**Business & Human Rights Resource Centre Survey Questions**

**Nature of involvement**

1. How long has your company or subsidiary been operating or investing in Ukraine? In summary, can you briefly describe the nature, sector, scale, and geographic area of these operations or investments?

The Michelin Group’s presence in Ukraine is extremely limited. There were usually 13 employees based in Kiev and western Ukraine who worked there to develop local sales.

**Assessing risks**

* 1. 2. How is your company enhancing its due diligence to identify, prevent, and mitigate heightened human rights risks and comply with international humanitarian law? a. What measures is your company taking to ensure it relies and acts upon robust monitoring of the situation, including through consultation with your workers, affected communities, human rights groups, and/or humanitarian organizations?

Michelin unequivocally condemns any violation of international laws.

Employee safety is a top priority for Michelin.

The Group is in regular contact with employees and their families based in Ukraine.

Michelin is responding to each situation on a case-by-case basis.

Michelin is providing logistical support and assistance to its employees in Ukraine in every way possible.

Michelin is also supporting its Ukrainian employees based in other countries.

**Mitigating risks and tracking effectiveness**

3. What measures is your company or subsidiary taking to ensure that your business relationships, products, services, operations, or other actions do not contribute to Russian military activities or occupation in Ukraine (including Crimea and occupied parts of Donetsk and Luhansk Oblasts)?

On March, 15th, the Michelin Group has decided to suspend production of its Davydovo site and its exportations to Russia. Prior to the conflit already, Michelin had no business in Crimea and occupied parts of Donetsk and Luhansk Oblasts.

4. Is your company or subsidiary planning to scale-down or suspend your operations in Ukraine? If so, what are the immediate and longer-term steps that your company has taken or is prepared to take to mitigate the negative impacts of this decision on affected communities and your workers?

The main activity of the local commercial agency consists in importing tires to Ukraine and selling them through local independent dealers. The supply chain today is still not able to operate properly, though the situation is stabilizing (in non-occupied Ukraine). With fund transfers difficulties, Michelin is working to implement the necessary mechanisms to pay salary advances.

5. What steps is your company or subsidiary taking to ensure that your risk prevention and/or mitigation measures do not negatively impact Ukrainian civilians?

This does not apply at the present time.

**Exercising leverage**

6. Is your company or subsidiary taking any other actions to promote respect for humanitarian law, human rights, democracy, and peace in Ukraine?

Michelin is actively contributing to humanitarian aid to refugees.

To date, through the Michelin Corporate Foundation and its sites in Central Europe, Michelin is committing donations, to support local humanitarian organizations, as well as the Red Cross and Red Crescent Movement.

In addition, the Group recognizes the overwhelming display of solidarity among all of its employees, as well as the numerous individual initiatives, that have spontaneously taken shape in recent weeks.

**For companies operating or investing in Russia**

**Nature of involvement**

How long has your company or subsidiary been operating or investing in Russia? In summary, can you briefly describe the nature, sector, scale, and geographic area of these operations or investments?

Michelin has been operating in Russia since 1997.

In Russia, we employ one thousand people, most of whom work at the Davydovo production plant. The plant usually produces car tires.

**Assessing risks**

* 1. 2. How is your company enhancing its due diligence to identify, prevent, and mitigate heightened human rights risks and comply with international humanitarian law? a. What measures is your company taking to ensure it relies and acts upon robust monitoring of the situation, including through consultation with your workers, affected communities, human rights groups, and/or humanitarian organizations?

On March, 15th, the Michelin Group has decided to suspend production of its Davydovo site and its exportations to Russia. Michelin is taking all possible and necessary measures to limit the impact on its employees’ daily lives. We intend, for example, to maintain the salary of Michelin Russia’s employees.

**Mitigating risks and tracking effectiveness**

* 1. 3. As the situation in Ukraine unfolds, is your company or subsidiary planning to cease operations in or divest from Russia?

On March, 15th, the Michelin Group has decided to suspend production of its Davydovo site and its exportations to Russia.

* 1. If so: a. What have been the key considerations informing this decision and did you consult with your workers and/or other affected stakeholders as part of your decision-making process?

Michelin Russia was facing very strong operational constraints due to supply difficulties, disruption of financial flows, currency instability, the consequences of the sanctions’ impact, etc. As a result, the Michelin Group has decided to suspend production of its Davydovo site and its exportations to Russia, since March, 15th..This decision was taken by the Group’s executive leadership.

* 1. b. What are the immediate and longer-term steps that your company has taken or is prepared to take to mitigate any negative impacts of your exit on affected communities and your workers, including addressing any loss of income?

On March, 15th, the Michelin Group has decided to suspend production of its Davydovo site and its exportations to Russia. Michelin is taking all possible and necessary measures to limit the impact on its employees’ daily lives. We intend, for example, to maintain the salary of Michelin Russia’s employees.

4. If your company or subsidiary chooses to continue operating in Russia, what human rights due diligence has been undertaken and how are you planning to mitigate harm in Ukraine?

On March, 15th, the Michelin Group has decided to suspend production of its Davydovo site and its exportations to Russia.

Michelin is actively contributing to humanitarian aid to refugees.

To date, through the Michelin Corporate Foundation and its sites in Central Europe, Michelin is committing donations, to support local humanitarian organizations, as well as the Red Cross and Red Crescent Movement.

In addition, the Group recognizes the overwhelming display of solidarity among all of its employees, as well as the numerous individual initiatives, that have spontaneously taken shape in recent weeks

5. What kind of due diligence measures does your company use to ensure that it does not have any business relationships with sanctioned Russian individuals and entities? Beyond sanctions compliance, how does your company ensure that it does not have any business relationships with individuals or entities with a track record of rights violating conduct?

As sanctions are adopted, the Group analyzes their impact to measure the consequences on its operations. The Group fully complies with the sanctions that are applicable to Michelin.There are several internal control processes and compliance procedures to ensure the company truly implement sanctions.

**Exercising leverage**

6. How does your company intend to use your leverage to protect the rights of your workers and communities affected by your operations in Russia, including freedoms of association and expression?

On March, 15th, the Michelin Group has decided to suspend production of its Davydovo site and its exportations to Russia. The same social and human rights standards apply everywhere in the world. If operations restart, the Group will make sure these standards are fully respected.

7. Is your company providing any support to Russian activists who are taking action against the war and in support of democracy and peace in Ukraine?

Michelin is involved in promoting human rights worldwide through its employment standards and operational procedures, in respect to the UN principals for multinational companies and the OECD principals for multinational companies. Where it operates, the Group contributes to the development of civil society initiatives to enhance human rights and well social being of local communities.However the Group is not involved in supporting political activists.