



Michelin Australia

Joint Modern Slavery Statement 2024

I. Introduction

This joint Modern Slavery Statement (this “**Statement**”) is being published in accordance with the Modern Slavery Act 2018 (Cth) (“**the Act**”) and sets out the actions taken by Michelin Australia¹ to assess and manage modern slavery risks within its own operations, supply chains and business activities for the financial year ending 31 December 2023 (“**FY23**”). This is Michelin Australia’s fourth statement under the Act.

This Year 4 Statement highlights Michelin Australia’s continuing commitment to addressing modern slavery risks in its operations and supply chains by reporting on the progress made since the preceding statement, expands the scope of the reporting entities and outlines the prevailing measures taken to address these modern slavery risks.

II. Reporting Entities

The reporting entities covered by this Statement are:

- i. **Michelin Australia Pty Limited** (ABN 84 006 761 628),
- ii. **Klinge Holdings Pty Limited** (ABN 69 087 237 518),
- iii. **Bearcat Tyres Pty Limited** (ABN 92 085 854 520),
- iv. **Fenner Dunlop Australia Pty Limited** (ABN 23 080 570 574),
- v. and **Hallite Seals Australia Pty Limited** (ABN 91 000 484 953).

all of which are wholly owned subsidiary businesses of Compagnie Generale des Etablissements Michelin (“**CGEM**”) (together referred to as “**Michelin Australia**” or the “**Reporting Entities**”). Michelin Australia is part of the Michelin Group (“**the Group**”) and its ultimate parent company is CGEM.

III. Operations and Structure

The Michelin Group, headquartered in Clermont-Ferrand, France, has operations in 177 countries, supported by its global workforce of 132,500 employees. It also operates 121 production facilities in 26 countries worldwide. CGEM is listed on the Paris Stock Exchange.

Michelin Australia Pty Limited: Michelin Australia Pty Limited imports and distributes all types of tyres as well as provides mobility services across Australia and New Zealand. It has offices in all major Australian cities and distributes its products through independent dealers. Michelin Australia Pty Limited has around 165 employees. These employees are largely office-based, and roles include senior management, account managers, administrative staff, customer service advisors, information technology, marketing, national and regional sales managers and supply chain personnel. They are located across all major Australian cities.

Klinge Holdings Pty Limited (“Klinge”): Klinge is a tyre software, training and consulting company based out of Brisbane, Queensland and is a wholly owned subsidiary of Michelin Australia Pty Limited. Klinge Holdings Pty Limited has around 17 employees.

¹ References to Michelin Australia in this statement are to Michelin Australia Pty Ltd and the entities that are subject to the requirements of the Modern Slavery Act 2018 (Cth), referred to in this statement as the Reporting Entities.



Bearcat Tyres Pty Limited (“Bearcat”): Bearcat is a supplier and installer of tyres, wheels and rubber tracks and is based out of Girraween NSW. Bearcat Tyres Pty Limited forms part of the Group’s acquisition of the Camso Global Group of Companies in 2018 and has around 80 employees.

Fenner Dunlop Australia Pty Limited (“Fenner Australia”): Fenner Australia is wholly owned by Fenner Australia Financing Pty Ltd ACN 146 477 009 (“Fenner Australia Financing”). Fenner Australia Financing also wholly owns Belle Banne Conveyor Services Pty Ltd ACN 146 806 055, Agile Maintenance Services Pty Ltd ACN 146 754 065 and Australian Conveyor Engineering Pty Ltd ACN 117 381 138. Fenner Australia wholly owns Conveyor Products & Solutions Pty Ltd. (**CPS**), an Australian based, designer and manufacturer of high-quality conveyor components for the bulk materials handling industry. Fenner Australia also holds a 50% interest in Wilvic Australia Pty Ltd.

Fenner Australia Financing and its subsidiaries including Fenner Australia are part of the Michelin Group and its ultimate parent company is CGEM. Fenner Australia has over 1,300 employees across eight manufacturing facilities and 19 service centers in Australia. Fenner Australia’s belt products include conveyor systems, wear protection, cured and uncured rubber sheeting and belts, while services include engineering and design. Other product categories include equipment components, electrical control systems, diagnostics: condition monitoring systems and accessories.

Other services include field services, equipment hire, overhauls and refurbishment, rubber lining and 24/7 conveyor emergency call outs. The vast majority of the products imported and distributed by Michelin Australia are manufactured by members of the Group. Logistics services are outsourced.

Hallite Seals Australia Pty Ltd (“Hallite Australia”): Hallite Australia is a leading supplier and distributor of premium quality hydraulic cylinder sealing solutions in Australia and operates branches in all major Australian capital cities. Hallite Australia is a wholly owned subsidiary of Fenner Australia and maintains an internal Modern Slavery Policy dated June 2023. Hallite Australia has around 78 employees.

IV. Supply Chains

The Reporting Entities’ main suppliers of tyre products sold and distributed in Australia are the Michelin Group and its members. Those products are manufactured by members of the Michelin Group located in 26 countries in Europe, the Americas, Asia and Africa.

The Reporting Entities also procure certain goods and services in Australia such as logistics & warehousing, technology and telecommunications hardware and services, financial services from Australian banks, consulting services, marketing and events management, insurance, accounting, audit and legal services. Further, we procure certain goods in Australia such as protective clothing, motor vehicles and miscellaneous office supplies. Some of the contracts for the aforementioned goods for information technology hardware and services are managed on a worldwide basis and others are regionally or locally managed.

The procurement of locally procured goods and services takes place under the supervision of the local purchasing team who generally follow the process and procedures set out in the Michelin Group’s policy articulated in the Duty of Care Plan, including but not limited to, the Michelin Purchasing Principles. Those principles include respecting human rights and provides that Michelin requests that its suppliers do likewise.

Fenner Australia sources the majority of its raw materials, goods and other services expenditure from Australian suppliers. A further 5-10% of its expenditure are products manufactured by members of the Michelin Group located in Asia. In addition, Fenner Australia imports a small percentage of conveyor belt and conveyor equipment manufactured by overseas suppliers.



Hallite Australia's supply chain include those related to polymer and rubber raw materials procured from local and overseas suppliers and the procurement of such goods is generally subject to the same procedures and due diligence practices as outlined in this Statement.

V. Risks of Modern Slavery in Michelin Australia's Operations and Supply Chains

The risk of modern slavery in Michelin Australia's supply chain can be separated into two parts:

i. **Risks in relation to products manufactured and supplied by members of the Michelin Group**

The identification, prevention and mitigation of the potential risks of modern slavery within the Michelin Group operations are detailed in the Duty of Care Plan which is updated yearly:

"Duty of Care Plan 2023", published on 22 May 2024
<https://www.michelin.com/en/publications>

These modern slavery risks are, broadly, (i) health and safety risks; (ii) human rights risks; and (iii) risks associated with suppliers' CSR practices, particularly with respect to raw materials.²

These risks will be discussed in detail below.

a. **Health and safety risks**

The Michelin Group directly employs 132,500 people worldwide. It also sources workers through agencies and employs subcontractors from time to time. These individuals work in diverse environments from industrial settings to research facilities and commercial offices. Michelin recognizes that in many of the countries in which it operates, its employees, in the course of their work, can be exposed to specific risks that could impact their health and well-being. These main health and safety risks relate to occupational accidents, exposure to chemicals, ergonomics, psychosocial issues at work and risks to employee security.

With the Group's adherence to its fundamental value of respect for people, Michelin actively deploys comprehensive policies on health, safety and the quality of work life, described in more detail in:

- The 2023 Health and Safety Declaration;
- The 2018 Health, Safety and Quality of Worklife Policy; and
- The 2022 Environment, Prevention and Security Guidance Letter.

These commitments are based on recommendations issued by key international organizations such as the UN, the ILO and the OECD, and prevailing standards and legislations. Further, these policies are being implemented through Michelin's "Environment and Prevention" management system, which is applied at all Group facilities to ensure best practices and maintain continuous progress.³

b. **Human rights risks**

The Michelin Group has published a Duty of Care Plan every year since 2017 describing (among other things) the main human rights risks incurred by the Group and its suppliers, along with measures in place

² Michelin's Duty of Care Plan 2023, published in May 2024: link <https://www.michelin.com/en/publications>. The main modern slavery risks indicated in this section are discussed on pages 12 to 36 and 60 to 68 of the Duty of Care Plan.

³ Michelin's Duty of Care Plan, page 31.



to prevent them. Since 2015, a specific work package has been devoted to identifying human rights risks within the Group.⁴

With the Group’s workforce of over 132,000 employees, manufacturing operations in 26 countries and overall business operations in 177 countries, the Group’s employees, suppliers, consumers and the local communities around the plants may be exposed to human rights violations. Some risks, such as child labor and forced labor, are deemed to be very minor within the Group but may be present in the supply chain.⁵

In last year’s Modern Slavery Statement, we reported that the Michelin Group had published its Master Policy on Human Rights. In 2023, the new framework policy on human rights was circulated within the company and posted on the Group’s website.⁶ The policy sets out Michelin’s principles on nine human rights risks: discrimination, harassment, health & safety, living wage and social protection, freedom of association, privacy and personal data, child labor, forced labor and impact on local communities.

c. Risks associated with suppliers’ CSR practices

Michelin has a diverse subcontracting chain and its 40,000 suppliers make responsible procurement a major issue for the Group. The Purchasing Department is the main channel for conveying Michelin’s social responsibility commitments to its suppliers. In addition to the Group’s risk map, the Purchasing Department has also produced a map of its CSR risks. Various databases, such as the Verisk Maplecroft database allow Michelin to identify the sourcing countries with high environmental and human rights risks. The results of the 2022-2023 risk mapping exercise for suppliers’ CSR-related risks are as follows:⁷

Examples of CSR-related at-risk purchasing categories		Main sourcing countries at risk from a CSR viewpoint
Raw material procurement	Other Procurement	
Natural rubber	Construction	China, Thailand, Indonesia, Vietnam, Brazil
Raw materials containing conflict minerals, even in minimal quantities	Logistics	Setting aside natural rubber, roughly 35% of raw materials are produced in a country with a CSR risk.
Synthetic rubber, monomers, reinforcing fillers, chemicals, oils, metal and textile reinforcements	Industrial services	
	Promotional items, work uniforms, contract employees	

The purchase of raw materials and in particular, natural rubber, presents risks for modern slavery and these purchasing activities are handled with great vigilance and a thorough, holistic approach. This is because, generally speaking, natural rubber is 90% sourced from Asia and 85% from smallholders, usually on farms of less than four hectares. In addition, its supply chain is complex and fragmented.⁸ As such, a dedicated approach for the purchase of natural rubber has been devised. Other raw materials are sourced primarily from chemical companies and steelmakers, with the environmental and health and safety risks proper to these industries. Certain raw materials contain conflict mineral derivatives and are therefore more particularly exposed to human rights risks. As a result, such minerals are tracked with a dedicated process, despite the small volume.

⁴ Michelin’s Duty of Care Plan, page 13.

⁵ Michelin’s Duty of Care Plan, page 13.

⁶ <https://www.michelin.com/durable/entreprise/societe>

⁷ Michelin’s Duty of Care Plan, page 64.

⁸ Michelin’s Duty of Care Plan, page 64.



In 2023, a specific analysis was conducted on silica purchases. This analysis, which was carried out with the help of the Group's main suppliers, covered sourcing beyond Tier 1 and in particular the risks associated with the extraction of sand.⁹

*ii. **Risks in relation to goods and services procured from outside the Michelin Group***

The due diligence conducted in respect of the Reporting Entities' non-Group supply chain focused upon its first-tier suppliers. Although each of these suppliers have their own supply chains, the Reporting Entities have limited visibility of those supply chains. We accept that these suppliers may be linked to modern slavery by way of their own supply chains.

The majority of Australia-specific suppliers are in industries and jurisdictions that are considered low risk for modern slavery, such as Australian providers of logistics, rubber compounding, professional services, banking and accounting.

Michelin Australia also has identified risks of modern slavery in the following suppliers, outside the Michelin Group: shipping, clothing, technology (e.g. IT equipment), hospitality, and cleaning.

VI. Prevention and Risk Mitigation Measures

New developments are added to the Michelin Group's Duty of Care Plan yearly. Comparing to the previous version, the current Duty of Care Plan focuses more specifically on the Michelin Group's collaboration with its stakeholders on each of the main themes tackled, summarising the major partnerships forged by the Michelin Group for each theme and mentioning the principle stakeholders within the main chapters.¹⁰

Each year, the Michelin Group's key non-financial risks and associated remediation plans are dealt with in the Duty of Care Plan. The risk prevention and mitigation measures relating to the risks highlighted in Section V in this statement will be discussed in detail below.

*i. **Management of the risks in the global supply chain by the Group and Michelin Australia***

The Michelin Group, including the Reporting Entities, have systems in place to ensure that its employees and all key players in its supply chain and its contractors comply with its values and that there exists a vigorous supply chain compliance program.

Group-wide specific measures include:

- **Fundamental reference documents issued by the Purchasing Department** - continuous implementation of the Michelin Purchasing Principles¹¹, the Supplier Relations Code of Conduct and the Responsible Natural Rubber Policy. These documents sets out the Group's guidelines and commitments in relation to responsible purchasing and governs the Group's supplier relationships. It specifies the rules of professional conduct for the Michelin Group's purchasing teams, the supplier approval process, the Michelin Group's quality standards and the environmental, social and ethical performance expected of the Michelin Group's suppliers, including compliance with local law and international standards with respect to human rights.
- **Training purchasing teams on CSR issues** - purchasing teams receive training on the Code of Conduct and responsible purchasing practices. The Group has issued a series of 15 online

⁹ Michelin's Duty of Care Plan, page 64

¹⁰ Michelin's Duty of Care Plan, page 5.

¹¹ The Michelin Purchasing Principles: <https://purchasing.michelin.com/en/purchasing-principles/>



modules on responsible which is available to the Group's teams at any time. In 2023, the mandatory modules for buyers had been completed by over 70 people around the world;

- **Whistleblowing procedure and alert mechanisms** - in 2023, the Group set down the Group Whistleblowing Procedure in a new document.¹² This document provides a very clear and detailed description of how we collect and process alerts, as well as the stakeholders involved in the process. In addition, the Group operates an Ethics hotline that is accessible to all its employees and external stakeholders, including all key suppliers who may wish to report breaches of the Code of Ethics, including modern slavery.
- **Desktop reviews** - the Group has engaged a third party, the EcoVadis CSR rating agency, to conduct CSR desktop reviews to measure the performance of Michelin's main suppliers against 21 CSR indicators classified under four themes: Environment & Climate, Labor and Human Rights, Ethics, and Sustainable Procurement. The scope of the desktop reviews is extended each year, focusing on the most at-risk categories identified as having an insufficient level of cover during the mapping phase. In 2023, 89% of respondents, or 1,092 suppliers, were confirmed to be compliant with Group standards.¹³ Suppliers who fail to attain the target overall score, or certain thematic scores, must introduce a plan to improve their CSR performance. Of the suppliers whose score was below the compliant level on their last assessment, 64% have since attained the level required by Michelin. We reported in previous statements that in 2021 and 2022, the CAMSO and then MULTISTRADA companies began conducting CSR assessments of their suppliers the most at risk. In 2023, the assessments were extended to suppliers specific to the FENNER company.¹⁴
- **Self-assessment questionnaires** – a simplified CSR evaluation questionnaire has been prepared and made available to purchasing teams. The teams may ask key suppliers to complete it whenever they deem necessary, either during the tender phase or during the duration of the contract. The questionnaire measures the maturity of a supplier's CSR practices and is generally used only for suppliers whose CSR performance is not assessed by desktop reviews.

Locally, in Australia, the Australian purchasing team of goods and services generally follow the same processes as explained in this section: the adoption of the Michelin Purchasing Principles, self-assessment questionnaires etc. The Group Purchasing Department also reviews Michelin Australia's suppliers and spending to identify whether an EcoVadis desktop review is required. In addition, Michelin Australia employees who engage with suppliers are required to undertake that they have reviewed the Michelin Purchasing Principles and the Code of Ethics and agree to comply with the terms. Furthermore, the Michelin Purchasing Department conducts annual checks to ensure continued compliance with the policies.

ii. **A specific approach for the management of the risks of natural rubber**

"As one of the world's leading purchasers of natural rubber, a critical raw material in tire manufacturing, Michelin is especially attentive to its rubber-tree supply chain."¹⁵

To address modern slavery risks in the natural rubber supply chain including the risk of child labour, the Group has published a commitment to responsible and sustainable natural rubber production and procurement. In addition to the Natural Rubber Procurement Policy published in 2015, the Group published a Sustainable Natural Rubber Policy in 2016 which was updated in 2021.¹⁶ Further, to understand and

¹² The Michelin Group Whistleblowing Procedure can be found here: <https://www.michelin.com/en/group/purpose-values>

¹³ Michelin Duty of Care Plan, page 61.

¹⁴ Michelin Duty of Care Plan, page 65.

¹⁵ Michelin Duty of Care Plan, page 68.

¹⁶ Michelin Sustainable Natural Rubber Policy: <https://purchasing.michelin.com/en/documentfilters/sustainable-natural-rubber-policy/>



mitigate the risks in its natural rubber supply chain, Michelin has deployed a jurisdictional level risk mapping tool called “Rubberway” aimed to identify CSR risks among the upstream supply chain and farmers. Since the application’s deployment in 2017, RubberWay® has gathered information from 239,583 smallholder farmers on topics such as income, working hours, working conditions and child labor. Based on the jurisdictional risks identified, and a number of projects to improve farmers’ living and working conditions have been launched since 2020. By the end of 2023, 92 natural rubber processing plants have been assessed and a total of 248,609 RubberWay® questionnaires had been completed. Michelin also requests that its suppliers initially deploy RubberWay® in their production facilities and with their own direct suppliers. In this way, 83% of the sourced natural rubber volumes purchased by Michelin have been mapped using RubberWay®¹⁷.

The application is currently deployed in the following countries: Indonesia, Thailand, Malaysia, Vietnam, Côte d’Ivoire, Ghana, Guinea-Conakry, Nigeria, Liberia and Brazil.

The progress made on rolling out RubberWay® and the results on risks are transparently reported on by Michelin.¹⁸

In preparation for the requirements in the EU Regulation on Deforestation Free products (EUDR), starting in 2023, Michelin has begun working with its natural rubber network and suppliers to geolocalise its supply chain at the farm level. Various tools have since been developed and deployed to not only geolocate rubber plantations but also to assess risks at farm level, of which includes topics related to child and forced labour.

Further, the Group has formalized its public commitments in a Sustainable Natural Rubber Policy published in 2016, and recently updated in 2021.¹⁹ This policy was drafted with input from stakeholders, particularly environmental and human rights NGOs, and is now a contractual reference document for the Group’s suppliers.

Further details of all these measures can be found in the Duty of Care Plan and Universal Registration Document.

Projects and initiatives

Since the deployment of the RubberWay® application, a number of key projects have been set up on the ground in key priority areas:²⁰

- In our Year 2 Statement we reported on the 2020 launch of the CASCADE project in Sumatra, Indonesia, which aims to improve the living and working conditions of 1,000 smallholder farmers and their families, while at the same time improving environmental and social practices. This four-year project, which runs until 2024, was developed from the RubberWay® findings and combines classroom training and a digital training tool to boost accessibility and enable impact measurement. The agricultural training equips farmers to increase their rubber yields and diversify their revenue streams for greater economic resilience, while the social and environmental training includes training on human rights, labour law, and the promotion of environmentally-friendly farming practices, such as reduced use of chemicals, intercropping or agroforestry, and environmental training courses.
- The RIVER project in Sri Lanka will build the skills of 6,000 smallholders and their families through to 2025, where rubber growing plays an important role in local livelihoods.
- In East Kalimantan in Indonesia,

¹⁷ Michelin Universal Registration Document, page 285.

¹⁸ <https://natural-rubber.michelin.com/commitments-and-transparency/progress>

¹⁹ Michelin Sustainable Natural Rubber Policy: <https://purchasing.michelin.com/en/documentfilters/sustainable-natural-rubber-policy/>

²⁰ Michelin Duty of Care Plan, page 68.



the MAHAKAM project aimed at training 2,000 smallholders and their families by 2025 kicked off in late 2022. In total, 111 farmers were trained in 2023.

- In Thailand, the GPSNR agroforestry project will enable 1,000 smallholders from the south of Thailand to implement agroforestry rubber-growing systems by 2025. In 2023, 109 farmers were trained under this project.

- In the Brazilian Amazonia, where the local communities harvest the rubber from wild rubber trees, the Michelin Foundation has been supporting a project since 2021, in collaboration with the WWF Brazil, that will generate a positive economic impact for 1,000 families. The project aims to maintain the existing ecosystem by upgrading the collection and marketing of wild rubber by the traditional communities.

Information about these can be found on the Duty of Care Plan, the Universal Registration Document and on www.michelin.com.

*iii. **Risk mitigation - written policies***

Michelin Australia's ultimate parent company, CGEM, is listed on the Paris Stock Exchange and is therefore subject to the French law known as the Duty of Vigilance Law Act No. 2017-399 of 27 March 2017 ("Duty of Vigilance law").

For the seventh year in a row, the Michelin Group has fulfilled its obligations under the Duty of Vigilance law by drafting its latest Duty of Care Plan, which sets out the identification and mitigation of risks associated with the environment, health and safety and human rights.

The Duty of Care Plan - built on recognised international standards contained in, notably, the United Nations Principles on Business and Human Rights, the fundamental conventions of the International Labour Organisation and the Organisation for Economic Co-operation and Development Guidelines for Multinational Enterprises – has a crucial role to play in maintaining the Group's values and commitment to responsible development in relation to all of its stakeholders. A copy of the latest Duty of Care Plan can be found on <https://www.michelin.com/en/sustainability/company>.

All members of the Michelin Group, including Michelin Australia, are required to comply, and have adopted the Duty of Care Plan. It is committed to preventing adverse human rights impacts, including modern slavery, in its operations and in its supply chains. The Michelin Group's policies reflect the Group's commitment to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in its supply chains.

The Duty of Care Plan expands on the initiatives already embedded in the Michelin Group's founding documents and policies that underpin its duty of care commitments and initiatives. These specific policies include:

- The Michelin Performance and Responsibility Charter;
- The Code of Ethics;
- The Purchasing Principles;
- Health, Safety and Quality of Worklife Policy;
- The Environmental General Policy Note;
- Diversity and Inclusion Policy;
- The Sustainable Natural Rubber Purchasing Principles;
- The Master Policy on Human Rights issued in 2022;
- The Group Whistleblowing Procedures.

Copies of these policies can be found on www.michelin.com.



iv. **Risk mitigation - practices in respect of Michelin Australia employees**

Locally, the following requirements and practices are implemented amongst Michelin Australia's employees:

- Each employee must consent freely and without constraint to be hired by Michelin;
- Each employee gets a working contract;
- Each employee can decide to leave the company at any time (in accordance with his/her employment contract and local legislation);
- Each employee receives a regular market-based salary;
- The remuneration of each employee conforms with the local laws; and
- Employees can use the Ethics Hotline to make or lodge a complaint.

v. **Risk mitigation - Whistleblowing**

The Michelin Group maintains an anonymous Navex Ethics Hotline that is managed by an independent third party. All employees and suppliers are advised of this facility and have access to it. Employees are actively encouraged to raise concerns relating to ethical issues including those relating to corruption and modern slavery with their managers, human resources department or via the Navex Ethics Hotline.

Whistleblowers are protected by whistle blower protection policies. Michelin Australia has adopted its own Whistleblower Policy, published in 2019, consistent with Whistleblower legislation in Australia. In 2023, the Group set down the Group Whistleblowing Procedure in a new document, applicable to all Group entities.

vi. **Risk mitigation - Training**

To ensure a high level of understanding of the CSR risks and ethical risks in Michelin Australia's supply chains business, Michelin Australia provides comprehensive training to its staff. A specific e-learning module for purchasing teams addresses human rights and modern slavery risks specifically within Michelin Australia's suppliers.

vii. **Remediation – disciplinary action**

Michelin Australia will take disciplinary action against any employee found to be involved in breaking laws in relation to any form of modern slavery including but not limited to, child labour, forced labour, slavery and human trafficking. Michelin Australia addresses, escalates and where appropriate remediates all issues that are raised in connection with its businesses through the Navex Ethics Hotline or other alert mechanisms.

VII. Effectiveness of the Prevention Measures

The Group, including Michelin Australia, continue to develop and implement means to measure the effectiveness of the actions outlined in Section VI above. In order to monitor the effectiveness of the actions taken to prevent modern slavery in our business operations or at our suppliers, we assess each year an array of indicators, such as, but not limited to:

- % of employees with basic health and welfare cover;
- Number of suppliers assessed each year on CSR issues, including human rights;
- Number of suppliers that reach the accepted CSR standards of the Group;
- Number of questionnaires (including questions on forced labor and child labor) filled in by small holders of natural rubber; and
- Number of training of natural rubber farmers to enhance their level of income and working conditions.



The data is available on a yearly basis in the Duty of Care Plan.

Numerous KPIs and objectives for 2030 are used to monitor the implementation of this policy with the goal of achieving its human rights ambitions.²¹ Further, a summary of the main indicators of progress relating to environment, health and safety, human rights and risks related to suppliers' CSR practices are contained on page 80 of the Duty of Care Plan.

VIII. Any Other Relevant Information

In Michelin Australia's Year 3 Statement, we reported that in 2021 and 2022, the CAMSO and then MULTISTRADA companies began conducting CSR assessments of their suppliers the most at risk. In 2023, the assessments were extended to suppliers specific to the FENNER company.²²

The principles for integrating new companies into the Group's CSR reporting process were defined in 2022 and more details can be found on page 11 of the Duty of Care Plan. This will ensure that human rights indicators are tracked in these newly acquired companies within five years. Certain companies acquired prior to 2022 (Camsco and Fenner in particular) are now partially incorporated into the Group's indicators.

For the avoidance of doubt, the Australian Reporting Entities' procurement practices follow the processes and procedures set out in Section VI(i) of this Statement, including but not limited to, adherence to the Michelin Purchasing Principles.

IX. Consultation and Approval

This Year 4 statement, made pursuant to the Modern Slavery Act 2018 (Cth), was made in consultation with management and key internal stakeholders from all Reporting Entities and approved by the Board of Directors of each of the Reporting Entities. This document constitutes our Modern Slavery Statement for the financial year ending 31 December 2023.

Signed on behalf of the Reporting Entities

Name: **Oliver Biggart**
Position: Managing Director of Michelin Australia Pty Limited
Date: 25/06/24

²¹ Michelin Duty of Care Plan, page 15.

²² Michelin Duty of Care Plan, page 65.