

VOLKSWAGEN

AKTIENGESELLSCHAFT



Slavery and Human Trafficking Statement

Volkswagen Group (Fiscal year 2021)

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 factory gates, 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 affirmed this understanding and our commitment to the internationally recognised agreements and conventions in the new “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](#).

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Organisation and supply chain

Volkswagen AG is the parent company of the Volkswagen Group. It primarily develops vehicles and components for the Group brands, and also produces and sells in particular passenger cars and light commercial vehicles of the Volkswagen Passenger Cars, Volkswagen Commercial Vehicles and Volkswagen Components brands. In its function as parent company, Volkswagen AG directly or indirectly holds investments in AUDI AG, SEAT S.A., SKODA AUTO a.s., Dr. Ing. h.c. F. Porsche AG, Scania AB, MAN SE, Volkswagen Financial Services AG, Volkswagen Bank GmbH as well as numerous other companies in Germany and other countries. Detailed information can be found in the list of shareholdings pursuant to sections 285 and 313 of the German Commercial Code (HGB), which can be accessed here and is part of the annual financial statements.

The Volkswagen Group operates 120 production plants in 19 European countries and a further 10 countries in the Americas, Asia and Africa. 662,575 employees worldwide produce vehicles, and work in vehicle-related services or other fields of business. The Volkswagen Group sells 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 as a result of the brands' networking of the various procurement organisations. We currently purchase products, services and parts from approx. 100 countries worldwide.

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 over 50,000 locations it is 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 as early as 2006 and are continuing to develop it. This concept anchors sustainability in our procurement processes and procurement organisations. In this way, by 2025 we intend to effectively prevent environmental, social and corporate governance risks, including human rights risks, and to ensure that 85% of our direct business partners receive an A-rating in our "Sustainability Rating". 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 50 experts and assists the Group in gaining a better understanding of local conditions.

Internal measures

General

In January 2019, the Group Board of Management – specifically Hiltrud D. Werner from Integrity and Legal Affairs, and Gunnar Kilian from Human Resources – appointed a Business & Human Rights coordinator, who is part of Group Compliance. Combating modern slavery in our value and supply chain is one of the focal areas of our activities in Business & Human Rights – embodied, for example in the key points of our “Salient Issues in Business & Human Rights”. For us, child labour and forced labour are serious violations of human rights and are therefore in particular prohibited. In addition to coordination within our Group itself, in 2021 we continued to prioritise collaboration with external stakeholders. We support the German Federal government’s National Action Plan (NAP) “Business & Human Rights”. Specifically, in 2020 we actively participated in the “Business & Human Rights” dialogue of the automotive industry under the aegis of the German Federal Ministry of Labour and Social Affairs (BMAS). We will continue this dialogue in 2022. Combating modern slavery also plays an important role here. In addition, since 2019, as the Volkswagen Group, we have been an active member of the Global Business Initiative for Human Rights (GBI), and are the only car manufacturer to take part. The purpose of this corporate network is to discuss issues and participate in peer learning. We also proactively seek communication with other stakeholders, as for example in the Volkswagen Group Sustainability Stakeholder Dialogue in February 2020. Here we presented and discussed our business and human rights measures with bodies such as NGOs and human rights organisations. On this basis, we have been able to develop our engagement in order to even better meet our corporate responsibility for human rights.

Only suppliers that accept our sustainability requirements and commit to fulfilling them may enter into a business relationship with us. Suppliers that enter into a business relationship with the Volkswagen Group shall then pass on these sustainability requirements to their business partners along the supply chain. Together with our direct suppliers we oppose any kind of forced labor and discrimination at Volkswagen Group. The Group takes its corporate responsibility and worldwide due diligence in the field of human rights very seriously - i.e. in China. The work with our factories, sales companies and suppliers is based on our principles, such as respect for minorities, employee representation, social and labor standards. We expect the same of our Business Partners worldwide.

Internal measures

Volkswagen Group Code of Conduct¹

The Volkswagen Group updated its Code of Conduct in 2017 and introduced it uniformly to all its brands and companies around the world. The Code of Conduct embodies the ethical principles of the Volkswagen Group and is based on common values, with a focus on honesty, integrity, compliance and ethical behaviour as well as on the subject of 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 set out in our Social Charter.

No forced labor

The Volkswagen Group rejects forced labor and all forms of modern slavery including human trafficking². This includes, in particular, work carried out involuntarily by people due to intimidation, penalty or threat of being disadvantaged (e.g. debt slavery or involuntary prison labor). Employment relationships are based on voluntary participation and can be terminated at any time by the employees of their own free will and within a reasonable period of notice.

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 hierarchical level. Additionally, members of the senior management confirm their knowledge and responsibility with regard to the Code of Conduct each year following a risk based approach.

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 partner are going to be updated in 2022.

Volkswagen Group Whistleblower System³

The Whistleblower System is responsible for reporting Serious Regulatory Violations. The violation of human rights is an example of an issue that involves in principle a Serious Regulatory Violation. It enables not only employees, but also business partners and customers around the world to report misconduct by employees any day of the year: written information can be submitted in any language using a specially protected online reporting channel. An international 24-hour telephone hotline is available for reporting information in a total of 15 languages. Information can also be submitted via commissioned external lawyers (ombudspersons). The reports can be made anonymously on all channels, if desired. Strict confidentiality and secrecy are maintained throughout the entire process. The Whistleblower System guarantees the highest possible protection for whistleblowers and all persons who contribute to an investigation and the termination of misconduct and Regulatory Violations. Their retaliation constitutes in principle a Serious Regulatory Violation and will not be tolerated. At the same time the Whistleblower System preserves the interests of Persons Implicated. For them, the presumption of innocence applies as long as a violation is not proven.

¹ <https://www.volkswagenag.com/en/sustainability/strategy-policy-engagement/policy.html>

² ILO Conventions 29 and 105.

³ <https://www.volkswagenag.com/en/group/compliance-and-risk-management/whistleblowersystem.html>

Internal measures

Risk analysis

Within the framework of the established Risk Management processes, represented by elements such as the Quarterly Risk Process and the Internal Control System (ICS), risk assessments on the subject of human rights can be recorded by the main Group divisions and companies. Within the Quarterly Risk Process, essential business risks are regularly recorded and evaluated, and the necessary countermeasures are tracked. As part of the annual Standard ICS process, control activities are carried out and tested for effectiveness in the Volkswagen Group's essential core processes in order to reduce process risks. This is done on the basis of a standardized risk catalog including clearly defined control objectives. The correct drafting of contracts -including requirements for human rights- in the supply chain, as well as the compliance with legal and internal requirements on human rights are verified in the standard ICS process. Reporting to the Board of Management of the brands, the Group Board of Management and the Audit Committee is carried out quarterly, annually and on an event-related basis and may contain -if the materiality thresholds are reached- risks or significant weaknesses in the topic of human rights.

In addition, a cross-departmental working group in Group Compliance of the Volkswagen Group developed a concept in 2019 for assessing risk exposures alongside 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 social 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. In the reporting period, specific communication and training activities continued to focus primarily on the Code of Conduct, the whistleblower system and the prevention of corruption. The latter is also mandatory for relevant groups of employees (e.g. procurers, members of local management) and has been rolled out across the Group since 2019. In addition, the Volkswagen Group also trains its business partners in procurement and sales on key aspects of compliance and anti-corruption. In the financial year 2021, dedicated employee training measures were held on various subjects, for example basic and advanced courses on human rights. The contents can be flexibly integrated into wider compliance training but can also be used as intensive courses to provide a separate and comprehensive introduction to the topic. For example: The groupwide Code of Conduct training, which has been updated in 2021, now contains a deep dive for the topic human rights. The Volkswagen Group also continues to pursue the communication strategy it developed the previous year in order to increase the transparency in human rights.

Measures in the supply chain

Sustainability requirements of our suppliers (Code of Conduct for Business Partners)⁴

We want to fulfil our responsibility in our business relations on a global level and act proactively beyond simply meeting legal requirements. In procurement, we pursue a three-pronged approach. The basic prerequisite for these steps is transparency in supplier relationships that go beyond the first level (Tier 1):

- **Prevent:** sustainability requirements are anchored in contracts and specifications, particularly the Code of Conduct for Business Partners; suppliers are fully trained and qualified.
- **Detect:** sustainability risks in the supply chain are systematically identified and prioritised. Sustainability is anchored across the Group in all important contract award decisions and a sustainability performance rating of potential suppliers (“S-Rating”) is used. This is based on self-disclosures and risk-based checks on site.
- **React:** various measures are provided in order to respond to the identified risks and effects. These include a standardised process for dealing with violations by individual suppliers and action plans from on-site inspections.

⁴ <https://www.volkswagenag.com/en/group/compliance-and-risk-management/compliance.html>

Measures in the supply chain

Clear specifications for suppliers (Prevent)

The “Requirements of the Volkswagen Group for Sustainability in Relationships with Business Partners” – the code of conduct for business partners – is a key part of our supplier management system. It is applicable for all suppliers of the Volkswagen Group. Our expectations as regards our business partners’ conduct with respect to core environmental, social and compliance standards are set out contractually there. The requirements are based among others on the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights and the relevant conventions of the International Labour Organisation (ILO). However, the Code of Conduct is not only based on international standards, but also on the Volkswagen Group’s objectives, rules and directives.

The expanded requirements for suppliers specific to the topic of modern slavery are as follows:

“No slavery and no human trafficking – business partners reject all conscious use of forced or compulsory labour as well as all forms of modern slavery and human trafficking. There is no bonded labor or involuntary prison labor. Employment relationships are entered into on a voluntary basis and may be terminated by employees at their own discretion and within a reasonable notice period.”

In order to raise awareness for sustainability aspects among suppliers, we adjusted the information and qualification programmes and conducted trainings mostly online in order to meet global COVID-19 travel restrictions. Also, we have developed a new online training concept. The offer still includes the information available on the ONE. Group Business Platform, workshops with suppliers and training courses with the Drive Sustainability Initiative. In addition, in 2021 a raw materials due diligence management system was introduced which identifies risks for 16 selected raw materials and allows specific mitigation measures to be developed on Group level. We produce an annual [annual report](#) on the progress of the raw material management system.

Measures in the supply chain

Systematic determination of sustainability risks (Detect)

Our aim is to be aware of the sustainability risks in our supply chain at all times and effectively address them. A key measure introduced in 2019 was the sustainability rating (S-Rating), which was fully integrated by the end of 2021. The S-Rating indicates relevant⁵ suppliers' sustainability performance and opportunities for continuous improvement. It evaluates the ecological performance of suppliers as well as their social sustainability and integrity. The S-Rating is of direct relevance to our direct suppliers in terms of contract awards. If a supplier does not meet our requirements for compliance with sustainability standards, they will generally not be awarded contracts. This is a direct incentive for suppliers to improve their sustainability performance.

The audits for the S-Rating are carried out using a multi-stage, 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 specific processes and policies in place, it must provide the documents to prove this. Specifically, a question is asked regarding a human rights policy which 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 no contract can generally be awarded.

Achieving improvements together (React)

A range of measures are available in order to be able to react to risks identified in the supply chain and to specific violations by suppliers, and therefore to actively effect improvements.

An important part of sustainable supply chain management is our grievance mechanism "Supply Chain Grievance Mechanism", with which we respond to suspected violations of our sustainability requirements that suddenly arise. The mechanism is accessible via our website, an email address and an anonymised channel and is open to all stakeholders and potentially affected persons such as employees of suppliers, social organisations or representatives of communities in the immediate vicinity of our production sites. The cases are handled according to a binding policy, managed by the Group and processed together with the Volkswagen Group brands and regions. If violations are identified, measures are initiated immediately. If there are particularly serious violations, the business relationship may even be terminated.

Employees and external parties can also report potential violations by our suppliers to the Volkswagen Group works council or trade unions, or use the Volkswagen Group whistleblower system or contact sustainability@vwgroupsupply.com. This concerns possible violations by our direct suppliers as well as by subcontractors in the supply chain. External ombudspersons are another point of contact.

In the reporting period, the Procurement division dealt with 111 cases. These were suppliers where conduct in violation of regulations or contracts had been identified as a result information received or through audits. In total, collaboration with 4 suppliers was terminated or they were excluded from new contract awards following the activities of the Procurement division.

⁵ The relevance of a business partner for the S-Rating comes from factors such as company size or risk exposure, which is derived from the type of service.

Measures in the supply chain

Special due diligence for human rights in the supply chain

As part of our sustainable supplier management, we are especially committed to protecting those groups along our supply chains who face a high risk of potential human rights violations. In order to meet the international framework agreements and requirements, in 2021 we implemented our developed human rights due diligence management system in relevant regions, which we use to systematically analyse, prioritise and minimise human rights risks in our supply chain. In 2021 a total number of 575 supplier employees in 15 high risk countries have been trained on human rights due diligence within this 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 also set up a raw material 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 types of raw material. Our actions for responsibly procuring 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 contains guidelines on management approaches, on risk identification and prevention, on inspecting smelters and on instruments for communication and reporting. Our current focus is on 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 manufacture of the finished product.

We cooperate closely with our direct suppliers to exercise human rights due diligence, 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 always 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 or are identified by us. In this case, we enter 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.

Measures in the supply chain

Digital innovations for greater transparency and safety in the supply chain

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

Another approach that has been pursued since 2020 is the use of a service provider which comprehensively audits suppliers using 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 more closely with our direct suppliers and sub-suppliers, we are engaged in international cross-industry initiatives and on-site projects to address human rights risks in the upstream supply chain and beyond our contractual relationships. These cross-industry and in some raw cases material-specific initiatives are listed in our „Responsible Raw Materials Report 2020“. The „Responsible Raw Materials Report 2021“ contains additional information on the goals of these initiatives and the progress of our projects on site. One example of our approach is the accession of Volkswagen AG to the Global Platform for Sustainable Natural Rubber (GPSNR), under whose umbrella we are committed to a sustainable supply chain for natural rubber.

When it comes to the battery raw material cobalt, the Volkswagen Group is working together with other partners in the “Cobalt for Development” project in the Democratic Republic of the Congo to improve the working and living conditions for people in small-scale cobalt mines and in the communities surrounding the mine sites. The pilot project aims to strengthen legal compliance, improve health and safety conditions and social well-being for local people. Additional information is available on the project website.

When it comes to lithium as a raw material for batteries, the Volkswagen Group and other partners have launched the “Responsible Lithium Partnership” initiative, which promotes the responsible use of natural resources and sustainable lithium production in the Salar de Atacama in Chile. This is to be achieved through a multi-stakeholder platform that includes all relevant stakeholders in the Salar – from civil society groups, including Indigenous communities, to state institutions and local mining companies.

Beyond the raw materials activities, our involvement in the industry initiative DRIVE Sustainability under the umbrella of CSR Europe is still central. The development of the common questionnaire standard for checking sustainability aspects at suppliers was a milestone in this respect, as was the further training approach pursued jointly with other OEMs of suppliers via training events in selected countries.

Measures in the supply chain

Sustainability training for employees and partners

The systematic training of our employees and suppliers is a central component of our strategy and essential for improving sustainability in the supply chain. We currently use two different formats for this purpose. First, live online training courses, as face-to-face training is still not possible due to the pandemic. Secondly, there are e-learning courses that can be accessed and carried out online at any time.

Sustainability is an integral part of the competency profile for all procurement employees. In total, over 1,900 persons worldwide received a specific training in 2021. We continue to direct our qualification measures to specific target groups. A separate format and intensive training were held for procurement employees of components with increased sustainability risks. We have been training our procurement employees on the special challenges in battery supply chains since 2017. In-depth human rights training has been available since 2020 and was carried out again in 2021.

To allow continuous supplier development, we conduct sustainability training courses and workshops with our suppliers at selected sites. In the reporting period, this was only possible to a very limited extent. We have therefore developed an online training course to train the suppliers in shorter sessions on our requirements and their implementation. Over 1,000 supplier employees took advantage of this offer in the reporting period. As part of the DRIVE Sustainability initiative, online training sessions with 85 participants were also held for suppliers in India, Argentina, France and Russia.

In addition to the training, we provide current suppliers with an e-learning module on sustainability in the nine languages of specific high-risk countries. By the end of the reporting year, more than 18,000 suppliers had completed the e-learning, which corresponds to covering 36% of the turnover of the suppliers in the 2021 procurement volume.

Supply chain progress report

As described in the last statement by the Volkswagen Group for the financial year 2020, various measures for preventing modern slavery and human trafficking were implemented in 2020: as well as updating the Code of Conduct for Business Partners, we rolled out the sustainability rating (S-rating) to the full extent, which also includes human rights risks and has been integrated in the contract award processes for the relevant procurement organisation globally.

By the end of the reporting period, over 15,000 active suppliers had submitted a sustainability questionnaire (SAQ). In the year under review, measures took place at 6,353 suppliers to improve sustainability performance.

In 2021, 654 risk-based on-site checks were carried out worldwide (in 2020 there were 790). On average, five violations against our sustainability requirements were identified. There are clear differences depending on the region.

NUMBER OF BREACHES FOUND WORLDWIDE, PER ON-SITE CHECK PER REGION AND IDENTIFIED TOP RISKS PER REGION (VALUES HAVE BEEN ROUNDED)

GEOGRAFIC REGION	AVERAGE BREACHES PER REGION	THE REGION'S TOP 3 RISKS
Africa	4	Unions, Emergency Exits, Emergency Lighting
Asia*	7	Supply Chain Management, Payment, Emergency Exits
Europe	5	Supply Chain Management, License to operate, Evacuation Drills
Latin America	6	Organization (Social Facilities), Organization (Fire Safety), Supply Chain Management
North America	5	Supply Chain Management, First Aid, Grievance Mechanism

*In terms of geographical distribution, Russia and Turkey are allocated to Asia.

Supply chain progress report

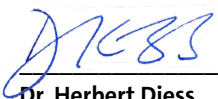
In the reporting period, we further developed and used a special tool for on-site checks of logistics service providers, which, in addition to compliance with environmental criteria, primarily checks compliance with minimum social standards when deploying drivers.

We are also continuously working on avoiding duplications in auditing and for a broader coverage of the supply chain together with car manufacturers and suppliers in a working group of the German Association of the Automotive Industry (VDA) on a common standard for on-site checks. For this purpose, we founded the Responsible Supply Chain Initiative e.V. together with 11 other partners in October 2021. V. was founded, which plans to share the first audit results in the coming year. The Volkswagen Group is committed to the continuous growth of the initiative with a board mandate.

In the coming year, we will continue to expand our activities to implement sustainability in our supply chains. To this end, we are taking steps to streamline our supply chains even better and focus the activities we have started on additional raw materials. Our aim is not only to identify risks in the future, but also to continuously minimise them using various instruments such as auditing, certification and qualification. To this end, we are taking steps to structure our processes relating to human rights due diligence even more systematically. The objective is to identify, prioritise and then prevent or mitigate our sustainability risks comprehensively. This aim fundamentally applies to the entire supply chain. Raw materials will continue to be a special focal area. Because of their importance, an OECD-compliant management system for high-risk raw materials was developed in 2020. We report on our objectives and activities and the progress of the management system in an [annual report](#), which we publish on our website.

Volkswagen AG

Wolfsburg, June 2022



Dr. Herbert Diess

Chairman of the Board of Management
of Volkswagen AG



Dr. Manfred Döss

Member of the Board of Management of Volkswagen AG
Integrity and Legal Affairs