in 2024.
It decreased because the Guarulhos facility was shut down, incurring closure and restructuring costs.
The decrease in income tax accrued was amplified by a correction made for previous years.

CANADA

9 COMPANIES
whose main activities are:

Michelin Canada's income before tax was lower in 2025 than in 2024 due to unfavorable market conditions, an accounting loss resulting from the sale of its agricultural activities to CEAT and a reduction in royalties received from other subsidiaries. This decline in performance resulted in a lower tax expense.

KEY FIGURES

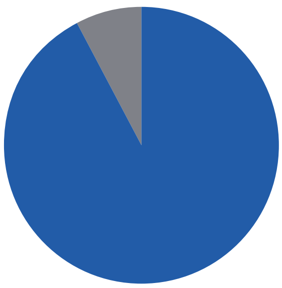
KEY FIGURES	2025	2024
Legal entities	9	9
Employees	4,575	4,744
Total revenue	€2,310m	€2,368m
Tangible assets	€636m	€638m
Profit (loss) before tax	€(14)m	€126m
Income tax accrued	€0m	€(44)m

RATIOS

Contribution to Group income before tax	-1.1%	5.5%
Contribution to Group income tax	-0.1%	5.8%

TAX CONTRIBUTION

(78) MILLION EUROS



- **NS** Income tax accrued
- **(73)** Tax on goods and services
- **(6)** Payroll taxes
- **NS** Environmental and other taxes

CHINA

12 ***COMPANIES***
whose main activities are:

Michelin China's income was subpar in 2024 owing to impairment charges incurred on projects aimed at adapting its operations. These exceptional circumstances are behind the variation observed in 2025. Meanwhile, the tax expense returned to a more normal level in 2025 (taxes were particularly high in 2024 due to the non-deductible nature of restructuring costs).

KEY FIGURES

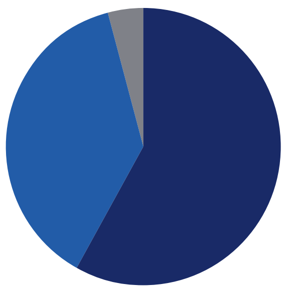
KEY FIGURES	2025	2024
Legal entities	12	13
Employees	5,626	6,037
Total revenue	€3,073m	€2,976m
Tangible assets	€841m	€933m
Profit (loss) before tax	€293m	€161m
Income tax accrued	€(72)m	€(73)m

RATIOS

RATIOS	2025	2024
Contribution to Group income before tax	22.9%	7.0%
Contribution to Group income tax	12.9%	9.7%

TAX CONTRIBUTION

(124)
MILLION EUROS



(72)
Income tax accrued

(47)
Tax on goods and services

(5)
Payroll taxes

NS
Environmental and other taxes

06

SPAIN

ARANDA

9 ***COMPANIES***
whose main activities are:

KEY FIGURES

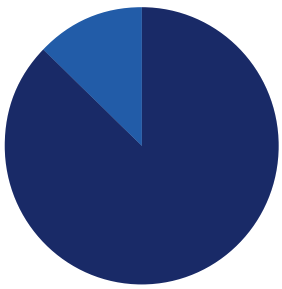
	2025	2024
Legal entities	9	10
Employees	8,586	8,526
Total revenue	€3,678m	€3,580m
Tangible assets	€1,173m	€1,148m
Profit (loss) before tax	€222m	€228m
Income tax accrued	€(48)m	€(54)m

RATIOS

Contribution to Group income before tax	17.4%	10.0%
Contribution to Group income tax	8.7%	7.2%

TAX CONTRIBUTION

(56) MILLION EUROS



(48) Income tax accrued

(7) Tax on goods and services

NS Payroll taxes

NS Environmental and other taxes

UNITED STATES

37 COMPANIES
whose main activities are:

Income fell in the United States in 2025 as market conditions were unfavorable, a situation exacerbated by the effects of US tariffs.

KEY FIGURES

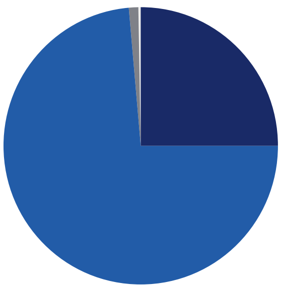
KEY FIGURES	2025	2024
Legal entities	37	36
Employees	18,083	19,684
Total revenue	€11,067m	€12,010m
Tangible assets	€2,432m	€2,712m
Profit (loss) before tax	€642m	€794m
Income tax accrued	€(118)m	€(185)m

RATIOS

RATIOS	2025	2024
Contribution to Group income before tax	50.2%	34.8%
Contribution to Group income tax	21.2%	24.6%

TAX CONTRIBUTION

(466) MILLION EUROS



(118) Income tax accrued

(343) Tax on goods and services

(5) Payroll taxes

(1) Environmental and other taxes

FRANCE

LADOUX

41 COMPANIES whose main activities are:

Michelin France's total income fell sharply in 2025 because of unfavorable market conditions and the impairment of equity investments following poor performances from certain subsidiaries. Such impairments are not tax deductible and therefore do not reduce the tax expense, which came out slightly higher than in 2024.

KEY FIGURES

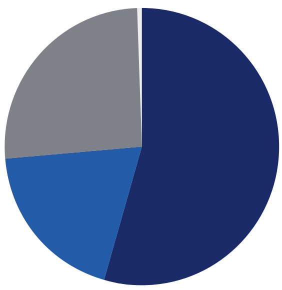
	2025	2024
Legal entities	41	40
Employees	20,872	21,295
Total revenue	€9,644m	€10,214m
Tangible assets	€2,089m	€2,021m
Profit (loss) before tax	€(587)m	€129m
Income tax accrued [1]	€(117)m	€(115)m

RATIOS

Contribution to Group income before tax	-46.0%	5.6%
Contribution to Group income tax	21.1%	16.7%

TAX CONTRIBUTION

(215) MILLION EUROS



(117) Income tax accrued

(41) Tax on goods and services

(55) Payroll taxes

(1) Environmental and other taxes

(1) *Of which withholding tax.*

HUNGARY

2 ***COMPANIES***
whose main activities are:

KEY FIGURES

KEY FIGURES	2025	2024
Legal entities	2	2
Employees	1,333	1,394
Total revenue	€818m	€869m
Tangible assets	€107m	€120m
Profit (loss) before tax	€24m	€46m
Income tax accrued	€(6)m	€(10)m

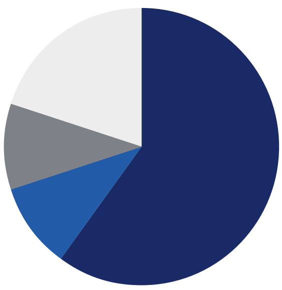
06

RATIOS

RATIOS	2025	2024
Contribution to Group income before tax	1.9%	2.0%
Contribution to Group income tax	1.1%	1.3%

TAX CONTRIBUTION

(9)
MILLION EUROS



(6)
Income tax accrued

(1)
Tax on goods and services

(1)
Payroll taxes

(2)
Environmental and other taxes

INDONESIA

CILEGON

8 COMPANIES
whose main activities are:

Michelin Indonesia's income fell into steeply negative territory in 2024 on account of asset impairments.
Its 2025 income reflected a more typical performance, even though it was penalized by the negative effects of US tariffs on its export volumes.

KEY FIGURES

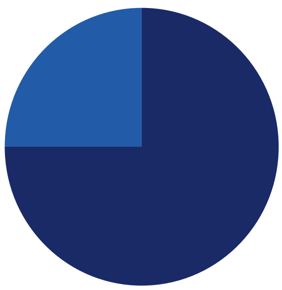
	2025	2024
Legal entities	8	8
Employees	6,047	6,708
Total revenue	€737m	€829m
Tangible assets	€756m	€874m
Profit (loss) before tax	€33m	€(25)m
Income tax accrued	€(6)m	€(8)m

RATIOS

	2025	2024
Contribution to Group income before tax	2.6%	-1.1%
Contribution to Group income tax	1.0%	1.1%

TAX CONTRIBUTION

(8) MILLION EUROS



(6) Income tax accrued

(2) Tax on goods and services

NS Payroll taxes

NS Environmental and other taxes

ITALY

15 COMPANIES
whose main activities are:

Michelin Italy's income was lower in 2025 than in 2024 mostly because market conditions were unfavorable, a situation exacerbated by the effects of US tariffs and higher production costs.

KEY FIGURES

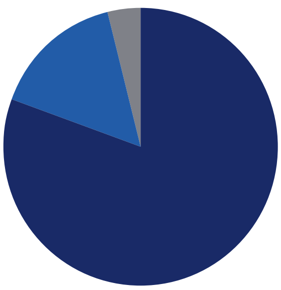
	2025	2024
Legal entities	15	16
Employees	4,400	4,275
Total revenue	€2,174m	€2,191m
Tangible assets	€598m	€539m
Profit (loss) before tax	€49m	€99m
Income tax accrued	€(21)m	€(20)m

RATIOS

	2025	2024
Contribution to Group income before tax	3.8%	4.4%
Contribution to Group income tax	3.8%	2.6%

TAX CONTRIBUTION

(26) MILLION EUROS



(21) Income tax accrued

(4) Tax on goods and services

(1) Payroll taxes

NS Environmental and other taxes

NETHERLANDS

12 *COMPANIES*

whose main activities are:

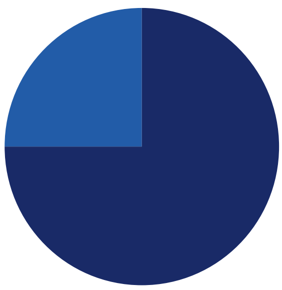
Income before tax returned to positive territory in the Netherlands in 2025.
In 2024, a non-tax-deductible impairment charge on equity investments had resulted in a loss.

KEY FIGURES	2025	2024
Legal entities	12	12
Employees	896	885
Total revenue	€1,102m	€1,485m
Tangible assets	€54m	€53m
Profit (loss) before tax	€11m	€(69)m
Income tax accrued	€(3)m	€(4)m

RATIOS		
Contribution to Group income before tax	0.8%	-3.0%
Contribution to Group income tax	0.6%	0.5%

TAX CONTRIBUTION

(4) MILLION EUROS



(3) Income tax accrued

(1) Tax on goods and services

NS Payroll taxes

NS Environmental and other taxes

POLAND

OLSZTYN

6 COMPANIES whose main activities are:

Michelin Poland's income was lower in 2025 than in 2024. This was because sales volumes fell due to the gradual winding down of production at the Olsztyn facility as well as unfavorable market conditions, especially in the OE, Truck and Beyond Road segments. The tax expense fell accordingly.

KEY FIGURES

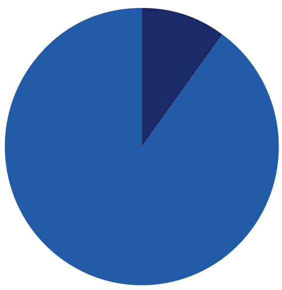
KEY FIGURES	2025	2024
Legal entities	6	6
Employees	5,074	5,136
Total revenue	€1,232m	€1,310m
Tangible assets	€599m	€580m
Profit (loss) before tax	€(5)m	€1m
Income tax accrued	€(1)m	€(21)m

RATIOS

RATIOS	2025	2024
Contribution to Group income before tax	-0.4%	0.0%
Contribution to Group income tax	0.2%	2.7%

TAX CONTRIBUTION

(10) MILLION EUROS



(1) Income tax accrued

(9) Tax on goods and services

NS Payroll taxes

NS Environmental and other taxes

ROMANIA

ZALAU

3 COMPANIES
whose main activities are:

Operating income in Romania fell in 2025 due to higher raw material costs and energy prices. A minimum turnover tax came into effect in the country in 2024.

KEY FIGURES

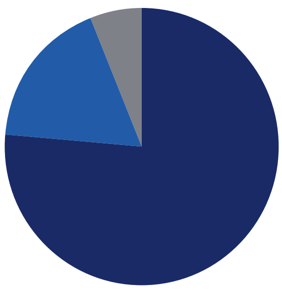
KEY FIGURES	2025	2024
Legal entities	3	3
Employees	5,729	5,823
Total revenue	€1,230m	€1,210m
Tangible assets	€478m	€492m
Profit (loss) before tax	€6m	€15m
Income tax accrued	€(13)m	€(11)m

RATIOS

RATIOS	2025	2024
Contribution to Group income before tax	0.5%	0.7%
Contribution to Group income tax	2.3%	1.5%

TAX CONTRIBUTION

(18) MILLION EUROS



(13) Income tax accrued

(3) Tax on goods and services

(1) Payroll taxes

NS Environmental and other taxes

SINGAPORE

SINGAPORE
HEADQUARTERS

8 COMPANIES
whose main activities are:

Income fell in 2025, mostly due to lower sales volumes.
Income was also penalized by an unfavorable variation in the EUR/USD exchange rate.
A higher tax expense was recorded in 2025 because of new regulations.

KEY FIGURES

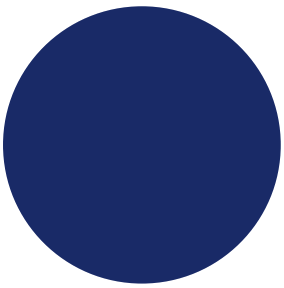
KEY FIGURES	2025	2024
Legal entities	8	9
Employees	167	181
Total revenue	€3,481m	€4,072m
Tangible assets	€5m	€6m
Profit (loss) before tax	€41m	€50m
Income tax accrued	€(7)m	€(4)m

RATIOS

RATIOS	2025	2024
Contribution to Group income before tax	3.2%	2.2%
Contribution to Group income tax	1.2%	0.6%

TAX CONTRIBUTION

(7) MILLION EUROS



(7) Income tax accrued

NS Tax on goods and services

NS Payroll taxes

NS Environmental and other taxes

SWITZERLAND

8 COMPANIES whose main activities are:

Michelin's Swiss operations cover a wide spectrum, including financing for all the Group's subsidiaries.
Income was lower in 2025 than in 2024 due to lower floating market interest rates on the interest income received by Michelin Switzerland.

KEY FIGURES

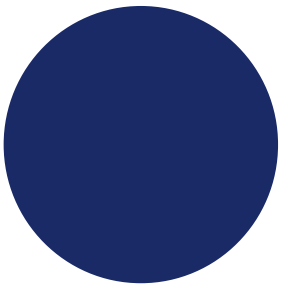
	2025	2024
Legal entities	8	11
Employees	358	342
Total revenue	€1,020m	€799m
Tangible assets	€31m	€34m
Profit (loss) before tax	€165m	€320m
Income tax accrued	€(34)m	€(68)m

RATIOS

	2025	2024
Contribution to Group income before tax	12.9%	14.0%
Contribution to Group income tax	6.2%	9.1%

TAX CONTRIBUTION

(35) MILLION EUROS



(34) Income tax accrued

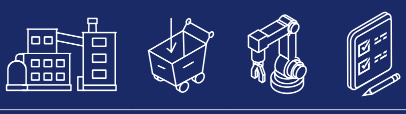
NS Tax on goods and services

NS Payroll taxes

NS Environmental and other taxes

THAILAND

3 COMPANIES
whose main activities are:



KEY FIGURES

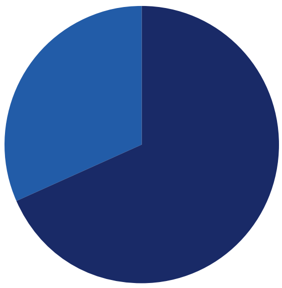
	2025	2024
Legal entities	3	3
Employees	7,595	7,675
Total revenue	€1,664m	€1,615m
Tangible assets	€971m	€1,070m
Profit (loss) before tax	€131m	€142m
Income tax accrued	€(26)m	€(24)m

RATIOS

Contribution to Group income before tax	10.3%	6.2%
Contribution to Group income tax	4.7%	3.1%

TAX CONTRIBUTION

(39) MILLION EUROS



(26) Income tax accrued

(12) Tax on goods and services

NS Payroll taxes

NS Environmental and other taxes

06

6.2 SUMMARY OF COUNTRY-BY-COUNTRY DATA

Selected tax contribution data by country (in € thousands)

JURIDICTION FISCALE	TOTAL REVENUE	PROFIT (LOSS) BEFORE TAX	TANGIBLE ASSETS	INCOME TAX ACCRUED	NUMBER OF EMPLOYEES [1]
GERMANY	**2,916,365**	55,400	331,639	(785)	5,315
AUSTRALIA	**1,036,587**	44,128	122,285	(19,067)	1,529
BRAZIL	**1,374,703**	45,198	441,583	(4,807)	7,979
CANADA	**2,309,602**	(14,151)	635,748	448	4,575
CHINA	**3,073,041**	292,792	840,589	(71,545)	5,626
SPAIN	**3,678,037**	222,188	1,173,093	(48,479)	8,586
UNITED STATES	**11,067,160**	641,603	2,432,135	(117,697)	18,083
FRANCE	**9,643,989**	(586,986)	2,089,114	(117,163)	20,872
HUNGARY	**817,994**	23,801	107,371	(5,852)	1,333
INDONESIA	**737,054**	32,631	756,297	(5,603)	6,047
ITALY	**2,173,886**	48,948	597,553	(20,878)	4,400
NETHERLANDS	**1,101,789**	10,791	53,857	(4,573)	896
POLAND	**1,231,578**	(4,685)	598,959	(1,320)	5,074
ROMANIA	**1,230,133**	5,905	478,462	(12,825)	5,729
SINGAPORE	**3,481,395**	41,370	4,989	(6,730)	167
SWITZERLAND	**1,020,027**	164,566	30,987	(34,365)	358
THAILAND	**1,663,979**	131,314	970,852	(25,822)	7,595
OTHER	**7,177,875**	122,287	1,533,224	(57,348)	18,422
TOTAL	**55,735,193**	**1,277,100**	**13,198,738**	**(554,410)**	**122,586**

(1) The figure of 122,586 is the number of employees registered as of 12/31/2025.

Reconciliation of country-by-country[1] data with the Universal Registration Document

(en millions d'euros)	**REVENUE (SALES)** *(Consolidated income statement)*	**PROFIT (LOSS) BEFORE TAX** *(Consolidated income statement)*	**TANGIBLE ASSETS (PP&E)** *(Consolidated statement of financial position)*	**INCOME TAX ACCRUED** *(Note 11 – Income tax)*
2025 consolidated financial statements (included in the Universal Registration Document)	**25,992**	2,258	13,212	(546)
Differences with the components constituting sales as defined in II a) of Article A232 of the French Commercial Code	**1,735**			
Revenue from inter-company transactions	**28,008**			
Miscellaneous adjustments recognized in preparing the consolidated financial statements		(980)	13	9
Country-by-country data presented in this report	**55,735**	1,277	13,199	(554)

(in € millions)	**COUNTRY-BY-COUNTRY DATA**	**CONSOLIDATION ADJUSTMENTS**	**DEFERRED TAX**	**NOTE 11 – INCOME TAX**
Income tax accrued	(554)	9		(546)
Deferred tax benefit/(expense)			(48)	(48)
INCOME TAX	**(554)**	**9**	**(48)**	**(594)**

(1) CbCR, as defined in Article 223 quinquies C of the French General Tax Code.

"Some of the figures in this report, including the global tax contribution and certain figures in the country data sheets, have been subject to limited assurance procedures carried out by the Company's Statutory Auditors".

Limited assurance report of Michelin's Statutory Auditors (see attached)

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