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GROUP SERVICES

“Slavery and Human Trafficking Statement” by Volkswagen Group Services Unipessoal, Lda. (Fiscal year 2022)

This statement has been prepared pursuant to section 54 of the United Kingdom Modern Slavery Act 2015. In particular, it details the measures implemented throughout the Group to prevent forms of modern slavery and human trafficking.

Preamble

In view of the advancing globalisation and the increased complexity of our value creation and supply chain, we recognise our global responsibility which includes the protection of human rights. For us, this responsibility does not end at our offices, but goes beyond them. Our broad understanding of the topic “Business & Human Rights” has been published under this [link](#) since the United Nations’ International Human Rights Day 2019 (10 December 2019).

We have extended and consolidated this understanding and our commitment to the internationally recognised agreements and conventions in the “Declaration by the Volkswagen Group on Social Rights, Industrial Relations and Business and Human Rights” (Social Charter). This declaration was signed jointly by the Group Executive Board and the European and Global Group Works Council on 27 November 2020 and can be found [here](#).

Organisation and supply chain

Volkswagen Group Services is part of the Volkswagen Group. It primarily provides a wide range of services for the Group brands and companies in Portugal and Spain.

The Group operates 120 production sites in 19 European countries as well as 10 American, Asian and African countries. 662,575 employees produce vehicles around the world or work in vehicle-related services or other business areas. The Volkswagen Group offers its vehicles in 153 countries.

With its presence in key markets, the Group’s global procurement organisation ensures that production materials, assets and services are sourced worldwide in the required quality, in accordance with sustainability standards and at the best possible terms.

The competitive advantages of the various procurement markets are utilised by the whole Group thanks to the brands' procurement organisation network. We currently purchase products, services, and parts from over 90 countries around the world.

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For us, global compliance with sustainability standards in areas such as human rights, occupational health and safety, environmental protection and combating corruption is a basic prerequisite for successful business with our suppliers. Only together with our business partners at more than 59,000 locations is it possible to ensure compliance with sustainability standards and contribute to the implementation of the UN Sustainable Development Goals (SDGs). To achieve this objective, we implemented the Sustainability in Supplier Relations concept back in 2006 and continue to develop it. This concept anchors sustainability in our procurement processes and procurement organisations.

The Volkswagen Group has a globally positioned and growing network of sustainability officers in the Procurement departments of the respective brands and regions. This network currently consists of more than 70 experts and assists the Group in gaining a better understanding of local conditions.

Internal measures

General

As the very first company listed in the German stock index, Volkswagen AG created the independent function of a Human Rights Officer in August 2022. This position serves as the first point of contact for all human rights related issues from authorities, NGO's and the public.

One of the substantial tasks of the Human Rights Officer is to monitor the adequacy and effectiveness of risk management under the obligations of the German Act on Corporate Due Diligence Obligations in Supply Chains (known as the Lieferkettensorgfaltspflichtengesetz, abbreviated as LkSG) carrying out the function provided by § 4 (3) LkSG, thus exercising risk-based controls.

In order to avoid both Human Rights and environmental risks, the LkSG specifies several obligations concerning due diligence that companies must adhere to. These obligations include, among others, the implementation of risk analyses, the establishment of preventive measures, the adoption of remedial actions once legal violations have been identified as well as the establishment of a whistleblower system. The effectiveness of measures needs to be checked and documented continuously.

The adherence to these obligations applies both to the Volkswagen Group's own business as well as to its supply chain. This supply chain, consisting of direct and indirect suppliers, is both complex and globally spread out due to the diversity of the Volkswagen Group's products.

Volkswagen Group Code of Conduct¹

¹https://www.volkswagenag.com/presence/konzern/documents/Code_of_Conduct_2017_VW_Konzern_deutsch.pdf

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The Volkswagen Group updated its Code of Conduct in 2017 and rolled it out uniformly in all brands and companies worldwide. The Code of Conduct embodies the ethical principles of the Volkswagen Group and is based on shared values. It focuses on honesty, integrity, compliance and ethical behaviour as well as responsibility. The Code of Conduct helps employees observe existing company rules at their workplace, as business partners and as members of society, providing them with practical guidance, assistance and advice. The rejection of all forms of modern slavery and human trafficking is an integral part of the Volkswagen Group Code of Conduct. In addition, we base our actions on the principles of the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the requirements of the International Labour Organisation (ILO) as laid down in our Declaration on Social Rights.

No forced labour

The Volkswagen Group completely rejects forced labour and all forms of modern slavery including human trafficking².

In particular, this includes work performed involuntarily by people under threat or penalties or other disadvantages (such as debt bondage or involuntary prison labour). Employment relationships must be voluntary and employees are to be able to give notice of their own volition at any time and in observance of reasonable deadlines.

The Code of Conduct is available at all times to all employees on the intranet and also to third parties on the Internet and is continuously communicated in digital and print media as well as at internal company events. Regular training on the Code of Conduct is mandatory for all employees, regardless of their hierarchical level. Additionally, members of senior management confirm their knowledge and responsibility with regard to the Code of Conduct each year, based on the risks that affect them.

The Volkswagen Group has also specially formulated the Code of Conduct for Business Partners. This details the Group's expectations regarding the attitude and conduct of business partners in their corporate activities, particularly with regard to suppliers and sales partners. The requirements are regarded as the basis for successfully shaping the business relationship between the Volkswagen Group and its partners. They include observance of human rights, such as the prohibition of child labour, human trafficking, and slavery, as well as ensuring environmental protection and preventing corruption. The requirements for business partners were revised in 2022 and amended to include the requirements of the German Act on Corporate Due Diligence Obligations in Supply Chains.

In addition to the Code of Conduct for Business Partners, there are further product-specific requirements to which suppliers must adhere. These are set out in specifications and prescribe how certain products are

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to be produced. For example, the specifications state that there has to be full disclosure of the supply chain for cobalt for battery cells. Such requirements are also binding for the affected suppliers.

Volkswagen Group Whistleblower System²

The Whistleblower System is responsible for reporting Serious Regulatory Violations. The violation of human rights is an example of circumstances that, in principle, constitute a Serious Regulatory Violation. Potential violations of the Code of Conduct for Business Partners, including reports on serious risks and violations regarding human rights and environment, including potential cases occurring at Volkswagen Group as well as at direct and indirect suppliers, can also be reported to the Whistleblower System.

Employees, as well as business partners and customers, have the opportunity to report misconduct by employees or suppliers around the clock, 365 days a year. Written reports can be submitted in all languages in a specially protected online reporting channel and by e-mail. In an international 24-hour telephone hotline, information can be reported in a total of 8 languages. In addition, information can also be submitted in person or through commissioned external lawyers (ombudsmen). If desired, the reports can be made anonymously in all channels. Strict confidentiality and secrecy apply throughout the process. The Whistleblower System guarantees the highest possible protection for whistleblowers and all persons who contribute in investigating and remedying misconduct and violations of the rules. Discrimination against whistleblowers and contributors is in principle a Serious Regulatory Violation and will not be tolerated. At the same time, the Whistleblower System safeguards the interests of the Persons Implicated. The presumption of innocence applies to the Persons Implicated as long as a violation is not proven.

Risk analysis

Matters such as risk assessments regarding human rights can be recorded in the established Risk Management and Internal Control System (ICS) processes by the key Group areas and companies. Material business risks are regularly recorded, assessed and followed up with the required countermeasures as part of the quarterly risk process. Control activities are carried out within the annual standard ICS process to minimise litigation risks in material business processes at the Volkswagen Group and are tested for their effectiveness. A standardised risk catalogue is used for this which includes clearly defined control targets. These activities include checks on the specific content of agreements (incl. requirements regarding human rights) in the supply chain and compliance with legal and in-house specifications regarding human rights in the standard ICS. Reports are sent to the brand and Group boards of management and the Audit

² <https://www.volkswagenag.com/de/group/compliance-and-risk-management/whistleblowersystem.html>

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Committee on a quarterly and annual basis or when the need arises. These reports can also contain risks and material weaknesses in the area of human rights if the degree of materiality for reporting is met.

In addition, a cross-departmental working group within Group Compliance at the Volkswagen Group developed a concept in 2019 for assessing risk exposures using a correlation of country risks and business model risks in the area of Business & Human Rights for controlled entities. Based on this, measures that in particular develop viable and uniform structures for this topic are defined for the entities. These measures are integrated in the general measures for traditional compliance topics such as the prevention of corruption and money laundering. These measures were communicated to the entities in the reporting period and became a mandatory component of the internal compliance risk management process at the end of 2021. For non-controlled companies, respective compliance risks are assessed individually in close cooperation with our business partners. We rely on the cooperation of these partners. The Volkswagen Group integrates business and human rights into the Group's existing Compliance Management System in accordance with the UN human rights due diligence guidelines. The Business & Human Rights Centre of Competence advises other business units on human rights issues, ad hoc cases and implementation of legal requirements, especially those related to compliance. This advisory function has been established in the Volkswagen Group since 2020.

Qualification of employees

Preventive measures promote compliance at Volkswagen AG and raise compliance awareness among employees. Target group-oriented communication and training measures for employees at all hierarchical levels play a key role in this. The Volkswagen Group reported on the Code of Conduct, anti-corruption, and the Whistleblower System throughout the entire reporting year. Correspondingly, obligatory training courses on these topics rolled out across the Group were implemented in line with the defined repetitive cycles for the specific employee groups (such as employees in procurement, members of local management). In addition, the Volkswagen Group also trains its business partners in procurement and sales on key aspects of compliance and anti-corruption. In the fiscal year 2022, employees underwent qualification activities in various scopes. For example, the current Code of Conduct training provides an in-depth chapter on human rights for the relevant target groups. The Volkswagen Group also continues to pursue the communication strategy it developed the previous year in order to increase the transparency in human rights.

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Measures in the supply chain

Sustainability requirements of our suppliers

In the reporting year, we also adjusted our management approach in procurement to meet the requirements of the new German Supply Chain Due Diligence Act (LkSG). The previous approach of “prevent, detect, react” was replaced by the responsible supply chain system (ReSC system).

The new approach has the aim of avoiding and minimizing human-rights, social or environmental risks along the Volkswagen Group’s supply chain based on a systemic risk analysis. It should also help to mitigate breaches and continuously improve suppliers’ sustainability performance. The ReSC system includes the following elements, which build on each other:

- **Risk Analysis:** A regular risk analysis serves to identify risks in the Volkswagen Group’s supply chain in advance. The analysis is made on the basis of the suppliers’ business models and takes account of internal and external data on human-rights and environmental risks. Based on the assessment of the risks, each supplier is allocated a low, medium or high sustainability risk. For suppliers with a low sustainability risk, a country risk score is additionally used. If the supplier has an increased country risk, it is upgraded to the medium risk category. The risk analysis is updated once a year and/or as required by Group Procurement Sustainability in consultation with relevant parent companies of the Volkswagen Group.
- **Standard measures:** These proactive and reactive measures include the Code of Conduct for Business Partners, the supply chain grievance mechanism, media screenings, the sustainability rating and training suppliers and employees.
- **Deep Dive measures:** These encompass the human rights focus system in the supply chain, the raw material due diligence management system and collaboration with external partners to develop the concept of sustainability in the supply chain.

Standard measures: the foundations of our ReSC System

Code of Conduct for Business Partners

The core element of our supplier management is the “Volkswagen requirements for sustainability in relations with business partners” – the Code of Conduct for Business Partners. It sets out our expectations of our business partners’ conduct with respect to key human-rights, environmental, social and compliance standards. The requirements are based, among other things, on the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights and

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the relevant International Labour Organization (ILO) conventions. The Code of Conduct is, however, not just based on international standards, but also objectives, rules, and policies of the Volkswagen Group.

Specifically with regard to modern slavery, the expanded requirement for suppliers is as follows: “Business partners must take appropriate and adequate measures to eliminate debt bondage, forced and compulsory labour, as well as all forms of modern slavery and human trafficking in their own area of responsibility and/or along the supply chain. Business partners ensure that employment relationships are voluntary and allow employees to give notice of their own volition in observance of a reasonable notice period. Employees of business partners are given a contract at the time of hiring that complies with applicable law and is in a sufficiently documented form (e.g. written or electronic), is written in a language they understand and in which their rights and obligations are truthfully and clearly set out. Furthermore, business partners must not mislead or defraud potential employees about the nature of the work, ask employees to pay recruitment fees or inappropriate transportation fees, and/or confiscate, destroy, conceal, and/or deny access to employee passports and other identity documents issued by government and/or restrict the employees’ freedom of movement or require employees to involuntarily use accommodation provided by the company for no operational reason.”

Supply Chain Grievance Mechanism

An important part of sustainable supply chain management is our complaint mechanism “Supply Chain Grievance Mechanism”, with which we respond to sudden suspected violations of our sustainability requirements. The mechanism accessible via the channels of the Volkswagen Group Whistleblower System and is open to all potentially affected stakeholders – such as employees of suppliers, citizens, or representatives of communities in the immediate vicinity of our production locations. The processing of cases is uniformly described in a binding manual and is managed by the Group. Cases are processed together with the brands and regions of the Volkswagen Group. Breaches identified are categorized by their severity to ensure adequate processing. Depending on the categorization of the breach, appropriate measures are then introduced. If there are serious breaches, it is possible to temporarily block suppliers from eligibility for the award of new contracts or to terminate the business relationship with them. In the reporting period, 145 alerts of violations from complaint management were processed in the Supply Chain Grievance Mechanism. These concerned suppliers where conduct in violation of regulations or contracts had been identified as a result of information received or through audits. In total, four suppliers were temporarily blocked from receiving contracts due to serious violations.

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Media screening

Group Procurement Sustainability carries out continuous and risk-based media screening of relevant suppliers using a software tool. If the tool identifies indications of possible breaches of our Code of Conduct for Business Partners, these are reviewed and, if necessary, processed in the supply chain grievance mechanism.

Sustainability rating

Our aim is to know the material sustainability risks in our supply chain and to address them effectively.

A sustainability rating (S rating) was introduced in 2019 as a key measure for all relevant companies and suppliers with a high sustainability risk. The S rating is used to audit the sustainability performance of relevant suppliers³ and reveal opportunities for continuous improvement. It assesses the environmental performance of suppliers and their social sustainability and integrity. The S rating is directly relevant to awarding contracts: If a supplier does not meet our requirements for compliance with sustainability standards, it is fundamentally not eligible for the award of contracts. There is thus a direct incentive for suppliers to improve their sustainability performance.

The check for the S rating takes place via a multistage, risk-based process. The company's sustainability performance is analysed using a standardised self-assessment questionnaire (SAQ) that was developed together with other European Original Equipment manufacturers (OEMs). The information and documents in the SAQ are checked and validated by a service provider. If a supplier states that it has appropriate processes and guidelines, it must prove this with documents. Specifically, suppliers are asked about a human rights policy that includes the topic of forced or compulsory labour and human trafficking.

Using a risk-based approach, further checks are carried out on site after an initial analysis of the supplier's details. If the results of the check show severe deficits in the implementation of our sustainability requirements, the supplier will receive a negative rating. This means that a contract can generally not be awarded.

Sustainability training for employees and suppliers

Systematic training of our employees and suppliers is a central component of our strategy and essential for the improvement of sustainability in the supply chain. We currently use two different formats to do this. One format is live training courses held online, as it was not possible to conduct training courses in person during the reporting year. Secondly, there are e-learning courses that can be taken online at any time.

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Sustainability is an established part of the skills profile for all Procurement employees. In total, the sustainability training courses in Procurement were attended 2,000 times across the world in 2022. We also continue to focus our training measures on specific target groups. For example, an intensive, specially structured training course was held for buyers of components with increased sustainability risks. We have been training our buyers on the specific challenges in battery supply chains since 2017.

To allow continuous supplier development, we carry out sustainability training courses and workshops for our suppliers on specific subjects. In the reporting period, over 2,900 suppliers received such training. This included 245 suppliers who took the online training and e-learning courses offered by Initiative Drive Sustainability.

The Volkswagen Group offers online training courses with shorter sessions to teach suppliers about our requirements and how to implement them. In addition to the training courses, we provide our current suppliers with an e-learning module on sustainability, which also includes content on modern slavery, in nine languages of defined risk countries. By the end of the year, more than 20,000 suppliers had completed the new e-learning courses, which is equivalent to 35% of supplier turnover in terms of procurement volume for 2022.

As part of the DRIVE Sustainability initiative, online training courses were also held in Germany, Italy, Mexico and the USA regarding the specific sustainability challenges in these countries. As part of the initiative, we offer our suppliers an e-learning training course so that they receive an introduction to sustainability and managing the n-tier supply chain.

Consolidation measures: additional elements of our RESC System, the Human Rights Focus System

As part of our sustainable supplier management, we are also committed to protecting those groups along our supply chains that may face a high risk of potential human rights violations. To help us comply with international frameworks, requirements and the German Act on Corporate Due Diligence Obligations in Supply Chains, we implemented a Human Rights Focus System (HRFS) in 2022. This system aims, in particular, to identify and properly address high risks in our supply chain in connection with human rights violations and the environment. In addition, we analysed the data collected during the reporting period from our Supply Chain Grievance Mechanism, the on-site checks and information from studies, NGO reports and discussions from stakeholders to come up with a long list of relevant topics. We plan to determine focus activities from this information in 2023 which will be processed

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over the course of the year. To aid this processing, a toolbox will be developed with measures to help mitigate risks identified from 2023 onwards.

Raw Material Due Diligence Management System~

Our raw material supply chains require special attention in this respect. To effectively deal with the sometimes-extensive risks in these supply chains, we have also set up a Raw Materials Due Diligence Management System. This details the prioritisation and processing of raw material supply chains which we classify as particularly prone to risks. Our focus is currently on 16 priority raw materials. Our actions for responsibly sourcing of raw materials are guided by the requirements of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. This includes guidelines on management approaches, risk identification and prevention, checking smelters, and communication and reporting instruments. Currently, our key activities in this regard include the battery raw materials cobalt and lithium. In close cooperation with our battery cell suppliers, our aim is to gain transparency of the supply chain from extraction at the mine through to the manufacture of the finished product.

To fulfil our human rights due diligence obligation, we therefore cooperate closely with our direct suppliers and in suspected cases demand disclosure of the origin of materials linked to potential breaches of human rights such as child labour, forced labour or any form of modern slavery and human trafficking. Among other things, this includes working conditions in the extraction of raw materials such as mica or natural rubber. Because these processes are highly elaborate due to the complexity of the supply chains with up to eight stages, we take a risk-based approach.

If on-site visits indicate breaches of human rights, we agree a mandatory plan of measures with the supplier to eliminate the deficits. If this is not effective, sanctions are imposed. Our complaints process is crucial for violations that are reported to us via other channels or are identified by us. In such cases, we enter into a dialogue with the supplier on an individual basis with the aim of achieving an improvement. If there is no improvement in the event of serious violations, this can lead to exclusion from the supply chain.

Digital innovations for greater transparency and safety in the supply chain

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To increase transparency in upstream supply chains and prevent risks in the procurement of raw materials, the Volkswagen Group requests direct suppliers to disclose relevant supply chains, and also uses second-party supply chain mapping audits. These risks include forms of modern slavery.

Another approach that has been pursued since 2020 is the use of a service provider to carry out comprehensive supplier checks with the help of artificial intelligence. Constant monitoring of freely available internet sources including social media allows information on possible violations by suppliers to be reported in real time.

Commitment to international initiatives

In addition to working closely with our direct and indirect suppliers, we are involved in initiatives and on-site projects to address human rights risks in the upstream supply chain and beyond our contractual relationships. These initiatives, which are both industry-wide and, in some cases, raw material-specific, are listed in our annual Responsible Raw Materials Report.

The aim of our cooperation with partners in the automotive industry and along the value chain includes knowledge transfer, the development of standardised tools for risk assessment and the introduction of standards for responsible raw material supply chains in terms of human rights, environment, and compliance. One example of our approach includes Volkswagen AG joining the Initiative for Responsible Mining Assurance (IRMA), a multi-stakeholder alliance which advocates for higher standards in mining.

For the battery raw material cobalt, the Volkswagen Group works together with other partners in the Cobalt for Development project in the Democratic Republic of Congo to improve the working and living conditions of the people affected by the small-scale mining of cobalt and the communities surrounding the mines. The pilot project aims to strengthen compliance with legislation and to improve health and safety conditions as well as the social well-being of the communities in the area. More information can be found on the project's website.

For the battery raw material lithium, the Volkswagen Group and other partners have established the Responsible Lithium Partnership initiative which promotes the responsible use of natural resources and sustainable lithium extraction in the Salar de Atacama in Chile. This is to be achieved through a multi-stakeholder platform that includes all relevant actors in the Salar watershed – from civil society groups, including indigenous communities, to state institutions and local mining companies.

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Beyond our activities in the area of raw materials, our commitment to CSR Europe's DRIVE Sustainability industry initiative continues to be central to our activities.

Supply chain progress report

As described in the Volkswagen Group's last statement for fiscal year 2021, various measures were implemented in fiscal year 2022 to prevent forms of modern slavery and human trafficking. A central component was updating the Code of Conduct for Business Partners.

By the end of the reporting period, a total of more than 16,029 active suppliers completed an SAQ in connection with the S rating. In the reporting period, 6,748 suppliers improved their sustainability performance through taking appropriate steps.

In 2022, 252 risk-based on-site checks were carried out worldwide (654 in 2021). On average, six violations against our sustainability requirements were identified. Significant differences were established, depending on the region. Measures such as the Corrective Action Plan (CAP) or a new audit can be implemented depending on the violation in question.

NUMBER OF VIOLATIONS FOUND WORLDWIDE, PER ON-SITE CHECK PER REGION, AND THE TOP RISKS IDENTIFIED PER REGION:

GEOGRAPHIC REGION	AVERAGE NUMBER OF VIOLATIONS PER REGION	TOP 3 RISKS IN THE REGION
Africa	4	Fire extinguishers, emergency lighting, emergency exits & evacuation routes, evacuation drills, fire detection, organization, exposure & response to chemicals and hazardous materials (5 risks with an identical rating)
Asia*-Pacific	10	Working hour violations, payment violations, supply chain management
Europe	4	Supply chain management, license to operate and Code of Conduct, evacuation drills
North America	6	Organization occupational health & safety, organization fire safety & emergency evacuation, license to operate and Code of Conduct
South America	9	Supply chain management, license to operate and Code of Conduct, evacuation drills

Palmela, June 2023

The Managing Directors of Volkswagen Group Services Unipessoal, Lda.