



Michelin Australia

Joint Modern Slavery Statement 2025

For the Financial Year Ending 31 December 2024

Prepared in accordance with the Modern Slavery Act 2018 (Cth)

1. Introduction

This joint Modern Slavery Statement (this “**Statement**”) outlines the actions taken by Michelin Australia¹ during the financial year ending 31 December 2024 to assess and address modern slavery risks in its operations and supply chains, in accordance with the Modern Slavery Act 2018 (Cth) (“the **Act**”).

This is Michelin Australia’s fifth Statement under the Act.

2. Reporting Entities

This statement is submitted by the following reporting entities:

- 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).

These entities are wholly owned subsidiaries of Compagnie Générale des Établissements Michelin (“**CGEM**”), (together referred to as “**Michelin Australia**” or the “**Reporting Entities**”) headquartered in France.

3. Operations and Structure

The Michelin Group, based in Clermont-Ferrand, France, has 129,800 employees² across 174 countries and operates 83 tire productions plants and 45 Polymer Composite Solutions production plants.³ CGEM is listed on the Paris Stock Exchange.

Michelin Australia operates in tyre distribution, mobility services, industrial solutions, and engineering services. Our supply chains include the importation of tyres and rubber products from Michelin Group facilities globally, as well as local procurement of logistics, IT, professional services, and personal protective equipment.

Below is an overview of each of the Reporting Entities:

Michelin Australia Pty Limited: Headquartered in Port Melbourne, Michelin Australia Pty Limited imports and distributes a wide range of tyres and provides mobility services throughout Australia and New Zealand. The company operates in all major Australian cities and sells its products through independent dealers. Michelin Australia Pty Limited employs approximately 160 employees, primarily in office-based

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

² The Group’s workforce totalled 129,832 people as at December 31, 2024.

³ Michelin Group Universal Registration Document, page 6.



roles. These roles encompass senior management, account managers, administrative staff, customer service advisors, information technology professionals, marketing specialists, national and regional sales managers, and supply chain personnel.

Klinge Holdings Pty Limited ("Klinge"): Klinge is a tyre software, training and consulting company located in Brisbane, Queensland. It is a wholly owned subsidiary of Michelin Australia Pty Limited and employs approximately 17 people.

Bearcat Tyres Pty Limited ("Bearcat"): Bearcat, located in Girraween New South Wales, is an Australian distributor of industrial, construction, and earthmoving equipment tyres, wheels, and rubber tracks. It was acquired by the Michelin Group as part of Camso Global Group in 2018 and employs about 80 people.

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 around 1200 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.

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 continues to maintain an internal Modern Slavery Policy dated June 2023. Hallite Australia has around 78 employees.

The vast majority of the products imported and distributed by Michelin Australia are manufactured by members of the Group. Logistics services are outsourced.

4. Supply Chains

Most of Michelin Australia's importation of tyres and related products in Australia is conducted through 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. As such, the Group's supply chain governance and sustainability practices are directly relevant to the Australian operations and will be explained in more detail in this Statement.

Locally, the Reporting Entities acquire various goods and services within Australia, including logistics and warehousing, technology and telecommunications hardware and services, financial services from Australian banks, consulting services, marketing and events management, insurance, accounting, audit, and legal services. Additionally, certain goods such as protective clothing, motor vehicles, and miscellaneous office supplies are procured locally. Some contracts for these goods, particularly information technology hardware and services, are managed globally, while others are managed regionally or locally.



The procurement of locally sourced goods and services is overseen by the local purchasing team, following the processes and procedures outlined in the various well-established Michelin Group policies including, but not limited to, the Michelin Purchasing Principles.⁴ These policies mandate supplier compliance with specific forced labour, child labour and employee requirements, in line with ILO standards.⁵

Fenner Australia primarily sources its raw materials, goods, and services from Australian suppliers. Additionally, approximately 5-10% of its expenditure is allocated to products manufactured by Michelin Group members in Asia. Furthermore, Fenner Australia imports a small proportion of conveyor belts and conveyor equipment from international suppliers.

Hallite Australia's supply chain encompasses polymer and rubber raw materials procured from both local and overseas suppliers. The procurement processes for these materials are typically governed by the same procedures and due diligence practices as outlined in this Statement.

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

As reported in previous statements under the Act, the risk of modern slavery in Michelin Australia's supply chain can be categorised into two parts:

- i. *Risks in relation to products manufactured and supplied by members of the Michelin Group; and*
- ii. *Risks in relation to goods and services procured from outside the Michelin Group.*

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

Regarding the risks associated with products manufactured by members of the Michelin Group, several areas of our operations and supply chains have been identified as potential risk factors. These encompass risks to both the Group's employees and the workers within the value chain in which Michelin operates.⁶

Own workforce

The Group acknowledges various risks to the health, safety, and wellbeing of its 129,800 employees within its own workforce. In all office, production, research, logistics, and retail facilities, employees may encounter accidents involving mechanical or electrical installations, materials and finished products handling, chemicals, tooling, and shopfloor movements. These risks have the potential to result in injuries of various severities. Additionally, traffic accidents during business travel have been identified as potential risks.⁷

Furthermore, there are occupational illnesses that arise from exposure to chemicals and harmful substances, including those considered hazardous. Employees engaged in research or manufacturing operations face the risk of exposure to chemicals which, if not adequately controlled, could result in illness. This pertains to certain products and substances used in tire production, as well as specific compounds that may be present in process fumes.⁸

⁴ The Michelin Purchasing Principles: <https://purchasing.michelin.com/en/purchasing-principles/>

⁵ Michelin Group Universal Registration Document, page 275.

⁶ Michelin Group Sustainability Statement, page 191.

⁷ Michelin Group Sustainability Statement, page 191.

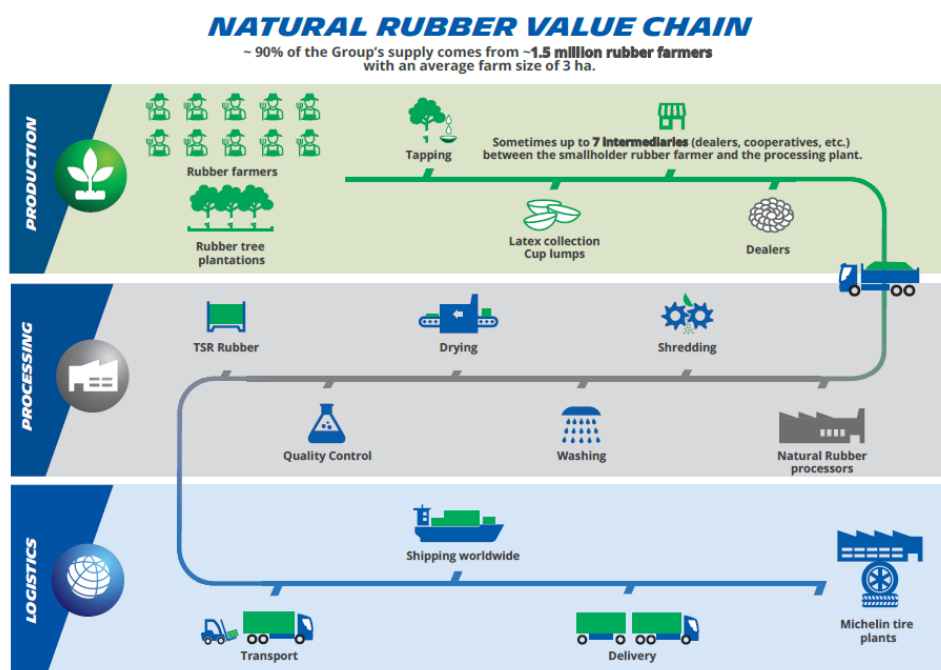
⁸ Michelin Group Sustainability Statement, page 191.

Workers in the value chain

The Group, with manufacturing operations in 26 countries and business operations in 174 countries, recognizes the potential negative impacts on its suppliers, consumers, and local communities. These potential risks include violation of the rights of workers in the upstream agricultural value chain, including child labour, forced labour and illegal labour practices, particularly among smallholder farmers and intermediaries in the natural rubber industry. Michelin engages with approximately 35,000 direct suppliers. The process of managing associated risks to the value chain is guided by an accountability assessment which evaluates the number and size of suppliers at each stage in the value chain, Michelin's influence within the chain, and the pertinent human rights issues and risks in its component channels. The assessment identified that the natural rubber value chain (see Image 1) characterized by labour-intensive farming activities and extensive geographical presence, as being most vulnerable to modern slavery risks. Forced labour is notably prevalent in farm commodity supply chains, and rubber plantations are situated in regions prone to forced or child labour, such as Southeast Asia or West Africa, and demand significant manual labour.

As a result, the Group is highly vigilant about the risk of forced and child labour, especially as the tire industry makes up 70% of the global natural rubber market. Section 6 of this Statement provides detailed information on how the Group manages these risks.

Image 1



Source: 2024 Universal Registration Document, page 274.

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

As reported in Michelin Australia's previous modern slavery statements, 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 acknowledge that they have limited visibility of those supply chains, and as such acknowledges that such 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.

How Michelin Australia manages these identified risks is explained in more detail in Section 6 of this Statement.

6. Prevention and Risk Mitigation Measures

The Group's workforce and supply chain

The Michelin Group adopts a proactive and structured approach to managing risks to its workforce and those within its value chain. Central to this is the Group's Duty of Care Plan, updated annually, which outlines the identification, prevention, and mitigation of risks related to human rights and health and safety as set out in Section 5 of this Statement.

The 2024 Duty of Care Plan, published in May (French) and June (English) 2025 can be found here: <https://www.michelin.com/en/publications>

In addressing risks to its own workforce, the Group adopts a comprehensive, people-centric approach, deeply rooted in its foundational value of respect for people. The Corporate Personnel Department, led by the Chief Personnel Officer, manages the Group's workforce strategy. This department sets workforce policies, ensures their implementation, and shares expertise. The strategy includes seven policies to promote social cohesion, equity, employer appeal, sustainable employability, and regulatory compliance.⁹

With respect to managing health and safety risks to its employees, the Group's health and safety strategy has three main objectives:

- Maintaining a priority focus on health and safety, including environmental impacts;
- Enhancing employer appeal and employee retention through a culture of prevention and monitoring, safety and cognitive ergonomics;
- Facilitating the organization's shift from technological compliance to agile human behavior in an automated world.¹⁰

In addition, each plant or office site conducts risk assessments, workstation mapping exercises, action plans, and equipment and process upgrades to ensure continuous improvement. These efforts are part of a broader workforce strategy that includes fair wages, a universal social protection floor, and extensive training and upskilling programs to enhance employability and resilience.¹¹ Additionally, ethical governance is maintained through a dedicated Ethics and Compliance body and the NAVEX whistleblower system, which allows for anonymous reporting of violations. Regular training programs are provided to employees to reinforce awareness and accountability in instilling an overall culture of safety.

⁹ Michelin Group Universal Registration Document, page 264.

¹⁰ Michelin Group Universal Registration Document, page 267.

¹¹ Michelin Group Universal Registration Document, page 268.



In addition to ongoing prevention and improvement measures deployed at Group level¹², in 2024, the Group accomplished several notable milestones in its dedication to enhancing employee well-being:

- Received the Fair Wage Network certification, making Micheline one of the first companies to earn the Fair Wage Network's "Living Wage Global Employer" certification.¹³
- Deployment of the Michelin One Care program to 98% of the Group's global workforce as at the end of 2024.¹⁴
- A total of €56 million was committed to workforce health and safety initiatives in the Group's production base in 2024, with more being budgeted over the next few years.¹⁵

For workers in the value chain, the Group applies a risk-based due diligence process to identify countries and categories most exposed to social and environmental risks. The Group has identified that forced and child labour risks are particularly prevalent in the natural rubber production value chain, especially in Southeast Asia and West Africa. To identify and address these risks, Michelin uses tools like RubberWay® to assess worker-related and other social risks at different points in the supply chain that are geo-located. This tool enables the Group to implement targeted risk mitigation projects, shared progress plans or remediation actions in collaboration with village smallholder farms.

In 2024, various field projects were undertaken in the natural rubber supply chain to develop the skills of village smallholders and enhance their living and working conditions, which are crucial factors in preventing the use of forced or child labour. These included the Cascade projects in Indonesia (2020-2027, in partnership with Porsche), the River project in Sri Lanka (2022-2025, in partnership with the French Ministry of the Economy and Finance) and the Mahakam project in Indonesia (2022-2025). In West Africa, the SIPH joint venture is also working closely with village smallholders and local communities. It is leading multiple programs to prevent malaria, AIDS and other diseases, providing training in best farming practices, and supplying high-quality planting material by producing and marketing rubber seedlings.¹⁶

These initiatives aim to improve farmers' living and working conditions and enhance environmental and labour practices. Information about these can be found on the Duty of Care Plan, the Universal Registration Document and on www.michelin.com.

In its daily operations, the Group diligently ensures that it does not contribute to the risk of human rights violations affecting workers within the value chain. In its procurement activities, Michelin ensures supplier compliance by evaluating its main suppliers through **third-party CSR assessments** (e.g., EcoVadis), which cover environmental, human rights, and business ethics criteria. Suppliers that do not meet the Group's standards are required to implement corrective action plans. In cases where third-party evaluations are not available, suppliers may complete a self-assessment questionnaire. These assessments are supported by the Group's **Purchasing Principles, Supplier Code of Conduct**, and **Sustainable Natural Rubber Policy**, which are embedded in all purchasing contracts. These policies are designed to uphold ethical practices, respect for human rights, and environmental stewardship throughout the supply chain.

Michelin Australia

¹² Michelin Group Universal Registration Document, page 268.

¹³ Michelin Group Universal Registration Document, page 266.

¹⁴ Michelin Group Universal Registration Document, page 266. The Michelin One Care program provides every employee with a universal social protection floor, comprising a set of basic social protection benefits to supplement host country social security systems.

¹⁵ Michelin Group Universal Registration Document, page 268.

¹⁶ Michelin Group Universal Registration Document, page 277.



Locally, the following requirements and practices are implemented amongst Michelin Australia's employees, in compliance with local labour laws and regulations:

- 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.

In addition, 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. Michelin Australia addresses, escalates and where appropriate remediates all issues that are raised in connection with its businesses through the Hotline or other alert mechanisms.

Whistleblowers are protected by its local whistleblower protection policies. In 2023, the Michelin Group issued the Group Whistleblowing Procedure applicable to all Group entities.¹⁷

Lastly, to ensure a high level of understanding of the CSR-related and ethical risks in Michelin Australia's supply chains businesses, 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.

7. Effectiveness of the Prevention Measures

Michelin tracks and assesses the outcomes of the abovementioned initiatives and prevention measures using various metrics, several of which have annual or multi-year targets. Internally, the Group tracks employee engagement through the annual global 'Moving Forward Together' surveys, enabling them to express their views on their daily employee experience. The engagement rate increased from 80% in 2019 to 84.7% in 2024, already meeting the target set for 2030.¹⁸ In addition, on the basis of the Fair Wage Network certification awarded in February 2024, 100% of employees in the assessed scope are being paid an adequate wage.¹⁹

Further, the Group tracks employee health and safety through the following metrics:

- Percentage of employees covered by a recognized health and safety management system (e.g. an ISO 45001-certified system); and
- Total Case Incident Rate (TCIR) indicator tracking work-related accidents and illnesses.

As of 31 December 2024, 68% of Group employees and temp agency workers were covered by a health and safety management system and the TCIR was 1.03 against a target of less than 0.5 by 2030. Notably, the number of work-related fatalities was zero.²⁰

These targets and metrics can be found in the 2024 Universal Registration Document and on [michelin.com](https://www.michelin.com).

¹⁷ The Michelin Group Whistleblowing Procedure can be found here:

<https://www.michelin.com/en/group/purpose-values>

¹⁸ Michelin Group Universal Registration Document, page 264.

¹⁹ Michelin Group Universal Registration Document, page 271.

²⁰ Michelin Group Universal Registration Document, page 271.



In tracking the effectiveness of the prevention measures for CSR-related risks on the value chain, the Group monitors the deployment of CSR assessments and the progress of supplier scores. Projects such as Cascade, River, and Mahakam include metrics for measuring the number of participants and their profiles, as well as actual progress, with indicators tracking the number of farmers whose working conditions and/or livelihoods have improved.²¹

The targets for managing negative impacts to workers in the rubber production value chain are defined by the Group Purchasing Department and presented in the Sustainable Purchasing Policy. The targets, including the outcomes for 2024, are presented in Image 2 below.

Image 2

	Baseline year			2024	Target	
	2018	2019	2022		2025	2030
Percentage of suppliers whose human rights score in the third-party CSR maturity assessments complies with the Group's standards		85%		93%		95%
Percentage of natural rubber used assessed for compliance with the Group's human rights standards	7%			80%	80%	
Number of village smallholders whose working conditions and/or livelihoods have improved			467	6,783		30,000

Source: 2024 Universal Registration Document, page 278.

The abovementioned action plans and initiatives are also recognized by outside agencies. Awards and labels earned from external agencies include:

- The French government's Responsible Supplier Relations label (June 2014);
- The French government's Responsible Supplier Relations and Procurement label for French companies that demonstrate balanced, sustainable relations with their suppliers (2019, 2022, confirmed in 2024); and
- Certification that the Group's purchasing practices align with the ISO 20400 Sustainable Procurement standard (2019, 2022).²²

In addition, in 2024, Michelin received an EcoVadis score of 90/100 in Responsible Purchasing, ranking it in the top 1% of companies rated in its industry. Additionally, in 2024, for the third year running, Michelin was ranked No. 1 in the tiremaker category by SPOTT, a natural rubber ESG disclosure platform, with a score of nearly 81% (No. 2 in the general natural rubber category).²³

Continuous improvement is embedded in our approach. Lessons learned from audits and incident investigations are used to update policies and training. Michelin also monitors regulatory developments, to ensure proactive compliance and leadership in responsible business conduct.

9. Consultation and Approval

This Year 5 Statement, made pursuant to the Modern Slavery Act 2018 (Cth) was developed in consultation with senior management and key stakeholders across all Reporting Entities. It was 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 2024.

²¹ Michelin Group Universal Registration Document, page 277.

²² Michelin Group Universal Registration Document, page 277.

²³ Michelin Group Universal Registration Document, page 277.



Signed:

Oliver Biggart

Oliver Biggart (Jun 27, 2025 17:00 GMT+10)

Oliver Biggart

Managing Director, Michelin Australia Pty Ltd

On behalf of the Reporting Entities

Date: 27 June 2025







(27 June 2025) Final OMGA Modern Slavery Statement 2025 - Execution Version

Final Audit Report

2025-06-27

Created:	2025-06-27
By:	Johan Van-Zyl (johan.van-zyl@michelin.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAze1vkRs7l6mc_O2RzXZV5oZ5PCNr3_aT
Documents:	(27 June 2025) Final OMGA Modern Slavery Statement 2025 - Execution Version.pdf (9 pages)
Number of Documents:	1
Document page count:	9
Number of supporting files:	0
Supporting files page count:	0

"(27 June 2025) Final OMGA Modern Slavery Statement 2025 - Execution Version" History

-  Document created by Johan Van-Zyl (johan.van-zyl@michelin.com)
2025-06-27 - 6:35:05 AM GMT- IP address: 130.41.115.125
-  Document emailed to oliver.biggart@michelin.com for signature
2025-06-27 - 6:37:34 AM GMT
-  Email viewed by oliver.biggart@michelin.com
2025-06-27 - 6:58:54 AM GMT- IP address: 77.81.110.202
-  Signer oliver.biggart@michelin.com entered name at signing as Oliver Biggart
2025-06-27 - 7:00:57 AM GMT- IP address: 165.1.230.248
-  Document e-signed by Oliver Biggart (oliver.biggart@michelin.com)
Signature Date: 2025-06-27 - 7:00:59 AM GMT - Time Source: server- IP address: 165.1.230.248
-  Agreement completed.
2025-06-27 - 7:00:59 AM GMT