



MICHELIN POLICY ON CONFLICT MINERALS

15.02.2021

OPERATIONAL PURCHASING DIRECTION

Michelin Policy on conflict minerals

As part of Michelin's commitment to corporate social responsibility and endeavor to respect human right in our own operations and in our supply chain, it is our goal to seek to procure materials and components that do not finance or support, either directly or indirectly, armed groups in conflict areas. This applies to the several minerals or their derivatives, such as tantalum, tin, tungsten, gold, cobalt.

Michelin addresses the conflict minerals by taking into account the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas", and in accordance with the United States' "Dodd-Frank Street Reform and Consumer Protection Act". Although Michelin is not subject to this US law, some of our customers are required to comply with the transparency obligations it imposes.

Michelin does not engage in mining, but minerals may be present in materials and components sourced from others in our supply chain. Michelin is therefore committed to working with its suppliers to achieve Michelin's objectives.

After identifying the materials and components present in our products that may contain such minerals and the corresponding suppliers, Michelin asks these suppliers to provide information about how they are sourced, using Responsible Minerals Initiative (RMI) templates and lists. Corrective action and follow-up may be implemented with suppliers who provide inadequate or incomplete responses, Michelin reserving the right to review future business with suppliers who do not undertake to promote conflict-free sourcing. Michelin may provide conflict mineral reports to its customer upon request.

Hence, Michelin expects any supplier in question to comply with the following requirements:

- Provide the required reports using the CMRT (Conflict Minerals Report Template) and/or CRT (Cobalt Reporting Template),
- Have or implement a policy and process to ensure that the supplier sources from a socially responsible supply chain (working only with conflict-free smelters and refiners),
- Have or implement a policy and process to communicate these requirements to its own supply chain.