

SUSTAINABLE NATURAL RUBBER ROADMAP

2020 - 2025

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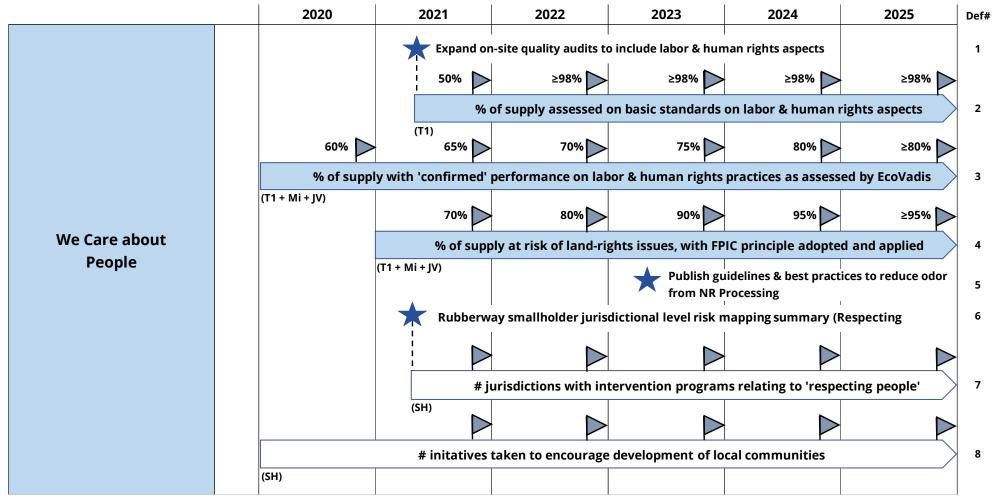
ABOUT THIS DOCUMENT

The Sustainable Natural Rubber Roadmap 2020 - 2025 sets key indicators to guide the implementation of Michelin's Sustainable Natural Rubber Policy. The categories correlate with the policy pillars to facilitate insight into Michelin's progress. The roadmap is considered a living document, and indicators can be added if they have been identified as material or removed if they are deemed no longer relevant (with rationale provided).

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WE CARE ABOUT PEOPLE

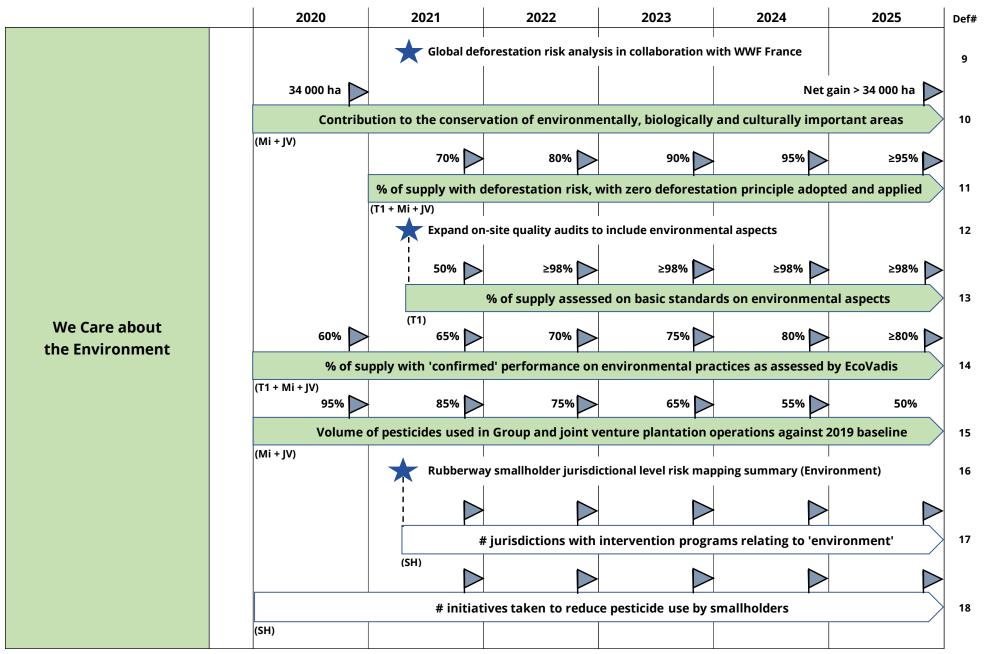


Main target group (legend):

- T1 Direct suppliers (Tier 1 suppliers)
- Mi Michelin owned operations (including subsidiaries whose activities relate to the production or processing of natural rubber)
- JV Joint Ventures: within this document, defined as companies whose activities relate to the production or processing of natural rubber where Michelin Group maintains financial interest but is a minority shareholder
- SH Smallholders
- SC Global Supply chain

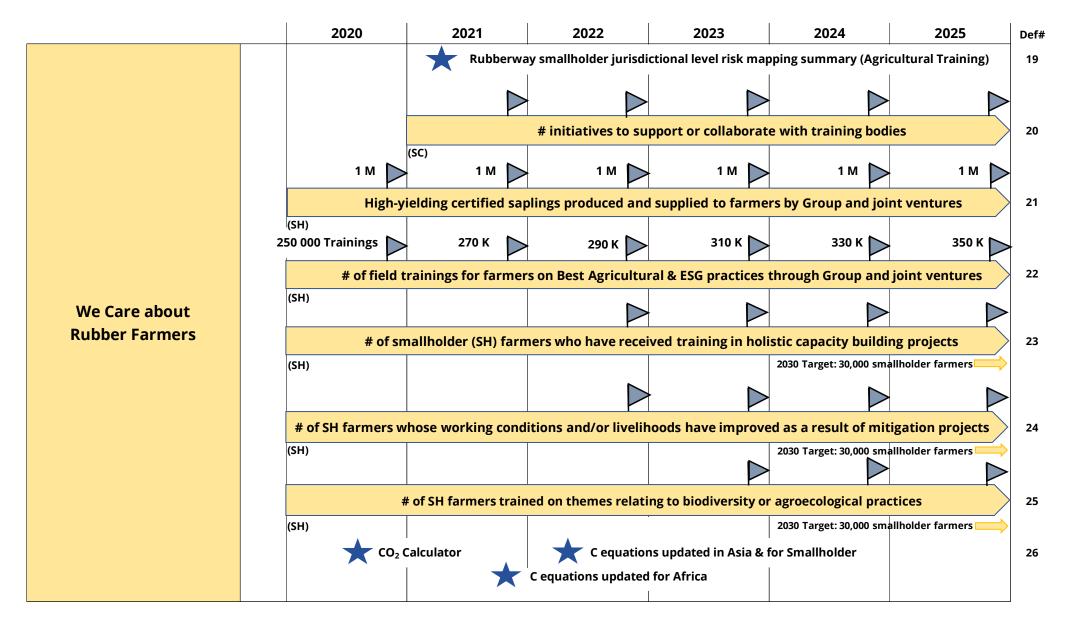


WE CARE ABOUT THE ENVIRONMENT



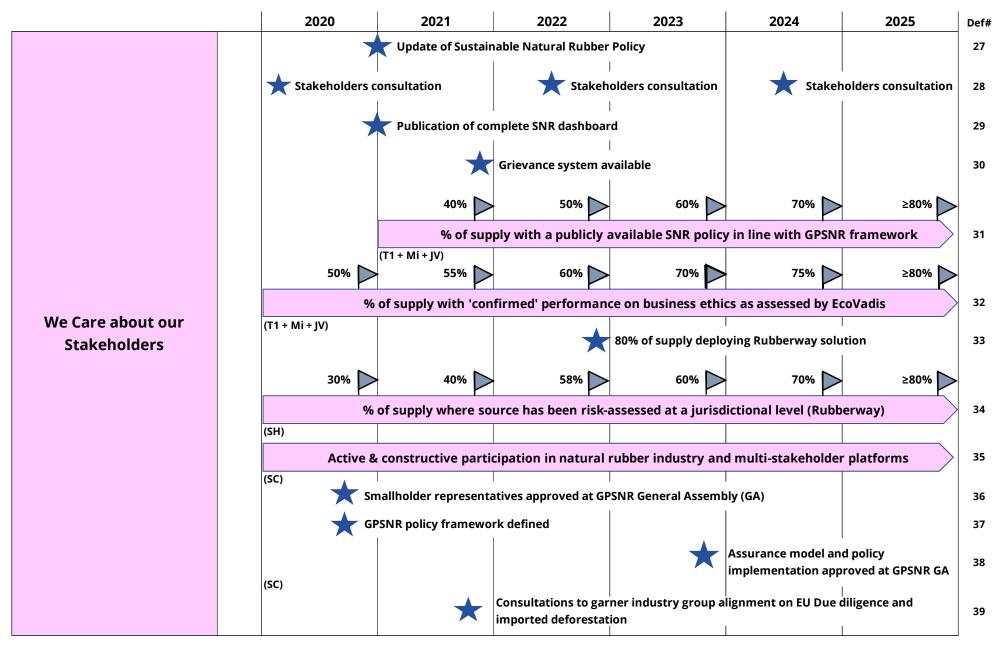


WE CARE ABOUT RUBBER FARMERS



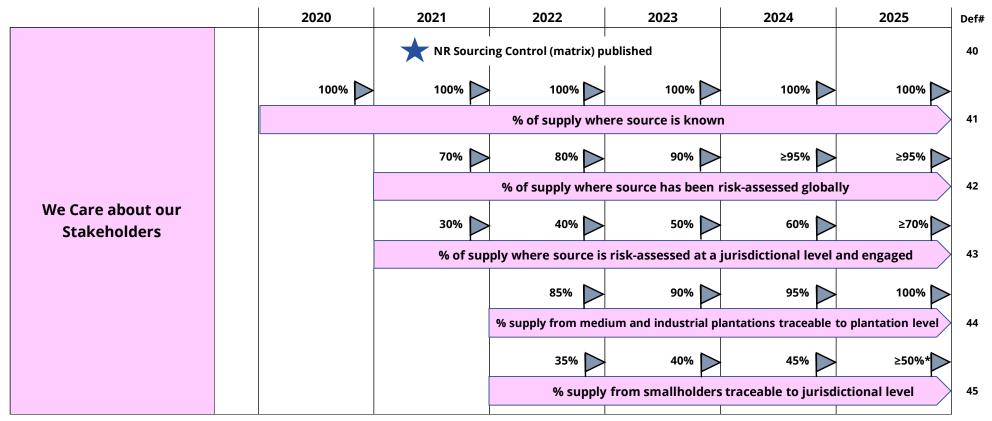


WE CARE ABOUT OUR STAKEHOLDERS (1)





WE CARE ABOUT OUR STAKEHOLDERS (2)



*Target of 100% of supply from smallholders traceable to jurisdictional level by 2030



Def#	Action / Indicator	Definition
1	Expand on-site quality audits to include labor & human rights aspects	2022 and before: Quality audits run on-site at individual supplier natural rubber (NR) processing factories (1) before they are included in Michelin's approved supplier list (2) once a year or once every two years based on their performance ranking. These audits already include health and safety aspects. Michelin will further expand these audits to include aspects relating to labor and human rights.
	% of supply assessed on basic standards on labor & human rights aspects	2022 and before: % of supply = % of NR volume purchased year - 1
		2023-2025: % target suppliers assessed on basic standards on labor & human rights aspects. % target = Achievement of number of actual audits against number of planned audits according to Michelin "supplier quality system audit procedure" (ESQF) framework.
		Assessed: On-site quality audit with expanded aspects that include labor & human rights aspects conducted.
2		Basic standards: Evidence that fundamental workers' rights are not infringed upon, including no evidence of child or forced labor. Evidence of appropriate health and safety practices, including the provision of appropriate personal protective equipment.
		Where gross infringements are identified, factories will need to implement timebound corrective action plans.
		Remarks: A new methodology for target setting and achievement will be used from reporting year 2023 onwards. Natural rubber processing factories (suppliers) will be assessed once a year or once every two years based on their performance ranking. These assessments support supplier compliance with its Quality standards and Purchasing Principles and aside from quality issues, also address the application of the health, safety, environmental and human rights standards.
		% of supply = % of NR spend* year - 1
3	% of supply with 'confirmed' performance on labor & human rights	*% of NR spend closely approximates % of supply volume, used for EcoVadis-related indicators as EcoVadis assessments are used across all purchasing domains and % spend is used to measure coverage.
	practices as assessed by EcoVadis	'confirmed' performance: Total aggregate score of supplier meeting confirmed grade as per the EcoVadis assessment methodology (≥45/100); labor & human rights pillar meeting minimum of 50/100.

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Def#	Action / Indicator	Definition
	% of supply at risk of land-rights issues, with FPIC principle adopted	Currently, supply determined to be at risk is defined to be supply originating from large natural rubber plantations where an individual management unit has an area >500ha (industrial plantations). Michelin is working to develop a risk assessment framework that will determine which plantations are at risk.
		% of supply at risk of land-rights issues with FPIC principle adopted and applied = volume from supply at risk ¹ purchased from suppliers with FPIC principle adopted and applied / volume from supply at risk ¹ purchased from all suppliers. Volume based on (year - 1).
		¹ Where supplier sources from a mix of industrial plantations and smallholders, volume at risk is calculated as: total volume purchased from supplier * [industrial plantation-based production of supplier / total production of supplier]
4	and applied	Adopted: FPIC clause is adopted in company policy
		Applied: Evidence of FPIC mechanism having been applied where there has been new development since Michelin's policies have been published. Where there are ongoing issues related to FPIC processes, there should be an active engagement process.
		Note on medium plantations (<500 and >50ha): Medium plantations are typically owned by individual landowners and exist in limited number primarily in West Africa and South America; they are sometimes difficult to differentiate from smallholder farms. Michelin working with its suppliers to refine the delineation between small and medium farms, as well as to consider specific approaches for non-industrial medium farms.
5	Publish guidelines & best practices to reduce odor from NR processing	-
6	RubberWay smallholder jurisdictional level risk mapping summary (Respecting People)	Jurisdictional-level risk mapping summary from RubberWay to be displayed on the web dashboard.
7	# jurisdictions with intervention programs relating to 'respecting people'	Cumulative number of jurisdictions where programs that address risks, identified through RubberWay, are taking place. Programs include those conducted directly by Michelin, joint ventures and its supply chain by suppliers.
8	# initiatives taken to encourage development of local communities	Cumulative number of direct initiatives. Examples of initiatives may include activities to improve health and education infrastructures, alternative forms of employment, capability building for better livelihoods, etc.

9 Global deforestation risk analysis in collaboration with WWF France -



Def#	Action / Indicator	Definition	
10	Contribution to the conservation of environmentally, biologically and culturally important areas (ha)	Environmentally, biologically and culturally important areas: areas may include HCV and HCS area, protected area, primary forest, riparian buffer zones, important areas used for cultural and social purposes and other areas deemed to be of environmental, biological and cultural importance. Contribution includes areas conserved through Group-owned and joint venture plantations.	
	p w % su fr 1\ a: % of supply with deforestation risk with zero deforestation principle p	Currently, supply determined to be at risk is defined to be supply originating from large natural rubber plantations where an individual management unit has an area >500ha (industrial plantations). Michelin is working to develop a risk assessment framework that will determine which plantations are at risk.	
11		% of supply at risk of land-rights issues with zero deforestation principle adopted and applied = volume from supply at risk ¹ purchased from suppliers with zero deforestation principle adopted and applied / volume from supply at risk ¹ purchased from all suppliers. Volume based on (year - 1).	
		¹ Where supplier sources from a mix of industrial plantations and smallholders, volume at risk is calculated as: total volume purchased from supplier * [industrial plantation-based production of supplier / total production of supplier]	
	adopted and applied	Adopted: zero deforestation clause is adopted in company policy	
		Applied: Implementation of zero deforestation commitment (including HCV and HCS assessments) where there has been new development since Michelin's policies have been published. Where there are ongoing issues related to deforestation, there should be an active engagement process.	
		Note on medium plantations (<500 and >50ha): Medium plantations are typically owned by individual landowners and exist in limited number primarily in West Africa and South America; they are sometimes difficult to differentiate from smallholder farms. Michelin working with its suppliers to refine the delineation between small and medium farms, as well as to consider specific approaches for non-industrial medium farms.	
12	Expand on-site quality audits to include environmental aspects	2022 and before: Quality audits run on-site at individual supplier NR processing factories (1) before they are included in Michelin's approved supplier list (2) once a year or once every two years based on their performance ranking These audits already include aspects relating to effluent treatment. Michelin will include additional aspects relating to the environment.	



Def#	Action / Indicator	Definition
		% of supply = % of NR volume purchased year - 1
		2023-2025: % target suppliers assessed on basic standards on environmental aspects.
		% target = Achievement of number of actual audits against number of planned audits according to Michelin "supplier quality system audit procedure" (ESQF) framework.
		Assessed: On-site quality audit with expanded aspects that include environmental aspects
13	3 % of supply assessed on basic standards on environmental aspects	Basic standards: Evidence of provisions to mitigate risk of environmental impacts, including treatment of effluent, management of hazardous waste, and storage of chemicals.
		Where gross infringements are identified, factories will need to implement timebound corrective action plans.
		Remarks: A new methodology for target setting and achievement will be used from reporting year 2023 onwards. Natural rubber processing factories (suppliers) are assessed once a year or once every two years based on their performance ranking. These assessments support supplier compliance with its Quality standards and Purchasing Principles and aside from quality issues, also address the application of the health, safety, environmental and human rights standards.
	% of supply with 'confirmed' performance on environment practices as assessed by EcoVadis	% of supply = % of NR spend* year -1
14		*% of NR spend closely approximates % of supply volume, used for EcoVadis-related indicator as EcoVadis assessments are used across all purchasing domains and % spend is used to measure coverage.
		'confirmed' performance = total score of supplier meeting confirmed grade as per the EcoVadis assessment methodology (≥45/100); environment pillar meeting minimum of 50/100
		Volume = volume/ha/year; kg of Active Ingredient (a.i.)
		Ha = Ha planted with natural rubber. Baseline is 2019.
	Volume of pesticides used in own and joint venture plantation operations against 2019 baseline	WHO class la & lb = 0
15		Class Ia (extremely dangerous), Ib (highly hazardous), Class II (moderately hazardous), class III (slightly hazardous), U (unlikely hazardous).
		Class la & lb = 0%.
		Class II & III to be reduced.
16	RubberWay smallholder jurisdictional level risk mapping summary (Environment)	Jurisdictional-level risk mapping summary (Protecting the Environment) from RubberWay to be displayed on the web dashboard.



Def#	Action / Indicator	Definition	
17	# jurisdictions with intervention programs relating to 'environment'	Cumulative number of jurisdictions where programs that address risks, identified through RubberWay, are taking place. Programs include those conducted directly by Michelin, joint ventures and its supply chain by suppliers.	
18	# initiatives taken to reduce pesticide use by smallholders	Similar guidelines to those applied in owned and joint venture natural rubber plantation operations will be embedded in agricultural training and capacity building programs and interventions. Performance of owned and joint venture plantation operations are considered to be demonstration pilots for widespread adoption across the industry.	
19	RubberWay smallholder jurisdictional level risk mapping summary (Agricultural Training)	Jurisdictional-level risk mapping summary from RubberWay to be displayed on the web dashboard	
20	# initiatives to support or collaborate with training bodies	-	
21	High-yielding certified saplings produced and supplied to farmers by Group and joint ventures	High-performing varieties of natural rubber trees (saplings a.k.a. rubber clones) that are produced in Group- owned and joint venture plantation operations and supplied to farmers. These are either sold at cost price, or at reasonable prices that are economical for farmers.	
22	# of field training for farmers on Best Agricultural and ESG practices through Group and joint ventures	Number of individual trainings (one farmer can attend multiple trainings in a year. Can be conducted by Group-owned or joint venture operations, or through direct intervention projects.	
23	# of smallholder farmers who have received training in holistic capacity building projects	Number of smallholder farmers and local community extractors that have received training under one of Michelin's capacity building projects. Holistic capacity building projects: Projects that aim to address both farmer livelihoods and environmental and social challenges. Themes include good agricultural practices, environment and social training, and improving working conditions and living standards.	



Def#	Action / Indicator	Definition
		Number of smallholder farmers that have reported an improvement in their working conditions and/or livelihoods after being part of capacity building projects deployed by Michelin.
		Working conditions have improved: Smallholder farmer or producers have experienced at least one of the following:
		Adoption of improved health and safety practices (increased use of PPE, better ergonomics)
		• Reduction of potentially harmful chemical use (e.g. sulfuric acid in coagulation, hazardous pesticides and herbicides)
24	# of smallholder farmers whose working conditions and/or livelihoods have improved as a result of mitigation projects	Livelihoods have improved: Smallholder farmer or producers have experienced at least one of the following:
	iveinoous have improved as a result of mitigation projects	Improved yields of primary crops
		Increased farm revenues
		Income diversification from the implementation of non-rubber crops
		 Increases in overall farm value (e.g., value of new crops or trees in the context of intercropping or agroforestry, value of new non-farm activities as a result of increased on-farm efficiency)
		• Direct above-market incentives or payments (e.g., producers receiving price premiums under 'payment for ecosystem services' or 'sustainability premium' frameworks.
25		Number of smallholder farmers that have received training related to biodiversity conservation or agroecological practices.
	# smallholder farmers trained on themes relating to biodiversity or	Biodiversity: Biodiversity protection, forest protection, agroforestry or other high biodiversity farming systems.
	agroecological practices	Agroecological practices: Diversification and regenerative agricultural techniques (no tillage, cover cropping,
		complementary intercropping or agroforestry), efficient use and reduction of agrochemicals (pesticide or
		herbicides), protection of waterways and forests, climate-smart agriculture.

26 CO₂ calculator; C equations updated in Africa; C equations updated in Asia & for Smallholder CO₂

CO₂ calculator developed and running



Def#	Action / Indicator	Definition
27	Update of Sustainable Natural Rubber Policy 2021	-
28	Stakeholders consultation	1 Stakeholder dialog every 2 years
29	Publication of complete SNR (Sustainable Natural Rubber) dashboard	Web dashboard reporting on indicators in the Sustainable Natural Rubber Roadmap published on the Michelin Purchasing website
30	Grievance system available	An accessible grievance mechanism (consistent with UNGP effectiveness criteria and OECD guidelines) will be set up by 2021 to enable stakeholders to express their grievance independently and to give opportunities to remedy adverse impacts caused through production or sourcing.
31	% supply suppliers having a publicly available SNR (Sustainable Natural Rubber) policy in line with GPSNR framework	Supply = NR spend for tier 1 suppliers / Total Michelin NR spend (year - 1)
		% of supply = % of NR spend* year - 1
32	% of supply with 'confirmed' performance on ethics as assessed by	*% of NR spend closely approximates % of supply volume, used for EcoVadis-related indicator as EcoVadis assessments are used across all purchasing domains and % spend is used to measure coverage.
	/adis	'confirmed' performance = total score of supplier meeting confirmed grade as per the EcoVadis assessment methodology (≥45/100); ethics pillar meeting minimum of 50/100
		% of supply = % of NR volume purchased year - 1
		[Sum of volume purchased (Y-1) from supplier NR processing factories having implemented RubberWay with 80% of their direct suppliers (Tier 2) on a proportional basis] divided by [Total Michelin volume (Y-1)]
33	80% of supply deploying RubberWay solution	Remark 1: [80% of Tier 2 suppliers that should answer to RubberWay to have a significant result]
		Remark 1: [80% of Tier 2 suppliers that should answer to RubberWay to have a significant result] Remark 2: NR processing factories purchasing directly from farmers (West Africa) as a reduced target: 25% of declared smallholders delivering directly at factory.



Def#	Action / Indicator	Definition
		% of supply = % of NR volume purchased year - 1
		[Sum of volume purchased (Y-1) from supplier NR processing factories having implemented RubberWay for 5% of their smallholders (theoretical number) on a proportional basis] divided by [Total Michelin volume (Y- 1)]
24	% supply where source has been risk-assessed at a jurisdictional level (RubberWay)	Theoretical number of smallholders = NR processing factories declared production 2018 divided by [average yield of country (LMC 2018) * average farm size of country (2018)]
34		Remark 1: NR processing factories purchasing directly from farmers (West Africa) as an increased target: 25% of declared smallholders delivering directly at factory.
		Remark 2: Corresponds with the Group level Master Policy on Human Rights under Objective 3 (A company whose supply chain ensures decent work for every employee): "Percentage of natural rubber volumes used by the Group covered by human rights assessments of a representative sample of farmers (via the RubberWay® application)".
35	Active & constructive participation in natural rubber industry and multi-stakeholder platforms	Examples of platforms include natural rubber industry platforms, including sustainability related working groups within industry platforms, and multi-stakeholder initiatives such as GPSNR
36	Smallholder representatives approved at GPSNR General Assembly (GA)	-
37	GPSNR policy framework defined	-
Assurance model and policy implementation approved at GPSNR GA		-
39	Consultations to garner industry group alignment on EU Due diligence and imported deforestation	-



Def#	Action / Indicator	Definition
40	NR Sourcing Control (matrix) published	A structured reporting framework on sourcing control that captures both aspects of traceability and risk control or mitigation will be published.
41	% of supply where source is known	% of supply = % of NR volume purchased year - 1 Source known = source is traceable to supplier (individual natural rubber processing factory)
42	% supply where source has been risk-assessed globally	% of supply = % of NR volume purchased year -1 Risk-assessed globally: where sourced has been risk-assessed for deforestation and other high-priority risks as part of a global risk assessment (e.g. spatial analysis etc.) or with other tools of equivalent or higher resolution that achieve the same purpose (e.g. RubberWay at a jurisdictional level).
43	% supply where has been risk-assessed and engaged	% of supply = % of NR volume purchased year -1 Risk-assessed at jurisdictional level: Supply has been jurisdictionally risk-assessed with RubberWay (see indicator 34) Engaged: Where significant risk is identified based on findings from RubberWay and threats are detected, suppliers (or other supply chain actors) are implementing mitigation or engagement actions. Where risk is under control, engagement is not mandatory (and rubber supplied automatically qualifies for the indicator.
44	% supply from medium and industrial plantations traceable to plantation level	Data includes information from supplier declarations and supply chain studies, and sourcing mix from each individual processing factory is assigned proportionally based on Michelin purchased volumed per factory (e.g. if Michelin sources 10% from a factory, and the factory has 50% of its own supply from industrial plantations traceable to industrial level, this is accounts for as 5% of volume traceable in Michelin's sourcing). Traceability refers to knowledge of farm or plantation location (geolocation through central GPS location or address) or boundary information (polygon). Industrial plantations: >500ha. Medium plantations: <500 and >50ha. Medium plantations are typically owned by individual landowners and exist in limited number primarily in West Africa and South America; they are sometimes difficult to differentiate from smallholder farms. Michelin working with its suppliers to refine the delineation between small and medium farms, as well as to consider specific approaches for non-industrial medium farms.



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		Data includes information from supplier declarations and supply chain studies, and sourcing mix from each individual processing factory is assigned proportionally based on Michelin purchased volumed per factory (e.g. if Michelin sources 10% from a factory, and the factory has 50% of its own supply from smallholders traceable to jurisdictional level, this is accounts for as 5% of volume traceable in Michelin's sourcing).
45	% supply from smallholders traceable to jurisdictional level	Traceability to smallholders at jurisdictional level currently defined as minimum 'province level or equivalent' (sub-national level), but generally follows administrative divisions used in RubberWay (e.g. Côte d'Ivoire-Department; Indonesia-Regency; Thailand-Province).
		Smallholders definition follows GPSNR definition.



Appendix: Version Control

Version number	Published	Change Log
V1.0	31 October 2020	nil
V1.1	24 January 2022	Indicator 42 and 43 : New indicators added Indicator 4 and 11: Updated 'estate' terminology to more widely used 'industrial plantations'. Added note on medium farms. Indicator 31 and 32: Minor changes in phrasing for clarity with no material change on meaning General: Some corrections of spelling errors
V1.2	04 July 2023	Indicator 1 and 12: Changed "annually thereafter (once every two years for factories in West Africa)" to "once a year or once every two years based on their performance ranking" Indicator 2 and 13: Added revised Indicator wordings for 2023-2025 with remarks explaining the change Indicator 5: Goal postponed to 2023 Indicator 7, 8, and 17: Minor changes in definition phrasing for clarity Indicator 23, 24 and 25: New indicators added Indicator 34: Added Remark 2 Indicator 44: Updated indicator to include traceability to medium plantations V1.1 Roadmap indicators 24-25: Changed indicator numbers to 26-45 due to the addition of new indicators





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