



**MICHELIN  
MASTER POLICY ON  
HUMAN RIGHTS**

**2025 EDITION**



# INTRODUCTION

## **Michelin's commitment to human rights**

At Michelin, we act by seeking a balance between human, economic and environmental issues. Our values of respect guide both our behaviour and our decisions and form the basis of the trust we build with our employees, partners and other stakeholders.

The Group's framework policy on human rights reaffirms this commitment at the highest level of the company. It reflects our desire to promote an ethical, inclusive and respectful working environment, wherever we operate, in compliance with international standards and in accordance with local regulations.

To this end, Michelin provides a system to report any situation that is contrary to our values. This mechanism, accessible to all, guarantees listening, confidentiality and protection, in accordance with local legislation.

We are counting on everyone's commitment to bring these principles to life on a daily basis.

## **Human rights and ethics are everyone's business**

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# I. GENERAL POINTS

## INTRODUCTION

Since its origins in the 19<sup>th</sup> century, the Michelin Group has been especially concerned with the well-being of its employees, with respect for people being one of its founding values. Today, the company is more than ever aware of its responsibility towards its various stakeholders. The “All Sustainable” strategy that governs all its activities advocates balance between People, Planet and Profit, and respect for all the stakeholders with which it interacts: employees, business partners, suppliers, local communities, etc.

This policy is also part of the duty of care that Michelin recognizes it has towards all its stakeholders. It specifies the Group’s expectations concerning this duty of care with regards to human rights.

The principles conveyed by this policy for each subject are guided directly by our ethical values and international law, and in particular by the fundamental ILO conventions and the United Nations guiding principles on business and human rights and the Universal Declaration of Human Rights. These are also the results of many working sessions with the UN Global Compact and other bodies specializing in these subjects.

While several of Michelin’s founding documents already set out the company’s undertakings on some subjects<sup>(1)</sup> coming under human rights, the Group has decided to present a clear and accessible summary of the main actions required in this matter in a single document. This policy is specified and completed in the various, more detailed documents to which reference is made in some chapters.

(1) These include: Diversity and Inclusion Policy, Health and Safety Policy, Anti-Harassment Policy, Purchasing Principles, Code of Ethics, Employee Relations Policy.

### **SCOPE OF THE POLICY**

This policy applies to all activities of Michelin, its subsidiaries and joint ventures in which the Group is the majority holder. It is also promoted in the companies in which Michelin holds a minority or 50/50 share. The Group's suppliers are asked to comply with Michelin's Purchasing Principles, which are in line with this policy.

All our stakeholders and in particular our business partners are made aware of this Human Rights policy and the main documents that complete it (in particular the Purchasing Principles). Michelin uses its power of influence to ensure that the policy is respected by its partners, and in particular by its suppliers.

### **HUMAN RIGHTS POLICY AND LOCAL LAW**

The Group's entities implement this policy, including in countries where the local regulations are not prescriptive on these subjects.

In the event of a difference between the national legislation and this policy, the standard most protective of human rights shall apply.

If, for a given subject, this policy proves to be contradictory to local law, the latter must be applied, and solutions must be sought to allow compliance with the spirit of this policy's principles.

When this policy goes against local customs without being contrary to local law, it must nevertheless be applied by management in good faith.

### **GOVERNANCE**

The Group's human rights governance<sup>(2)</sup>, as well as that for the health and safety of people on subjects concerning them, are responsible for defining, applying, deploying and updating this policy. They decide on the actions for progress and improvement, in accordance with the results seen and new knowledge on this topic.

In the Group's various geographical regions, the Regional Director is the guarantor for implementing it in all the companies and entities in his/her scope. To do this, he/she may appoint one or more operational managers (HR, Purchasing, Industry, etc.) and rely on the regional ethics committee to handle complaints on ethical lines<sup>(3)</sup>. These managers are trained in human rights.

New companies and acquisitions<sup>(4)</sup> are responsible for deployment within their scope, while the region remains guarantor for implementation. The region supports, collaborates and issues alerts, if necessary, but does not act in place of the companies.

*(2) The Group's Human Rights governance is chaired by the Director of Personnel and includes three members of the Executive Committee.*

*(3) Especially for complaints relating to harassment.*

*(4) Hosted by the departments named DB4 and DB5.*

### **IMPLEMENTATION OF THE DUTY OF CARE**

Given the extremely vast field concerned by the expectations of the human rights policy, the following is requested, at Group level and at geographical region level, across all the fields of this policy, distinguishing Michelin Group activities from those of suppliers:

① Perform risk assessments in order to identify the main risks on human rights<sup>(5)</sup>.

These maps are regularly updated.

② For the topics identified as a priority, analyse the variance between the actual situation and the policy expectations.

③ When differences are noted between the local situation and the requirements of this policy, draw up and implement action plans.

④ Define monitoring and progress indicators, the results of which are presented regularly to the human rights governance<sup>(6)</sup>.

⑤ If, for a given country, it is considered that the variances cannot be overcome satisfactorily due to a specific context, the human rights governance<sup>(7)</sup> must be informed in order to take the appropriate decisions.

This implementation of the duty of care on human rights is an ongoing process of progress that will continue over time.

### **ACQUISITIONS AND CREATION OF JOINT VENTURES**

A human rights evaluation (due diligence) is performed during the acquisition of a new company or the creation of a joint venture. The information from this analysis is taken into consideration during the decision-making phases of the acquisition or joint-venture creation project.

Clauses relating to human rights must be integrated into all our acquisition and joint-venture contracts and Michelin must ensure their proper application.

Furthermore, if this proves necessary, a human rights action plan is defined and implemented to reach the Group's standards within a maximum of 5 years.

With regards to the companies in which Michelin holds a minority share, Michelin's company representatives are trained in human rights and bring the principles of this policy to board meetings.

(5) The main criteria for risk analysis are: the severity of the impact on people and the probability of occurrence. External organizations, such as VeriskMaplecroft, can help define the level of risk.

(6) And to the Ethics Committee when in relation to harassment.

(7) And to the Ethics Committee when in relation to harassment.

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## **SUPPLIERS**

Michelin's suppliers must comply with the "Michelin Purchasing Principles", which include a section dedicated to human rights. Michelin supports its suppliers in implementing these principles.

Furthermore, in accordance with the "Responsible and Sustainable Purchasing Policy<sup>(8)</sup>":

- A mapping is done of the purchasing categories and countries most exposed to human rights risks, and in particular the natural rubber supply chain.
- Suppliers are assessed on their CSR (Corporate Social [and environmental] Responsibility) performance, with specific attention to human rights.
- CSR criteria are taken into consideration in calls for tender. Instructions focused more closely on natural rubber supplies are set out in the "Sustainable natural rubber policy" that applies to the Group, its joint-ventures and its suppliers.

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References:

■ **Michelin Purchasing Principles:**

■ **Michelin Sustainable Purchasing Policy:**

■ **Sustainable natural rubber policy:**

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<sup>(8)</sup> Michelin Sustainable Purchasing Policy - Purchasing Documents.

**REPORTING, REMEDIATION AND SANCTION MECHANISM**

Any Group employee or external stakeholder of the Group can and must report any deviations from the principles set out in this policy via the ethics line or other reporting channels made available by the Group: Group employees may also report through a manager, a member of the Staff, DCAPP (Anticipation, Protection and Prevention), Legal Department, or a manager compliance officer.

The available warning channels are recalled here:



The Group has made available to all a Group Whistleblowing Procedure describing in a detailed and transparent manner the procedures for collecting and processing alerts as well as the actors involved in this system. It is available on the Group's website ([www.michelin.com](http://www.michelin.com)).

Regardless of the reporting mechanism used, no one will be authorized to take retaliatory action against any person who, in good faith, has reported a possible violation of this Policy, the Code of Ethics, the law, or Michelin's principles and regulations.

Anyone who believes they are subject to retaliation must report it via the same alert channels.

All reports are received, analysed and treated confidentially and securely by authorised persons in accordance with the principles set out in the Group Whistleblowing Procedure and the Investigations Directive. The Group's Ethics Committee and the Regional Ethics Committees ensure the effective implementation of this system.

**Remediation et reparation:**

If, following a report, the verifications and investigations carried out show a breach of human rights, dialogue must be held with the victims, reparation measures must be established, and the prevention mechanisms must be boosted. Compensation is considered depending on the situation.

Non-compliance with human rights on the part of a Group employee is sanctioned, regardless of his/her position, in accordance with the applicable procedures and laws.

**Remediation concerning commercial partners:**

If a breach of human rights or a risk prevention failing is seen in a business partner (stakeholder, client, supplier, consultant, etc.), dialogue is held with the person concerned, or in the case of a company with the company manager, in order to remedy the situation. Failure to implement remediation or corrective measures must result in the Group questioning the partner in this regard and may lead to termination of the commercial relationship.

**ARTIFICIAL INTELLIGENCE (AI) AND HUMAN RIGHTS**

Generative Artificial Intelligence (AI) is experiencing rapid and massive adoption around the world, the uses of which can raise a number of ethical issues at the level of society, but also of companies.

Michelin wants the use of AI to be fully in line with its values and has adopted three ethical principles directly integrated into the Group's Code of Ethics:

● **Principle 1: Human-centered AI**

Respectful of the rights and freedoms of each person (equity, autonomy, dignity, non-discrimination, privacy, etc.) but which also produces beneficial results (well-being at work, inclusiveness, etc.).

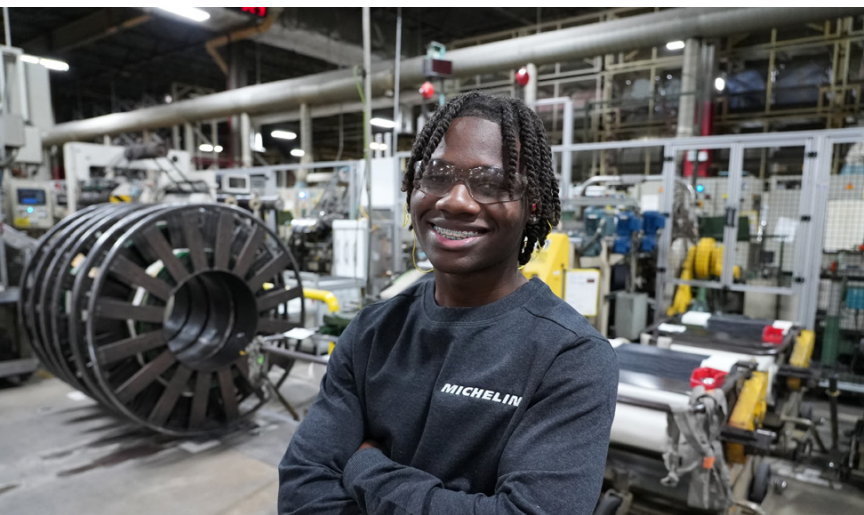
● **Principle 2: Transparent and explainable AI**

Michelin wants to promote transparency through awareness and training and by ensuring that people are properly informed when they interact with an AI.

Michelin wants to focus on AI whose results are intelligible and reproducible. This principle, which is a challenge in generative AI, takes into account the context of application and the severity of the consequences on people.

● **Principle 3: Accountability**

Michelin has set up an adapted governance body to review projects and demonstrate that precautions are being taken to reduce risks.





## **II. PRINCIPLES BY SUBJECT**

### ***DISCRIMINATION***

Michelin wants each of its employees and stakeholders who interact with the company to feel respected in their authenticity and uniqueness, and does not tolerate any form of discrimination. Every employee, candidate, customer, supplier, local community, or other stakeholder must be treated fairly and with the same level of dignity and respect, regardless of gender identity, age, religion, culture, social origin, nationality, ethnicity, disability, sexual orientation, trade union membership, family status, political opinion, physical appearance, etc.

Vigilance is maintained to ensure equal opportunities for all, particularly in recruitment, compensation decisions, career paths, access to training, and employment conditions.

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Reference:

■ **Ethics Code:**

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Reference:

■ **DEI Policy :**

## **HARASSMENT AND INAPPROPRIATE BEHAVIOUR**

The Michelin Group wants to offer its employees a welcoming and safe work environment, where everyone can thrive without obstacles or fear. It does not tolerate any form of harassment, whether moral or sexual, and regardless of the means used (physical, visual, or via digital means of communication) towards any person it meets in the course of work, including when it concerns external stakeholders (candidates, suppliers, customers, partners, distributors, visitors). Any act qualified as harassment will give rise to a sanction.

Inappropriate behaviour (characterised by humiliating, offensive or degrading comments or behaviours or more generally by comments or behaviours that do not comply with the Group's values and ethical standards as described in the Code of Ethics (and in particular the I CARE leadership model) but which do not have the seriousness of moral or sexual harassment, in particular with regard to the assessment criteria described in the Code) are also prohibited in that they do not comply with the Group's ethical requirements. These behaviours will also be subject to an appropriate response depending on the circumstances in which they were committed.

The Michelin Group promotes an environment where people can express their difficulties in confidence and is committed to ensuring that a person who reports a case in good faith is protected from any reprisals. It also ensures that no person who harasses or exhibits inappropriate behaviour is protected by their position in the company.

The Group ensures that all cases are treated seriously, in accordance with confidentiality, within a reasonable timeframe, with the greatest possible diligence and impartiality, and that appropriate measures are taken to avoid any possible conflict of interest during the investigation. It undertakes to sanction all proven cases of harassment and to put in place proportionate corrective actions to remedy proven inappropriate behaviour.

Michelin is also careful to ensure that the company's transformation projects do not generate any form of systemic harassment and involves employees in the design of preventive measures associated with structural changes.

People who have been subjected to inappropriate behaviour or sexual or moral harassment confirmed following an internal investigation will be supported in their personal recovery and their professional situation.

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Reference :

■ **Ethics Code:**

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## **HEALTH & SAFETY**

The Group's Health and Safety Declaration reminds us that each person is unique and that their health and safety are paramount.

This is why Michelin:

- strives to provide all its employees with a safe working environment and working conditions that preserve their physical and mental health, promote their life balance and well-being and maintain their fitness in the long term;
- takes into account the impact of adapting to climate risks on the physical and mental health of its employees.

To do this, the Group applies the following principles:

- The safety and health of people take precedence over any other activity.
- Each person has the duty to respect the rules and to put an end to any risky situation. He/she must refuse to carry out tasks for which he/she has not been trained and validated to intervene safely.
- The opinion of the staff and their representatives is taken into consideration for the definition of action plans to improve working conditions.
- Between the Group's prescriptions and local regulations, Michelin complies with the most protective standards.
- Michelin implements the means and conditions to sustainably preserve fitness for work, reduce arduousness, preserve physical, mental and social health, and ensure the safety and well-being of everyone.

Michelin makes the best efforts not only to ensure the safety of its employees, but also that of the staff of external contractors, service providers and visitors

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Reference:

■ **Ethics Code:**

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Reference:

■ **Climate change policy :**

### **DECENT WAGE AND SOCIAL PROTECTION**

Michelin ensures that its employees receive a living wage, as defined by the International Labour Organization (ILO). It allows all its employees to have sufficient income to meet their essential needs and those of their families (food, housing, transport, children's education, health costs), but also to build up precautionary savings. It also encourages its suppliers to ensure that their employees receive such vital remuneration.

In addition, Michelin wishes to provide each Group employee and his or her family, throughout his or her career with the company, with a set of essential social protection guarantees, complementing national public systems when necessary:

- leave to accompany the birth or adoption of a child;
- life insurance paid to the family;
- access to a healthcare program (hospitalization costs, emergency treatments, costs relating to maternity, consultations and medical treatment).

### **FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING**

Michelin promotes and organizes open and constructive social dialogue between management and employee representatives wherever it operates, while respecting freedom of association and the right to collective bargaining.

This social dialogue is based on employee representation that is independent of the hierarchy.

When the law or the context is not conducive to this, local management looks for forms of employee participation in the development of concerted solutions.

The aim of social dialogue is to engage in a co-construction process and to arrive at balanced solutions for the benefit of the company and employees.

The company shares information with employees or their representatives that allows them to take ownership of the strategic orientations of their entity and the company.

## **PRIVACY AND PERSONAL DATA**

The Michelin Group is convinced that the protection of personal data is a vector of trust, particularly in its relations with its employees, customers, suppliers and partners. The Group therefore undertakes to comply with the following principles<sup>(9)</sup>:

- At the time of data collection, the data subject is informed of the use that will be made of his or her data; their data is processed lawfully and fairly;
- The data is processed for a precise, determined and explicit purpose, and will not be further processed in a way that is incompatible with the original purposes;
- All data collected is limited to what is strictly necessary in relation to the purpose pursued by the processing and, if necessary, updated regularly;
- Personal data is not stored for longer than is necessary in relation to the purpose of the processing;
- Personal data is processed in such a way as to ensure an appropriate level of security, and in particular to protect it against: any unauthorised processing, loss, destruction or accidental damage, using appropriate technical and organisational measures;
- From the design of products and services and by default, compliance with the protection of personal data is taken into account;
- The rights of data subjects over their personal data are respected.

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Reference:

■ **Ethics Code:**

## **CHILD LABOUR**

At Michelin, we are opposed to any form of child labour likely to harm their health, schooling or integrity and that is not in line with the ILO conventions.

We want to protect children, support their physical and psychological development and exclude from our activities and those of our suppliers any labour that contravenes these principles.

The Michelin Group does not employ people under the age of 18.

Exceptions are possible for people between the ages of 15 and 18 within the framework of a training course or in certain sectors (agriculture, especially in developing countries etc.), if this is not detrimental to their schooling or their development or health, and does not expose them to any dangerous work, and is in compliance with ILO Conventions 138 and 182 and with national law (ad-hoc, light work that is not detrimental to schooling or health).

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Reference:

■ **Ethics Code:**

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<sup>(9)</sup> In accordance with the local regulations applicable to personal data, including the RGPD (General Data Protection Regulation) and Convention 108 of the Council of Europe on the protection of individuals with regard to the processing of personal data.

## **MODERN SLAVERY, FORCED LABOUR, HUMAN TRAFFICKING**

Michelin opposes all forms of modern slavery, forced labour and human trafficking at its sites and in its ecosystem, including among its customers and suppliers.

The concepts of modern slavery and human trafficking are defined by the United Nations as «the recruitment, transportation, transfer, harbouring or receipt of persons, by the threat or use of force or other forms of coercion, by abduction, fraud, deception, abuse of power or position of vulnerability, or by the giving or receiving of payment or benefits to obtain the consent of a person having control over another for the purpose of exploitation. Exploitation includes the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery, servitude or the removal of organs.»

This implies that:

Employment contracts are readable and understandable for all employees.

- An employee does not work under duress and his or her autonomy is respected.
- Each employee is free to use his or her identity papers and can terminate his or her employment contract at his or her own initiative according to the notice period provided for by local regulations or the employment contract.
- Jobseekers are prohibited from paying commissions or recruitment fees.
- A check is carried out that the recruitment and temporary employment agencies mandated by the Group comply with the above principles, and in particular that they do not put the employee in debt, which may give rise to a form of servitude towards the employer.

Michelin also fights against forced labour at its suppliers and subcontractors.

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Reference:

■ **Ethics Code:**



### IMPACT ON LOCAL COMMUNITIES

The Michelin Group wishes to carry out its activities in harmony with local communities and with respect for their rights wherever it operates and seeks to ensure that its presence benefits them. To this end:

● **The interests, needs and rights** of surrounding populations, including the most vulnerable groups, are identified prior to a construction, site development or land acquisition project, through a human rights impact assessment and consultations with local communities. Projects are adjusted accordingly so that they benefit communities as much as possible and do not harm their health, safety, access to natural resources or cultural heritage.

The Michelin Group is sensitive to issues related to land ownership, customary or legal, in particular with regard to its natural rubber supply chain, as well as the right of access to natural resources, including access to water. The Group respects the principle of free, prior and informed consent of local people when land issues are at stake.

Michelin acts to provide access to a healthy environment, particularly in and near its production sites, but also in all the countries where it operates. The Group intervenes directly in the area it controls. The Michelin Foundation, for its part, contributes to projects aimed at preserving or restoring ecosystems for the benefit of local populations.

● **Opportunities and actions beneficial** to local stakeholders (employment, joint projects, volunteering) are sought.

● **Direct, regular, transparent and quality communication** is carried out with local communities and all stakeholders present near the sites in operation.

● **An alert mechanism** is accessible and made visible to local communities. Each alert is dealt with and if damage is caused to them, it gives rise to appropriate repairs and compensation.

● **A complaint handling mechanism** is accessible and made clear to local communities. Every complaint is treated and if damage has been caused to them, this gives rise to suitable reparations and compensation.

Reference:

■ **Ethics Code:**

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