



Business for Ukraine &lt;contact@b4ukraine.org&gt;

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## Letter regarding Recent Reporting on Michelin Products Entering Russia

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**Herve Deguine** <herve.deguine@michelin.com>  
To: Business for Ukraine <contact@b4ukraine.org>

25 March 2026 at 18:28

Dear Madame, Dear Sir,

I am surprised that you cannot open the attachment, as it is not crypted.

However, I copy it below.

With my warm regards,

Hervé Deguine

### Answer to the Guardian's request - 11 12 2025

Dear Sir,

We received your email on the 8th of December requesting further information on Michelin Group measures to manage diversion risk.

We would like to reiterate that, as previously stated in our response to The Guardian in September 2024, as well as to the Economic Security Council of Ukraine in September 2025, and consistently with our public statements dated March 2022, Michelin Group has ceased all exports to Russia and closed all its commercial and industrial activities in the country. Michelin Group is committed to scrupulously complying with applicable economic and financial sanctions concerning Russia and has established dedicated internal processes and organization to ensure this compliance, which are regularly reviewed and updated to adapt to the evolving legal landscape, as well as authorities' guidelines. This aims to mitigate any potential diversion of our products, to the greatest possible extent.

We would also like to clarify that none of the tires listed in ESCU's correspondence have been identified as military. Furthermore, Michelin Group has no tires homologated for the military aircraft mentioned by ESCU in their letter (Su-34 and Su35S).

Since the onset of the conflict and the rising risks of circumvention, Michelin Group has strengthened its compliance program by implementing enhanced controls in addition to existing measures to further mitigate diversion risk. These measures include:

- Enhanced customer due diligence and end-user screenings;
- Additional information requirements from direct customers placing orders for aviation tires;
- Requests for customers to provide signed end-user certificates, supplementing existing export compliance clauses in customer contracts;
- Targeted training courses designed to educate Michelin Group employees and higher-risk customers on diversion risks and trade compliance obligations.

Any suspected diversion of products to Russia is addressed with the utmost seriousness and diligence, conducting thorough reviews as necessary, with the support of an external law firm when required. If confirmed, specific actions will be taken, ranging from immediate suspension of contracts up to termination of the business relationship. Nevertheless, please note that the conclusions of each investigation are confidential and cannot be disclosed.

The adaptation of our compliance program to diversion risk has significantly reduced instances of circumventions, as indicated by your recent figures. However, we remain vigilant regarding the quality of the data provided by such reports, as there is no guarantee that the tires mentioned are indeed Michelin Group products notably due to risk of counterfeiting and false declaration.

Furthermore, it is important to note that the aviation tire industry is unique, with standard compatibility of an aviation tire across all copies of the same aircraft model and a complex commercial chain involving several distributors and resellers.

Regarding the list of clients mentioned in your email or in ESCU's communication, we can confirm that none of the listed companies are direct clients of Michelin Group.

Lastly, regarding the Duty of Care Plan, we wish to clarify that export control and sanctions risks are not included within its scope, as stated by the French Law on Duty of Care (n°2017-399) dated March 27, 2017. Nevertheless, even if not explicitly mentioned in our latest Duty of Care plan, Michelin Group has implemented and consistently reviewed and strengthened its export control and sanctions compliance policy, adapting its measures and controls to address diversion risks.

We hope this response clarifies the seriousness and effectiveness of Michelin's Group commitment to these issues.

Sincerely.

[Name] [Position]

## Hervé DEGUINE

Relations with Non Governmental and Civil Society Organizations

Corporate Public Affairs

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**De :** Business for Ukraine <[contact@b4ukraine.org](mailto:contact@b4ukraine.org)>

**Envoyé :** mercredi 25 mars 2026 13:50

**À :** Herve Deguine <[herve.deguine@michelin.com](mailto:herve.deguine@michelin.com)>

**Objet :** Re: [EXT] Re: Letter regarding Recent Reporting on Michelin Products Entering Russia

Florent Menegaux  
Chief Executive Officer  
23 Pl. Des Carmes Déchaux  
Clermont Ferrand 63000  
France

**B4Ukraine** 

January 15, 2026

Dear Mr. Menegaux, Mr. Deguine,

We are writing to you again on behalf of [B4Ukraine](#). As a reminder, we previously [wrote to Michelin](#) and held a constructive meeting in 2023. We were grateful for Michelin's readiness to engage openly with Ukrainian and international civil society organisations, as well as for the steps the company took to [exit the Russian market](#) and to demonstrate solidarity with Ukraine. That engagement set an important standard for responsible corporate conduct in the context of Russia's war against Ukraine.

However, recent reports indicate that aviation tyres manufactured by Michelin have continued to enter Russia despite sanctions and Michelin's stated exit from the market. According to customs data, between October 2024 and March 2025 Russia imported [2,687 Michelin tyres](#) worth more than \$7 million via intermediary companies based in countries such as Turkey, Spain, Saudi Arabia, and India, and one UK-linked firm, even though Michelin officially ceased exports to Russia in March 2022 and has closed its commercial and industrial activities there. The same reporting notes that these shipments continued despite Michelin's efforts to adapt its monitoring systems to prevent diversion of products into Russia, and that there is no suggestion of direct wrongdoing by Michelin itself.

We acknowledge Michelin's public statements in response to this reporting, including its assertion that none of the tyres identified were intended for military use and that the company has recently strengthened its compliance programme by implementing enhanced controls to further mitigate diversion risks. Nevertheless, the persistence of these flows raises **questions about the effectiveness of compliance controls and supply-chain oversight**.

In this context, we would appreciate any further information Michelin is willing to share regarding the measures it has taken to prevent, detect, and address the diversion of its products into Russia, in line with the OECD Guidelines for Multinational Enterprises and related due-diligence standards. We recognise that Michelin has established compliance and human rights due-diligence mechanisms and has previously engaged constructively on these issues; however, the continued presence of Michelin tyres in Russia suggests that gaps remain in practice. **Any additional insight you could provide on where these risks may be arising, how they are being identified and addressed, and what further steps are being considered to strengthen controls across intermediary supply chains would be valuable.**

We would be pleased to discuss these matters in greater detail and to better understand how Michelin is addressing these challenges in practice. We would be happy to arrange a meeting at your convenience to continue this dialogue. Kindly note that this letter and any responses will be published on the B4Ukraine website.

Sincerely,

The B4Ukraine Coalition

Mr Eric LE CORRE

Public Affairs Department

27, cours de l'Ile Seguin F-92100 Boulogne-Billancourt

**B4 Ukraine**

**A l'attention de Madame Eleanor Nichol**

**[enichol@b4ukraine.org](mailto:enichol@b4ukraine.org)**

Paris, February 17, 2023

Madame,

We have received your letter dated January 23, 2023, addressed to our Chairman, in which you express concerns about the Michelin Group's commitments to respect human rights in the current context of the war in Ukraine.

From the first days of the conflict, the Michelin group made sure, as a priority, of the safety of its Ukrainian employees and their families. The Group has also taken, in coordination with its Ukrainian teams, all the necessary measures to honor its commitments to its Ukrainian customers and to ensure the supply of tires.

In addition, without delay, the Michelin Group actively contributed to the humanitarian aid provided to Ukrainian refugees. It intervened, at the central level, by means of donations to NGOs, including the Red Cross, made by the Michelin Foundation for a value of more than one million euros, as well as by means of donations and collections organized by various Group sites located in Poland, Romania and Hungary. In addition, many actions have been implemented, at the local level, in collaboration with the communities and thanks to a significant mobilization of the employees, such as the search for emergency accommodation, the organization of donation campaigns blood or the supply of basic necessities.

As of March 15, 2022, the Group announced the suspension of its industrial activity in Russia as well as that of its exports to Russia.

The activity of the Michelin group in Russia is carried out mainly through its subsidiary, Michelin Russian Tire Manufacturing Company (MRTMC, also called LLC Michelin), active in the production and sale of tires for the local Russian market.

As you recall in your letter, this subsidiary employed, in 2021, nearly a thousand employees, including 750 employees at the Davydovo industrial site, near Moscow.

[Michelin tires](http://www.michelin.com)

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Simplified Joint Stock Company with  
capital of 504,000,004 Euros. 855 200  
507 R.C.S. Clermont-Ferrand VAT  
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French Manufacture

On June 28, 2022, in a context of lasting conflict and general uncertainty, the Group announced its plan to sell its activities in Russia to local management.

Unfortunately, after an in-depth feasibility study, this option had to be abandoned because it did not appear to be feasible in practice.

The Michelin group having decided to leave Russia, it was therefore necessary to seek other exit solutions from potential third-party buyers, taking into account both the Russian regulatory context and the applicable international sanctions. It is this process that is currently at work and that the Group hopes to see completed very soon.

With regard to the Michelin group's exports to Russia, it should be noted that, before the start of the dispute, there were two types of export flows: on the one hand, Russian customers obtaining their supplies of tires directly from the subsidiaries of the Group located outside Russia and, on the other hand, Russian customers obtaining supplies from MRTMC for tires that this subsidiary manufactured or that it imported after having purchased them from other Michelin group subsidiaries located outside from Russia.

The vast majority of export flows to Russia to which you refer in your letter concern exports resulting from transactions initiated before our press release of March 15, 2022 (tyres in transit or in transit on this date), which were subsequently cleared. These residual flows of tires have not existed for several months now and requests for customs clearance have gradually died out.

Subsequently, as part of our transfer project to local management, a few exceptional, very limited and essential shipments were intended, during this transitional phase, to enable MRTMC to honor its contractual obligations and thus limit the risks of litigation that would have hampered the Group's efforts to withdraw from Russia. These flows therefore had the exclusive purpose of creating conditions for transfer to local management. In no way was it a continuation of normal business activity.

Naturally, these export flows have been subject to due diligence and strictly comply with applicable economic and financial regulations and have remained exceptional.

Moreover, the total value of these residual and exceptional exports bears no relation to the volumes of exports of previous years.

Michelin tires

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These limited exports are part of the many elements of the exceptional system put in place to accompany the departure of the group from Russia, in accordance with the commitments that have been made.

I hope that these answers will have convinced you of the effectiveness of the Michelin Group's commitment, to leave the country and its particular attention to respect for human rights.

Please accept, Madame, my respectful greetings.

Mr Eric LE CORRE

Director of Public Affairs

French Manufacture  
Michelin tires

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Florent Menegaux  
Chief Executive Officer  
23 Pl. Des Carmes Déchaux  
Clermont Ferrand 63000  
France

CC: Michelin Group's Executive Team and Board of Directors

January 23, 2023

RE: Michelin Group's business operations in Russia

Dear Mr. Menegaux,

We write to you as [B4Ukraine](#), a coalition of Ukrainian and international civil society organizations working to curtail the financial resources enabling the Russian invasion of Ukraine. In the spirit of respect for the fundamental rights of all people, the rules-based international order, and a prosperous global economy, we expect companies to demonstrate public support for the people, democracy, and territorial integrity of Ukraine, opposition to Russia's war of aggression, and alignment with the UN Guiding Principles on Business and Human Rights (UNGPs).

We request an urgent dialogue regarding potential inconsistencies between Michelin Group's stated policies on Russian aggression and human rights more broadly and the company's ongoing business operations and relationships in Russia that may contribute to, or be linked with, human rights harms.

We acknowledge Michelin Group's (Michelin) stated commitment to human rights. Michelin is a signatory of the UN Global Compact and its approach is underpinned by recognised international standards, including the Universal Declaration of Human Right, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises.<sup>1</sup> This is confirmed in Michelin's Duty of Care Plan 2021 which states:

"Michelin makes every effort to uphold human rights in all its businesses and in every host community. The Group embraces both the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. Since 2010, Michelin has been a signatory to the United Nations Global Compact, an initiative set up and led by the United Nations, which encourages enterprises to adopt a socially-responsible attitude through 10 principles."<sup>2</sup>

Michelin's Chief Executive Officer, Florent Menegaux, confirms that:

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<sup>1</sup> Michelin, "Respect Human Rights: Acting responsibly and ethically with everyone," <https://www.michelin.com/en/sustainable-development-mobility/for-people/respecting-human-rights/> (accessed January 9, 2023).

<sup>2</sup> Michelin, "Duty of Care Plan 2021," June 2022, [file:///C:/Users/NinaKP/Downloads/MFP\\_PLAN\\_DE\\_VIGILANCE\\_GB\\_VF.pdf](file:///C:/Users/NinaKP/Downloads/MFP_PLAN_DE_VIGILANCE_GB_VF.pdf) (accessed January 9, 2023).

“At Michelin, we put human rights at the center of our operations, whether regarding employees, suppliers, local communities, customers, or the public at large. Promoting human rights is part of Michelin’s DNA.”<sup>3</sup>

It has been over ten months since Russia invaded Ukraine and the devastating impacts continue to shock the global conscience and shake the global economy. Russia is violating international humanitarian law (IHL), including war crimes and crimes against humanity, through attacks on civilians and civilian infrastructure (e.g., mass executions, sexual violence, torture, forcible transfer of civilians). More than 18,000 Ukrainians have been killed and injured and millions more have been forced to flee their homes, creating one of the largest humanitarian and refugee crises of modern times.

On September 21, President Vladimir Putin escalated the war by announcing a “partial mobilisation” of the Russian population. The accompanying legislation ([Article 9 of Federal Law No. 31-FZ](#)) mandates all organisations, including the more than 1,500 international companies that are currently operating on a full or limited scale in Russia, to conduct military registration of the staff if at least one of the employees is eligible for military service.<sup>4</sup> They must also assist with delivering the military summons to their employees, ensure the delivery of equipment to assembly points or military units, and provide information, buildings, communications, land plots, transport, and other material means of support to the war effort.

This legislation entails new and significant legal risks for companies remaining in Russia, including potential civil and criminal liability under comprehensive sanctions regimes and recent international jurisprudence holding corporations and their officers responsible for human rights abuses abroad.<sup>5</sup> Companies may be exposed to financially material risks through operational restrictions, such as limitations of future government contracts.<sup>6</sup>

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<sup>3</sup> Michelin, “For People,” <https://www.michelin.com/en/sustainable-development-mobility/for-people/> (accessed January 9, 2023).

<sup>4</sup> Federal Law No. 31-FZ of February 26, 1997 “On mobilization training and mobilization in the Russian Federation” (as amended), <https://base.garant.ru/136945/> (accessed November 14, 2022).

<sup>5</sup> International companies remaining in Russia are now at a greater risk of violating sanctions regimes as implementation of the legislation will likely involve transacting with sanctioned individuals or entities. Furthermore, new domestic civil and criminal cases against companies involved in violations of international law demonstrate the risk of significant liability for facilitating state-sponsored human rights abuses abroad (e.g., Lafarge case, Lundin case, Castel Group indictment, Nevsun holding, and Dassault Aviation, Thales, and MBDA France criminal complaint.) Victoria Riello and Larissa Furtwengler, “Corporate Criminal Liability for International Crimes: France and Sweden Are Poised To Take Historic Steps Forward,” *Just Security*, September 6, 2021, <https://www.justsecurity.org/78097/corporate-criminal-liability-for-human-rights-violations-france-and-sweden-are-poised-to-take-historic-steps-forward/> (accessed November 14, 2022); The Sentry, “Breaking: France Opens War Crimes Inquiry Focused on Iconic Food and Beverage Conglomerate,” July 1, 2022, <https://thesentry.org/2022/07/01/7216/breaking-france-opens-war-crimes-inquiry-focused-iconic-food-beverage-conglomerate/> (accessed November 14, 2022); Rfi, “French technology firm charged over Libya cyber-spying,” July 2, 2022, <https://www.rfi.fr/en/business-and-tech/20210701-french-tech-firm-charged-over-libya-cyber-spying> (accessed November 14, 2022); Preston Lim, “Canadian Supreme Court Allows Corporate Liability for International Law Violations,” *Lawfare*, March 12, 2022, <https://www.lawfareblog.com/canadian-supreme-court-allows-corporate-liability-international-law-violations> (accessed November 14, 2022); Sherpa, “Aiding and abetting war crimes in Yemen: Criminal complaint submitted against French arms companies,” June 2, 2022, <https://www.asso-sherpa.org/aiding-and-abetting-war-crimes-in-yemen-criminal-complaint-submitted-against-french-arms-companies> (accessed November 14, 2022).

<sup>6</sup> Venable LLP, “Do You Contract with State Governments? If So, Beware of Emerging State Sanctions’ Obligations Related to Russia and Belarus,” *JD Supra*, June 3, 2022, <https://www.jdsupra.com/legalnews/do-you-contract-with-state-governments-6537229/> (accessed November 14, 2022).

In response to this unprovoked and unjustified war<sup>7</sup> many companies have left Russia. According to the Kyiv School of Economics Institute's #LeaveRussia [company tracker](#), Michelin is halting production at some plants/reviews, but is continuing other business and retaining its presence in the Russian market. On March 15, 2022, Michelin announced that it is “suspending its industrial activity in Russia, as well as its exportations to Russia.”<sup>8</sup> A few months later, on June 28, 2022, Michelin announced that it plans to transfer all of its Russian operations to their current local management by the end of 2022.<sup>9</sup> As motivation for this decision, Michelin names supply issues and a context of general uncertainty.<sup>10</sup> However, our research indicates that Michelin is failing to expeditiously execute its commitments and remains exposed to the Russian market.

Prior to Russia’s invasion of Ukraine, Michelin maintained a significant presence in Russia. It employs over 1,000 employees in the country, 750 of which work at the Davydovo plant. The plant has an annual production capacity of 1.5 to 2 million tires, made mostly for passenger cars. Its sales in the country represent 2% of the Group’s total sales and 1% of its global car tire production. According to Michelin’s statement, “the Group’s balance sheet exposure to the project’s perimeter is currently estimated at around €250 million.”<sup>11</sup> The decision to stop exporting to Russia also includes freezing a supply contract for airplane tires with Aeroflot PJSC, which was halted as part of European Union sanctions barring the supply of aircrafts, parts, or services to airlines linked to Russia.<sup>12</sup> Since then, a ban on tires and materials used in their production was further expanded by the EU sanctions.

Despite this and contrary to its own statements, our research shows that Michelin has continued importing to Russia. In March, Michelin sales to Russia amounted to just over \$8 million, originating from Michelin United States of America, Spain, France, Poland, and other countries. Although with a significant drop, the sales continued in August, September, and in October when they accounted for just under \$2 million. The sales in October show direct imports from Michelin Spain, France, Poland, and other countries (Italy, Hungary, and Germany).<sup>13</sup> Since this data seems to be contradictory to the statements made in March 2022, we are seeking to clarify Michelin’s position regarding these shipments to Russia and its dedication to practice heightened HRDD in light of the illegal war Russia is conducting in Ukraine. Further, with respect to the June statement, we would like to clarify whether Michelin concluded its intention to transfer its Russian operations to the local team.

These activities in Russia risk enabling and financing Russia’s violations of IHL and human rights law during the ongoing invasion and occupation of Ukraine and violating Fortum’s human rights commitments. It remains to be seen how directly Michelin will be impacted by the partial mobilisation and the heightened legal, regulatory, operational, and financial risks associated with

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<sup>7</sup> The UN General Assembly condemned Russia’s “aggression against Ukraine” and demanded that Moscow “unconditionally withdraw all of its military forces from the territory of Ukraine within its internationally recognized borders.”

<sup>8</sup> Michelin, “Michelin Suspends its Industrial Activity in Russia as well as its exportations to Russia,” March 15, 2021, <https://www.michelin.com/en/press-releases/michelin-suspends-its-industrial-activity-in-russia-as-well-as-its-exportations-to-russia/> (accessed January 9, 2023).

<sup>9</sup> Michelin, “Michelin announces its intention to transfer its activities in Russia to local management by the end of 2022,” June 28 2022, <https://www.michelin.com/en/press-releases/michelin-announces-its-intention-to-transfer-its-activities-in-russia-to-local-management-by-the-end-of-2022/> (accessed January 9, 2023).

<sup>10</sup> Ibid.

<sup>11</sup> Ibid.

<sup>12</sup> Tara Patel, “Tire Maker Michelin Suspends Russian Operations,” March 15, 2022, <https://www.bloomberg.com/news/articles/2022-03-15/michelin-suspends-russian-operations-exports-to-country> (accessed January 10, 2023).

<sup>13</sup> Information gathered from Russian customs data.

companies being required to provide direct support to the internationally sanctioned Russian military.

We seek to understand the status of Michelin's exposure to Russia and how Fortum has conducted and continues to conduct heightened human rights due diligence, per its stated policy and the UNGPs concerning due diligence in conflict-affected areas, and how the findings of such a process has resulted in these continued business activities and relationships. As noted by the UNGPs:

...the more severe the abuse, the more quickly the enterprise will need to see change before it takes a decision on whether it should end the relationship. In any case, for as long as the abuse continues and the enterprise remains in the relationship, it should be able to demonstrate its own ongoing efforts to mitigate the impact and be prepared to accept any consequences – reputational, financial or legal – of the continuing connection.

In consideration of the above points and B4Ukraine's [Declaration](#), we request an urgent dialogue with Fortum's relevant senior management and staff to discuss the company's ongoing activities and relationships in Russia, associated risks to the people of Ukraine and the company, and potential steps to prevent/mitigate these risks. Please contact B4Ukraine at [contact@b4ukraine.org](mailto:contact@b4ukraine.org) to schedule a call. We kindly ask for your response by 5:00pm CET, January 26th, 2023.

Please do not hesitate to get in touch if you require any further information.

Sincerely,

The B4Ukraine Coalition