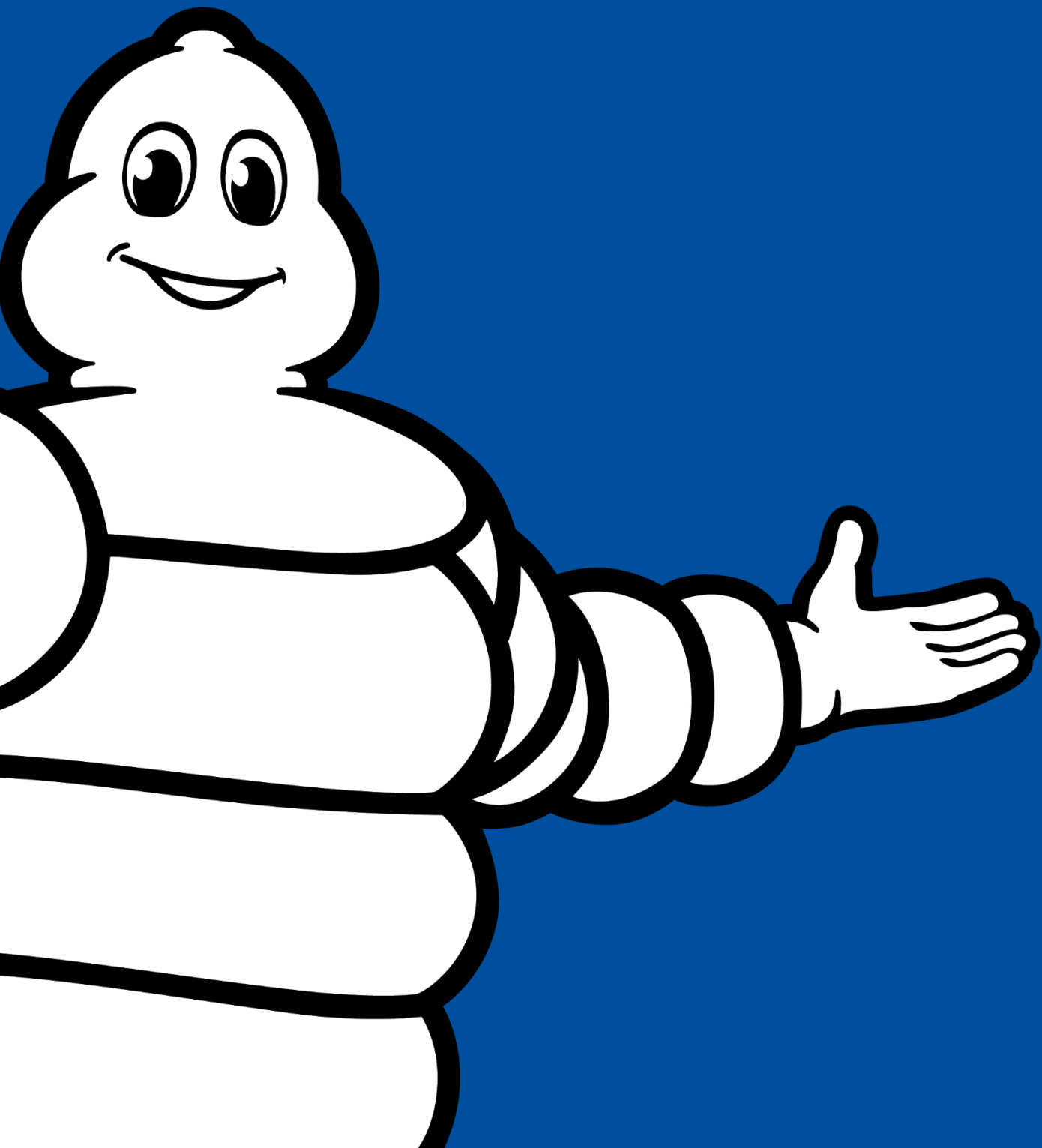


# *Group Whistleblowing Procedure*

*Collecting and processing Alerts*



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### **Opening Remarks from the Group Ethics Committee**

At Michelin, we are united by our values.

Building together the Michelin of tomorrow requires that our individual and collective conduct remain in line with these values and ethical principles.

This is why Michelin is making available to all employees and external partners the "Group Whistleblowing Procedure", which describes in complete transparency and detail our Whistleblowing System (ethical hotline and other reporting channels, etc.) and how we work in terms of collecting and processing Alerts.

This reference document is fundamental to sustaining the trust of our employees and all the external stakeholders with whom we work.

Any Alert will be taken into account, analyzed and processed and, if necessary, may give rise to appropriate corrective measures.

We ensure, to any person who uses the Group Whistleblowing System, the guarantees and protections provided for by the applicable local legislation as well as respect for confidentiality throughout the process of collecting and processing an Alert.

We thank you for your commitment to contribute to the respect of our values on a daily basis.

Ethics is everyone's business.

**Yves CHAPOT**

General Partner & Finance  
Director

**Nicolas BEAUMONT**

Sustainable Development &  
Mobility Director

**Pascal MAHIER**

Internal Control Director

**Jean-Claude PATS**

Personnel Director

**Jean-Claude GALLET**

Security & Environment  
Director

**Dmitriy MOLOKANOV**

Customer Experience  
Director

**Benoit BALMARY**

General Counsel

**Charlotte GRASS**

Chief Compliance Officer

**Vincent ROUSSET  
ROUVIERE**

Purchasing Director

The values of respect of the facts, of the People, of the clients, of the shareholders and of the environment define the Group's identity and form the basis of its ethical culture. The Michelin Group wishes to guarantee ethical behavior towards its external partners, and across all its business activities.

The Group's ethical standards are described in a single document: the Code of Ethics. This Code of Ethics is applicable to all Michelin Group employees, its officers, and its occasional workers without exception and regardless of their hierarchical level. The principles of this Code of Ethics are also applicable to all the Group's partners worldwide.

The Group Whistleblowing System aims to ensure that all employees and stakeholders can have confidence in the way the Group handles ethical alerts, by providing a secure way to report behavior that does not comply with our Code of Ethics.

This system complies with the obligations of French law, and in particular with Act n°2016-1691 of 9 December 2016 (Sapin II law on the prevention of corruption (Article 17) and the protection of whistleblowers (Article 8)) and Act n°2017-399 of 27 March 2017 (duty of vigilance).

When local laws set standards, which provide greater protection for the Whistleblower, these must always take precedence. If, on the other hand, this Group Whistleblowing Procedure (hereinafter the 'Procedure') provides more protective rules, the Michelin Group will apply them on a voluntary basis, to the extent legally possible.

In addition to this Group Whistleblowing Procedure, there may be similar systems within the Michelin Group entities as required by local law.

This Procedure applies to all companies directly or indirectly controlled by Compagnie Générale des Etablissements Michelin.

## **1. Who can make an Alert and on what subjects?**



The Group Whistleblowing Procedure is accessible to all Michelin group employees, as well as to the following persons:

- Employee whether under a fixed or permanent contract, full-time or part-time, any corporate officer of the Michelin Group, and subject to the statutes of limitation provided for by local legislation, employees who have left the Michelin Group concerning information obtained in the course of their employment.
- Temporary staff, trainees, work-study students and employees of Michelin Group service providers or subcontractors.
- Stakeholder (shareholders of the Michelin group, partners and holders of voting rights in the general meeting of a Michelin entity, persons applying for a job in the Michelin group (when the information has been obtained in the context of this application), members of the administrative, management or supervisory bodies of the Michelin group entities, Michelin group's co-contractors (suppliers, customers), as well as their subcontractors, and in when they are legal entities, members of the administrative, management or supervisory bodies of the Michelin group's co-contractors and subcontractor, as well as members of their staff, and the representatives of civil society).
- Any other external person who observes a violation of the law, the regulations, Michelin Code of Ethics or any internal codes or policies of the Michelin group.

A person belonging to one of the above-mentioned categories may, provided that the Alert is made in good faith and without direct financial compensation, may report information of which he or she has become aware, directly or indirectly, which concerns:

- Events which occurred or have a significant likelihood of occurring within the Michelin Group or in a situation relating to any of its business activities which concerns a violation of the law or a regulation, Michelin's Code of Ethics, Anti-Corruption Code of Practice, Antitrust Compliance Program, Michelin Purchasing Principles, Michelin Master Human Rights Policy or Michelin Group's internal policies and requirements.
- or a threat or harm to the general interest, any serious infringement of human rights and fundamental freedoms, the health and safety of persons or the environment, as defined in the Michelin Group's internal policies and requirements.

Alerts may therefore concern the following topics:

- Anti-competitive practices
- Corruption / influence peddling
- Sexual harassment
- Harassment
- Inappropriate behaviors
- Human rights (other than discrimination or harassment)
- Discrimination
- Fraud
- Conflicts of interest
- Health and Safety
- Confidentiality
- Personal Data Protection
- Theft, sabotage, vandalism
- Intellectual Property Rights
- Environment
- International Sanctions, Embargo & Export Control
- Retaliation
- Any other violation of the law or a Michelin Group internal policy
- Complex employee relations that could not be resolved in the relationship with the manager and/or the development partner.

Detailed definitions for each category can be found in Appendix 1.

If the information was obtained outside of the professional context, the Whistleblower must have had personal knowledge of it.

Any information or fact which does not fall into one of the above-mentioned categories, may not be the subject of an Alert recorded on the Ethics Line or send via one of the traditional reporting channels (or to the Authorized Person(s) as defined here below) and does not fall within the scope

of this Procedure. If this is the case, the Whistleblower will be informed and redirected to the appropriate persons to forward the alleged concern.

For example, the Group Whistleblowing System is not intended to deal with issues solely related to staff management (compensation, performance, etc.) which do not constitute a violation of the law. These concerns should be forwarded to the manager and the Personnel Department for treatment.

In addition, facts, information and documents covered by medical secrecy, the secrecy of relations between a lawyer and a client, the secrecy of judicial deliberations, the secrecy of the judicial investigation or investigation, or the secrecy of national defense are excluded from the Group Whistleblowing Procedure.

Finally, the Group Whistleblowing Procedure does not apply to situations of emergency or serious and imminent danger. In the event of an emergency or serious and imminent danger, the person is invited to take all necessary measures to put an end to the situation, protect themselves and third parties and to contact the Group's Chief Compliance Officer (CCO) and/or the Group Security Director directly.

## 2. Submitting an Alert



The Group Whistleblowing System allows you to report events or behavior via:

- The Group's Ethics Line,
- Traditional reporting channels.

### 2.1 Alert via the Group Ethics Line

It is possible to make an Alert, including anonymously, directly via the Ethics Line, which is a dedicated and secure platform, available free of charge 24/7, managed by a specialized external service provider (Navex Global), and subject to a strict non-disclosure obligation.

This platform is accessible in writing at the following address:

<https://secure.ethicspoint.eu/domain/media/en/gui/38522/index.html>

The Ethics Line can also be reached by telephone on the numbers listed in Appendix 2.

The link to the Ethics Line is also available on the Michelin Group's intranet and Internet sites.

### 2.2 Alert via traditional reporting channels

For Michelin Group employees, it is also possible to send an Alert, in writing or orally, via the traditional reporting channels as mentioned in the Michelin Code of Ethics; these persons must transmit the Alert to the persons authorized in the Group to collect and process an Alert, as listed here below:

- to the Group Personnel Director, or the Region/Country Personnel Directors in the Personnel Department.
- to the Group Legal Director, the Region/Country Legal Directors, or the Chief Compliance Officer in the Legal and Compliance teams.

- to the Group Security Director, or the RRSE (Regional Risk Safety and Environment Directors) in the Security Department.
- To the Ethics Alert Officer in certain companies of the Group.

(Hereinafter referred to as 'Authorized Persons').

Authorized Persons are subject to a strict non-disclosure and impartiality obligation and have the competence, the authority and the resources to fulfil their roles.

Authorized Persons must record all Alerts relating to the categories mentioned in Article 1) in the Ethics Line.

Anyone may also seek advice and/or discuss any concerns with their manager or another manager, or their development partner. If the concern raised with a manager or development partner may constitute an Alert, they will encourage the Whistleblower to report the issue, either through the Ethics Line or by contacting the Authorized Persons.

Any Alerts received by other persons or departments must be forwarded promptly and confidentially either to the Authorized Persons or recorded directly by them on the Ethics Line.

As the use of the Group Whistleblowing Procedure is optional, no sanction can be taken against a person who has not activated it when he or she was entitled to do so.

### **2.3 Staff with access to the Alerts**

Only the Chief Compliance Officer and designated persons in their team have access, at Group level, to all Alerts registered on the Ethics Line.

The Regional Risk, Safety and Environment Managers (RRSE) who functionally report to the Group Anticipation Prevention and Protection Corporate Direction (DCAPP) and, where applicable, anyone formally appointed as deputies, have access to Alerts from the countries in their respective Regions.

All these people are considered Authorized Persons are therefore subject to a strict obligation of non-disclosure and impartiality and have the competence, authority and resources to fulfil their roles.

### **2.4 Content of the Alerts**

Whistleblowers must provide the information and details which they are aware of to corroborate their Alert.

The information provided must be factual and have a direct link with the purpose of the Alert.

The more precise and factual information and elements the Whistleblower provides, whatever their form or media, the easier it will be to process the Alert.

A list of useful information to process an Alert is provided in Appendix 3 as an example.

The Ethics Line provides Whistleblowers with a form to help guide them through what information to provide.

If Whistleblowers are not sure about a fact, they should say so.

If Whistleblowers realize that they have got a fact wrong after making the Alert, they must rectify this as soon as they realize it.

## 2.5 Managing anonymous Alerts

Anonymous Alerts may be submitted via the Ethics Line.

Anonymous Whistleblowers may nevertheless provide an email address on the Ethics Line Platform, which will technically be made totally anonymous by Navex Global, the service provider, in order to communicate with them, while maintaining their anonymity.

If anonymous Whistleblowers do not provide an email address, they will be encouraged to log on regularly to the Ethics Line in order to follow the status of their Alert and provide any necessary additional information.

The Whistleblower will be informed if their anonymity makes it impossible to process the Alert.

In order to efficiently process the Alert, Michelin reserves the right to ask the Whistleblower to lift their anonymity and to disclose their identity. The Whistleblower is then free to accept or refuse. They will be informed if their refusal makes it impossible to process the Alert.

## 3. Processing Alerts



### A. Fundamental Principles

The Group Ethics Committee ensure compliance with fundamental principles detailed here below.

All Alerts are submitted on a disinterested basis (in good faith and without seeking direct compensation).

It is important to remind that, in the context of the Group Whistleblowing Procedure, the Michelin group is not intended to offer any counterpart or financial compensation, act of recognition or promotion of any kind whatsoever to a Whistleblower for the submission of an Alert.

All Alerts shall be reviewed impartially.

The principles of presumption of innocence, respect for confidentiality, protection of privacy and protection of the reputation of individuals will be applied throughout the phases of processing an Alert.

All decisions on an Alert (admissibility, appointment of an investigator, coming to a decision after investigation) are taken in a collegial manner.

The methods used to check the accuracy of the information and events reported must be justified and proportionate to the seriousness of the allegations contained in the Alert.

When processing Alerts, the Michelin Group attaches great importance to preserving confidentiality. The conditions of collecting and processing the Alerts therefore guarantee that the Whistleblower's identity and all of all details likely to reveal the identity of the Whistleblower, the persons targeted by the Alert, any third party mentioned in the Alert and the information collected while processing of the Alert will be kept strict confidential.

The Authorised Persons and Investigators must keep the Whistleblower's identity, the Alert's subject and the identity of the persons concerned (both those implicated and witnesses) strictly confidential, who are subject to a reinforced confidentiality obligation. Any other disclosure of the Whistleblower's identity as part of the investigation will be made with their explicit consent.



However, this information may be communicated to a court or administrative authority, under the conditions provided for by the applicable law. The Whistleblower shall be informed of this, provided this does not jeopardise the court or administrative proceedings.

Investigators shall have sufficient impartiality, competence, authority and resources to perform their duties and shall comply with the internal requirements of the investigation. To this end, they must have taken a specific training course for this purpose.

Potential for conflicts of interest with respect to Authorised Persons, Investigators and members of decision-making Ethics Committees are carefully considered and appropriate measures must be taken, if necessary.

If Authorised Persons are mentioned in an Alert, the internal procedures implemented ensure that Authorised Persons are unable to access the Alert and that the Alert is automatically sent and processed by an impartial department.

### ***B. Main steps for processing an Alert.***

The steps for processing an Alert are as follows:

- Confirming receipt.
- Checking an Alert's admissibility.
- Appointing an Investigator.
- Performing an internal investigation.
- Coming to a decision following the investigation.
- Giving feedback to the Whistleblower and the people involved in the Investigation.
- Closing the Alert.
- Archiving.

The diagram below summarises the main stages of processing the Alert:



The details of each step are described below:

### Confirming Receipt

Whistleblowers will be informed in writing that their Alert has been received, at the latest within seven (7) working days of its receipt.

A confirmation will be sent either via the Authorised Persons or via the Ethics Line.

Confirming receipt does not constitute the admissibility of the Alert.

### Checking the Alert's admissibility

All the Alerts received will be subject to a preliminary phase to check whether they are admissible. This involves ensuring that:

- The Alert falls within the scope of the Procedure (categories listed in Article 1).
- The Alert seems to be made in good faith and without seeking financial consideration.
- The information or events reported are factual, objective and sufficient to open an investigation.

The admissibility decision is then recorded on the Ethics Line and the Whistleblower is informed.

The decision as to whether an Alert is admissible is taken collectively.

This decision is taken by the competent Ethics Committee (at region/country level or at Group level) in an *ad-hoc* composition comprising at least the RRSE, the Legal Director of the Region/Country and/or the Ethics and Compliance Officer of the Region/Country and, if necessary, the Personnel Director of the Region/Country, all of whom are Authorised Persons.

If there is a difference of opinion, the case is escalated to the Chief Compliance Officer and/or to the Group Ethics Committee.

An Alert may be considered inadmissible, if:

- the Whistleblower or the subject of the Alert does not fall within the scope of this Procedure (Article 1).
- the Whistleblower is acting in bad faith or is seeking direct financial consideration.

If the information contained in the Alert is the subject of a report to external authorities and/or court proceedings (arbitration, mediation, injunction, etc) and/or has been publicly disclosed, the Alert is in principle inadmissible. The Michelin Group nevertheless reserves the right to examine it and to take corrective measures, if applicable.

Furthermore, since it is prohibited to include certain information in an Alert, the Michelin Group reserves the right not to process an Alert if:

- The Whistleblower has revealed events, information or documents, in any form or medium whatsoever, which is covered by national defense secrecy, medical secrecy or the secrecy of relations between a lawyer and their client, unless they belong to them, such as discussions with their lawyer or their personal medical information.
- The Whistleblower has provided information that was not obtained legally or that was obtained by violating a contractual obligation.
- Finally, the Michelin Group also reserves the right not to process an Alert if:
- The factual details of an anonymous Alert are not sufficiently detailed despite the Whistleblower being asked to provide more precise information.
- The Alert contains information that may constitute crimes or offences which the Group has a legal obligation to pass on to the relevant authorities.

The Whistleblower is informed that their Alert is not admissible, and including if applicable, the reasons for its inadmissibility.

If possible, the Whistleblower will be directed to other contact persons so that their concern can be addressed.

### **Appointing an investigator**

When the Alert is considered admissible, the concerned Ethics Committee appoints an investigator.

It ensures that the investigator is impartial and has competence, authority and sufficient means to exercise their mission and has followed the dedicated training for the conduct of investigation. The concerned Ethics Committee also ensure that the appointed investigator is not in a conflict-of-interest situation regarding the Alert which must be investigated.

If necessary, it may be possible to request the assistance of a specialized approved external service provider.

### **Performing an internal investigation**

When the Alert is considered admissible, steps are taken to check the accuracy of the information.

The Whistleblower will be informed that their Alert is admissible, and an Investigation will be launched.

It may be necessary to take certain temporary measures while processing the Alert in order to preserve evidence, safeguard the health and safety of individuals and/or avoid retaliatory

measures. All persons involved in implementing these measures are subject to a strict non-disclosure obligation.

An Alert may be communicated in a confidential manner to another company of the Michelin group for processing if this is necessary to verify the alleged facts or depending on the nature or degree of seriousness of the alleged malfunction.

In order to avoid any interference, the Whistleblower may not conduct their own investigation and must respect the confidentiality of the Alert.

The Whistleblower must also inform the Investigator if, before any feedback is given on the results of the investigation, they decide to refer the matter to external authorities and/or to initiate legal or similar proceedings (arbitration, mediation, injunction, etc...) and/or to make a public disclosure. In this case, the Michelin Group reserves the right to suspend the internal investigation.

The person(s) implicated in an admissible Alert shall be informed of the nature of the allegations concerning them, in a reasonable time after the admissibility decision, of the recipients of the Alert and of the entity responsible for its processing, as well as of the procedures for exercising their right of access to personal data concerning them in compliance with the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016). This information may be delayed, if necessary, for example, to check facts, preserve evidence, protect individuals or contact local authorities.

An implicated person may be asked to provide information or attend one or several interviews. Total cooperation is expected, under a duty of loyalty. The sole aim of these interviews is to check the accuracy of the information contained in the Alert.

The implicated person(s) may not, however, demand information about the identity of the Whistleblower or third parties mentioned in the Alert.

Any request for cooperation from a Michelin Group employee or from a third party will be treated as strictly confidential. The same holds for the content of the information or events communicated.

### **Coming to a decision following the investigation**

At the end of the investigation, its conclusions are presented to the competent Ethics Committee (Region / Country, Group) by the investigator.

On the basis of the investigation report, determining whether the Alert has been substantiated, partially substantiated or not substantiated, the competent Ethics Committee shall decide, in agreement with the legal entity of the Michelin Group concerned, if necessary, on any necessary measures to take.

These measures are taken in accordance with applicable local laws and may include disciplinary action, adoption or amendment of internal rules, reorganisation of operations or departments, training and/or accompaniment implementation, or bringing legal action.

The relevant Ethics Committee is responsible for checking that these measures are effectively implemented by the entities concerned.

### **Feedback to the Whistleblower**

The Whistleblower will be kept regularly informed in writing of the developments in processing their Alert (measures envisaged or taken to assess the accuracy of the information and facts communicated in the Alert) and within a reasonable period of time which cannot exceed three (3) months from acknowledging receipt of their Alert.

The time it takes to process the Alert varies and depends on the complexity of the facts reported and the nature of the information provided.

The level of information provided may vary according to the applicable local legislation.

The Whistleblower is also informed if the Alert has been found to be groundless.

### **Closing the Alert**

At the end of the investigation, the Whistleblower as well as the person(s) implicated in the Alert are informed that the investigation has been closed, whether the Alert has been substantiated, partially substantiated or not substantiated and, as appropriate, any measures taken in compliance with confidentiality obligations.

This information is provided via the Ethics Line, and/or by letter or email, and in some cases, during a direct conversation with the Whistleblower and the implicated person(s).

Those who participated in the Investigation are also informed by post or email that the Alert has been closed.

### **Managing personal data and archiving**

The Group Whistleblowing System involves the collection and processing of personal data, the terms of which are described in the Personal Data Protection Policy accessible on the Ethics Line website and detailed in Appendix 4.

The Alert and any documents and information communicated as part of an Alert will be destroyed or archived anonymously in accordance with the procedures also described in Appendix 4.

## **4. No retaliation**



No Whistleblower may suffer retaliation for making an Alert, including if the events and information are not proven to accurate, are not sufficiently substantiated, not substantiated or do not lead to any action being taken. The measures deemed to be retaliation are determined by applicable local laws.

As an example, the following measures may be considered as retaliation:

- Disciplining or dismissing a Whistleblower when they are employed by the Michelin Group.
- Terminating an agreement to supply goods or services entered into with the Whistleblower as a client, supplier or partner of the Michelin Group.
- Or undermining the reputation of a Whistleblower.

In addition, retaliation is also prohibited against:

- A person or organization for having helped the Whistleblower make an Alert and/or participating in processing it, by giving evidence during an internal investigation.
- A person, because of their relationship with the Whistleblower.
- An entity controlled by a Whistleblower, in which they work or with which they are connected in a professional context.
- Any implicated person when the investigation has demonstrated that the allegations were not substantiated.

Any person who thinks they have suffered retaliation for making an Alert or taking part in the investigation is encouraged to report this to the Ethics Line or the Authorised Persons.

On the other hand, except in the case of imminent or manifest danger to the public interest, the Whistleblower cannot validly claim to be protected when his report is made public on his initiative, in particular by means of the press, whatever the medium, or by publication on social networks.

Finally, the Whistleblower of a bad faith Alert, in particular when the report is made with the intention of harming the reputation of the person concerned or in the event of a false Alert, is exposed to disciplinary sanctions as well as legal proceedings.

## 5. Using the system responsibly



The Michelin Group takes Alerts very seriously and will ensure that they are processed effectively in compliance with this Procedure which aims to protect the rights of individuals.

Therefore:

- Making an Alert in bad faith.
- Making an Alert with the intention of obtaining financial compensation, when this is not provided for by local regulations.
- Making an Alert in order to knowingly harm someone.
- Including information in an Alert that is prohibited and/or obtained illegally or in violation of a contractual obligation.
- Obstructing an Alert or its processing by an action or inaction.
- Violating the strict confidentiality obligations related to receiving, processing or archiving an Alert.
- Retaliating, attempting, or threatening to retaliate.

May result in sanctions up to and including dismissal and/or legal action.

Using the system will not expose Whistleblowers to any sanctions if they provide information in good faith, with no intention to harm, and which they believe is complete, local and accurate, such that they might reasonably believe it to be true, even if the facts subsequently prove to be inaccurate or are not followed up.

## 6. Updating the Procedure



Michelin is entitled to update this Procedure regularly.

All employees of the Michelin Group along with its clients, suppliers and stakeholders will be made aware of any new version, in compliance with applicable local laws.

The prevailing version is available on the Michelin Group website: [www.michelin.com](http://www.michelin.com)

## APPENDIX 1 – Accessible categories in the Group Whistleblowing System

CATEGORY	DEFINITION
<b>Anticompetitive practices</b>	<p>Any act contrary to applicable local laws and regulations regarding competition law.</p> <p>As examples : oral or written agreements and/or arrangements or understandings with competitors and/or via intermediaries to fix prices or commercial terms; taxation / influence of a distributor / reseller resale price; any practice aimed at excluding a competitor; boycott of specific suppliers or customers; distribution of products, territories or markets; or exchange of non-public sensitive information or information that may have an impact on competition (including strategic plans or marketing studies, production capabilities).</p>
<b>Corruption / influence peddling</b>	<p>Any act contrary to applicable local laws and applicable Michelin policies regarding anticorruption and/or influence peddling.</p> <p>Corruption/Bribery: Offering (active bribery) any gift or benefit to a public or private sector actor for themselves or for someone else, directly or indirectly, in order to perform or refrain from performing an act within the scope of his or her function or mandate (e.g. influencing a business decision, obtaining or renewing a contract, obtaining advantages, contracts, ...). The acceptance or solicitation by a public or private person of such a proposal or offer is an act of passive corruption, as reprehensible as active corruption.</p> <p>Influence Peddling: Act of offering (active influence peddling) directly or indirectly, to a public or private person with influence (real or supposed) any gift, any contribution or any advantage in return for the latter's abuse of his influence to obtain a favorable decision from an authority or public administration (distinctions, jobs, contracts, etc.). The acceptance or solicitation by a public or private person of such a proposal is an act of passive influence peddling, as reprehensible as passive corruption.</p>
<b>Sexual Harassment</b>	<p>Sexual Harassment generally refers to a range of unacceptable behaviors, practices, actions and words (based on sex and/or gender) of sexual or sexist nature that cause harm to an individual and may create an intimidating, hostile, and/or threatening work environment. This behavior constitutes a violation of applicable local laws defining sexual harassment.</p>
<b>Harassment</b>	<p>Harassment generally refers to a range of unacceptable behaviors, practices and words that cause harm to an individual and may create an intimidating, hostile, and/or threatening work environment. This behavior constitutes a violation of the applicable local laws defining harassment.</p>

<p><b>Human Rights (other than discrimination and harassment)</b></p>	<p>Any violation of applicable, national, European and international standards on human rights and fundamental freedoms or any serious risk or infringement of human rights and fundamental freedoms.</p> <p>For example: prohibition of child labor or forced labor, freedom of association, right to collective bargaining, freedom of expression</p>
<p><b>Discrimination</b></p>	<p>Any different treatment of a person or group of persons by disadvantaging, denigrating, excluding or favoring them on the basis of criteria such as gender identity, age, religion, culture, social origin, nationality, ethnicity, disability, sexual orientation, trade union membership, family status, political opinion, physical appearance, etc.</p> <p>Discrimination may occur during recruitment, promotion, raising, training, accessibility to services, advantages or benefits. Discrimination can also take the form of behavior, words and gestures that may be based on stereotypes.</p>
<p><b>Fraud</b></p>	<p>Any willful and intentional act of dishonesty and deception committed in order to illegally obtain a financial benefit or any other advantage or benefit.</p> <p>Fraud may benefit to a Group employee or to a third party.</p> <p>It may be committed by an employee of the Michelin Group and/or by a person or organization outside the Michelin Group.</p> <p>For example, accounting fraud, tax fraud, embezzlement, falsification of documents, fraud relating to financial statements, misuse of company assets, misuse of Michelin Group resources.</p>
<p><b>Conflict of Interest</b></p>	<p>Any situation of conflict of interest (actual, potential or perceived/apparent), with the exception of situations declared in accordance with the procedure applicable within the Group.</p> <p>A conflict of interest is defined as a situation in which the private or personal interest of person are in conflict with independent, objective and impartial exercise of the missions entrusted by Michelin Group. The interests likely to influence an objective professional decision or which can be perceived in an ambiguous way may be associative, charitable, cultural, financial, commercial, political, religious, sporting, or due to family, sentimental or friendly ties.</p> <p>The Ethics Line is not intended to replace the procedure for declaring conflicts of interest defined by the Michelin group.</p>
<p><b>Health and Safety</b></p>	<p>Any violation of applicable local laws or Michelin group internal policies relating to health and safety obligations for persons.</p> <p>For example: non-compliance with safety rules, poor maintenance of premises, risky situations, pressure to work in an unsafe environment, alcohol or drug use.</p>



<p><b>Confidentiality</b></p>	<p>Any leak, alteration, deletion and/or fraudulent use of sensitive data corresponding to information that has or may have an economic and/or strategic value that is detrimental to the Group. This includes products, services, materials, procedures and equipment/manufacturing processes as well as design, testing and manufacturing techniques, methods and data, associated databases, business strategies (industrial, research and commercial), consumer and supplier databases, or a large volume of Michelin data.</p> <p>This category does not cover any disclosure of personal data, which is covered in another category.</p>
<p><b>Personal Data Protection</b></p>	<p>Any violation of applicable law on the protection of personal data and the Michelin group policies and prescriptions.</p> <p>For example, the unauthorized access, extraction or disclosure of data of employees, customers or suppliers, the collection of sensitive data (health, religion, etc.) outside any legal framework authorizing it.</p> <p>Personal data is information relating to an identified or identifiable natural person that directly or indirectly identifies a natural person by reference to an identifier such as a photo, surname, first name, professional identification number, telephone number, email address, combination of personal information, location data, a registration plate, or one or more factors specific to its physical, physiological, genetic, mental, economic, cultural or social identity.</p>
<p><b>Theft, sabotage, vandalism</b></p>	<p>Any theft, unlawful appropriation or destruction of the property of the Michelin Group or any interference with the activities of the Michelin Group.</p>
<p><b>Inappropriate Behaviors</b></p>	<p>Inappropriate behaviors are those, among others, that are deemed offensive, humiliating, or degrading, and that does not meet the Group's ethical standards, without constituting harassment under applicable local laws.</p>
<p><b>Intellectual Property Rights</b></p>	<p>Any violation of an intellectual property right of the Michelin group (trademark, domain name, patent, designs and models).</p> <p>For example,</p> <ul style="list-style-type: none"> <li>• any infringement, unauthorized or inappropriate use or copy of a Michelin Group brand (name, logo, graphic element) or product name, regardless of the type of medium (online or in the field).</li> <li>• any unauthorized reproduction of one of our products (as an example, copy of the tread pattern of our tires).</li> <li>• any unauthorized use of technology belonging to the Michelin Group.</li> </ul>
<p><b>Environment</b></p>	<p>Any violation of environmental protection standards and any serious risk or damage to the environment within Michelin and in the Group value chain.</p>

<p><b>International Sanctions, Embargo and Export Control</b></p>	<p>Any violation of applicable export control rules (military goods, dual-use goods) or international sanctions (embargoes, asset freezes, etc.).</p> <p>For example, European Union restrictive measures against Russia, embargo on certain states, etc.</p>
<p><b>Retaliation</b></p>	<p>Any retaliatory measure, threat or attempt to use such measures, taken against anyone who has reported an Alert in good faith via the Group Ethics Line or any other channels or who has participated in the treatment of an Alert.</p> <p>The definition of Whistleblower and retaliatory measures are determined by applicable local laws.</p>
<p><b>Other violation of the law or internal policies</b></p>	<p>Any other violation of the laws or the Michelin group internal policies and prescriptions, not listed in the above categories</p>
<p><b>Complex employee relations that could not be resolved in the relationship with the manager and/or the development partner</b></p>	<p>Any concern that does not relate to a violation of the law, relating to working conditions, relations between employees, holidays, indemnities, or other concerns of employees not specifically falling into another category, and which has not been resolved in the context of the relationship with the manager and/or with the development partner (Personnel Department / Human Resources).</p>

## ***APPENDIX 2 – Access to the Ethics Line***

Links to access the Ethics Line (or Beeline, michelingroup.ethicspoint, groupemichelin.ethicspoint):

<https://secure.ethicspoint.eu/domain/media/en/gui/38522/index.html>

### **Phone Numbers:**

The phone numbers to reach the Ethics Line are accessible through the home page of the Ethics Line internet website.

## ***APPENDIX 3 – List of useful information for processing an Alert***

For any Alert, regardless of the reporting channel used, the information listed below is useful to process it:

- If the Whistleblower has a professional tie with the Michelin Group and the nature of this tie.
- If the events have already occurred or are likely to occur.
- When and how the Whistleblower found out about the events.
- Whenever possible, the events, information and documents which may corroborate the Alert.
- The names and job titles of the people who may have been involved in the events.
- The names and job titles of the people who may be able to provide additional information.
- In cases where it concerns a local legal requirement, any information proving that the Whistleblower belongs to one of the categories that can make an Alert.
- How to contact the Whistleblower.
- If the Whistleblower has already reported these events to an entity in the Michelin group.
- Insofar as it is possible under the applicable local law, if the Whistleblower has already reported the matter externally, and if so, to which authority.
- If, as far as the Whistleblower is aware, at the time of the Alert and during its treatment, legal or similar proceedings are imminent or in progress (arbitration, mediation, injunction, etc.),

## **APPENDIX 4 – PROCESSING AND ARCHIVING PERSONAL DATA**

The personal data protection policy here below is also available on the Ethics Line internet website.

### **PERSONAL DATA PROTECTION POLICY OF THE MICHELIN GROUP WHISTLEBLOWING SYSTEM**

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#### **Summary**

The Michelin Group is committed to protecting your personal data and having a clear and transparent approach to collecting and using such data.

This policy explains how we process personal data that we collect, or that you provide to us, when the Michelin Group Whistleblowing System is activated, regardless of the channel used and as defined in the Group Whistleblowing Procedure, in particular when you use our secure ethics line (the "**Ethics Line**"), either via this Internet site (the "**Site**") or by telephone (the "**Telephone Line**").

Please read this policy carefully to understand our vision and our practices regarding your personal data and how we will process it.

1. Who are we and how can you contact us?
2. What kind of data will we collect about you?
3. Where do we store your personal data?
4. Sharing your personal data
5. Transferring personal data abroad
6. How long do we keep your personal data for?
7. Your rights under data protection legislation
8. What remedies are available to you if you are dissatisfied with the way we use your data.
9. Data security
10. Changes to our personal data protection policy

#### **1. Who are we and how can you contact us?**

Personal data may be collected and processed when handling a whistleblowing alert within the Michelin Group. This data will only be processed by Authorised Persons, as defined in the Group Whistleblowing Procedure, who report to the local Michelin company where the employee or the external person (employee of the client, supplier, or partner, etc.) is employed or at the Group level.

For example, this may include members of the Ethics Committee concerned by the Alert (at Group, Region or Country level), the investigator in charge, the members of the Legal Department in charge of compliance (DCJ/CSG).

Each concerned Michelin local company acts as data controller.

Each Michelin Group company will process personal data for the purposes described in this Policy. In this document, the term "Michelin" refers to this entity.

To learn more about how the Michelin Group collects and processes personal data, you can send a request to: [account-function.Group.Ethics.Line@michelin.com](mailto:account-function.Group.Ethics.Line@michelin.com).

All Michelin Group employees are committed to protecting and respecting your privacy. In addition, we have data protection officers and data protection departments responsible for all personal data matters of Michelin employees.

The Compliance service of the Legal Department (DCJ/CSG) will forward your request to the data protection department in the country where you work or to which you are related.

You can send your request to: [account-function.Group.Ethics.Line@michelin.com](mailto:account-function.Group.Ethics.Line@michelin.com)

## 2. What kind of data will we collect about you?

This section presents:

- Staff members concerned by this policy.
- How we collect your personal information.
- What types of data we collect.
- What we plan to do with the data we collect.
- The legal basis for processing the data collected.
- The period for which we store the collected data.

- **Who does this policy concern?**

This policy is intended for anyone who may issue an Alert via the Group Whistleblowing System and/or be interviewed during the investigation of an Alert, and in particular:

- The staff of the Michelin Group, regardless of their legal status (employees, temporary workers, interns, etc.).
- External staff, clients and suppliers outside of the Michelin Group, when these are individuals with a direct contractual tie with the Michelin Group (consultants, agents, counsels, subcontractors, individuals with self-employed status, etc.).
- Staff (employees, partners, managers, etc.) of legal entities who have a contractual link with the Michelin Group.

Those persons concerned by this Group Whistleblowing System considered as "data subjects" include anyone whose personal data is effectively processed as part of the system, for example, the whistleblowers, the targeted persons, the individual facilitators, the witnesses interviewed as part of the investigation, as well as the persons protected through a knock-on effect (natural persons with ties to the Whistleblower as well as anyone who has links with legal" . entities controlled by the Whistleblower).

- **Processor service provider:**

Protecting whistleblowers is a basic concern for the Michelin Group which has selected to use the secure "Ethics Point" platform of NAVEX Global UK Limited, to host and process all information

related to Alerts. This platform guarantees to encrypt and store data in full confidentiality on an external server disconnected to the IT systems of the Michelin Group.

- **Data collected:**

The Site and Telephone Line make it possible to either send anonymous or identified Alerts.

When a person sends an Alert by mentioning his/her name, the Michelin Group will collect and store the data listed below.

When drafting the Alert, the Whistleblower may send their personal data to the Michelin Group and the personal data of the person(s) involved in the Alert.

Finally, when processing an Alert, the Michelin Group can also collect data of persons likely to supply the information needed to handle the Alert (these people may or may not have been named by the Whistleblower).

The types of personal data which may be collected and processed include:

- The name, job title and contact details of the Whistleblower.
- The name, job title and contact details of the person(s) implicated in the Alert.
- The name, job title and contact details of any person mentioned in the Alert.
- As well as any other information disclosed voluntarily by the Whistleblower or as a result of processing the Alert (in particular: information gathered in the course of verifying the facts reported, reports on verification operations, action taken on the Alert).

Please do not provide sensitive data unless such data is a key part of your Alert.

Sensitive data includes data disclosing a person's ethnic or presumed racial origin, political opinions, religious or philosophical beliefs or trade union membership, genetic data, biometric data, data concerning health or data concerning a person's sex life or sexual orientation.

To learn more about the main stages involved in processing an Alert, please see the Group's Whistleblowing Procedure.

- **Purpose and legal basis;**

Personal data is collected and processed in order to assess the admissibility of the Alert, check the facts given in the Alert, carry out an Investigation and take the appropriate measures if necessary.

It also enables the Michelin Group to meet its legal obligations (especially those under the French Sapin 2 Act (French anticorruption law) and equivalent applicable anticorruption laws and regulations); and those which meet the obligation of vigilance and the legislation to protect whistleblowers) and to protect its legitimate interests (compliance with the Michelin Group's Code of Ethics).

- **Storage period:**

The data for an Alert considered by the data controller in question not to fall within the scope of the Whistleblowing system shall be immediately destroyed or anonymised. In particular: any Alert that is clearly outside the scope of the Whistleblowing system, that is not serious, that is made in

bad faith or that constitutes an abusive or slanderous accusation, as well as any alert concerning facts that cannot be verified.

Any data for an Alert which the data controller in question considers to fall within the scope of the Whistleblowing system may be kept in the active database until a final decision is made on any follow up action to be taken.

Once the final decision has been made on the follow up action for the Alert, the data may be stored in an intermediary archive for the time that is "strictly proportionate to processing and protecting the whistleblowers, the persons targeted and the third parties mentioned, by considering the timelines of any additional investigations". When disciplinary or litigation proceedings are initiated against a person mentioned or implicated or against a person who has misused the Whistleblowing system, the data relating to the Alert may be kept by the Authorised Persons until the end of the proceedings or up to the time limit for appeals against the decision. At the end of this period, this data shall be anonymised or deleted.

Data may be kept for a longer period, in intermediary storage, if the data controller is legally obliged to do so (for example, to meet accounting, social or tax obligations).

- **Personal data of minors**

If we become aware that we hold any data about a minor under the age of 15, we will take all necessary steps to comply with the personal data protection regulations.

If you become aware that your child has provided us with personal data without your permission, please contact us as soon as possible at: [account-fonction.Group.Ethics.Line@michelin.com](mailto:account-fonction.Group.Ethics.Line@michelin.com), so that we can take the appropriate action.

### **3. Where do we store your personal data?**

All the data which you send us is stored with our service provider NAVEX Global Inc., on its secure servers in Germany and back-ups in the Netherlands.

### **4. Sharing your personal data.**

Your personal data will only be passed on to those people who need to be aware of this information in order to perform their task of collecting and processing Alerts.

We may share your personal data in the following ways:

- **Inside the Michelin Group**

The persons who may access the personal data sent or collected are the Authorised Persons in order to receive and/or handle an Alert, to conduct an Investigation, and to take appropriate measures if necessary, as defined in the Group Whistleblowing Procedure: the members of the Ethics Committee concerned by the Alert (at Group, Region or Country level), the investigator in charge, the members of the Legal Department in charge of compliance (DCJ/CSG), etc.

These people are bound by a strict non-disclosure obligation.

- **Michelin's subcontractor (its data processor)**



Our external service provider, NAVEX Global, Inc., may also have access to the personal data sent or collected. This processor is contractually bound to guarantee the confidentiality and security of the personal data received and to only process your personal data on our instructions.

- **With third parties, for legal reasons**

If we are obliged to disclose or share your personal data in order to comply with a legal obligation, or in order to protect our rights, property or the security of the Michelin Group, its customers or others; in this context and to the extent necessary, we may pass your personal data to any outside advisor who will also be bound by a non-disclosure obligation.

## **5. International transfers of personal data**

Since Michelin is an international group, it may need to transfer your personal data within the group to another Michelin company or to NAVEX Global Inc., our service provider based in the United Kingdom and the United States.

Given that the level of data protection varies from country to country, we will only send your personal data to companies in the Michelin group or to third-party companies if they offer the same levels of protection for personal data as the Michelin Group.

For transfers within the Michelin Group, Michelin has implemented internal rules which govern transferring personal data within the European Economic Area (EEA). Click on "[Binding Corporate Rules](#)" for details of these rules.

For transfers to our processor, NAVEX Global, Inc., outside the European Economic Area, Michelin has set up mechanisms recognised by the applicable regulations to guarantee a sufficient level of protection for your data.

## **6. The period for which we store your personal data**

By default, we do not store your personal data for any longer than necessary for the purposes for which we have collected it. This is regardless of the purpose, including to meet any legal, accounting or reporting requirement. If you wish to obtain more specific information on the storage period of your personal data, please see paragraph 2 of this Policy.

In certain circumstances, you may ask us to delete your data: see your right to deletion below for more information.

In certain circumstances, we may anonymise your personal data (so that it can no longer be traced back to you) for research or statistical purposes. In this case, we may use this information indefinitely, without informing you.

## **7. Your rights under data protection regulations .**

In certain countries, including within the European Union, the data protection regulations give you certain rights over the processing of your data. These include the following rights:

- The right to be informed
- The right to access your data

- The right to correct your data
- The right to delete your data
- The right to object the processing
- The right to restrict processing
- The right to determine what happens to your data after your death

- **The right to be informed**

You have the right to be informed about how we collect and process your personal data, including who we are, how we use your personal data and your rights over your personal data. We have included all the necessary information in this policy with respect to your privacy.

- **The right to access your data**

You have the right to access any of your personal data which we hold. We can confirm whether or not your data is processed and give you access to your personal data.

- **The right to correct your data**

If your personal data is inaccurate or incomplete, you are entitled to get it corrected and updated. If we have disclosed your data to third parties, where possible we will inform them of any update which you send to us. You can update your personal data we hold by contacting us using the contact methods provided in this personal data policy.

- **The right to delete your data**

You are entitled to ask that your personal data is deleted or withdrawn if we have no reason to continue to process it. The circumstances in which you can use your right to be forgotten include situations where the data is no longer necessary for the purpose for which it was originally collected or processed and situations where you have withdrawn your consent to processing.

In certain restricted circumstances, the right to be forgotten does not apply. If you wish to have any further information, please feel free to contact us.

- **The right to object the processing**

The right to object may not be exercised for personal data processing necessary for compliance with a legal obligation to which the data controller is subject.

In the case of persons whose data is mentioned in the alert or appears during its investigation, the right to object may be exercised, but the data controller may refuse to do so if :

- there are legitimate and compelling grounds which override the rights and interests of the data subject or;
- processing is necessary for the establishment, exercise or defence of legal claims.

Under these conditions, it is up to the data controller to examine each request for opposition, regardless of the capacity of the person making the request.

- **The right to restrict processing**

You are entitled to 'block' or prevent your personal data from being processed. If you ask us to block your personal data, we will stop processing it.

- **The right to determine what happens to your data after your death**

In France, you are also entitled to tell us what you want us to do with your data after your death. We will record this and, if we learn that such an event has occurred, we will respect your instructions.

- **To learn more about your rights**

You can find more information about your data protection rights from your local supervisory authority.

## **8. What you can do if you are not satisfied**

We take great care in respecting your privacy. However, if you are not happy with the way we collect or process your data, or if you would simply like more information about your rights, you can contact us by sending an e-mail to [account-function.Group.Ethics.Line@michelin.com](mailto:account-function.Group.Ethics.Line@michelin.com). We will try to resolve any problem you encounter and answer all your questions you may have as quickly as possible.

You can also lodge a complaint with the competent personal data protection authority in the jurisdiction of your habitual residence, your workplace, or the location of the alleged violation.

## **9. Data security**

Michelin has implemented measures to protect the confidentiality, security, and integrity of your personal data. Access to personal data is restricted to those employees and service providers who need to access such data and who have received training on complying with the non-disclosure rules.

Michelin undertakes to ensure that your personal data is not damaged or altered and that unauthorised third parties are unable to access it.

## **10. Changes to our personal data protection policy**

We may make changes to our policy from time to time. Any future changes to this policy will be published on this page.

**Date:** 23.11.2023

## ***APPENDIX 5 – Definitions used in the Procedure.***

**Alert** : any information sent in good faith and without seeking direct financial consideration, in any form (verbal or written) or medium, by a Whistleblower via the Group Whistleblowing Procedure, relating to events that have occurred or are very likely to occur within the Michelin Group or in a situation in relation with one of the Group's activities, relating to crime or misdemeanour, a violation or an attempt to conceal a violation of the law or a regulation, a violation or an attempt to conceal a violation of an international commitment of France, a violation of the Code of Ethics, the Anti-Corruption Code of Practice, the Antitrust Compliance Program, the Michelin Purchasing Principles, the Michelin Master Human Rights Policy and the Michelin Group's internal policies and requirements, as well as any threat or harm to the general interest, serious violations of human rights and fundamental freedoms, human health and safety and the environment, as defined in the internal policies and regulations of the Michelin Group.

**Whistleblower**: any natural person or legal entity, who has direct or indirect knowledge of information or events that may constitute a violation of the law or regulations, the Code of Ethics or any internal policy of the Michelin Group, and who makes an Alert.

- Employee whether under a fixed or permanent contract, full-time or part-time, any corporate officer of the Michelin Group, and subject to the statutes of limitation provided for by local legislation, employees who have left the Michelin Group concerning information obtained in the course of their employment.
- Temporary staff, trainees, work-study students and employees of Michelin Group service providers or subcontractors.
- Stakeholder (shareholders of the Michelin group, partners and holders of voting rights in the general meeting of a Michelin entity, persons applying for a job in the Michelin group (when the information has been obtained in the context of this application), members of the administrative, management or supervisory bodies of the Michelin group entities, Michelin group's co-contractors (suppliers, customers), as well as their subcontractors, and in when they are legal entities, members of the administrative, management or supervisory bodies of the Michelin group's co-contractors and subcontractor, as well as members of their staff, and the representatives of civil society).
- Any other external person who observes a violation of the law, the regulations, Michelin Code of Ethics or any internal codes or policies of the Michelin group.

**Whistleblowing System**: Any channel for collecting Alerts available within the Michelin Group. These are the Ethics Line and the traditional reporting channels as described in the Code of Ethics, as well as Authorized Persons, as defined in this Procedure.

## ***APPENDIX 6 – List of countries with specific procedures***

This Procedure is supplemented in some countries by additional documents which specify certain specific requirements set by the applicable local laws. These documents complement this Procedure.

To date, specific documents exist in the following countries:

- France
- Germany
- Italy
- Spain
- Netherlands
- Morocco
- Sri Lanka
- India
- Poland
- Romania
- Hungary
- Colombia

## APPENDIX 7 - Scheme of collecting and processing Alerts

### FUNCTIONING & ORGANIZATION

